

UC San Diego

RESEARCH COMPLIANCE AND INTEGRITY

Research Compliance and Integrity Hot Topics Session
April 19, 2023

UC San Diego

RESEARCH COMPLIANCE AND INTEGRITY

- Conflict of Interest (COI)
- Dual Use Research of Concern (DURC)
- Export Control and Facility Security
- Institutional Animal Care and Use Committee (IACUC)
- Research Ethics and Integrity (Research Misconduct)
- ClinicalTrials.Gov, NIH Good Clinical Practices (GCP) and Responsible Conduct of Research (RCR) Compliance
- Foreign Engagements
- General Research Compliance Activities

Website: RCI.UCSD.EDU

Helpline: (858) 822-4939

Email: rci@ucsd.edu

UC San Diego

RESEARCH COMPLIANCE AND INTEGRITY

Conflict of Interest (COI):

Navigating Kuali COI and COI Disclosure Requirements for Research

Jennifer J. Ford

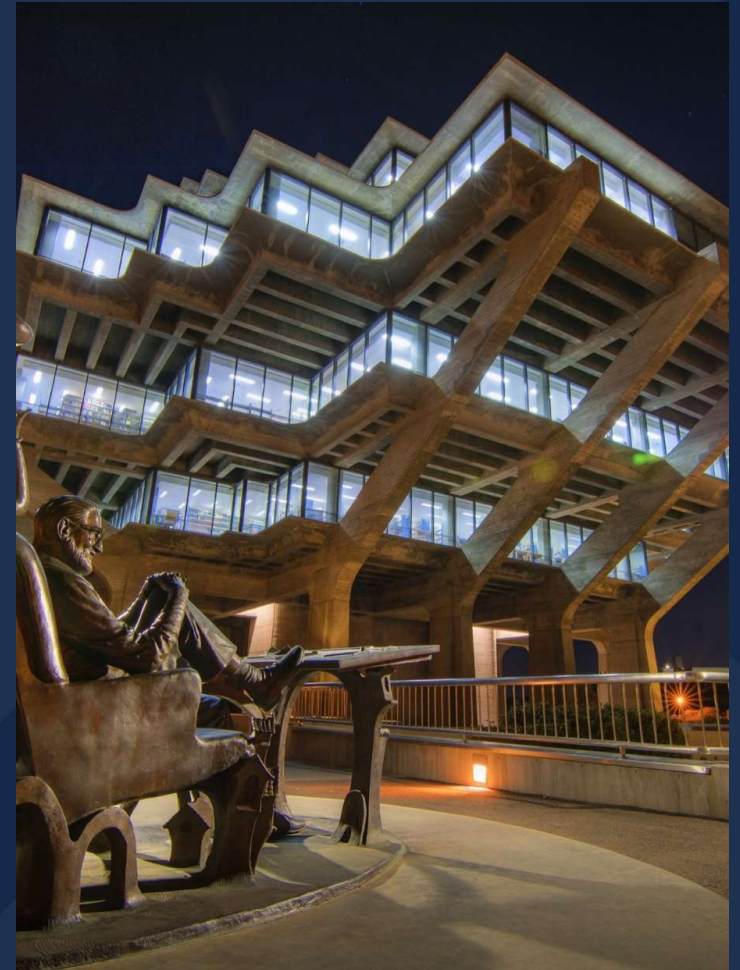
Director, Conflict of Interest Office

April 19, 2023

UC San Diego

AGENDA

- Role of the Conflict of Interest (COI) Office
- Why Does Disclosing COI Matter?
- Research COI Policies
 - Sponsored Research and other related activities disclosures
 - Essential information for understanding and completing disclosures
 - Guidance on areas of concern
- Quali COI
- Questions and Answers



**WHAT IS THE ROLE AND SERVICES OF
THE CONFLICT OF INTEREST (COI) OFFICE?**

THE ROLE OF THE CONFLICT OF INTEREST (COI) OFFICE



The UC San Diego Conflict of Interest Office, also known as the COI Office, role is to provide faculty and staff assistance in assessing circumstances under which their outside activities or financial interests may inappropriately conflict with their responsibilities to the University.

CONFLICT OF INTEREST (COI) OFFICE SERVICES

- Reviews disclosures of financial interests from University faculty, students and staff
- Ensures compliance with all applicable regulations
- Serves as a resource to University faculty, students, staff and institutional offices
 - Starting Companies
 - Consulting
 - Dual appointments



WHY DOES DISCLOSING COI MATTER?

BESIDES COMPLYING WITH FEDERAL AND STATE LAWS AND UC POLICY

COI IN THE NEWS

The screenshot shows the ProPublica website interface. At the top, there are navigation links for "ProPublica", "Illinois", "Texas", "Local Reporting Network", "Electionland", and "Data Store". The main header features the ProPublica logo, "Graphics & Data", "Newsletters", and "About". A search bar with the text "Get the Big Story" and a "Join" button is also present. Below the header, there are category links: "Health Care", "Environment", "Immigration", "Trump Administration", "More...", "Series", "Video", "Impact", and "Search". A blue banner below the categories reads "Enter to win a free ProPublica tote bag by taking our annual Reader Survey." The main content area features a Facebook icon, the sub-headline "DOLLARS FOR PROFS", and the main headline "Federally Funded Health Researchers Disclose at Least \$188 Million in Conflicts of Interest. Can You Trust Their Findings?". Below the headline is a paragraph: "A National Institutes of Health database, which we're making public for the first time, shows that researchers have reported more than 8,000 'significant' financial conflicts, potentially influencing their work." There are also icons for Twitter, Email, Creative Commons, and a dollar sign.

ProPublica Illinois Texas Local Reporting Network Electionland Data Store

PROPUBLICA Graphics & Data Newsletters About

Get the Big Story Join

Health Care Environment Immigration Trump Administration More... Series Video Impact Search

Enter to win a free ProPublica tote bag by taking our annual Reader Survey.

DOLLARS FOR PROFS

Federally Funded Health Researchers Disclose at Least \$188 Million in Conflicts of Interest. Can You Trust Their Findings?

A National Institutes of Health database, which we're making public for the first time, shows that researchers have reported more than 8,000 "significant" financial conflicts, potentially influencing their work.

In December of 2019, Propublica requested all Financial Conflicts of Interests (FCOIs) submissions by Awardees to National Institute of Health

COI IN THE NEWS

The screenshot shows the top of a ProPublica article. The header includes the ProPublica logo, the text 'DOLLARS FOR PROFS', and navigation links for Facebook, Twitter, email, 'SIGN UP', and a red 'Donate' button. The main heading is 'Dollars for Profs' in a large, bold, black serif font. Below it is the subtitle 'Dig Into University Researchers' Outside Income and Conflicts of Interest' in a smaller, bold, black sans-serif font. The byline reads 'By Sisi Wei, Annie Waldman and David Armstrong, ProPublica. Published December 6, 2019.' The introductory paragraph states: 'Professors' outside income can influence their research topics and findings, policy views and legislative testimony. But these conflicts of interest have largely stayed hidden — until now. This unique database allows you to search records from multiple state universities and the National Institutes of Health for outside income and conflicts of interest of professors, researchers and staff.' Below the text is a dark blue search box with the title 'Search' and the instruction 'Find disclosures related to a person, academic institution or company'. It features a white search input field and a red 'Search' button. An example text below the search box reads: 'For example: David Sinclair, Yale University, Pfizer'.

Then December 2019, Propublica created “Dollars for Profs” a searchable database of the details for researcher’s financial interest(s) of all FCOI submission from National Institute of Health

WHY AND WHEN CHANGES TO COI STARTED?

NIH Investigating Foreign Influence on Research

By [Andrew Kreighbaum](#) // August 24, 2018

0 COMMENTS 

National Institutes of Health director Francis Collins said Thursday that the agency is investigating multiple research institutions where researchers failed to disclose improper support from foreign governments.

In [a letter](#) to grant recipient institutions, Collins said foreign entities had mounted "systematic programs" to influence NIH research. The agency's concerns include the sharing of information on grant applications with foreign entities as well as failures to disclose financial support from foreign governments.

Collins also spoke about those research issues at [a hearing](#) of the Senate Health, Education, Labor and Pensions Committee, which oversees the agency.

NIH is responding by working with other government agencies and professional organizations to push for better reporting on sources of research support and improve intellectual property.

The [letter](#) also encouraged research institutions to reach out to the FBI about information involving grant applications or awards.

