
April 19, 2016

To: Conflict of Interest Coordinators

Subject: Interim Process for Disclosure and Review of 700-U Disclosure Forms

Purpose

This Interim Guidance Memorandum is intended to notify the campuses about pending revision of University policies pertaining to disclosure and review of 700-U forms (including, University Policy on Disclosure of Financial Interest in Private Sponsors of Research (also issued as Academic Personnel Manual Section 028), Disclosure of Financial Interests and Management of Conflicts of Interest, National Science Foundation Awards, and other local campus policies and procedures).

Background

Effective July 22, 2105, the Fair Political Practice Commission (FPPC) made a number of changes to its regulations. These revisions include the repeal of references to independent substantive review of 700-U forms.

As revised, the FPPC regulations still require those with principal responsibility for a research project to complete a 700-U form if their research is supported by non- governmental entities that are not exempt from triggering the review requirement as set forth in 2 CCR Section 18755.

Prior to its repeal in July 2015, 2 CCR 18702.4(c)(2) was the regulatory basis for University policy requiring review of Form 700U disclosures by University of California campuses. However, as revised, the regulations no longer require independent substantive review of 700-U forms.

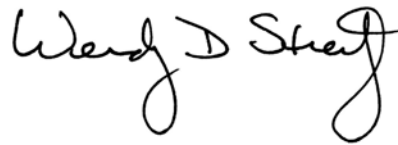
In the wake of this FPPC regulatory change, the University will initiate a process to review and possibly revise its current policies pertaining to the disclosure and independent substantive review of decisions to undertake research supported by non-governmental entities as set forth in 2 CCR Section 18755. This process will examine the policy reasons for continuing, revising, or discontinuing campus review of economic interest disclosures from Principal Investigators whose research is supported in whole or part by non-governmental sponsors. I anticipate the review and revision process to be completed by Fall 2016.

Pending this policy review and revision, with the concurrence of the Council of Vice Chancellors for Research and Provost Dorr, review of 700-U disclosures will continue to take place according to existing UC policy.

Until further notice, existing review requirements remain in effect.

Contact

Jeff Hall
Jeff.Hall@ucop.edu
(510) 987-0688

A handwritten signature in black ink, reading "Wendy D. Streit". The signature is fluid and cursive, with the first and last names being more prominent than the middle initial.

Wendy D. Streit
Executive Director
Research Policy Analysis & Coordination