Conflict of Interest (COI) Office

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CONFLICT OF INTEREST (COI) OFFICE SERVICES

- Reviews disclosures of financial interests from University faculty, staff and students
- Ensures compliance with all applicable regulations
- Serves as a resource to University faculty, staff, students and institutional offices
  - Starting companies
  - Consulting
  - Foreign engagement / foreign influence
In January, 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) is implementing PHS FCOI regulations
- Other Federal Agencies may add a COI policy

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 Kuali COI

Based on Investigator feedback Kuali implemented changes to entry screen to the user interface
For PIs and Key Personnel applying for or currently receiving Department of Energy (DOE) and National Nuclear Security Administration (NNSA) funded research MUST be aware of the following:

- The dollar thresholds and disclosure requirements are similar to the PHS FCOI regulations
- The policy will require disclosure of Significant Financial interests that relate to your institutional responsibilities (e.g., research, teaching, or service).
  - The definition is a slightly broader than PHS FCOI regulations.
- Investigator will need to track of any personal Significant Financial Interests within the last 12 months to properly disclose
- Travel reimbursed or paid for by an outside entity may be a zero-dollar reporting threshold
  - This means it may also apply to PHS funded (change from $5,000 to zero-dollar threshold)
- The UCOP Ethics and Compliance Briefing for Researchers (ECBR) will satisfy the DOE training
- This new DOE disclosure process in Kuali COI will be communicated to the research community
  - We must implement mid-June
  - We are awaiting clarification from DOE

DOE Interim policy: https://www.energy.gov/sites/default/files/2021-12/Interim%20COI%20Policy%20FAL2022-02%20to%20SPEs.pdf
### WHEN ARE CONFLICT OF INTEREST (COI) DISCLOSURES REQUIRED?

<table>
<thead>
<tr>
<th>COI Research and Other Related Activity Disclosures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category</td>
</tr>
<tr>
<td>----------</td>
</tr>
</tbody>
</table>
| Sponsored Research | Federal | National Institute Health (NIH)  
                                National Science Foundation (NSF) |
|          | Non-Federal | For-Profit  
                                Non-Profit* |
| Other Related Activity | Non-Federal | For-Profit or Non-Profit*  
                                • Gifts  
                                • Material Transfer Agreements (MTA)  
                                • Service  
                                • Unfunded** |

* There are sponsors exempt from the 700-U disclosure requirement  
** Disclosure may be required for internal University clinical research projects when Human Subjects are involved
<table>
<thead>
<tr>
<th>Funding Entity / Sponsor</th>
<th>Income / Compensation</th>
<th>Ownership / Position</th>
<th>Investment / Equity</th>
<th>Travel Expenses / Reimbursement</th>
<th>Loans</th>
<th>Gifts</th>
<th>Intellectual Property / Patents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Health Services (PHS)</td>
<td>publicly traded &gt; $5,000</td>
<td>Any</td>
<td>publicly traded &gt; $5,000</td>
<td>&gt; $5,000</td>
<td>&gt; $5,000</td>
<td>&gt; $5,000</td>
<td>Any Royalties (excludes UC)</td>
</tr>
<tr>
<td></td>
<td>non-publicly traded &gt; $5,000</td>
<td>non-publicly traded ≥ $0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Federal Non-PHS (NSF, CIRM, &amp; UC Prog)</td>
<td>&gt; $10,000</td>
<td>Any</td>
<td>&gt; $10,000 or &gt; 5% owner</td>
<td>≥ $10,000</td>
<td>&gt; $10,000</td>
<td>&gt; $10,000</td>
<td>Any Royalties (excludes UC)</td>
</tr>
<tr>
<td>Non-Federal 700-U</td>
<td>&gt;$500</td>
<td>Any</td>
<td>&gt;$2,000</td>
<td>≥ $0</td>
<td>≥ $500</td>
<td>≥ $50</td>
<td>Any Royalties (excludes UC)</td>
</tr>
</tbody>
</table>

**Important:**
1) Update of Financial Interests for Sponsored Activities within 30 days
2) Mandatory PHS Training required every four years
<table>
<thead>
<tr>
<th>Who is the Sponsor?</th>
<th>Which Disclosure Type?</th>
<th>What to Disclose?</th>
<th>Who decides if the research and the interests are related?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Public Health Services (PHS)</strong> (i.e., NIH and those who have adopted PHS)</td>
<td>PHS</td>
<td>Disclose all interests related to the discloser’s Institutional Responsibilities*</td>
<td>Institution</td>
</tr>
<tr>
<td><strong>Federal Non-PHS (i.e., NSF, CIRM, UC Programs)</strong></td>
<td>9510</td>
<td>Disclose any interests related to the work to be conducted under the proposed project</td>
<td>Discloser</td>
</tr>
<tr>
<td><strong>Non-Federal (For-Profit or Non-Profit)</strong>**</td>
<td>700U</td>
<td>Disclose any interests with the sponsor(s)</td>
<td>Institution</td>
</tr>
</tbody>
</table>

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

** Includes research and other related activities (gifts, service agreements, MTAs, unfunded, human subject projects, etc.)
Kuali COI: Federal (PHS and Non-PHS)

Portfolio Concept:
- New Projects
  - Highlighted on Federal Screen
- Previously Reviewed Projects
  - Re-affirming no change
  - If there is a change, then update
### PHS Federal Gating Question

During the past 12 months, did you, your spouse, or registered domestic partner, or dependent children have ANY financial interest(s) that meet the definitions BELOW related to your Institutional Responsibilities:

- Publicly Traded Entity: A financial interest in a publicly traded entity that exceeds $5,000 OR
- Privately Held or Not-For-Profit Entity:
  - Any equity interest
  - Compensation that exceeded $5,000 OR
- Intellectual Property Rights and Interests: Payments in excess of $5,000 OR
- Travel Reimbursement/Sponsorship (for only the discloser): Sponsored or reimbursed travel in excess of $5,000 (foreign or domestic) that is related to your Institutional Responsibilities

- [ ] Yes
- [x] No

*Note: For PHS funded projects, PHS requires each investigator and senior/key personnel to complete conflict of interest training prior to engaging in research related to any PHS funded project.*
Kuali COI: Non-Federal (700-U)

One disclosure per project and entity:
- New Projects
  - Highlighted on 700-U Screen
- Previously Reviewed Projects
  - Re-affirming no change
  - If there is a change, then update
- If a project is not appearing, contact COI Office
This is an example of an expanded 700U project record that requires action from the Discloser.

When the user scrolls down, the 700U COI Disclosure questions will display.
Must be Added by Researcher

- Researcher must add Delegates before staff can access Researcher’s Kuali COI Portfolio
- ONLY the Researcher can verify and certify in Kuali COI
- One auto-generated email is sent to both Researcher and their Delegate(s)
- Researcher can add many Delegates as necessary

Click KUALI COI: DELEGATES (SUPPORT STAFF)
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
PLEASE COMPLETE THE SURF EVALUATION

We want to hear from you!