August of 2018, Foreign Influence
NIH Director Francis Collins

CONCERNS NOT LIMITED TO NIH

- The National Defense Authorization Act, signed in August 2018, included Sec. 1286, which stated that “The Secretary of Defense shall . . . establish an initiative to work with academic institutions who perform defense research and engineering activities . . . to **limit undue influence, including through foreign talent programs, by countries to exploit United State Technology ...**”
- The National Science Foundation issued a statement on “Security and Science” dated October 23, 2018, stating that **US universities must “embrace transparency** and rigorously adhere to conflict of interest and conflict of commitment policies.”
- The Department of Energy issued a notification on February 1, 2019, stating that DOE plans to implement a policy, which will mandate that “federal and contractor personnel fully disclose and, as necessary, **terminate affiliations with foreign government-supported talent recruitment programs.**”

CONFLICT OF INTEREST (COI) UPDATES: NSPM-33 AND DOE

- In January of 2022, the Office of Science and Technology Policy (OSTP) released implementation guidance for [NSPM-33](#) which requires all federal funding agencies harmonize/standardize COI disclosures and other requirements
 - Department of Energy (DOE) requires implementation PHS FCOI regulations
- PHS/DOE Investigators must complete the UCOP's Ethics and Compliance Briefing for Researchers (ECBR)
 - It satisfies the federal PHS/DOE training requirements
- Investigators must submit COI Disclosures in Quali COI
- More federal agencies may have or will change COI policy

COGR

Council On Governmental Relations

An Association of Research Institutions

Summary of NSTC Guidance for Implementing National Security Presidential Memorandum 33: Provisions Regarding DPIs, Consequences, Information Sharing and Research Security Programs

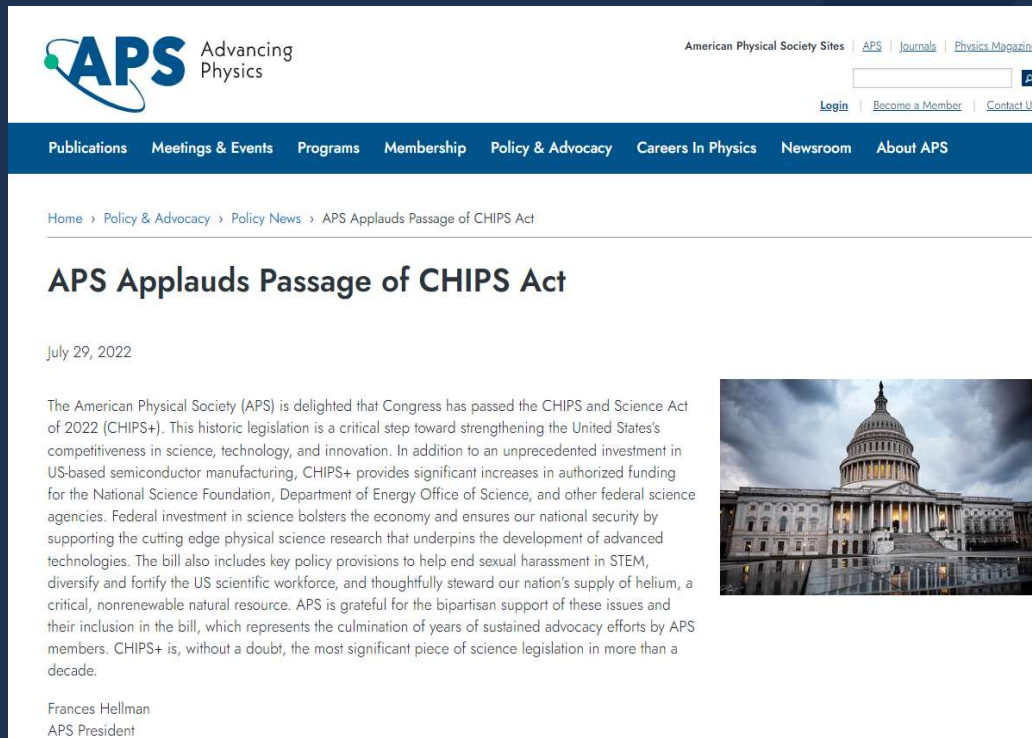
On January 14, 2021, the White House issued "[Presidential Memorandum on United States Government – Research and Development National Security Policy](#)" (NSPM-33).

NSPM-33 tasked the heads of U.S. research funding agencies with establishing policies on various aspects of research security, including:

- Researcher disclosure requirements
- Use of digital persistent identifiers (DPIs)
- Appropriate consequences for disclosure violations
- Sharing of information about violators, as consistent with applicable laws
- Standards for research security programs

<https://www.cogr.edu/sites/default/files/final%20NSPM%2033%20guidance%20re%20research%20security%20programs%20etc%20jan%2010%202022.pdf>

AFTER NSPM-33 ENACTMENT OF CHIPS AND SCIENCE ACT



The screenshot shows the APS website header with the logo 'APS Advancing Physics' and navigation links for 'American Physical Society Sites', 'APS', 'Journals', and 'Physics Magazine'. Below the header is a blue navigation bar with links for 'Publications', 'Meetings & Events', 'Programs', 'Membership', 'Policy & Advocacy', 'Careers In Physics', 'Newsroom', and 'About APS'. The main content area features a breadcrumb trail: 'Home > Policy & Advocacy > Policy News > APS Applauds Passage of CHIPS Act'. The article title is 'APS Applauds Passage of CHIPS Act' with a date of 'July 29, 2022'. The text describes the APS's delight in Congress passing the CHIPS and Science Act of 2022 (CHIPS+), highlighting its significance for strengthening the U.S. competitiveness in science, technology, and innovation. It mentions increased funding for the National Science Foundation, Department of Energy Office of Science, and other federal science agencies. The article also notes key policy provisions in the bill, such as ending sexual harassment in STEM, diversifying the U.S. scientific workforce, and stewarding the nation's supply of helium. The article is signed by Frances Hellman, APS President.

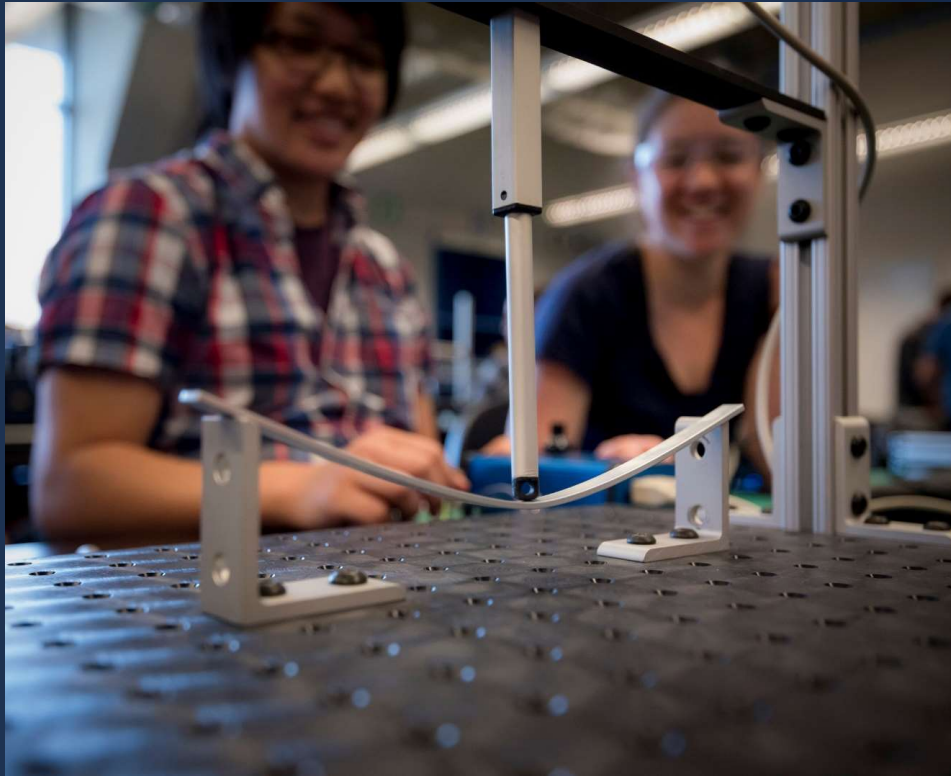
<https://aps.org/policy/analysis/chips-act.cfm>



The screenshot shows the White House website header with the logo and navigation links for 'Administration' and 'P'. Below the header is a date 'AUGUST 09, 2022'. The main title is 'FACT SHEET: CHIPS and Science Act Will Lower Costs, Create Jobs, Strengthen Supply Chains, and Counter China'. Below the title is a navigation bar with links for 'BRIEFING ROOM' and 'STATEMENTS AND RELEASES'. The text describes the Biden-Harris Administration's industrial strategy to revitalize domestic manufacturing, create good-paying American jobs, strengthen American supply chains, and accelerate the industries of the future. It mentions that these policies have spurred an historic recovery in manufacturing, adding 642,000 manufacturing jobs since 2021. Companies are investing in America again, bringing good-paying manufacturing jobs back home. The construction of new manufacturing facilities has increased 116 percent over last year. The text concludes by stating that President Biden will sign into law the bipartisan CHIPS and Science Act of 2022, which will build on this progress, making historic investments that will poise U.S. workers, communities, and businesses to win the race for the 21st century. It will strengthen American manufacturing, supply chains,

<https://www.whitehouse.gov/briefing-room/statements-releases/2022/08/09/fact-sheet-chips-and-science-act-will-lower-costs-create-jobs-strengthen-supply-chains-and-counter-china/>

EXAMPLES OF POTENTIAL COI AND FOREIGN ENGAGEMENT



- Affiliation with foreign University
- Students visiting from their home foreign institution, and investigator has a formal affiliation with the home foreign institution and/or is performing research at foreign institution
- Co-authorship with foreign collaborator on federal sponsor publication that also lists investigators affiliation
- Patent filings with foreign entity
- Travel paid for by or reimbursed by a foreign entity
- Member of a talents program or equivalent

RESEARCH CONFLICT OF INTEREST (COI)

WHAT TYPES OF ACTIVITIES REQUIRE RESEARCH COI DISCLOSURE?

COI Sponsored Research and Other Related Activity Disclosures		
Category	Agency	Examples
Sponsored Research	Federal	National Health Institute (NIH) National Science Foundation (NSF)
	Non-Federal	For-Profit Non-Profit*
Other Related Activity	Non-Federal	Gifts Material Transfer Agreements (MTA) Service Unfunded Human Subject Research

* There are sponsors exempt from the disclosure requirement

WHAT CONSTITUTES A POTENTIAL RESEARCH COI?

