

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](https://researchcoi.berkeley.edu/comparison.html) at <https://researchcoi.berkeley.edu/comparison.html>.

	State Law	National Science Foundation	Public Health Service
Reporting Triggers	<ul style="list-style-type: none"> • Research contract/grant from a non-governmental entity • Research Gifts earmarked for a specific individual or a specific research project • Material Transfer Agreement • Data Use Agreement <p><i>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.</i></p>	<ul style="list-style-type: none"> • NSF research contract/grant • Non-governmental entity <u>which flows down</u> NSF funds • California Institute for Regenerative Medicine (CIRM) Grant • UC Research Programs (HIV/AIDS, breast cancer, and tobacco related disease) <p><i>Note: Exclude Phase 1 SBIR or STTR grants.</i></p>	<ul style="list-style-type: none"> • PHS research contract/grant • Non-governmental entity which flows down PHS funds • Research funding from organizations that follow PHS disclosure requirements (e.g., American Cancer Society, American Heart Association). See list at: https://researchcoi.berkeley.edu/phsagencies.html <p><i>Note: Exclude Phase 1 SBIR or STTR grants.</i></p>
Who	UCB Principal Investigator and co-Principal Investigator, if applicable	UCB Investigator(s) (<i>individuals responsible for the design, conduct, or reporting of the funded research project</i>)	UCB Investigator(s) (<i>individuals responsible for the design, conduct, or reporting of the funded research project</i>)
What to Disclose	<p>A financial interest in the non-governmental sponsor of the research including:</p> <ul style="list-style-type: none"> • 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 	<p>A significant financial interest related to the research project including:</p> <ul style="list-style-type: none"> • Income > \$10,000 (<i>excluding income from seminars, lectures, teaching engagements, or service on advisory committees or review panels for public or nonprofit entities</i>) • Equity interest > \$10,000 or 5% • Intellectual Property interest in a patent, patent application, or copyright of a software (<i>excluding intellectual property owned by the UC</i>) 	<p>A significant financial interest related to the investigator's <u>institutional responsibilities</u> including:</p> <ul style="list-style-type: none"> • 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 (<i>excluding intellectual property owned by the UC</i>) • Reimbursed or sponsored travel > \$5,000 (<i>per NIH</i>) (<i>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</i>)
When to Disclose	<ul style="list-style-type: none"> • 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) 	<ul style="list-style-type: none"> • With the initial proposal • When a new Investigator(s) is added • With any change in an investigator's financial interest 	<ul style="list-style-type: none"> • 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 (<i>New significant financial interests must be reported within 30 days of acquiring or discovering the new SFI.</i>)
Forms	<ul style="list-style-type: none"> • Statement of Economic Interests for Principal Investigators (State of California Form 700-U) <ul style="list-style-type: none"> • On current year version • Original ink signature • Addendum to Statement of Economic Interests for Principal Investigators, if necessary 	<ul style="list-style-type: none"> • Non-PHS Financial Interest Screening Questions • Non-PHS Financial Disclosure Form (required with proposal), if necessary 	<ul style="list-style-type: none"> • PHS Financial Interest Screening Questions • PHS Financial Disclosure Form, if necessary