ALL UA INVESTIGATORS (see policy definition of investigator - note: not related to faculty status): [http://orcr.arizona.edu/coi/uapol/investigator#definitions](http://orcr.arizona.edu/coi/uapol/investigator#definitions)

Required Training: Initial training by January 1, 2013, and once every 4 years.
[http://orcr.arizona.edu/coi/training](http://orcr.arizona.edu/coi/training)

Required financial disclosure of SFI (see policy definition of significant financial interests):
[http://orcr.arizona.edu/coi/forms](http://orcr.arizona.edu/coi/forms)

• Initial annual disclosure by January 1, 2013; and
• Within 30 days of acquiring SFI not previously disclosed; and
• As may be required by IRB.

UA INVESTIGATORS FUNDED BY PHS on or after 8/24/12 (INCL NIH, excluding Phase I SBIR/STTR)

Required training: Initial training by January 1, 2013 or before new or continued access to PHS funds, whichever is earlier, and once every four years.

Required financial disclosure of SFI: As for all UA investigators; and

• At least 45 days before access to new award funds or by 9/15/2012, whichever is later; and
• At least 45 days before joining an ongoing project or by 9/15/2012, whichever is later; and
• At least 105 days before the start of the new budget period or 9/15/2012, whichever is later;

• SFI includes certain travel sponsorship/reimbursements

Extra procedures/penalties for late disclosures of Financial Conflict of Interest (FCOI - see policy definition): bias assessment review and report to PHS/NIH

SENIOR/KEY PERSONNEL (in the PHS-funded subset) Financial Conflict of Interest (FCOI - see policy definition) information accessible by request to UA from the public (UA must provide response to requests for this information)