Type of Interests*	Examples
Income/Payments	Salaries, Consulting, Honoraria
Position	Founder, Partner, Board of Directors, Scientific Advisory Board, Employee
Equity / Ownership Interest	Stocks, Bonds, Stock Options
Gifts	From outside entity
Loans	Money loaned to outside entity
Travel Reimbursement/Payments	From outside entity
Intellectual Property	Non-UC royalties

*Applies to the Employee, Spouse, Registered Domestic Partner, and Dependent Children

EXAMPLES OF OUTSIDE INTERESTS AND POTENTIAL COI DOMESTIC AND FOREIGN



- Being a founder of a company
- Being on the board of a company or non-profit
- Consulting as a Scientific Advisory Board Member
- Affiliation with a university
- Travel paid for by or reimbursed by a university, company or association

700-U DISCLOSURE

CALIFORNIA'S FAIR POLITICAL PRACTICES COMMISSION (FPPC) NON-FEDERAL 700-U



STATEMENT OF ECONOMIC INTERESTS FOR PRINCIPAL INVESTIGATORS *A Public Document*

Date Received
Campus Use Only

Campus: _____

ID No: _____

Please type or print in ink.

NAME (LAST)	(FIRST)	(MIDDLE)	TELEPHONE NUMBER ()
ACADEMIC UNIT OR DEPARTMENT		MAIL CODE	E-MAIL ADDRESS
TITLE OF RESEARCH PROJECT			

1. Information Regarding Funding Entity
(Use a separate Form 700-U for each funding entity.)

Name of Entity:

Address of Entity:

3. Filer Information - Cont.

D. Have you received loans from the entity in Part 1 for which the balance exceeded \$500 during the reporting period?
 No Yes – highest balance:

<input type="checkbox"/> \$500 - \$1,000	<input type="checkbox"/> \$1,001 - \$10,000
<input type="checkbox"/> \$10,001 - \$100,000	<input type="checkbox"/> Exceeded \$100,000

WHEN AND WHO MUST DISCLOSE FOR 700-U?

Funding Entity Sponsor	Common Sponsors	When to Disclose	Who Must Disclose
Non-Federal*	Non-Profit For-Profit	Initial submission, Additional funding, Change in financial interest	Principal Investigator (PI) Studies involving <u>human subjects</u> , PI and any study personnel with a financial interest in an entity that would reasonably appear to be affected by the research
Unfunded Projects Clinical Research	Internal unrestricted	Initial submission to IRB	PI with a financial interest in an entity that would reasonably appear to be affected by the research

*There are sponsors exempt from the disclosure requirement: all non-profit tax-exempt educational institutions, and those on the list (on COI Website).

THRESHOLDS FOR 700-U DISCLOSURE?

Funding Entity Sponsor	Income Compensation	Ownership Position	Investment Equity	Travel paid for by / Reimbursement	Loans	Gifts	Intellectual Property
Non-Federal 700-U	>\$500	Any	>\$2,000	≥ \$0	≥ \$500	≥ \$50	Any >\$500 (Excludes UC)

Important: Update of Financial Interests for Sponsored Activities within 30 days

700-U DETERMINATION

Who is the Sponsor?	Which Regulation?	What to Disclose?	Who decides if the research and the interests are related?
Non-Federal (For-Profit or Non-Profit)*	700-U from the Fair Political Practices Commission (FPPC)	Disclose any interest(s) that meet the applicable threshold with the <u>specific</u> sponsor(s) supporting the project	Institution

* Includes research and other related activities (gifts, service agreements, MTAs, unfunded projects, etc.)

FEDERAL NON-PHS DISCLOSURE

WHEN AND WHO MUST DISCLOSE FOR FEDERAL NON-PHS?

Funding Entity Sponsor	Common Sponsors	When to Disclose	Who Must Disclose
Federal Non-PHS (formerly 9510)	NSF, CIRM and UC Programs	Initial submission, Change in funding, Change in financial interest	Principal Investigator (PI) and ALL other individuals who have the responsibility for the design, conduct or reporting of research

There are federal sponsors that do NOT require COI disclosure, such as, DOD, NOAA, and other federal agencies

THRESHOLDS FOR FEDERAL NON-PHS DISCLOSURE?

Funding Entity Sponsor	Income Compensation	Ownership Position	Investment Equity	Travel Paid for by / Reimbursement	Intellectual Property
Federal Non-PHS (formerly 9510)	> \$10,000	Any	> \$10,000 or > 5% owner	≥ \$10,000	Any > \$10,000 (Excludes UC)

Important: Update of Financial Interests for Sponsored Activities within 30 days

FEDERAL NON-PHS DETERMINATION

Who is the Sponsor?	Which Regulation	What to Disclose?	Who decides if the research and the interests are related?
Federal Non-PHS (i.e., NSF, CIRM, UC Programs)	NSF Grants Policy	Disclose any interest(s) that meet the applicable threshold and is related to the work to be conducted under the proposed project	Discloser

Sponsors: National Science Foundation (NSF), California Institute for Regenerative Medicine (CIRM), some UC Programs

FEDERAL PUBLIC HEALTH SERVICES (PHS) DISCLOSURE

WHEN AND WHO MUST DISCLOSE FOR FEDERAL PHS?

Funding Entity Sponsor	Common Sponsors	When to Disclose	Who Must Disclose
Public Health Services (PHS) including DOE*	NIH, DOE, or those non-profits that have adopted FCOI	Initial submission, Change in funding, Addition of new personnel, Change in financial interest, No cost extension, At least annually	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 such research

- PHS phase I STTR/SBIRs are exempt from a PHS disclosure requirement
- Mandatory PHS training is required by all senior key before funds can be released
- *Sponsors: Public Health Services (PHS) Agencies (e.g., NIH, FDA, CDC, etc.), Department of Energy (DOE) effective June of 2022, and other non-federal sponsors that adopt the PHS policy, (e.g., American Heart Association and the American Cancer Society)

THRESHOLDS FOR FEDERAL PHS DISCLOSURE

Funding Entity Sponsor	Income Compensation	Investment Equity	Travel paid for by / Reimbursement	Intellectual Property
Public Health Services (PHS), DOE	publicly traded > \$5,000	publicly traded > \$5,000	> \$5,000	Any (\$0) (Excludes UC)
	non-publicly traded > \$5,000	non-publicly traded \geq \$0		

Important: Update of Financial Interests for Sponsored Activities within 30 days

FEDERAL PHS DETERMINATION

Who is the Sponsor?	Which Regulation?	What to Disclose?	Who decides if the research and the interests are related?
Public Health Services (PHS) (i.e., NIH, DOE, and those who have adopted PHS)	PHS FCOI Regulation	Disclose all interest(s) that meet the applicable thresholds and are related to the discloser's Institutional Responsibilities*	Institution

* Reasonably appears *to be related to or is in the same field of expertise as* the Investigator's **Institutional Responsibilities**

COI DISCLOSURES WITH INCOMING SUBAWARDS

- For subawards more than one COI disclosure may be required:
 - PHS and 700-U (i.e., STTR/SBIR prime funding from NIH awarded to a company to UCSD)
 - Non-PHS and 700-U (i.e., STTR/SBIR prime funding from NSF awarded to a company to UCSD)
 - Two 700-Us (i.e., prime funding from a for-profit to non-profit to UCSD)



SUMMARY RESEARCH COI DISCLOSURES



- Three COI disclosure regulation based on sponsor
 - PHS
 - Non-PHS (formerly 9510)
 - Non-Federal (700-U)
- Each COI disclosure regulation has different requirements, timing, and thresholds
- Researchers need to provide updates of financial interest within 30 days

Submit in Quali COI

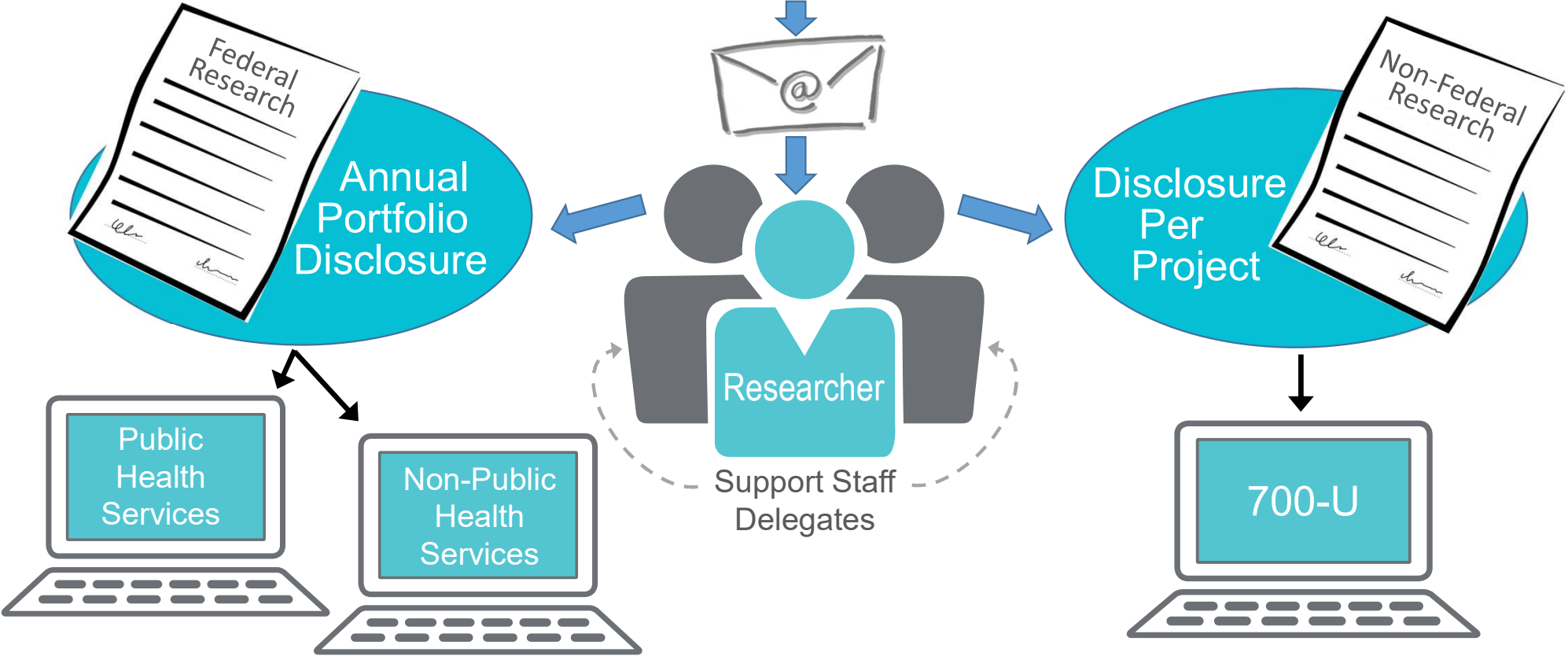
ESR Enterprise Systems Renewal

Kuali COI:

