

## 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.

<b>If Direct Sponsor is...</b>	Public Health Service (exclude Training Grants)	All Investigators complete <a href="#">Annual Disclosure</a>
	Public Health Service Training Grants	Principal Investigator/Program Director & Co-Principal Investigator/Co-Program Director (if applicable) complete <a href="#">Annual Disclosure</a>
	<a href="#">Organizations following PHS regulations</a>	All Investigators complete <a href="#">Annual Disclosure</a>
	National Science Foundation (NSF)	All Investigators complete <a href="#">Annual Disclosure</a> (and if positive, COI will email a NSF disclosure question)
	CIRM/UC Special Research Programs	All Investigators submit <a href="#">Annual Disclosure</a> (and if positive, COI will email a NSF disclosure question)
	Non-governmental entity (including non-profit foundations)	Principal Investigator & Co-Principal Investigator (if applicable) submit <a href="#">Form 700U</a>
	Contract Research Organization ( <i>only if CRO signed agreement with UCI</i> )	Principal Investigator & Co-Principal Investigator (if applicable) each submit a <a href="#">Form 700U</a> for CRO <b>and</b> a <a href="#">Form 700U</a> for drug or device manufacturer of study
	Non-governmental entity on <a href="#">exempt list</a> 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
<b>If Prime Sponsor is... (applicable when UCI is subrecipient)</b>	Public Health Service SBIR/STTR Phase I	No Annual Disclosure required
	Public Health Service (including SBIR/STTR Phase II)	All Investigators submit <a href="#">Annual Disclosure</a>
	<a href="#">Organizations following PHS regulations</a>	All Investigators submit <a href="#">Annual Disclosure</a>
	National Science Foundation SBIR/STTR Phase I	No NSF Disclosure required
	National Science Foundation (including SBIR/STTR Phase II)	All Investigators submit <a href="#">Annual Disclosure</a> (and if positive, COI will email a NSF disclosure question)
	CIRM/UC Special Research Programs	All Investigators submit <a href="#">Annual Disclosure</a> (and if positive, COI will email a NSF disclosure question)
	Non-governmental entity (including non-profit foundations)	Principal Investigator & Co-Principal Investigator (if applicable) submit <a href="#">Form 700U</a>
	Non-governmental entity on <a href="#">exempt list</a> 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.

## 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).

Forms available at: <https://research.uci.edu/ref/conflict-of-interest/forms-references/index.html>