<table>
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<th>STATE LAW (FPPC – Nongovernmental Funding)</th>
<th>FEDERAL POLICY (NSF Funding)</th>
<th>FEDERAL REGULATIONS (PHS Funding)</th>
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| REPORTING TRIGGERS   | • Research contract/grant from a non-governmental entity  
• Research Gifts earmarked for a specific individual or a specific research project  
• Material Transfer Agreement  
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.  
• 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)  
Note: Exclude Phase 1 SBIR or STTR grants  
• 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  
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 |                              |                                  |
| WHO MUST DISCLOSE?   | CSU Principal Investigator  
• CSU Investigator(s) – Individuals responsible for the design, conduct, or reporting of the funded research project  
Note: All positive disclosures must be reviewed and approved prior to expenditure of funds.  
• 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  
Note: All positive disclosures must be reviewed and approved prior to expenditure of funds. |                              |                                  |
| WHAT TO DISCLOSE- FINANCIAL INTEREST | A financial interest in the non-governmental sponsor of the research including:  
• Income ≥ $500  
• Investments ≥ $2,000  
• Director, Officer, Employee, Partner, Trustee, Consultant or Management position  
• Loan Balances ≥$500  
• Personal Gifts Valued at ≥ $50  
• Travel Reimbursements  
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.  
A significant financial interest related to the research project including:  
• Income > $10,000  
• Equity (of any type) > $10,000 or 5%  
• Director, Officer, Employee, Partner, Trustee, Consultant or Management position  
• Intellectual Property  
A significant financial interest related to the investigator’s institutional responsibilities including:  
• 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. |                              |                                  |
| WHEN TO DISCLOSE     | • With the initial proposal  
• With additional funding  
Note: All positive disclosures must be reviewed and approved prior to acceptance of the award or additional funding.  
• With the initial proposal  
• When new personnel are added  
• With any change in an investigator’s financial interest  
Note: All positive disclosures must be reviewed and approved prior to acceptance of the award or additional funding.  
• With the initial proposal  
• With non-competitive 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.)  
Note: All positive disclosures must be reviewed and approved prior to expenditure of funds. | • With the initial proposal  
• With additional funding  
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Note: All positive disclosures must be reviewed and approved prior to expenditure of funds. |                                  |                                  |
| DISCLOSURE FORMS TO SUBMIT | • State Disclosure (Form 700-U)  
• Campus addendum forms, if applicable  
| • NSF/Federal Disclosure (CSU or compliant campus form)  
• Campus addendum forms, if applicable  
| • PHS/Federal Disclosure (CSU or compliant campus form)  
• Campus addendum forms, if applicable |                              |                                  |
| TRAINING REQUIREMENTS  | • Ethics Training (CSU for University investigators; CITI or campus-based training for auxiliary investigators)  
• NA  
| • PHS Training and/or campus based training modules or programs (including CITI FCOI Training and campus in-person training/workshops) |                              |                                  |