IT System of Record for COI at UC San Diego

UC San Diego

Conflict of Interest (COI)



Kuali COI: How to Know when to Access



Click Kuali COI link in Email

Log in with AD and Duo

Email is from:
Kuali Notifications at no-reply@kuali.co

- Once a record in is created, Kuali COI will e-mail the Researcher and their assigned Delegate(s)
- The email **contains a direct link to Kuali COI**
- Researcher will receive emails at proposal and award
 - Enhancement planned to minimize emails

FLOW AND TIMELINE OF DISCLOSURE IN KUALI COI

700-U Projects: Non-Federal Sponsors

Notification will be sent to **ONLY** PI once PD record is created with a sponsor and the PI is added in the Key Personnel tab.
700-U is reviewed at time of proposal submission in Kuali COI

**Proposal
(PD in KR)**

PHS/Non-PHS Projects: Federal Sponsors

Notification will be sent to Key Personnel **ONLY** if Investigator has never disclosed in Kuali COI

**Award
(Award in KR)**

The Award must be created in KR before COI can be completed in Kuali COI. Notification will be sent to ALL Key Personnel only if the Investigator(s) have Interest(s).
COI is reviewed at time of Award

Legend: Kuali Research (KR) and Proposal Development (PD)

Kuali COI

How to access without an email from Kuali COI

<https://ucsd.kuali.co/coi>

In order to submit COI disclosure(s) in Kuali COI:

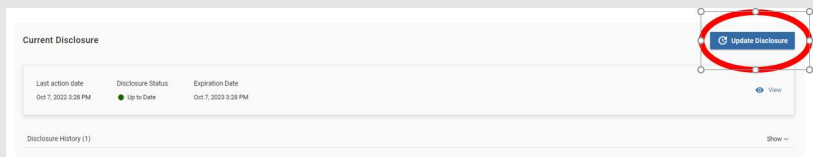
There must be a record recently saved (after 1/21/2020) from either

- Kuali Research (for sponsored research) **OR**
- Manual project (for other related activities)

Kuali COI

Log in at <https://ucsd.kuali.co/coi>

- Select the blue “Update Disclosure” button

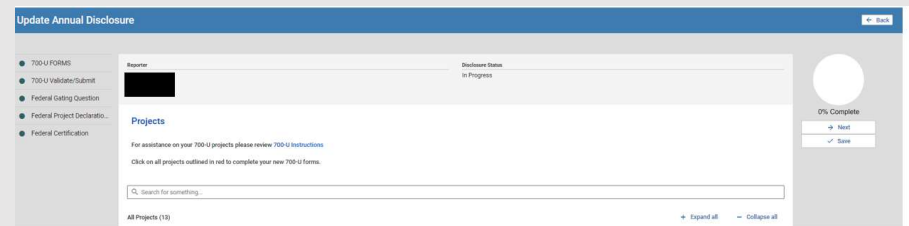


The screenshot shows the 'Current Disclosure' section of the Kuali COI interface. It includes a table with the following data:

Last action date	Disclosure Status	Expiration Date
Oct 7, 2023 3:28 PM	Up to Date	Oct 7, 2023 3:28 PM

Below the table is a 'View' button and a 'Disclosure History (1)' section with a 'Show' dropdown menu. A blue 'Update Disclosure' button is circled in red.

Complete 700-U Form for New projects



The screenshot shows the 'Update Annual Disclosure' page. It features a progress bar for '700-U FORMS' and a list of projects. The page includes a search bar and a 'Next' button.

If the Discloser has 700-U projects and interests to report, then additional screens may populate

Kuali COI: Return Portfolios Submitted for Approval to COI Office

Request COI Office to Send Back Portfolio to Investigator

CONFLICT OF INTEREST **kuali** CHANG, LILIAN

Update Annual Disclosure ← Back

Reporter	Disclosure Status	Submitted Date
CHANG, LILIAN ljchang@ucsd.edu 000167 - Temporary Employment Services	Submitted for Approval	Apr 24, 2020 2:22 PM

Print Management Plan

Read Only: To edit, please [request to edit](#) to notify the administrator.

Projects

For assistance on your 700-U forms, please review [700-U Instructions](#)

Click on all projects outlined in red to complete your new 700-U forms.

Once a Portfolio with interest(s) is submitted, the portfolio is **locked** to ensure changes cannot be made during the COI Office's review

To unlock, click the hyperlink "[request to edit](#)" in the red bar to submit a request to the COI Office to return Researcher's portfolio

Request Edit [X]

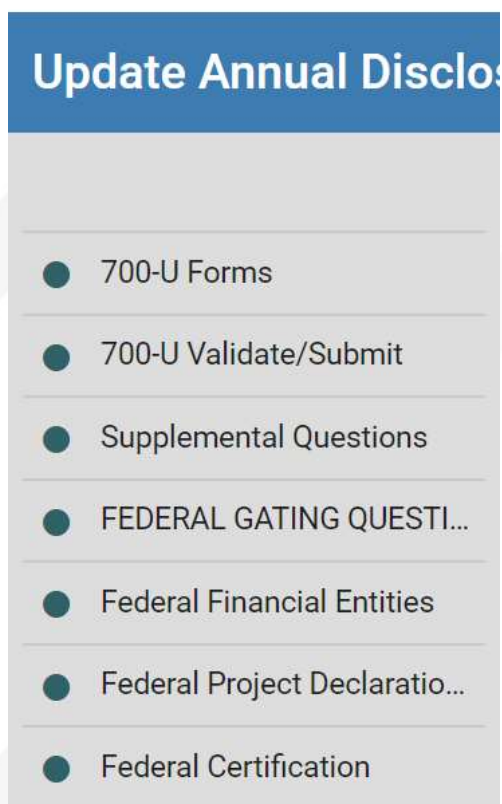
This action will notify the COI administrator that you would like to edit this disclosure. Once approved, the disclosure will be recalled, and editing will be possible

CANCEL [Click] Request Edit

Kuali COI: System Behaviors

Order of Screens through left Navigation Bar

CONFLICT OF INTEREST



- 1. 700-U Forms**
 - Always appears, even if there are no 700-U projects
 - Must complete ALL 700-U forms before moving to the next screen
- 2. 700-U Validate/Submit****
 - Appears after Researcher completes questions for 700-U projects
- 3. Supplemental Questions**
 - Appears if Researcher marks “Yes” to Role (3a), Equity (3b) or Income (3c) of 700-U
- 4. Federal Gating Question**
 - Appears for Federal PHS and Non-PHS Project(s)
- 5. Federal Financial Entities**
 - Appears if Researcher marks interest(s) = “Yes” to gating question
- 6. Federal Project Declaration**
 - Questions answered only when award is created in Kuali Research
- 7. Federal Certification****
 - Always appears, even if Researcher only has 700-U projects

**Delegate cannot complete/submit on these screens

Kuali COI: Non-Federal (700-U)

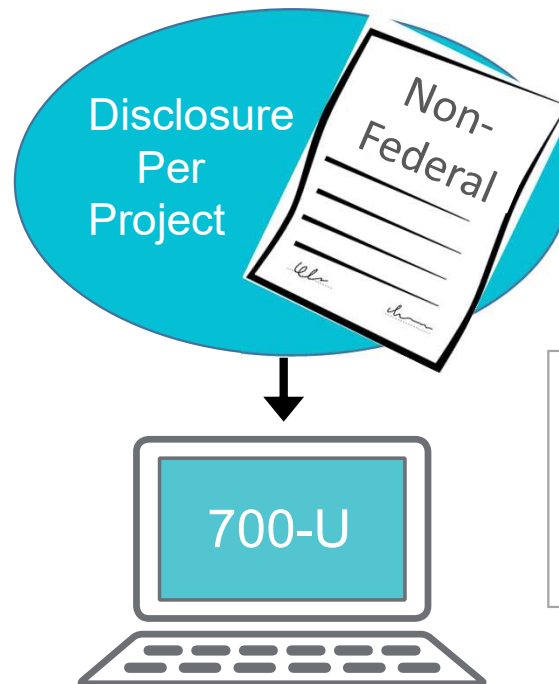
kuali
Research

Conflict of Interest (COI)

kuali

Non-Kuali
Projects**

- Complete 700-U at time of proposal or submission to central office
- Minimum Requirements:
 - Need a draft project title and draft SOW in KR or to central office



** Non-Kuali Projects are:

- Gifts, HS Business Contracting, Unfunded Human Subject, etc.
- Continue to submit paperwork to the applicable central office

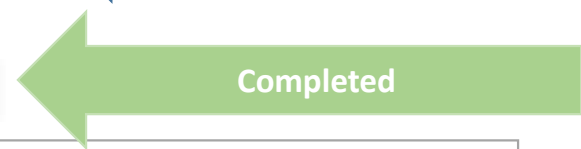
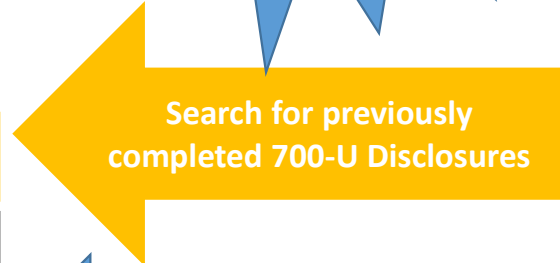
Kuali COI: 700-U Forms Screen

Projects Need Attention and Searching

Projects

For assistance on your 700-U projects please review [700-U Instructions](#)

Click on all projects outlined in red to complete your new 700-U forms.



