

### UCSF Guidelines on Conflict of Interest

#### Pertaining To Receiving/Disbursing Research Funds

1. When a faculty member accepts a full time appointment at the University of California it is understood that he or she will accord the University his or her primary professional effort and will arrange outside professional obligations, financial interests, and activities so as not to conflict or interfere with this commitment to the University.
2. Faculty with a management or a financial interest or relationship in a commercial entity that could pose a real or potential conflict of interest will disclose that relationship to the Department Chair.
3. A potential conflict of interest exists when a faculty member:
  - A. Receives research funding from an entity, and he/she or his/her spouse or dependent child:
    1. Serves as a director, officer, partner, trustee, employee, or holds a position of management with the entity funding his/her research;
    2. Has an investment (including, but not limited to, stock options) in this entity;
    3. Receives income, including salary, which is not paid through the University, or consulting fees from this entity;
    4. Has received personal gifts of \$50 or more from this entity; or
    5. Has an outstanding loan with this entity;

-OR-

- B. Receives research funding from PHS (is this defined somewhere else in this document?) or NSF (is this defined somewhere else in the document?) and he/she, or his/her spouse or dependent child has a financial relationship valued at over \$10,000 in monetary value or 5% equity in a company which would reasonably appear to be related to his/her research.
4. A potential conflict of interest exists if an investigator disburses research funds to an entity in which he/she, or his/her spouse or dependent child, has a financial interest or relationship.
5. All potential conflicts of interest shall be reviewed by an independent substantive review committee known at UCSF as the Chancellor's Conflict of Interest Advisory Committee, prior to acceptance/disbursement of any research funds.

6. The Chancellor's Conflict of Interest Advisory Committee shall review all sponsored research agreements, research gifts or consulting agreements where there is a potential conflict of interest, using the definitions set forth in University Policy on Disclosure of Financial Interest in Private Sponsors of Research<sup>1</sup> (dated April, 1984) or in accordance with the University of California Policy on Disclosure of Financial Interests and Management of Conflicts of Interest Related to Sponsored Projects.<sup>2</sup> Each disclosure shall be reviewed on a case by case basis using the University of California Guidelines on University-Industry Relations,<sup>3</sup> issued in May, 1989 as a guide and paying specific attention to the following criteria: an open academic environment is maintained, freedom to publish and discuss research results is not compromised, and the intellectual freedom of students is protected; fair licensing practices are employed; and the use of University facilities and resources is appropriate.
7. In situations where a faculty member has a conflict of interest in the research, and this conflict is deemed acceptable by the University, the faculty member shall disclose his or her relationship with the sponsor in any publications emanating from this research and in public discussions of the research.
8. Faculty and administrators shall withdraw from any decisions by the University or the sponsor affecting the University in regard to a company in which they or their family members have a financial interest or relationship.
9. Any faculty member who serves on the Board of Directors of a for-profit company shall not be permitted to receive research funding from that company. This section does not apply to contracts and grants under the federal SBIR/STTR programs.
10. Any faculty member who has an investment in a company, which is more than five percent (5%) of the total value of the company, shall not be permitted to receive research funding from that company. This section does not apply to contracts and grants under the federal SBIR/STTR programs.
11. Faculty who have, or participate in, a privately sponsored clinical study shall not concurrently receive any compensation from the sponsor, including honoraria and consulting fees, during the course of the study. In addition, they shall not have any investment in, or serve in a decision-making capacity for (such as service on the Board of Directors or management committee), or be an officer or employee of the company sponsoring the study.

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1 Web link: [www.ucop.edu/academic-personnel/files/apm/apm-028.pdf](http://www.ucop.edu/academic-personnel/files/apm/apm-028.pdf)

2 Web link: [www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/index.html](http://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/index.html)

3 Web link: [www.ucop.edu/raohome/cgmemos/89-20.html](http://www.ucop.edu/raohome/cgmemos/89-20.html)