

FEDERAL DISCLOSURE REQUIREMENTS

	NSF or Other Non-PHS Federal Agency	PHS
<i>Reporting Triggers</i>	<ul style="list-style-type: none"> ▪ NSF contract/grant for research and/or educational activity ▪ Other federal research contract/grant (except PHS) ▪ Non-governmental entity that flows down federal funds (<i>excluding PHS funds and SBIR/STTR Phase I awards</i>) ▪ California Institute for Regenerative Medicine (CIRM) 	<ul style="list-style-type: none"> ▪ PHS contract/grant for research (including research contracts and grants, career development awards, center grants, individual fellowships, infrastructure awards, institutional training grants, program projects, research resource awards and conference grants) ▪ Grant from other non-federal sponsors that adopt the PHS policy (such as Alliance for Lupus Research, American Cancer Society, American Heart Association, Arthritis Foundation, and Susan G. Komen for the Cure)
<i>Who Must Disclose</i>	<ul style="list-style-type: none"> ▪ ECU Principal Investigator(s) ▪ Other Investigators (others who share responsibility for design, conduct, or reporting of the results of a sponsored project) 	<ul style="list-style-type: none"> ▪ ECU Principal Investigator(s) ▪ Other Investigators (others who share responsibility for design, conduct, or reporting of the results of a sponsored project)
<i>What to Disclose</i>	<p>Significant Financial Interests* (see below)</p> <ol style="list-style-type: none"> 1) That would reasonably appear to be affected by the research (or educational activities) funded or proposed for funding; or 2) Are in entities who financial interests would reasonably appear to be affected by such activities 	<p>Significant Financial Interests** (see below) related to the Investigator's institutional responsibilities:</p> <p>Teaching/education, research, outreach, clinical service, and University and public service on behalf of the University which are in the course and scope of the Investigator's ECU appointment or employment</p>

<p><i>When to Disclose</i></p>	<ul style="list-style-type: none"> ▪ Prior to submission of competing proposals (new & renewal) ▪ Prior to submission of supplemental funding requests ▪ When a new Investigator joins an ongoing project ▪ Whenever there is a change in an Investigator’s interest <p><i>Note: All positive disclosures must be reviewed and approved prior to acceptance of an award or additional support, and before a new investigator joins an ongoing project.</i></p>	<ul style="list-style-type: none"> ▪ Prior to submission of competing proposals (new & renewal) ▪ Prior to submission of progress reports ▪ Prior to submission of no-cost time extension requests ▪ Prior to submission of supplemental funding requests ▪ When a new Investigator joins a ongoing project ▪ Within 30 days of an Investigator acquiring or discovering a new significant financial interest ▪ At least annually through the life of a PHS-supported research grant/contract <p><i>Note: All positive disclosures must be reviewed and approved prior to acceptance of an award, requests for no cost time extensions or additional support, and before a new investigator joins an ongoing project.</i></p>
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<p>Disclosure Mechanism</p>	<ul style="list-style-type: none"> ▪ ECU Investigators complete project specific disclosure in COI Risk Manager ▪ External Sub-awardees complete form 	<ul style="list-style-type: none"> ▪ ECU Investigators complete project specific disclosure in COI Risk Manager ▪ External Sub-awardees complete Subrecipient COI Certification form on website
<p>Significant Financial Interests</p>	<p>*Significant Financial Interests:</p> <ul style="list-style-type: none"> ▪ Income \geq \$10,000¹ ▪ Equity \geq \$10,000 or 5%² ▪ Director, Officer, Employee, Partner, Trustee, Consultant or Management position (paid or unpaid)³ ▪ Intellectual Property Rights <p><i>Note: Significant Financial interests must be reported for the discloser and his/her spouse or registered domestic partner, and dependent children.</i></p>	<p>**Significant Financial Interests:</p> <ul style="list-style-type: none"> ▪ For a publicly traded entity: Income <u>and</u> Equity $>$ \$5,000⁴ ▪ For a non-publicly traded entity: Income $>$ \$5,000 <u>and/or</u> any equity⁵ ▪ Income from intellectual Property rights $>$ \$5,000⁶ ▪ Travel paid directly by or reimbursed by an outside entity (for the Investigator only)⁷ <p><i>Note: Except for travel, Significant Financial Interests must be reported for the discloser and his/her spouse or registered domestic partner, and dependent children.</i></p>

***Definitions for NSF and other Non-PHS Federal Agencies:**

¹ **Income** including salary or other payments for services including consulting fees, honoraria, reimbursement of expenses (including travel), royalty payments, dividends, loans from an entity or any other payments or consideration with value including payments made to a health science compensation plan during the previous 12 months or anticipated in the next 12 months.

² **Investments/Equity** in the form of stock, stock options, warrants, real estate, loans to or from an entity, or any other investment or ownership interest either exceeding \$10,000 (current market value if publicly traded, otherwise amount of investment) or a 5% ownership interest, for any one enterprise.

³ **Key Position/Management Position** includes any position of management, whether paid or unpaid, including director, officer, partner, trustee, consultant, employee, or board member.

****Definitions for PHS and other non-federal sponsors that adopt the PHS policy:**

⁴ **For a Publicly traded entity: Income** or other payment for services including salary, consulting payments, honoraria, paid authorship or other payments of considerations of value, including payments made to a health science compensation plan AND the value of any **equity interests** including stock, stock options or other ownership interests, as determined by public prices or other reasonable measure of market value during the previous 12 months **which, when aggregated, exceeds \$5,000.**

⁵ **For a non-publicly traded entity: Income** including salary or other payments for services including consulting fees, honoraria, reimbursement of expenses (including travel), royalty payments, dividends, loans from an entity, and any other payments or consideration with value including payments made to a health science compensation plan during the previous 12 months or anticipated in the next 12 months **which, when aggregated, exceeds \$5,000, AND equity interest of any amount**, including, but not limited to stock, stock options, or ownership interest in the entity.

⁶ **Intellectual rights and interests:** Income received during the previous 12 months that exceeds \$5,000 for royalty, license fees, etc. (does not include payments from The Regents).

⁷ **Travel:** The occurrence of any sponsored or reimbursed travel, whether payment was made to the Investigator or paid for on behalf of the Investigator, during the previous 12 months.