3 Search for something...

Needs Attention (1) + Expand all - Collapse all

1 Usability of an Online COI system

All Projects (1)

2 COI Functionality with online system

1. Researcher lands on the “700-U Forms” screen, the Researcher can only answer 700-U questions
“Needs Attention” and highlighted in pink identifies to the Researcher which projects **requires action** on this screen
Click arrow or “Expand All” button to expand the project record to complete answers
2. Once the necessary answers are completed, projects will be marked as **completed and moved to “All Projects”**
3. **Search for previously submitted 700-U disclosures** to provide updates to interest(s)

Kuali COI: 700-U Form Project Expanded

700-U FORMS

- 700-U Validate/Submit
- Federal Gating Question
- Federal Project Declaratio...
- Federal Certification

Reporter
FORD, JENNIFER
jjford@ucsd.edu

Disclosure Status
In Progress

Projects

For assistance on your 700-U projects please review [700-U Instructions](#)

Click on all projects outlined in red to complete your new 700-U forms.

[Expand All](#) [Collapse All](#)

Implementation of new COI systems and impact on normal research process

Title Implementation of new COI systems and impact on normal research process	Project Type Proposal
Project Number 25594	Principal Investigator FORD, JENNIFER
Project Role Principal Investigator, PI/Contact	Start Date February 28, 2020
Sponsor Name and Code ASTRAZENECA PLC: 1676	End Date January 1, 2022
Prime Sponsor Name and Code	Sponsor Project ID
Notice of Opportunity	Project Link View project

0% Complete

[Next](#)

[Save](#)

Scroll down to answer 700-U questions

- Researcher expands the 700-U project record that requires answers completed
- When the user scrolls down, the 700U COI Disclosure questions will display

Kuali COI: 700-U

Complete Form – FPPC (state of CA agency) COI disclosure

0036-NEXAGEN, INC.

1. Information Regarding Funding

Address of Entity
1223 Landrake Lane

Principal Business of Entity
Pharmaceuticals

Amount of Funding
23456 Estimated Actual

2. Type of Statement

Initial (for new funding)
 Interim (for renewed funding)

Funding was renewed on
Click Here to Add Date
November 15, 2019

3. Filer Information

A. Are you a director, officer, partner, trustee, consultant, employee, or do you hold a position of management in the entity listed in Part 1?

Yes
 No

Title
Compliance Officer

- FPPC requires the discloser to enter every Part of the 700-U (i.e. Parts 1, 2 and 3)
- Recommend the Delegate complete Parts 1 and 2
 - Then notify Researcher to complete Part 3
- Estimates on amount of funding and date of funding
- If Income or Equity received for active consulting, mark “Yes” to Position (3a)

Interest Questions

Kuali COI: 700-U

Verify and Sign

The screenshot shows a web interface for Kuali COI 700-U forms. On the left is a navigation menu with items: 700-U Forms, 700-U VALIDATE/SUBMIT, Federal Gating Question, Federal Project Declaratio..., and Federal Certification. The main content area is titled '700-U Verification' and includes the following text: 'The Reporter listed above must verify and submit the 700-U forms listed below. The verify and submit button is inactive for delegates.' Below this is a bold instruction: 'Please verify that the information in these forms is correct:'. A form entry for '25594 IMPLEMENTATION OF NEW COI SYSTEMS AND IMPACT ON NORMAL RESEARCH PROCESS: ASTRAZENECA PLC' is shown with a 'DOWNLOAD UNSIGNED FORM' button. A 'FORM PREVIEW' dropdown is visible. The verification text reads: 'I verify that the information on this form is correct.' Below this is a 'Signature' field with the note 'This is your digital signature' and a 'VERIFY & SUBMIT' button. On the right side, there is a progress indicator showing '25% Complete' with a pie chart and three buttons: 'Next', 'Previous', and 'Save'. A blue arrow on the left points to the 'Verify and Sign' section of the interface.

Researcher must verify and sign for each 700-U form
Delegate cannot complete or sign on this screen; however, can move to the next screen

Kuali COI: 700-U

Download Completed Form

The screenshot displays the Kuali COI: 700-U system interface. On the left, a sidebar lists navigation options: 700-U Forms, 700-U VALIDATE/SUBMIT, Federal Gating Question, Federal Project Declaratio..., and Federal Certification. The main content area shows the '700-U Verification' section for Reporter FORD, JENNIFER (jjford@ucsd.edu) with a disclosure status of 'In Progress'. A '700-U Verification' section states that the reporter must verify and submit the forms listed below. A 'Please verify that the information in these forms is correct:' message is followed by a form preview for '25592 COI SYSTEM AND ITS IMPACT ON RESEARCH PROCESSING: PFIZER INC.'. The form is marked as 'Verified and submitted by FORD, JENNIFER on 11:44 AM 13 February 2020'. A 'DOWNLOAD SIGNED FORM' button is visible. A large blue arrow points to the 'Download and Save' button, which is located below the 'Previous' and 'Save' buttons. The form preview includes the following information:

011700162-UCS-0162
CALIFORNIA 700-U FORM STATEMENT OF ECONOMIC INTERESTS FOR PRINCIPAL INVESTIGATORS
FAIR POLITICAL PRACTICES COMMISSION *A Public Document*
Date Received: 2/13/2020
Campus: _____
ID No: 25592

Please type or print in ink.

NAME (LAST)	(FIRST)	(MIDDLE)	TELEPHONE NUMBER
FORD	JENNIFER		(858) 534-3335
ACADEMIC UNIT OR DEPARTMENT		MAIL CODE	E-MAIL ADDRESS
Research			jjford@ucsd.edu
TITLE OF RESEARCH PROJECT			
COI system and its impact on research processing			

1. Information Regarding Funding Entity (Use a separate Form 700-U for each funding entity.)

3. Filer Information - Cont.
D. Have you received loans from the entity in Part 1 for which the balance exceeded \$500 during the reporting period?

If Researcher marks “Yes” to 700-U questions about Position (3a), Equity (3b) or Income (3c) then Researcher will be presented the “Supplemental Questions” screen

Supplemental Questions after completing 700-U form

Answers on 700-U form transfer to separate supplemental questions screen

3. Filer Information

A. Are you a director, officer, partner, trustee, consultant, employee, or do you hold a position of management in the entity listed in Part 1?

- Yes
 No

Title

Consultant

Supplemental Questions

Needs Attention (1)

! Usability of an Online COI system (FE36-GOOGLE INC.)

Project Title
Usability of an Online COI system

Economic Interest
FE36-GOOGLE INC.

Are you a director, officer, partner, trustee, consultant, employee, or do you hold a position of management in the entity listed in Part 1?
Yes

Do you, your spouse or registered domestic partner, or your dependent children have an investment of \$2,000 or more in the entity listed in Part 1 above?
No

Have you received income of \$500 or more from the entity listed in Part 1 during the reporting period?
No

Title of Office
Consultant

Non Federal Disclosure Questions

The system retains and re-displays the answers for position, income or equity from the primary 700-U form onto the supplemental question screen

Kuali COI: Federal PHS and Non-PHS

kuali
Research

Conflict of Interest (COI)

kuali

Portfolio means:

- Projects are added to a Researcher's Portfolio
- Answers to questions are saved
- Financial Interest(s) are saved
- Each certification creates a new version



Kuali COI: Federal PHS/DOE Gating Question and Mandatory Training Data

PHS/DOE Gating Question

PHS/DOE Training Data

Once submitted for review to COI Office:

- Negative = auto approved (“no conflict”)
- Positive = interest(s) will be reviewed at NOA

This is a **four-part** question to answer the one PHS question:

1. Public Traded Entity
Equity or Income
OR
2. Privately Held Entity
Equity or Income
OR
3. Intellectual Property
OR
4. Travel by Entity
Paid for by or
Reimbursed

- Gating Question for Federal PHS/DOE only Disclosers OR Federal PHS/DOE and Federal Non-PHS Disclosers
- Training Data from UC Learning linked in Kuali COI

Kuali COI: Federal Non-PHS (9510)

Non-PHS (9510) Gating Question (at proposal)

CONFLICT OF INTEREST kuali WANG, XUEMEI (impersonated by Victor Kinzer)


Update Annual Disclosure ← Back

Reporter	Disclosure Status
WANG, XUEMEI xmwang@ucsd.edu	In Progress

Do you, your spouse, or dependent children have any financial interests related to the work to be conducted on this project?

Yes

No



66% Complete

→ Next

← Previous

✓ Save

Gating Question

- Project Declaration
- Certification And Attachm...

This gating question appears for Non-PHS only disclosers
Once submitted for review to COI Office:
Negative = auto approved (“no conflict”)
Positive = interest(s) will be reviewed at NOA

Kuali CO: Entering Federal Financial Entities

Select +Add Line and +Add Info to update financial entities

Financial Entities

1. Please provide information on each entity with which you have a financial or other interest during the past 12 months
2. If the relationship has not previously been disclosed, click on the "+ Add Line" button.
3. If the relationship has been previously disclosed, to update the information click on the "Pencil" icon next to the name of the entity.
4. If the relationship is now more than 12 months in the past and you do not anticipate continuing a relationship with this entity, or if you entered an entity that was unnecessary and wish to delete it, set the Active indicator to No.

