



# **Disclosure of Financial Interest in Sponsored Research**

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# Overview of Disclosure Requirements

**Public Health Service/NIH, National Science Foundation, WFO from Sponsor w/funding from PHS/NIH or NSF, UC Discovery Grants & UCOP Special Research Programs, American Heart Association, American Cancer Society**

- **PI and anyone responsible for the design, conduct and/or reporting of research (NIH key personnel) must disclose financial interests related to the proposed research**

- **Disclosure is made using DFI (“Disclosure of Financial Interest) form series. DFI-1 lists personnel, DFI-2 is individual disclosure of whether or not a researcher has a financial interest to disclose, DFI-3 only required if individual has interests to disclose**

**Privately Funded Research/State of California requirement**

- **PI must disclose financial interests in the sponsor of the research**
- **Disclosure is made using 700-U form (a State of CA form)**



# Process Reminder

- Both kinds of disclosures must be submitted at the same time as the research proposal.
- Disclosures must be sent to RIIO, MS 50A4119 [coi@lbl.gov](mailto:coi@lbl.gov). Note that 700-U forms require an original signature (DFIs may be emailed). Copies should go to OSPIP with the proposal.
- It is very important that submission and certification dates, and the COI review factor checkbox in RAPID, are accurate and complete. This information is the basis for RIIO's ability to ensure that all required disclosures have been received and reviewed.



# Update

- DFI series was recently updated to comply with policy, including removal of reference to human subjects research.
- Updated forms are available at <http://www.lbl.gov/Workplace/RIO/coi/index.html#forms>
- Always refer to RIO website for current version of forms!
- Disclosure of financial interests in human subjects research is managed by the Human and Animal Regulatory Committee; forms for this process are available on HARC's website. Note that RIO is still responsible for review of any positive disclosures of financial interest in human subjects research.



# Preview of Coming Attractions

PHS has revised rules\* governing disclosures of financial interest. Biggest changes will include:

- Lowering the threshold for disclosure to **\$5k of income** (from the current \$10k), or equity of **any** value
- Shifting the decision of what constitutes a “related” interest to the institution (from the researcher); e.g. researchers must disclose **all** interests, not just “related” ones

\* exact implementation date TBD