

## 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.

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| <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  | Principal Investigator & Co-Principal Investigator (if applicable) each submit a <a href="#">Form 700U</a> for drug or device manufacturer of study. Form 700U is not required for the CRO. |
|   | 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>