

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.

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

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.

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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).

Forms available at: <http://www.research.uci.edu/compliance/conflict-of-interest/forms-references/index.html>