Research Administrators Forum

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Implementation at UCLA

- Applies to research supported by the National Institutes of Health and other PHS agencies
- Also applies to research supported by non-profits that have adopted the PHS COI regulations
- UCLA Policy 926 will be issued to implement the PHS regulations
Applies to:

- All PHS proposals that are submitted on or after August 24, 2012 are subject to these regulations
- The regulations also apply to all awards issued on or after August 24, 2012
- Awards that are ongoing as of August 24, 2012 will become subject to the revised regulations when additional funds are requested through submission of a progress report, application for supplemental funding or request for no-cost extension
Disclosures

- The regulations require that investigators disclose Significant SFIs:
  - Those that meet the definition of SFI, and
  - Are related to the investigator’s institutional responsibilities

- “For the purposes of this policy, the term institutional responsibilities is defined as “teaching/education, research, outreach, clinical service, and University and public service on behalf of the University of California which are in the course and scope of the Investigator’s UC appointment/employment” (UC and UCLA definition)

- Disclosures will be made via the electronic Disclosure Gateway (eDGE)

- By law, the PI and other Investigators must disclose their significant financial interests (as defined under the regulations) to UCLA before a proposal can be submitted
Disclosures are Required for:

- All research awards, including some types of projects that previously did not require disclosure, such as conference, equipment or training grants.
- To determine if a project requires disclosures, see the Activity Codes, and descriptions of funding found at [http://grants.nih.gov/grants/funding/ac_search_results.htm](http://grants.nih.gov/grants/funding/ac_search_results.htm).
- Disclosure is required for projects with a D, F, K, L, M, P, R, S, or T prefix
- Disclosure required for many, but not all, with a U prefix
- Disclosure probably not required for a C, G, H, I, V, or X prefix, unless UCLA is a subrecipient conducting a research component
- Contact RPC if you are unable to determine if disclosure is required
UCLA Reviews

- Requires that UCLA engage in a two-step review of disclosed financial interests to determine:
  - if any disclosed significant financial interest is **related to the PHS-funded research** (*could be affected by the research or is in an entity whose financial interest could be affected by the research*), and then
  - if any disclosed significant financial interest constitutes a **financial conflict of interest** (*a significant financial interest that could directly and significantly affect the design, conduct, or reporting of PHS-funded research*)
Electronic Disclosure Gateway (eEDGE)

- Demonstration
- Contact RPC with Questions:
  - eEDGE Help Desk – 310-206-8546