A Significant Financial Interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse, registered domestic partner and/or dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities:

Publicly-Traded Entity: Any income received from entity in 12 months preceding disclosure and value of any equity interests in entity as of date of disclosure exceeding \$5,000 when combined for an Investigator, Investigator's spouse, and dependent children from a single Entity (Business, Public or Nonprofit) including salary, consultant payments, honoraria, royalty payments, dividend, loan, or any other payments or consideration with value, including payments made to the University of California Health Sciences Compensation Plans during the prior twelve months. Equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

Privately Held For-Profit Entity or Not-For-Profit Entity or Foreign Entity (including Foreign University and Foreign Government): Any remuneration received from entity in 12 months preceding disclosure, when combined, exceeds \$5,000; or when Investigator holds any equity interest (e.g., stock, stock option, or other ownership interest). Exclude income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, a U.S. institution of higher education as defined at 20 U.S.C. 1001(a), a U.S. academic teaching hospital, a U.S. medical center, or a U.S. research institute that is affiliated with a U.S. institution of higher education; however, these references refer to a US institution of higher education or a federal, state, or local government agency within the US. Therefore, Investigators, including subrecipient Investigators, must disclose all financial interests received from a foreign institution of higher education or the government of another country (which includes local, provincial, or equivalent governments of another country).

Intellectual property rights and interests, upon receipt of ANY income (no dollar threshold), during the twelve months preceding disclosure from such rights and interests. However, Significant Financial Interests do NOT include royalties received from the University of California Regents.

Travel: Sponsored travel or reimbursements made to or on behalf of, the Investigator, exceeding \$5,000 during the twelve months preceding disclosure, from a for-profit or non-profit entity, including professional organizations, foreign universities and foreign governments, related to the Investigator's Institutional Responsibilities. However, Significant Financial Interests do not include travel reimbursed or paid by a federal, state, or local government agency, a U.S. institution of higher education, or a U.S. research institute, a U.S. academic medical center or hospital affiliated with a U.S. institution of higher education.

- **NEW ENTITIES:** Click "+ Add Info" below to add new entities.
- **ADDITIONAL ENTITIES:** Click "+ Add Line" to insert additional entities.
- **EXISTING ENTITIES:** Select the Edit Pencil next to an existing entity to edit as needed.

To change entity status to active or inactive, select the pencil icon to the left of the entity. At the top of the dialog box, select the toggle button to active or inactive, scroll down to bottom of dialogue box, and select done.

Has anything changed with your entities since your last disclosure? If so click the pencil icon to the left of the entity and make all appropriate changes.

ACTIVE	ENTITY NAME	MANUAL ENTITY NAME	RELATIONSHIPS

Columns + Add Line

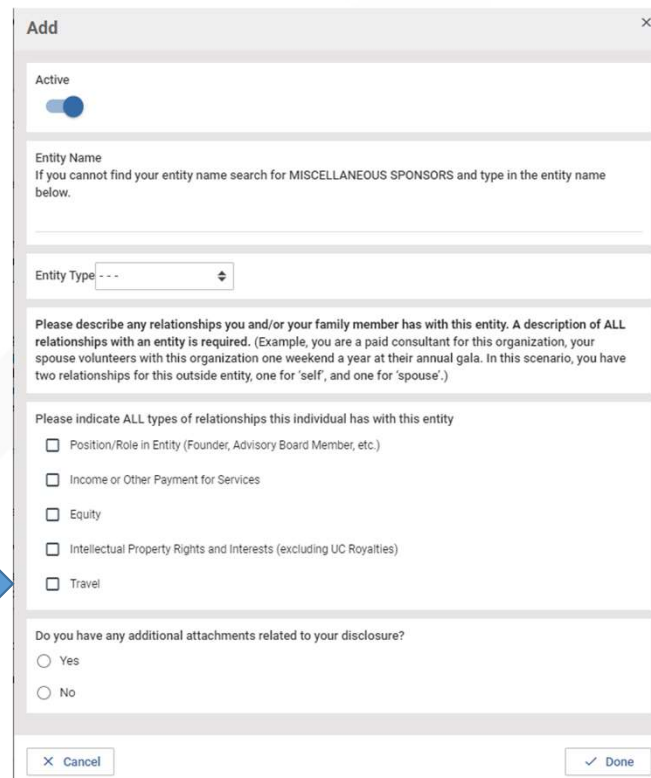
+ Add Info

Your work has been saved.

Add Outside Entity

If Researcher marks "yes" to the Gating Question, then Researcher enters their interest(s)
This information is stored and saved in the Researcher's portfolio

Kuali COI: Federal Financial Entity Entry



The screenshot shows a 'Add' dialog box with the following fields and options:

- Active:** A toggle switch that is currently turned on.
- Entity Name:** A text input field with a note: "If you cannot find your entity name search for MISCELLANEOUS SPONSORS and type in the entity name below."
- Entity Type:** A dropdown menu currently showing "----".
- Relationships Description:** A text area with the instruction: "Please describe any relationships you and/or your family member has with this entity. A description of ALL relationships with an entity is required. (Example, you are a paid consultant for this organization, your spouse volunteers with this organization one weekend a year at their annual gala. In this scenario, you have two relationships for this outside entity, one for 'self', and one for 'spouse'.")
- Relationship Selection:** A section titled "Please indicate ALL types of relationships this individual has with this entity" containing five checkboxes:
 - Position/Role in Entity (Founder, Advisory Board Member, etc.)
 - Income or Other Payment for Services
 - Equity
 - Intellectual Property Rights and Interests (excluding UC Royalties)
 - Travel
- Additional Attachments:** A section titled "Do you have any additional attachments related to your disclosure?" with two radio buttons:
 - Yes
 - No
- Buttons:** "Cancel" and "Done" buttons at the bottom.

- Researcher enters each entity separately
- For each entity, click ALL applicable relationships:
 - Position/Role
 - Income
 - Equity
 - Intellectual Property
 - Travel
- If Income or Equity received for consulting, mark "yes" to Position/Role

Kuali COI: Federal Financial Entities with Interests

CONFLICT OF INTEREST

kuali

JOYCE, NICOLE (impersonated by Victor Kinzer)

Update Annual Disclosure ← Back

700-U Forms
700-U Validate/Submit
Federal Gating Question
FEDERAL FINANCIAL ENT...
Federal Project Declaratio...
Federal Certification

Reporter: JOYCE, NICOLE
njoyce@ucsd.edu
Disclosure Status: In Progress

Financial Entities

1. Please provide information on each entity with which you have a financial or other interest during the past 12 months.
2. If the relationship has not previously been disclosed, click on the "+ Add Line" button.
3. If the relationship has been previously disclosed, to update the information click on the "Pencil" icon next to the name of the entity.
4. If the relationship is now more than 12 months in the past and you do not anticipate continuing a relationship with this entity, or if you entered an entity that was unnecessary and wish to delete it, set the Active indicator to No.

A Significant Financial Interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse, registered domestic partner and/or dependent children) that reasonably appears to be related to the Investigator's institutional responsibilities:

Publicly-Traded Entity: Any income received from entity in 12 months preceding disclosure and value of any equity interests in entity as of date of disclosure exceeding \$5,000 when combined for an Investigator, Investigator's spouse, and dependent children from a single Entity (Business, Public or Nonprofit) including salary, consultant payments, honoraria, royalty payments, dividend, loan, or any other payments or consideration with value, including payments made to the University of California Health Sciences Compensation Plans during the prior twelve months. Equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

Privately Held For-Profit Entity or Not-For-Profit Entity or Foreign Entity (including Foreign University and Foreign Government): Any remuneration received from entity in 12 months preceding disclosure, when combined, exceeds \$5,000; or when Investigator holds any equity interest (e.g., stock, stock option, or other ownership interest). Exclude income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, a U.S. institution of higher education as defined at 20 U.S.C. 1001(a), a U.S. academic teaching hospital, a U.S. medical center, or a U.S. research institute that is affiliated with a U.S. institution of higher education; however, these references refer to a US institution of higher education or a federal, state, or local government agency within the US. Therefore, Investigators, including subsipient Investigators, must disclose all financial interests received from a Foreign Institution of higher education or the government of another country (which includes local, provincial, or equivalent governments of another country).

Intellectual property rights and interests, upon receipt of income, exceeding \$5,000 during the twelve months preceding disclosure from such rights and interests. However, Significant Financial Interests do NOT include royalties received from the University of California Regents.

Travel: Sponsored travel or reimbursements made to or on behalf of the Investigator, exceeding \$5,000 during the twelve months preceding disclosure, from a for-profit or non-profit entity, including professional organizations, foreign universities and foreign governments, related to the Investigator's Institutional Responsibilities. However, Significant Financial Interests do not include travel reimbursed or paid by a federal, state, or local government agency, a U.S. institution of higher education, or a U.S. research institute, a U.S. academic medical center or hospital affiliated with a U.S. institution of higher education.

- NEW ENTITIES: Click "+ Add Info" below to add new entities.
- ADDITIONAL ENTITIES: Click "+ Add Line" to insert additional entities.
- EXISTING ENTITIES: Select the Edit Pencil next to an existing entity to edit as needed.

To change entity status to active or inactive, select the pencil icon to the left of the entity. At the top of the dialog box, select the toggle button to active or inactive, scroll down to bottom of dialogue box, and select done.

Has anything changed with your entities since your last disclosure? If so click the pencil icon to the left of the entity and make all appropriate changes.

