UC Berkeley Conflict of Interest Disclosure Requirements Comparison

Disclosing individuals must disclose their financial interests received within the 12 months prior to disclosure submission including the financial interests of his/her spouse/registered domestic partner, and/or dependent children. All positive disclosures must be approved prior to acceptance of the award or additional funding, to expenditure of funds.

This chart is also available on the COI website at https://researchcoi.berkeley.edu/comparison.html.

<table>
<thead>
<tr>
<th>Reporting Triggers</th>
<th>State Law</th>
<th>National Science Foundation</th>
<th>Public Health Service</th>
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| When to Disclose   | • With the initial research contract/grant proposal  
• With the initial gift award  
• With the MTA/DUA request  
• With renewal award (additional funding intended to extend or results in the extension of a project beyond the originally approved project period)  
• When a new Investigator(s) is added  
• With any change in an investigator’s financial interest | • With the initial proposal  
• When a new Investigator(s) is added  
• With any change in an investigator’s financial interest | • With the initial and renewal proposals  
• With supplemental funding proposal  
• With non-competing continuation  
• With no cost time extension  
• When a new Investigator(s) is added  
• At least annually for duration of project  
• With any new significant financial interest *(New significant financial interests must be reported within 30 days of acquiring or discovering the new SFI.)* |
| What to Disclose   | A financial interest in the non-governmental sponsor of the research including:  
• Income ≥ $500  
• Investments ≥ $2,000  
• Director, Officer, Employee, Partner, Trustee, Consultant or Management position (paid or unpaid)  
• Loan Balances ≥ $500  
• Personal Gifts valued at ≥ $50  
• Travel Reimbursements | A significant financial interest related to the research project including:  
• Income > $10,000 (excluding income from seminars, lectures, teaching engagements, or service on advisory committees or review panels for public or nonprofit entities)  
• Equity interest > $10,000 or 5%  
• Intellectual Property interest in a patent, patent application, or copyright of a software (excluding intellectual property owned by the UC) | A significant financial interest related to the investigator’s institutional responsibilities including:  
• If publicly traded entity, total value of compensation > $5,000 or equity interest > $5,000  
• If non-publicly traded entity, total value of compensation > $5,000 or any equity interest, regardless of value  
• Income received related to intellectual property > $5,000 (excluding intellectual property owned by the UC)  
• Reimbursed or sponsored travel > $5,000 (per NIH) (excluding (1) travel funded by a US government agency, a US university, academic medical center, or affiliated research institute; and (2) sponsored or reimbursed travel for the Investigator’s immediate family) |
| Who                | UCB Principal Investigator and co-Principal Investigator, if applicable  
UCB Investigator(s) (individuals responsible for the design, conduct, or reporting of the funded research project) | UCB Investigator(s) (individuals responsible for the design, conduct, or reporting of the funded research project) | UCB Investigator(s) (individuals responsible for the design, conduct, or reporting of the funded research project) |

*Note: Exclude all exempt sponsors on FPPC approved list and all nonprofit, tax-exempt educational institutions. However, researchers must disclose for the prime sponsor if the educational institution received its funds from a non-governmental entity.*

[https://researchcoi.berkeley.edu/phsagencies.html](https://researchcoi.berkeley.edu/phsagencies.html)