

Conflict of Interest Disclosure in Research
Frequently Asked Questions (FAQs)
Updated: 6/22/2021

1. Why do we have a new electronic disclosure system?

The new system has been designed by the Office of Research to streamline the disclosure submission process. In addition, a new feature within ORBiT, Key Personnel, allows users to more easily identify project investigators who need to submit disclosures, reduce the provision of redundant information, and allows us to move away from the old DCR form. Upcoming enhancements will improve integration with our grant management system, ORBiT, and allow for increased efficiency.

2. Who needs to disclose outside interests?

Federal regulations require that all Investigators receiving funding from PHS agencies, foundations that adopt the PHS requirement, NSF, and agencies that adopt the NSF requirement, must provide financial disclosures and complete COI training. California State regulations require that researchers performing research under non-federal funds must also disclose their outside interests. "Investigator" is defined as the project director or principal investigator and any other person (regardless of title or position) who is responsible for the design, conduct, or reporting of research, or proposed for such funding. The Principal Investigator will be asked to identify those individuals on the study team who meet this definition of Investigator.

3. How do I login to the system?

UCSB faculty and staff who are required to disclose outside activity will use the University Single-Sign-On system (UCSB NetID). In order to access the disclosure system, use <https://orcoi.research.ucsb.edu> to login. If you are unable to login or are a non-UCSB investigator who is following our COI policy, please submit a detailed request to the COI Administrator coi@research.ucsb.edu.

4. What will I be asked?

You will be asked about outside income, outside professional activities, active intellectual property interests, and travel (reimbursed from non-University and non-governmental resources).

5. How often do I need to make a disclosure?

You must update your disclosures **within 30 days** of any new activity. You will be required to formally disclose all activities at least annually (reporting on the previous 12 months).

6. How long will it take to complete the disclosure?

Completing the questionnaire(s) depends on the complexity of your outside activities. If you have no outside activities or income, it will take only a few minutes to read and answer the questions.

7. How do I learn how to use the system?

Several instructional materials are available to guide you in using the electronic disclosure system. If you have any questions, concerns, or difficulty, please contact us at coi@research.ucsb.edu.

8. What if I have already disclosed this information to my department chair or the Office of Research in the past? Why do I need to do it again?

Currently the new electronic system addresses the federal conflict of interest regulations, which eliminate most paper forms for financial disclosures for research which had been submitted to the Office of Sponsored Projects.

9. How do I report travel (not reimbursed by a government agency or the University)?

The electronic disclosure system has a section for identifying travel and can be updated at any time. See FAQ 12.C (below) for additional information. We request that all disclosures be made in the electronic system and changes or updates to your disclosure be done **within 30 days** of any new changes.

10. When does a Researcher need to complete a California Form 700-U for non-governmental funding?

For those receiving funds from non-governmental/private sponsors, separate disclosure (700-U) is required. This form has been embedded in the electronic disclosure system and there are instructions that will direct researchers to the correct series of disclosure type. The series of questions related to non-federal/private awards adhere to the state of California regulations regarding the acceptance of a non-federal/private award.

11. I currently receive a PHS-supported fellowship. Am I required to disclose my financial interests?

Yes. The regulation explicitly applies to research authorized under the PHS Act or other statutory authority, such as a research grant, career development grant, center grant, individual fellowship award, infrastructure award, institutional training grant, program project, or research resources award.

12. What must I report?

The following are some examples of reporting requirements.

a. I am consulting for a company because I'm an expert in their field of interest. I also have Federal funding in a similar scholarly area, but not completely over-lapping with my consulting role. Do I need to disclose this consulting to the University COI office using the electronic system?

Yes. Outside activity related to your appointment at the University and all associated University responsibilities (e.g., research and scholarly work and committee service) must be disclosed.

b. I drive to a meeting for which I am being directly reimbursed (e.g., mileage) by a non-UC entity? Do I need to disclose this to the University COI office using the electronic system?

Yes. While we recognize this is burdensome, the new federal rules require the reimbursement for travel to be disclosed to the University. We have attempted to make this disclosure as easy as possible.

c. Do I need to disclose the occurrence of any reimbursed or sponsored travel related to my institutional responsibilities?

Yes. The regulation requires Investigators to disclose any reimbursed or sponsored travel related to the Investigator's institutional responsibilities regardless of whether the PI believes it is unrelated to a specific grant/award. There are exceptions for travel that is reimbursed or sponsored by the following:

- a federal, state, or local government agency,
- an Institution of higher education,
- an academic teaching hospital,
- a medical center, or
- a research institute that is affiliated with an Institution of higher education.

At a minimum, the following is disclosed: purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration.

d. A company is providing an unrestricted gift to my department for which my department chair allows reimbursement for my travel. Do I need to disclose the departmental reimbursement for this travel to the University?

No, you are not required to report this reimbursement in the University COI electronic system. However, if you receive a gift and additional business travel support from the company within the same year, you may be required to report this on a California Form 700-U. Please contact the COI office at coi@research.ucsb.edu for more information.

e. I have been asked to speak at a non-University of California academic institution and travel is sponsored by a non-profit or non-governmental-organization. Is this travel disclosable? What about honoraria?

If the travel is sponsored by any non-UC or non-governmental organization, the travel must be disclosed [exceptions for travel are in item (c) above]. The honoraria is disclosable as outside (non-UC) income and must be disclosed regardless of whether the entity is a non-UC, non-profit, or non-governmental organization.

f. I have invested in mutual funds and index funds, which may include investments in companies that fund some of my research. Do I need to disclose this investment to the COI Office?

No. However, if you own individual stocks or have private investments in non-publicly traded companies related to any products used in any of your research, you must disclose these financial interests via the COI electronic system.

g. I own shares of Apple and American Express. Do I need to disclose these investments?

Generally speaking, all financial interests that involve entities which fund UCSB research or manufactures, sells, invests in, or markets products for health care, health services, pharmaceuticals, or devices, should be disclosed. Depending on your research (for example, if you are developing an App or a device for which Apple or American Express could benefit), a variety of financial interests should be disclosed. Stock held in retirement or mutual funds for which you have no control over the buying or selling of individual stock holdings are exempt from disclosure. For individual cases, please feel free to contact us at coi@research.ucsb.edu. If in doubt, disclose.

h. I serve as an editor of a journal and they provide me honoraria/stipend/salary. Is this disclosable?

Yes. All non-UC income (and non-governmental income) is disclosable so long as the income is related to your appointment at UCSB and associated University responsibilities (including but not limited to research and scholarly work and committee memberships). Federal regulations no longer make the distinction whether a financial interest is related to a specific Federally-funded grant or award.

13. What if I have a question that has not been answered here?

Please contact us at coi@research.ucsb.edu. We are here to help!