Columns + Add Line

	ACTIVE	ENTITY NAME	RELATIONSHIPS
	<input checked="" type="checkbox"/>	Pfizer	Equity
	<input checked="" type="checkbox"/>	Amgen Inc.	Income or Other Payment for Services

Saved Interest(s)

Once Financial interest(s) are entered and saved in Researcher's portfolio
Upon re-entry the Researcher will re-affirm the accuracy and/or update, accordingly
Click pencil per entity to review, edit and update, accordingly

Kuali COI: Federal Project Declarations (NOA) Screen

If **NO**
Highlighting
in Pink
click "Next"

The screenshot shows the 'CONFLICT OF INTEREST' section with a search bar and a list of project records. Annotations include:

- A blue starburst callout: "If **NO** Highlighting in Pink click 'Next'"
- A yellow arrow pointing to the search bar: "Search for previously completed Federal Disclosures"
- A blue arrow pointing to the left sidebar: "Federal Records"
- A blue arrow pointing to the 'Needs Attention (1)' section: "Click to Expand"
- A green arrow pointing to the 'All Projects (1)' section: "Completed"
- Numbered callouts: '1' points to the pink-highlighted record, '2' points to the 'All Projects' section, and '3' points to the search bar.

Status	Project Record
Needs Attention (1)	Usability of an Online COI system
All Projects (1)	COI Functionality with online system

For those Researchers that have disclosed interests in their Federal Portfolio:

1. Records marked "**Needs Attention**" and highlighted pink identifies which federal projects **requires action**
Click arrow or "Expand All" button to expand the project record to **answer declaration questions** per project
2. Once the necessary answers are completed, projects will be marked as **completed and moved to "All Projects"**
3. Searching is available for previously submitted 700-U disclosures to provide updates to interest(s) on 700-U Forms Screen

Kuali COI: Federal Project Declarations (NOA)

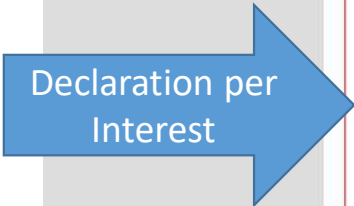
Principal Investigator 2c9034e73a1082cf013a4c97517503ea	Start Date February 1, 2020
Sponsor Name and Code NATIONAL INSTITUTES OF HEALTH CLINICAL CENTER: 3402	End Date January 31, 2025
Prime Sponsor Name and Code	Sponsor Project ID
Notice of Opportunity	Project Link View project

Reviewer Recommended Disposition	Project Disposition
----------------------------------	---------------------

This project includes PHS Relationships

The Reporter Comment is only required when the Financial Entity is 'related'

FINANCIAL ENTITY	DECLARATION	REPORTER COMMENTS	SUPPLEMENTAL QUESTIONS
Pfizer	<input type="radio"/> Not Related <input checked="" type="radio"/> Related	Click Here to Add Text Required	Columns + Add Line STUDENT INVOLVEMENT + Add Info
Amgen Inc.	<input type="radio"/> Not Related <input type="radio"/> Related Required	Click Here to Add Text	Columns + Add Line STUDENT INVOLVEMENT + Add Info



75% Complete

- Next
- ← Previous
- ✓ Save

Kuali COI: Federal Certification and Submission

Update Annual Disclosure ← Back

Reporter: [Redacted] Disclosure Status: In Progress

Federal Certification

By clicking submit, I certify to the best of my knowledge that this is a complete and accurate disclosure and I have used all reasonable diligence in preparing this financial interest disclosure. I also acknowledge that it is my responsibility to disclose within 30 days of discovering or acquiring a new reportable interest during the term of the federal project(s).

Department of Energy (DOE) Certification:

For DOE Investigators by clicking submit, I understand that this Disclosure is required to obtain funding from the U.S. Government. I certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to U.S. Government's funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above.

The Reporter listed above must certify and submit this disclosure. The submit button is inactive for delegates.

99% Complete

[Submit](#)

[← Previous](#)

[✓ Save](#)

- Discloser must click “submit” (under pie chart) as e-signature certification for the ALL projects (federal and non-federal) in their Kuali COI portfolio
- Once Researcher has finished answering all questions, the final page of the disclosure is the federal certification screen
- Delegate(s) cannot certify to submit a Researcher’s portfolio in Kuali COI

Kuali COI: Assign Delegates

Researcher Must Add Each Support Staff

The screenshot displays the Kuali COI interface. At the top left, it says 'CONFLICT OF INTEREST'. The Kuali logo is in the top right. A dark sidebar menu on the left contains 'Hide Menu', 'Disclosures', and 'Manage Delegates'. The 'Manage Delegates' option is highlighted with a purple box, and a blue arrow labeled 'Click' points to it. The main content area is titled 'Disclosures' and has two tabs: 'MY DISCLOSURES' (active) and 'DELEGATED TO ME'. Below the tabs is an 'Update Disclosure' button. A table with the header 'LAST ACTION DATE' shows two entries, both dated 'Dec 4, 2019 10:35 AM'.

Researcher must add Delegates (support staff) before staff can have access

Kuali COI: Assign Delegates

Researcher ability to add support staff

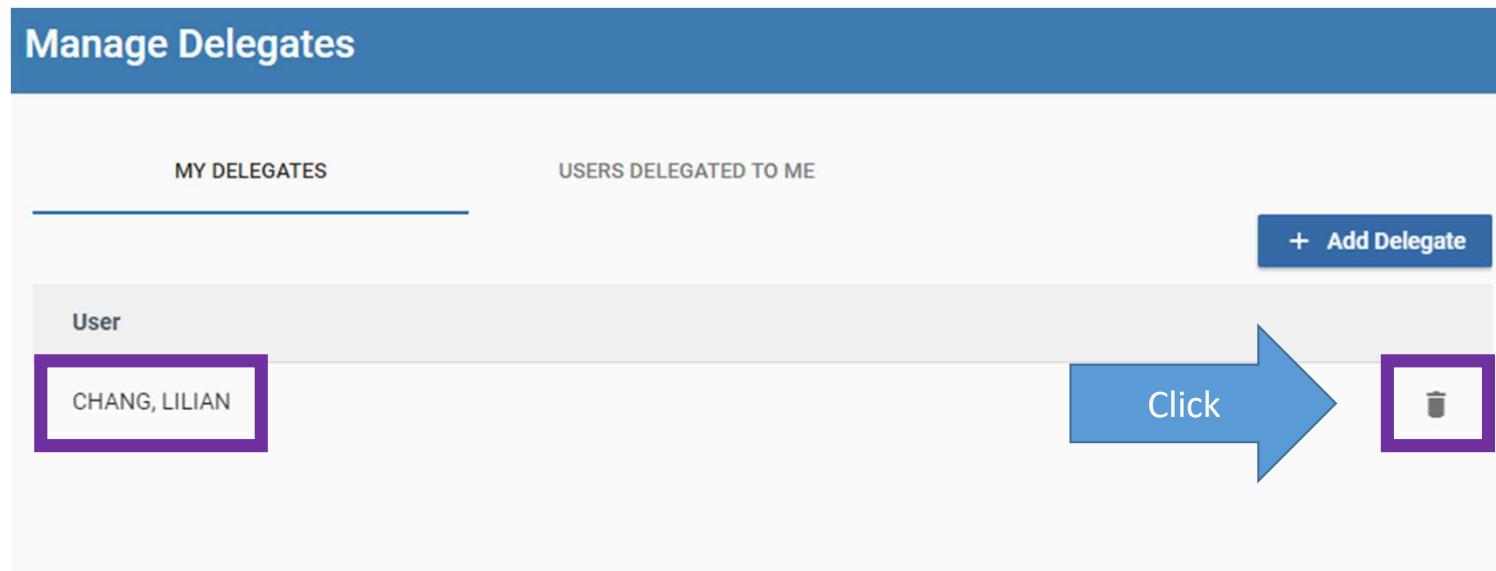
The image illustrates the process of adding a delegate in the Kuali COI system. It consists of two main parts:

- Manage Delegates Screen:** This screen has a blue header with the text "Manage Delegates". Below the header, there are two tabs: "MY DELEGATES" (which is selected and underlined) and "USERS DELEGATED TO ME". On the right side of the screen, there is a blue button labeled "+ Add Delegate". A blue arrow labeled "Click" points from the text "Click" to the "+ Add Delegate" button.
- Add Delegate Dialog:** This is a modal dialog box that appears when the "+ Add Delegate" button is clicked. It has a title bar with the text "Add Delegate" and a close button (X) in the top right corner. The main content area contains the text "Click here and type a user's name" above a text input field. At the bottom of the dialog, there are two buttons: "Add" on the left and "Cancel" on the right. A blue arrow labeled "Enter" points from the text "Enter" to the "Add" button.

