UCR Procedure for Reviewing PHS Financial Disclosures

A. New Proposal

1. At the time of the completion of the application, all Investigators’ ¹ must complete, sign, and submit the Financial Disclosure for PHS-Funded Research (Form 500) with the electronic Campus Approval Form.

2. At the Just-in-Time stage of awarding process:
   - Conflict of Interest staff will verify that each Investigator has completed the NIH-compliance training about the PHS financial conflicts of interest policy. (This is required prior to engaging in research related to any PHS-funded project and at least every 4 years.)
   - Conflict of Interest (COI) staff will contact Investigators who have disclosed any significant financial interests (SFI) to request the submission of the PHS Appendix (Form 510). The Research and Economic Development Office (RED) COI Designated Official and/or Conflict of Interest Committee (COIC) will review the Form 510 to determine whether or not the SFI is related to the PHS funded research project.

3. If it’s determined that there is a SFI related to the PHS funded research, the COI staff will contact the Investigators who have the SFI related to the PHS funded research project to request the submission of PHS Addendum (Form 520) for COIC review.

4. The COIC will determine whether there is a financial conflict of interest issue, based on documentation provided by the designated Campus Official, and makes a final recommendation to the Vice-Chancellor for Research and Economic Development (or designee) about whether any conditions or restrictions should be placed on the project to eliminate or manage the Financial Conflict of Interest.

5. If the COIC determines there is a Financial Conflict of Interest, the COIC shall develop a Management Plan specifying actions required to manage the Financial Conflict of Interest, how the plan will safeguard objectivity in the research activity, confirms the investigator’s agreement to the plan, and specify the way in which the Investigator’s compliance with the management plan shall be monitored.

6. RED shall provide to the PHS funding agency an initial report regarding Investigator Financial Conflict of Interest.

¹“Investigator” means the project director or principal investigator and/or any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded by the PHS (e.g., NIH), or proposed for such funding.
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B. Disclosure Requirements during the Award

1. Throughout the period of the PHS research award, Investigator(s) must disclose to the RED COI Staff their SFIs, and those of their spouse or registered domestic partner and dependent:
   - Within 30 days of discovering or acquiring any new SFI (Using the Form 500);
   - and
   - At least annually throughout the period of the award.

C. Non-Competing Continuation Awards (For awards with initial start date prior to August 24, 2012. These awards were under the PHS 1995 regulations. All non-competing continuation awards with an award date of August 24, 2012 or after are subject to the PHS 2011 Revised Regulations.)

1. RED will notify all Principal Investigator’s that have non-competing continuation awards to be awarded within 30 days and request the PI and Investigator’s on the project complete the Financial Disclosure for PHS-Funded Research (Form 500).

2. Conflict of Interest (COI) staff will contact Investigators who have disclosed any significant financial interests (SFI) to request the submission of the PHS Appendix (Form 510). (Please see Section A (New Proposal) and follow steps 3-6).

D. ANNUAL DISCLOSURES.

Procedure Under Review (Coming Soon)