

<b>700-U - Statement of Economic Interests for Principal Investigators</b>	
State requirement (see the California Fair Political Practices Commission website - <a href="http://www.fppc.ca.gov">http://www.fppc.ca.gov</a> ) 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 <a href="https://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-non-governmental-entities-exempt-from-disclosure-requirement.html">https://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-non-governmental-entities-exempt-from-disclosure-requirement.html</a>
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 & how is it signed?	A 700-U is required at the time of award or renewal. The signature requirement is satisfied by signing into <a href="#">ORCOI</a> using your UCSBnetID and password to disclose and submit.

<b>Annual Disclosure Forms (NSF, PHS &amp; DOE)</b>	
These three separate disclosure forms meet Federal requirements for projects sponsored by 1) NSF, 2) DOE, or 3) PHS/NIH and other sponsors applying the PHS financial conflict of interest regulations set forth by 42 CFR Part 50 Subpart F.	
What sponsors does it apply to?	National Science Foundation, Department of Energy, or Public Health Service agencies and other entities following the PHS requirements ( <a href="#">list of sponsors known to follow PHS requirements</a> ).
Flow-through	An Annual Disclosure Form is required for flow-through funding from prime sponsors that would normally require the disclosure.
Who must submit?	The lead PI and all individuals involved in the design, conduct and reporting activities associated with the project (as listed on the Key Personnel page of the datasheet in the ORBIT record).
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 and must be received by the Office of Research prior to proposal submission. For PHS/NIH, DOE, and NSF a

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

	<p>disclosure must also be collected at revised budget or JIT stage. Additionally, it must be collected annually during 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.</p>
Subrecipients	<p>A sub-recipient's compliance with the Federal regulations can be determined by their answers on the FDP website or the Sub-recipient Commitment Form. If the sub-recipient does not have their own FCOI compliant policies and procedures, UCSB will determine if the subrecipient is permitted to follow our COI policy. If permitted to do so, an Annual Disclosure Form (PHS, DOE, or NSF) will need to be collected for any subrecipient personnel meeting the definition of Investigator. These decisions need to be made prior to proposal submission, since disclosures must be submitted at time of proposal.</p>
How is it signed?	<p>The signature requirement is satisfied by signing into <a href="#">ORCOI</a> using a UCSBnetID and password to disclose and submit all outside activities.</p>

### Identifying Investigators – Key Personnel Page or DCR Form (for subrecipients)

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

What sponsors does it apply to?	<p>National Science Foundation Department of Energy Public Health Service agencies and other entities following the PHS requirements (<a href="#">list of sponsors known to follow PHS requirements</a>).</p>
Flow-through	<p>Investigators must be identified in the Key Personnel page in the datasheet of the ORBIT record for flow-through funding from prime sponsors that would normally require a financial conflict of interest disclosure.</p>
Who must submit?	<p>The lead PI is responsible for identifying investigators working on the project.</p>

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

When is it required?	Investigators must be identified prior to proposal submission. The list of investigators must also be updated whenever there is a change to those listed. The PI is responsible for identifying changes in the list of investigators (additions or subtractions) prior to their participation in the project. The PI shall confirm that the list of investigators is up to date prior to SPO processing a JIT, revised budget, award (new, renewal, continuation, and supplement), and post-award approval action (including NCE requests).
Subrecipients	The subrecipient PI is required to identify all individuals involved with the project that meet the definition of Investigator via the completion of the DCR Personnel Form, which must be sent to the COI Administrator.
How is it signed?	For subrecipient DCR Forms, original signatures, DocuSign signatures, photocopies, and scans of original signatures are accepted. Electronic versions are preferred.

### 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/DOE/NSF) within the Office of Research Conflict of Interest Disclosure System (ORCOI).

Who must submit?	Any investigator that has identified an outside interest(s).
When is it required?	For PHS, DOE, 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 Administrator may request the completion of a <i>Disclosure of Economic Interests: Addendum</i> . 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 Administrator may use the existing Addendum on file for reference.
How is it signed?	The signature requirement is satisfied by signing into <a href="#">ORCOI</a> using a UCSBnetID and password to disclose and submit all outside activities.