For a Researcher to review their Delegates on the "My Delegates" Screen

Kuali COI: Remove Delegates

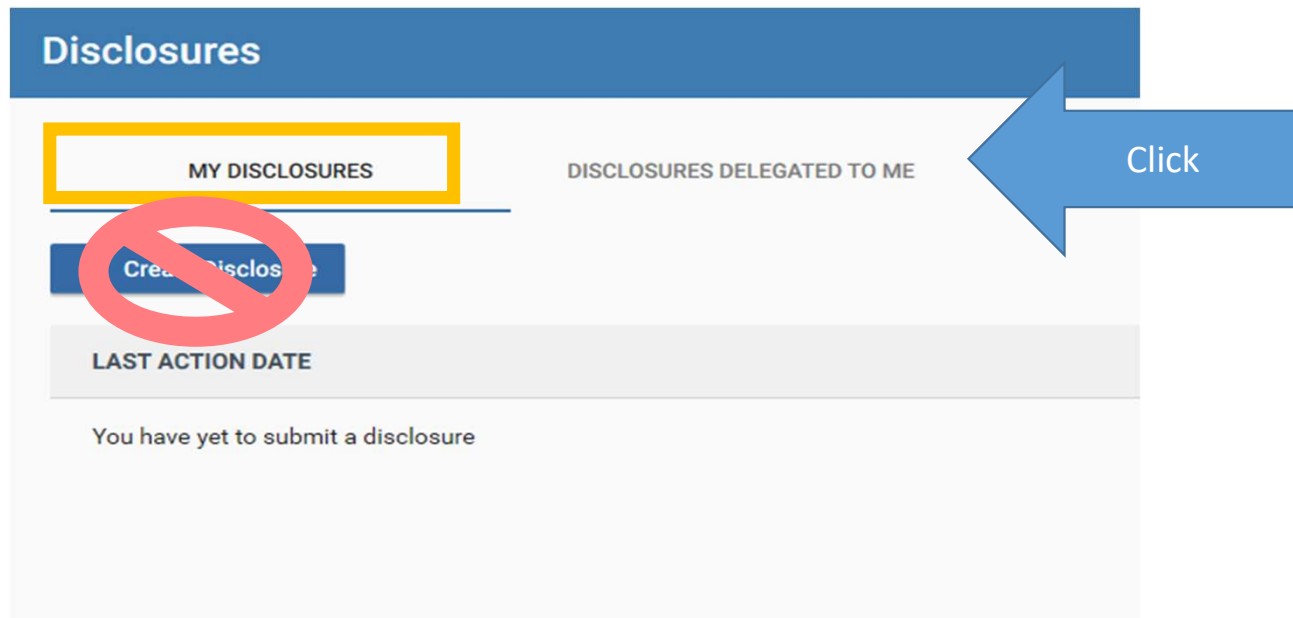
Researcher ability to remove support staff



For a Researcher to remove their Delegates on the “My Delegates” Screen

Kuali COI: Delegate Access

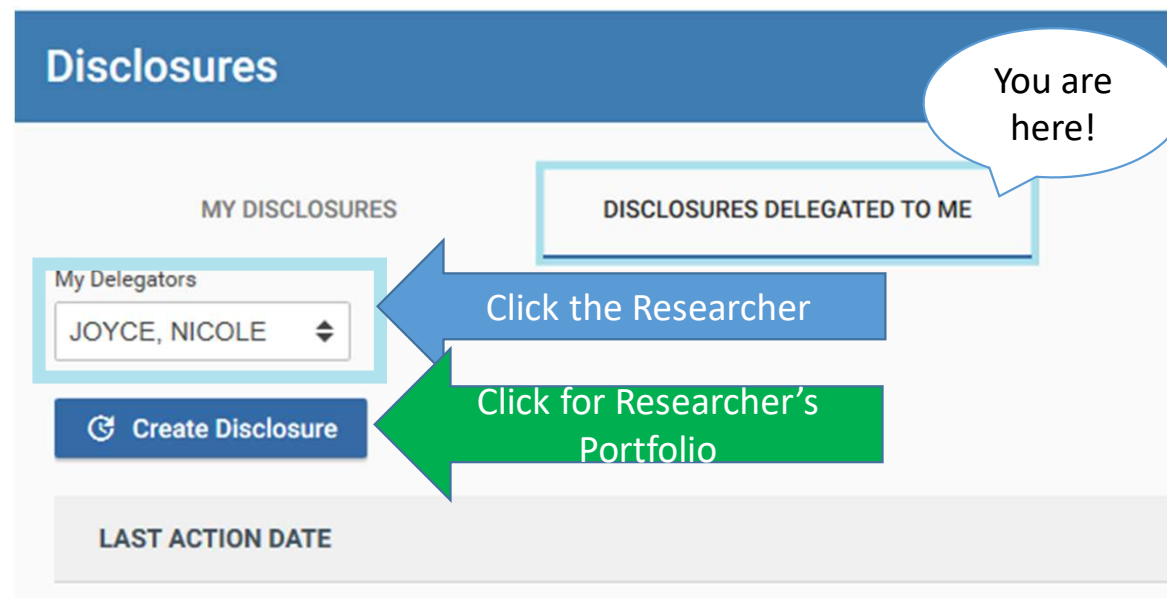
Delegate's ability to view and edit Researcher's Portfolio



- At log in, Kuali COI defaults to “Disclosures” Screen and the “My Disclosures” Tab
 - Click “Disclosures Delegated To Me” Tab
- Do **NOT** click “Create Disclosure” button on “My Disclosures” tab, it is YOUR COI portfolio

Kuali COI: Disclosures Delegated to Me

Delegates have the ability to choose the Researcher to obtain access to Researcher's portfolio



- Delegate clicks to choose which Researcher's portfolio to review and edit
- Then **click** "create disclosure" or "update disclosure" button for access to the specific Researcher's Portfolio
 - If the Portfolio is not editable, the delegate can request the Portfolio to be unlocked

Kuali COI: System Behavior for Delegates

Researcher Role:

- Researchers **must** verify, review, certify, and submit/sign their COI disclosure(s) in Kuali COI
- Researchers can add as many Delegates as needed

Delegate Role:

- Delegates **can**:
 - Enter on the “700-U Verify/Submit” screen (can click “next”)
 - Can be assigned to as many Researchers, as necessary
 - Communicate to the Researcher inside of Kuali COI when the Delegate has finished their portion of their review and data entry.
 - Then an email is sent to Researcher with the Delegates name in the subject line.
- Delegates **cannot**:
 - **Certify and Submit** (“700-U Verify/Submit” or “Federal Certification”)
- COI Office does not have real-time access to view which Researcher has Delegates assigned



Definition of COI Statuses in Kuali Research

- There are three listed COI statuses listed for each researcher listed in Kuali Research record:
 - **COI Annual Disclosure Status:** refers to the overall Kuali COI status of the researcher's federal disclosure portfolio.
 - **COI Project Status:** refers to the Kuali COI status of the particular project being viewed
 - **COI Project Disposition Status:** refers to the status assigned by the COI office during the review process
 - Viewable only by the proposal creator and the PI of record

HOW TO REVIEW COI STATUS IN KUALI RESEARCH (KR) IN AWARD FEDERAL AWARDS

For Kualu Research (KR) Award Records

- Viewable for only Federal PHS and Federal non-PHS
- Go to “**Contacts**” tab in KR
- Must review COI statuses for every Researcher Individually

COI Annual Disclosure Status:	In Progress
COI Project Status:	Update Needed
COI Project Disposition:	None

← Update is Required by Researcher

Tutorial to read all Kualu COI Statuses in Kualu Research: https://blink.ucsd.edu/_files/coi/Kualu-COI/How%20to%20check%20COI%20status%20in%20KCOI.pdf

COI STATUSES IN KUALI RESEARCH

Project Disposition Status and Project Status

Project Disposition Status	Project Status “Up to Date”	Project Status “Update Not Required”	Project Status “Update Needed”
None	COI Disclosure Incomplete*	COI Disclosure Complete	COI Disclosure Incomplete
No Conflict	COI Disclosure Complete		
Approved/Managed	COI Disclosure Complete		

- If “Annual Disclosure Status” is “Submitted for Approval”, then the Researcher’s disclosure has been updated and submitted to include this particular project; however, the submission has not been reviewed by the COI office
 - A project disposition MUST be set by the COI Office in order for the COI disclosure to be complete
- *For federal projects only, the COI Disclosure is incomplete if the “Annual Disclosure Status” is “Expired”




Grey shading indicates that these combinations of status are not likely

Kuali COI Office Hours

We provide Kuali COI Office Hours on
Wednesdays at 11:00 am via Zoom

Investigator's sign-up for office hours at:
www.calendly.com/ucsdcoioffice



Conflict of Commitment	or	Conflict of Interest
 	System	
Academic Personnel Office	Responsible Office	Conflict of Interest Office Part of the Research Compliance and Integrity (RCI) office
UCOP APM 671 / APM 025	Governing Policies	UCSD (PPM 200-13), UCOP (APM 028), Funding agencies (PHS/NIH, NSF)
Identify and manage outside professional activities to avoid conflicts of commitment	Purpose	Protect the objectivity of research and comply with policies and regulations
Prior approval to engage in category 1 activities and annual reporting of time and earnings for category 1 and 2 activities	Disclosure Requirements	Dependent on outside funding entity or type of activity
Category I: Prior to Engagement Category II: Annually	Timing	Proposal and/or award stages and then dependent on funding
Academic Personnel	Questions	info-coi@ucsd.edu

QUESTION PROVIDED BEFORE TODAY'S PRESENTATION

Background:

- UCSD faculty member served as a grant reviewer for a scientific Institute in the U.S. (a non-profit entity) on April 5 and 6, 2023
- This outside activity involved five hours of zoom on each day (10 hours total)
- UCSD faculty was paid \$6,000 for their outside activity with non-profit entity

Question: How does this UCSD Faculty member report this outside activity in Kuali COI and UCOATS?

- For COI and Kuali COI, does the faculty member have PHS/DOE funded research at UCSD? Yes, then given the \$ threshold (income amount) the faculty member must disclose within 30 days in Kuali COI. However, if the faculty member has only federal non-PHS funded research, then no disclosure required (below \$ threshold).
- For COC and UCOATS, in general, grant reviewing is considered category III and not required to be disclosed in UCOATS. For questions, consult their academic personnel analyst for assistance.

CONTACT CONFLICT OF INTEREST (COI) OFFICE



Email Questions: info-coi@ucsd.edu
Telephone: (858) 534-6465

Kuali COI (access):
<https://ucsd.kuali.co/coi>
Kuali COI Tutorials:
<https://blink.ucsd.edu/sponsor/coi/kualicoi.html#Tutorials>

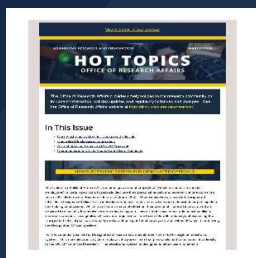
COI Website: <http://coi.ucsd.edu>

QUESTIONS AND ANSWERS



RCI COMMUNICATIONS

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