

## CSU FCOI Disclosure Chart - Requirements by Funding Source

STATE LAW ( <a href="#">FPPC – Nongovernmental Funding</a> )	FEDERAL POLICY ( <a href="#">NSF Funding</a> )	FEDERAL REGULATIONS ( <a href="#">PHS Funding</a> )
<b>REPORTING TRIGGERS</b>		
<ul style="list-style-type: none"> <li>Research contract/grant from a non-governmental entity</li> <li>Research Gifts earmarked for a specific individual or a specific research project</li> <li>Material Transfer Agreement</li> </ul> <p><i>Note: Exclude all <a href="#">exempt sponsors on FPPC approved list</a> 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"> <li>NSF research contract/grant</li> <li>Non-governmental entity which flows down NSF funds</li> <li>UC Discovery Grant</li> <li>California Institute for Regenerative Medicine (CIRM) Grant</li> <li>UC Special Research Programs (HIV/AIDS, breast cancer and tobacco related disease)</li> </ul> <p><i>Note: Exclude Phase 1 SBIR or STTR grants</i></p>	<ul style="list-style-type: none"> <li>PHS research contract/grant from <a href="#">PHS designated agencies within the DHHS</a></li> <li>Non-governmental entity which flows down PHS funds</li> <li>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: <a href="http://nrc59.nas.edu/pub/fcoi_agencies_phs_regs.html">http://nrc59.nas.edu/pub/fcoi_agencies_phs_regs.html</a></li> </ul> <p><i>Note: Exclude Phase 1 SBIR or STTR grants. List of PHS compliant institutions and entities is available at the FDP site: <a href="http://nrc59.nas.edu/pub/fcoi_home.html">http://nrc59.nas.edu/pub/fcoi_home.html</a></i></p>
<b>WHO MUST DISCLOSE?</b>		
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
<b>WHAT TO DISCLOSE- FINANCIAL INTEREST</b>		
<p>A financial interest in the non-governmental sponsor of the research including:</p> <ul style="list-style-type: none"> <li>Income ≥ \$500</li> <li>Investments ≥ \$2,000</li> <li>Director, Officer, Employee, Partner, Trustee, Consultant or Management position</li> <li>Loan Balances ≥ \$500</li> <li>Personal Gifts Valued at ≥ \$50</li> <li>Travel Reimbursements</li> </ul>	<p>A significant financial interest related to the research project including:</p> <ul style="list-style-type: none"> <li>Income &gt; \$10,000</li> <li>Equity (of any type) &gt; \$10,000 or 5%</li> <li>Director, Officer, Employee, Partner, Trustee, Consultant or Management position</li> <li>Intellectual Property</li> </ul>	<p>A significant financial interest related to the investigator’s institutional responsibilities including:</p> <ul style="list-style-type: none"> <li>If publicly traded entity, total value of compensation and equity interest &gt; \$5,000</li> <li>If non-publicly traded entity, total value of compensation &gt; \$5,000 or any equity interest</li> <li>Income received related to intellectual property &gt; \$5,000</li> <li>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.)</li> </ul>
<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>		
<b>WHEN TO DISCLOSE</b>		
<ul style="list-style-type: none"> <li>With the initial proposal</li> <li>With additional funding</li> </ul> <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"> <li>With the initial proposal</li> <li>When new personnel are added</li> <li>With any change in an investigator’s financial interest</li> </ul> <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"> <li>With the initial proposal</li> <li>With non-competing continuations</li> <li>With renewals</li> <li>With supplemental funding</li> <li>When new personnel are added</li> <li>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.)</li> </ul> <p><i>Note: All positive disclosures must be reviewed and approved prior to expenditure of funds.</i></p>
<b>DISCLOSURE FORMS TO SUBMIT</b>		
<ul style="list-style-type: none"> <li>State Disclosure (<a href="#">Form 700-U</a>)</li> <li>Campus addendum forms, if applicable</li> </ul>	<ul style="list-style-type: none"> <li>NSF/Federal Disclosure (CSU or compliant campus form)</li> <li>Campus addendum forms, if applicable</li> </ul>	<ul style="list-style-type: none"> <li>PHS/Federal Disclosure (CSU or compliant campus form)</li> <li>Campus addendum forms, if applicable</li> </ul>
<b>TRAINING REQUIREMENTS</b>		
<ul style="list-style-type: none"> <li>Ethics Training (CSU for University investigators; CITI or campus-based training for auxiliary investigators)</li> </ul>	<ul style="list-style-type: none"> <li>NA</li> </ul>	<ul style="list-style-type: none"> <li>PHS Training and/or campus based training modules or programs (including CITI FCOI Training and campus in-person training/workshops)</li> </ul>