Quick Reference Guidance - Office of Research Conflict of Interest Disclosure System (ORCOI)

700-U: Statement of Economic Interests for Principal Investigators
State requirement (see the California Fair Political Practices Commission – [http://www.fppc.ca.gov](http://www.fppc.ca.gov) for non-governmentally funded projects including non-profits, industry, and gifts.

**WHAT SPONSORS DOES IT APPLY TO:**
All non-profit, industry and gifts unless they are on the Exemption List - [http://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-non-governmental-entities-exempt-from-disclosure-requirement.html](http://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-non-governmental-entities-exempt-from-disclosure-requirement.html)

**FLOW-THROUGH:**
A 700-U is required for flow-through funding from prime sponsors that would normally require the disclosure.

**WHO MUST SUBMIT:**
All persons employed by UC who have principal responsibilities for the research project. Typically, this includes PIs and Co-PIs.

**WHEN IS IT REQUIRED & SIGNATURE TYPE:**
A 700-U is required at the time of proposal submission. The signature requirement is satisfied by signing into ORCOI using your UCSBnetID and password to disclose and submit.

**Annual Disclosure Form (PHS & NSF)**
Federal requirement for projects sponsored by PHS/NIH, NSF, and other sponsors applying the financial conflict of interest regulations set forth by the NSF in its Award and Administration Guide (AAG) Chapter IV.A, 42 CFR Part 50 Subpart F, and 45 CFR Part 94.

**WHAT SPONSORS DOES IT APPLY TO:**
An Annual Disclosure Form (PHS & NSF) is required for any sponsor applying the financial conflict of interest requirements detailed in 42 CFR Part 50 Subpart F, 45 CFR Part 94, and those set forth by the NSF in its Award and Administration Guide (AAG) Chapter IV.A. This includes NSF, CIRM, PHS (NIH, CDC, HRSA, FDA, SAMHSA, HIS, ATSDR, AHAQ), and other sponsors electing to apply similar conflict of interest requirements. A list of entities following the PHS disclosure standard can be found on the FDP website’s ‘List of Agencies using the PHS FCOI Regulations’ – [http://sites.nationalacademies.org/PGA/fdp/PGA_070596](http://sites.nationalacademies.org/PGA/fdp/PGA_070596).

**FLOW-THROUGH:**
An Annual Disclosure Form (PHS & NSF) is required for flow-through funding from prime sponsors that would normally require the disclosure.

**WHO MUST SUBMIT IT:**
The lead PI and all individuals involved in the design, conduct, and reporting activities associated with the project (as listed on the Design, Conduct, and Reporting (DCR) Personnel Form).

**WHEN IS IT REQUIRED:**
Completed disclosures should be filed within the Office of Research Conflict of Interest electronic disclosure system (ORCOI) for all investigators identified by the DCR Personnel Form and **must** be received by the Office of Research prior to proposal submission. For PHS/NIH a disclosure must also be collected at revised budget or JIT stage. Additionally, it must be collected annually during the course of the award, typically with continuation funding or when processing a no-cost extension. Investigators who have previously disclosed through the Office of Research Conflict of Interest electronic disclosure system (ORCOI) are responsible for updating their disclosures as circumstances change or within 30 days of any addition or subtraction of outside activity.

**SUBRECIPIENTS:**
A subrecipient’s compliance with the Federal regulations can be determined by their answers on the Subrecipient Commitment Form. If the subrecipient indicates that they do not have their own FCOI compliant policies and procedures, an Annual Disclosure Form (PHS & NSF) will need to be collected for all named PIs and Co-PIs. Keep in mind that a signed Subrecipient Commitment Form must be received by SPO prior to proposal submission for all subrecipients to certify their compliance with Federal regulations.

**SIGNATURE TYPE:**
The signature requirement is satisfied by signing into ORCOI using your UCSB NetID and password to disclose and submit all outside activities.

**DISCLAIMER:** The information presented in this document is intended for general, quick-reference guidance only, and does not fully encompass all applicable Federal, State, UC, or UCSB conflict of interest policies or procedures. Additional guidance and resources regarding conflict of interest can be found at [http://www.research.ucsb.edu/compliance/conflict-of-interest/](http://www.research.ucsb.edu/compliance/conflict-of-interest/). Questions about the information provided in this document should be directed towards the UCSB COI Coordinator or your Sponsored Projects team.
Design, Conduct, and Reporting (DCR) Personnel Form – Identifies Key Personnel and Confirms Completion of PHS Training Requirement

Federal requirement for projects sponsored by PHS agencies, NSF, and other sponsors adopting the financial conflict of interest requirements outlined in the NSF Award and Administration Guide (AAG) Chapter IV.A, 42 CFR Part 50 Subpart F, and 45 CFR Part 94.

WHAT SPONSORS DOES IT APPLY TO: Required for any sponsor applying the financial conflict of interest requirements detailed in 42 CFR Part 50 Subpart F, 45 CFR Part 94, and those set forth by the NSF in its Award and Administration Guide (AAG) Chapter IV.A. This includes NSF, CIRM, PHS (NIH, CDC, FDA, SAMHSA, HIS, ATSDR, AHAQ), and other sponsors listed on the FDP website – http://sites.nationalacademies.org/PGA/fdp/PGA_070596.

FLOW-THROUGH: A DCR Personnel Form is required for flow-through funding from prime sponsors that would normally require a financial conflict of interest disclosure.

WHO MUST SUBMIT IT: The lead PI only.

WHEN IS IT REQUIRED: Completed DCR Personnel Forms must be received by the Office of Research prior to proposal submission. The DCR Personnel Form must also be updated whenever there is a change to those listed. To ensure that the DCR Personnel Form is always up to date, the PI will need to confirm that the DCR Personnel Form received at proposal stage is still accurate and does not require any changes. If any updates or changes are needed to the form, a new DCR Personnel Form must be sent to the COI Coordinator (MC 2050) prior to SPO processing a JIT, revised budget, award (new, renewal, continuation and supplement), and post-award approval action (including NCE requests).

SUB-RECIPIENTS: Sub-recipients are required to complete a DCR Personnel Form, sub-recipient PIs and Co-PIs should not be listed on the UCSB PIs DCR Personnel Form.

SIGNATURE TYPE: Original signatures, photocopies, faxes, and scans of original signatures are accepted. Verisign signatures with date and time stamp are accepted.

Addenda – Disclosure of Economic Interests: Addendum for 700U and PHS & NSF Annual Disclosure For individuals who have identified the existence of an outside interest when submitting the applicable disclosure form(s); State of CA Form 700-U or an Annual Disclosure Form (PHS/NSF) within the Office of Research Conflict of Interest Disclosure System (ORCOI).

WHO MUST SUBMIT: The investigator that has identified an outside interest(s).

WHEN IS IT REQUIRED: For PHS and NSF Annual Disclosure Forms, as well as the 700-U: Statement of Economic Interests for Principal Investigators, that contain a disclosure of outside interest(s), the COI Coordinator may request a Disclosure of Economic Interests: Addendum. In cases where a positive disclosure is related to continuation or renewal funding for a research project that an Investigator has already filed an Addendum and no changes have been made to the respondent’s disclosure of outside activities/interests, the COI Coordinator may use the existing Addendum on file for reference.

SIGNATURE TYPE: The signature requirement is satisfied by signing into ORCOI using your UCSBnetID and password to disclose and submit all outside activities.