Potential COI Management Scenarios for Human Subjects Research

- **Outside Professional Activities with Sponsor of Research**
  - ≥$5,000 in aggregate within 1 year of FIR review
  - Disclosure in publications/presentations and to study personnel; recommend disclosure in ICF to IRB; may require cap on consulting

- **Licensed IP Used in Research**
  - ≥$5,000 in aggregate within 1 year of FIR review
  - Disclosure in publications/presentations and to study personnel; recommend disclosure in ICF to IRB
  - Disclosure in publications/presentations and to study personnel; recommend disclosure in ICF to IRB; no subject recruitment or access to identifiable data; alternate contact for study personnel

- **Officer/Director for Company Sponsoring the Research**
  - ≥$5,000 in aggregate salary* within 1 year of FIR review
  - Disclosure in publications/presentations and to study personnel; recommend disclosure in ICF to IRB; no subject recruitment or access to identifiable data; alternate contact for study personnel

- **Equity Interest in Company Sponsoring or Subcontracting the Research**
  - ≥$5,000 in aggregate salary*, >3% value*, or any percentage value in a start-up within 1 year of FIR review
  - Disclosure in publications/presentations and to study personnel; recommend disclosure in ICF to IRB; alternate VCU PI; divestiture to <$5,000 for duration of study

- **Non-Public Company**
  - Disclosure in publications/presentations and to study personnel; recommend disclosure in ICF to IRB; alternate VCU PI; no recruitment or access to identifiable data; alternate contact for study personnel

- **Public Company**
  - Disclosure in publications/presentations and to study personnel; recommend disclosure in ICF to IRB; alternate VCU PI; divestiture to <$5,000 for duration of study

*State-prohibited contract requiring recommendation of C 8. exception
Potential COI Management Scenarios for Non-Human Subjects Research

- **Outside Professional Activities with Sponsor of Research**
  - ≥$5,000 in aggregate within 1 year of FIR review
  - Disclosure in publications/presentations and to study personnel

- **Licensed IP Used in Research**
  - ≥$5,000 in aggregate within 1 year of FIR review
  - Disclosure in publications/presentations and to study personnel

- **Officer/Director for Company Sponsoring the Research**
  - ≥$5,000 in aggregate salary* within 1 year of FIR review
  - Disclosure in publications/presentations and to study personnel; publication oversight; alternate VCU PI; alternate contact for study personnel

- **Equity Interest in Company Sponsoring or Subcontracting the Research**
  - ≥$5,000 in aggregate salary*, >3% value*, or any percentage value in a start-up within 1 year of FIR review
  - Disclosure in publications/presentations and to study personnel; alternate VCU PI; divestiture to <$5,000 for duration of study

*State-prohibited contract requiring recommendation of C.B. exception