**COIAC Review Guidelines**

**Version 1: 2/2/22**

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**What must be disclosed based on sponsor type?**

- **Public Health Service**
  - Income and/or equity in a publicly-held entity exceeds $5,000; OR
  - Income or any amount of equity in a privately-held entity exceeds $5,000; AND/OR
  - Income from intellectual property rights exceeds $5,000 in the previous 12 months, excluding royalties received from the University of California Regents.

- **National Science Foundation**
  - Income exceeding $10,000 from either a publicly traded, private or non-profit entity;
  - Equity exceeding $5,000 or 5% of the value of the entity;
  - Any intellectual property not held by the UC Regents.

- **Government**
  - Income and/or equity in publicly-held entity exceeds $40,000; OR
  - 5% ownership interest in any entity;
  - A management position, whether paid or unpaid, such as a board member, director, officer, partner, or trustee, held by the investigator;
  - Intellectual property interest in the form of a patent, patent application or copyright held by the Investigator, assigned or to be assigned to a party other than The Regents.

- **Private**
  - Board member, consultant or has a management position with the sponsor;
  - Equity exceeding $2000 or more in the sponsor;
  - Income or loans from the sponsor exceeding $500;
  - Gifts exceeding $50 in value;
  - The entity has sponsored travel exceeding $500 in income or gifted more than $50 in travel costs to the investigator;
  - Anything that meets the PHS threshold.

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**Does a related* disclosure require a management plan?**

- Yes. Anything that meets the PHS, NSF, or government threshold must be managed if related.

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**Does the disclosure need to go to the COIAC for review?**

- Yes, unless one or more of the following conditions are met:
  1. The study at issue is not a UCSF research project funded by the Public Health Service (PHS) or PHS agencies.
  2. The value of the investigator’s interest is less than $10,000 and the investigator owns less than 5% ownership equity; or the interest disclosed is greater than $10,000 or a greater than 5% equity interest, but the investigator’s role in the study is tangential or very minimal.
  3. A disclosure is very similar to an existing, COIAC-approved disclosure, and the management plan would be the same.
  4. The COIAC Administrator and Chair determine there are other reasonable circumstances for administrative approval, including indirect relationship with potential conflict.

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*A financial interest is related to the research if either of the following conditions apply:

- The value of the interest (e.g. material or intellectual property) could be affected by the outcome of the project.
- The investigator has financial interests in an entity of which the value could be affected by the outcome of the project.*