## Disclosure Form Reference

### Direct Sponsor: Award to UCI
- When UCI is receiving funds directly from the sponsor (UCI is not a subrecipient), evaluate UCI’s direct sponsor to determine the disclosure requirements.

### Prime Sponsor: Subrecipient Award to UCI
- In cases where UCI is a subrecipient, evaluate both UCI’s direct sponsor and the prime sponsor to determine the disclosure requirements.
  - Example: **Subcontract from University A with Organization following PHS Regulations as prime sponsor**
    - Based on Direct Sponsor (University A), no Form 700U required since non-profit, tax exempt educational institution.
    - Based on Prime Sponsor (Organization following PHS regulations), all Investigators must complete the Annual Disclosure.

<table>
<thead>
<tr>
<th>If Direct Sponsor is...</th>
<th>Public Health Service (exclude Training Grants)</th>
<th>Public Health Service Training Grants</th>
<th>Organizations following PHS regulations</th>
<th>National Science Foundation (NSF)</th>
<th>CIRM/UC Special Research Programs</th>
<th>Non-governmental entity (including non-profit foundations)</th>
<th>Contract Research Organization (only if CRO signed agreement with UCI)</th>
<th>Non-governmental entity on exempt list for state disclosure requirement</th>
<th>Non-profit, tax exempt educational institution</th>
<th>Foreign governmental entity</th>
<th>Governmental entity not PHS or NSF</th>
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<tbody>
<tr>
<td></td>
<td>All Investigators complete <strong>Annual Disclosure</strong></td>
<td>Principal Investigator/Program Director &amp; Co-Principal Investigator/Co-Program Director (if applicable) complete <strong>Annual Disclosure</strong></td>
<td>All Investigators complete <strong>Annual Disclosure</strong></td>
<td>All Investigators complete <strong>Annual Disclosure</strong> (and if positive, <strong>NSF Disclosure</strong>)</td>
<td>All Investigators submit <strong>Annual Disclosure</strong> (and if positive, <strong>NSF Disclosure</strong>)</td>
<td>Principal Investigator &amp; Co-Principal Investigator (if applicable) submit <strong>Form 700U</strong></td>
<td>Principal Investigator &amp; Co-Principal Investigator (if applicable) each submit a <strong>Form 700U</strong> for CRO and a <strong>Form 700U</strong> for drug or device manufacturer of study</td>
<td>No Form 700U required</td>
<td>No Form 700U required</td>
<td>No disclosure requirements</td>
<td>No disclosure requirements</td>
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<tr>
<td>If Prime Sponsor is... (applicable when UCI is subrecipient)</td>
<td>Public Health Service SBIR/STTR Phase I</td>
<td>No Annual Disclosure required</td>
<td>Public Health Service (including SBIR/STTR Phase II)</td>
<td>All Investigators submit <strong>Annual Disclosure</strong></td>
<td>Organizations following PHS regulations</td>
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</table>

Notes: “Investigator” is defined as an individual responsible for the design, conduct, or reporting of the funded research project. Non-UCI Investigator(s) may have different disclosure forms—refer to Conflict of Interest Forms webpage below.
Disclosure Form Reference

Other Examples:

- **NSF STTR Phase II Subcontract from Entity A (non-profit foundation not on exempt list)**
  Based on Direct Sponsor (Entity A), collect Form 700U from Principal Investigator & Co-Principal Investigator (if applicable).
  Based on Prime Sponsor (NSF STTR Phase II), all Investigators complete Annual Disclosure and if necessary, NSF Disclosure.

- **NIH SBIR Phase I subcontract from Company X (for-profit)**
  Based on Direct Sponsor (Company X), collect Form 700U from Principal Investigator & Co-Principal Investigator (if applicable).
  Based on Prime Sponsor (NIH- PHS Agency), no Annual Disclosure required since SBIR Phase I.

- **Company C (for-profit) subcontract with Company D (for-profit) as prime sponsor**
  Based on Direct Sponsor (Company C), collect Form 700U from Principal Investigator & Co-Principal Investigator (if applicable).
  Based on Prime Sponsor (Company D), collect Form 700U from Principal Investigator & Co-Principal Investigator (if applicable).