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 website - 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-https://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 award or renewal. 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 42 CFR Part 50 Subpart F, and 45 CFR Part 94 NSF in its Award and Administration Guide (AAG) Chapter IV.A.

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 SO 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 following UCOP website (list is not comprehensive): https://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-sponsors-that-follow-phs-conflict-of-interest-disclosure-requirements.html.

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: 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 and NSF a 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.

SUBRECIPIENTS: A sub-recipient's compliance with the Federal regulations can be determined by their answers on the Sub-recipient Commitment Form. If the sub-recipient 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 Sub-recipient Commitment Form must be received by SPO prior to proposal submission for all sub-recipients to certify their compliance with Federal regulations.

SIGNATURE TYPE: The signature requirement is satisfied by signing into ORCOI using a UCSBnetID and password to disclose and submit all outside activities.
Identifying Investigators – Key Personnel Page or DCR Form (for subrecipients)

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 IVA 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 following the PHS FCOI regulations. UCOP maintained list: [https://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-sponsors-that-follow-phs-conflict-of-interest-disclosure-requirements.html](https://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-sponsors-that-follow-phs-conflict-of-interest-disclosure-requirements.html)

**FLOW-THROUGH:**

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.

**WHO MUST SUBMIT IT:**

The lead PI is responsible for identifying investigators working on the project.

**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). 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).

**SUB-RECIPIENTS:**

Sub-recipients are required to complete a DCR Personnel Form, which must be sent to the COI Administrator.

**SIGNATURE TYPE:**

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/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 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 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 Administrator 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.