

CSU FCOI Disclosure Chart - Requirements by Funding Source

| STATE LAW (FPPC – Nongovernmental Funding) | FEDERAL POLICY (NSF Funding) | FEDERAL REGULATIONS (PHS Funding) |
|--|--|---|
| REPORTING TRIGGERS | | |
| <ul style="list-style-type: none"> • Research contract/grant from a non-governmental entity • Research Gifts earmarked for a specific individual or a specific research project • Material Transfer Agreement <p><i>Note: Exclude all exempt sponsors on FPPC approved list and all non-profit, tax-exempt educational institutions. However, researchers must disclose for the prime sponsor if the educational institution received its funds from a non-governmental entity.</i></p> | <ul style="list-style-type: none"> • NSF research contract/grant • Non-governmental entity which flows down NSF funds • UC Discovery Grant • California Institute for Regenerative Medicine (CIRM) Grant • UC Special Research Programs (HIV/AIDS, breast cancer and tobacco related disease) <p><i>Note: Exclude Phase 1 SBIR or STTR grants</i></p> | <ul style="list-style-type: none"> • PHS research contract/grant from PHS designated agencies within the DHHS • Non-governmental entity which flows down PHS funds • Research Funding from organizations that follow PHS disclosure requirements (i.e., American Cancer Society, American Heart Association). Complete list at FDP (Federal Demonstration Partnership) website: http://nrc59.nas.edu/pub/fcoi_agencies_phs_regs.html <p><i>Note: Exclude Phase 1 SBIR or STTR grants. List of PHS compliant institutions and entities is available at the FDP site: http://nrc59.nas.edu/pub/fcoi_home.html</i></p> |
| WHO MUST DISCLOSE? | | |
| CSU Principal Investigator | CSU Investigator(s) – Individuals responsible for the design, conduct, or reporting of the funded research project | CSU Investigator(s) – Individuals responsible for the design, conduct, or reporting of the funded research project |
| WHAT TO DISCLOSE- FINANCIAL INTEREST | | |
| <p>A financial interest in the non-governmental sponsor of the research including:</p> <ul style="list-style-type: none"> • Income ≥ \$500 • Investments ≥ \$2,000 • Director, Officer, Employee, Partner, Trustee, Consultant or Management position • Loan Balances ≥\$500 • Personal Gifts Valued at ≥ \$50 • Travel Reimbursements | <p>A significant financial interest related to the research project including:</p> <ul style="list-style-type: none"> • Income > \$10,000 • Equity (of any type) > \$10,000 or 5% • Director, Officer, Employee, Partner, Trustee, Consultant or Management position • Intellectual Property | <p>A significant financial interest related to the investigator’s institutional responsibilities including:</p> <ul style="list-style-type: none"> • If publicly traded entity, total value of compensation and equity interest > \$5,000 • If non-publicly traded entity, total value of compensation > \$5,000 or any equity interest • Income received related to intellectual property > \$5,000 • Any reimbursed or sponsored travel (excluding (1) travel that is reimbursed or sponsored by a Federal, state, local government agency, an Institution of higher education as defined by 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute affiliated with an Institution of higher education; or (2) sponsored or reimbursed travel for the Investigator’s spouse/registered domestic partner and/or dependent children.) |
| <i>Note for all sources: Financial interests received within 12 months prior to submission must be reported for the disclosing individual and his/her spouse or registered domestic partner, and dependent children.</i> | | |
| WHEN TO DISCLOSE | | |
| <ul style="list-style-type: none"> • With the initial proposal • With additional funding <p><i>Note: All positive disclosures must be reviewed and approved prior to acceptance of the award or additional funding.</i></p> | <ul style="list-style-type: none"> • With the initial proposal • When new personnel are added • With any change in an investigator’s financial interest <p><i>Note: All positive disclosures must be reviewed and approved prior to acceptance of the award or additional funding.</i></p> | <ul style="list-style-type: none"> • With the initial proposal • With non-competing continuations • With renewals • With supplemental funding • When new personnel are added • With any new significant financial interest (New significant financial interests must be reported within 30 days of acquiring or discovering the new SFI for the disclosing individual and his/her spouse/registered domestic partner and dependent children.) <p><i>Note: All positive disclosures must be reviewed and approved prior to expenditure of funds.</i></p> |
| DISCLOSURE FORMS TO SUBMIT | | |
| <ul style="list-style-type: none"> • State Disclosure (Form 700-U) • Campus addendum forms, if applicable | <ul style="list-style-type: none"> • NSF/Federal Disclosure (CSU or compliant campus form) • Campus addendum forms, if applicable | <ul style="list-style-type: none"> • PHS/Federal Disclosure (CSU or compliant campus form) • Campus addendum forms, if applicable |
| TRAINING REQUIREMENTS | | |
| <ul style="list-style-type: none"> • Ethics Training (CSU for University investigators; CITI or campus-based training for auxiliary investigators) | <ul style="list-style-type: none"> • NA | <ul style="list-style-type: none"> • PHS Training and/or campus based training modules or programs (including CITI FCOI Training and campus in-person training/workshops) |