

PUBLIC HEALTH SERVICE (PHS) CONFLICT OF INTEREST REPORTING REQUIREMENTS

The Public Health Service (PHS) regulations on Objectivity in Research provide a reasonable expectation that the design, conduct, and reporting of PHS research activities will be free from bias resulting from Investigators' financial conflicts of interest. The objectivity of research is important for obtaining and maintaining public trust. As a public institution, UC San Diego employees have to be mindful of the actual and the appearance of a conflict of interest.

1. Who Must Disclose?

Principal Investigator (PI), Project Director, Senior/Key Personnel, and others who direct or can materially influence the research, or who are responsible for the design, conduct, and reporting of the research.

2. When to Disclose?

Initial submission, change in funding, addition of new personnel, change in financial interest, no cost extension and at least annually.

- Submit an updated disclosure within 30 days of acquiring a new financial interest.

3. What to Disclose?

All outside financial interests that meet the threshold for disclosure regardless if related to the PHS-funded research, including interests with foreign Universities and foreign governments.

- This includes interest by the researcher, their spouse or registered domestic partner, and dependent children.
- The Institution determines which financial interests are related or have the appearance of being related to the PHS-funded research.

4. Disclosure Thresholds

- Income/Compensation: publicly traded or non-publicly traded > \$5,000
- Equity:
 - Publicly traded > \$5,000
 - Non-publicly traded ≥ \$0, including stock options that have yet to be exercised
- Travel: Domestic and foreign travel paid for on the researcher's behalf or reimbursed to the researcher by one entity > \$5,000 in the past 12 months.
- Intellectual Property: Royalties from non-UC inventions > \$5,000

5. PHS Training Requirement

Required prior to engaging in PHS-funded research and at least every four years.

6. What constitutes a Financial Conflict of Interest (FCOI)?

An FCOI means that a researcher's financial interests could directly and significantly affect the design, conduct, or reporting of research.

- The Institution determines if a researcher's financial interest is a FCOI.
- FCOI reports are submitted to the applicable funding agency annually.

Resources:

- [Disclosing Financial Interests: Public Health Service Sponsored Research](#)
- [UC San Diego Conflict of Interest Office FAQs](#)
- [Frequently Asked Questions - Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought \(42 CFR Part 50 Subpart F\) \(2011 Revised Regulations\)](#)

Questions:

UC San Diego Conflict of Interest Office

<http://coi.ucsd.edu>

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