

**UC San Diego**

**RESEARCH COMPLIANCE AND INTEGRITY**

## **Conflict of Interest (COI) Office**

ORUBA

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**Director**

**UC San Diego**

## THE ROLE OF THE CONFLICT OF INTEREST OFFICE



The role of the UC San Diego Conflict of Interest Office, also known as the COI Office, 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, staff and students
- Ensures compliance with all applicable regulations
- Serves as a resource to University faculty, staff, students and institutional offices



## UNIVERSITY EMPLOYMENT COI

- Faculty APM 025/671: Conflict of Commitment
  - Not managed by the COI Office
- Staff Conflict of Interest:
  - PPSM-82
- Provide guidance for COI
  - Starting companies
  - Consulting with companies



## WHEN ARE CONFLICT OF INTEREST (COI) DISCLOSURES REQUIRED?

### COI 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 Agreements Unfunded Agreements Subrecipients

\* 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

## WHEN AND WHO MUST DISCLOSE FOR COI?

Funding Entity	Common Sponsors	When to Disclose	Who Must Disclose
Public Health Services (PHS)	NIH or those 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
Federal Non-PHS*	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
Non-Federal*	Non-Profit For-Profit	Initial submission, Additional funding, Renewal proposal 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).

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

## COI DISCLOSURE DETERMINATION

Who is the Sponsor?	Which Disclosure Form?	What to Disclose?	Who decides if the research and the interests are related?
Public Health Services (PHS) (i.e. NIH and those who have adopted PHS)	PHS	Disclose all interests related to the discloser's Institutional Responsibilities*	Institution
Federal Non-PHS (i.e. NSF, CIRM, UC Programs)	9510	Disclose any interests related to the work to be conducted under the proposed project	Discloser
Non-Federal (For-Profit or Non-Profit)**	700U	Disclose any interests with the sponsor(s)	Institution

\* 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 projects, etc.)



## INITIAL SUBMISSION OF COI DISCLOSURE FORMS

PHS Form submitted at time of proposal and supplement at NOA  
9510 and 700U must be completed, signed and dated at time of proposal

Sponsor	Disclosure Form Required with Initial Proposal Submission	Additional Form Required if Positive	When does COI Office review?
Public Health Services (PHS) (NIH and those who have adopted PHS)	PHS form	Supplement	Notice of Award Annually
Federal Non-PHS (NSF, CIRM, UC Programs)	9510	Addendum	Proposal submission
Non-Federal (For-Profit or Non-Profit)**	700U	Addendum	Proposal submission

## REMINDERS

- Special review line in ePD AND email completed, signed and dated COI Disclosure forms to [coiforms@ucsd.edu](mailto:coiforms@ucsd.edu) with ePD #
- STTR/SBIR if a University researcher wants to be the PI for the Company, contact the COI Office
- Disclose financial interests including foreign Universities and foreign governments consistent with the regulations of the applicable COI form
- Researchers need to provide updates of financial interest within 30 days
- COI question for interests with Subrecipients in Marketplace



## COMMUNICATIONS

- Research Compliance and Integrity Helpline: (858) 822-4939, [rci@ucsd.edu](mailto:rci@ucsd.edu)
- Conflict of Interest Helpline: (858) 534-6465, [info-coi@ucsd.edu](mailto:info-coi@ucsd.edu)
- Export Control Helpline: (858) 246-3300, [export@ucsd.edu](mailto:export@ucsd.edu)
- IACUC Helpline: (858) 534-6069, [iacuc@ucsd.edu](mailto:iacuc@ucsd.edu)
- Hot Topics and Newsletters:



- Website: <http://blink.ucsd.edu/sponsor/rci/news.html>
- To be added to the RCI list serv, please email [rci@ucsd.edu](mailto:rci@ucsd.edu)

# CONTACT THE CONFLICT OF INTEREST (COI) OFFICE

Email Questions: [info-coi@ucsd.edu](mailto:info-coi@ucsd.edu)  
Email COI Forms: [coiforms@ucsd.edu](mailto:coiforms@ucsd.edu)  
Telephone: (858) 534-6465  
COI Website: <http://coi.ucsd.edu>



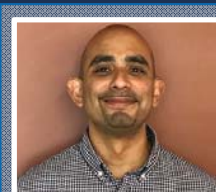
Jennifer Patterson

PHS Support



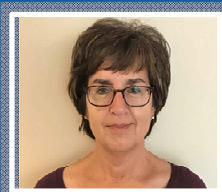
Xuemei Wang

PHS Support



Albert Carazolez

Non-PHS and 700U  
Support



Dena Demos

COI forms intake



Jennifer Ford

Director