COIC Management Scenarios

*Possible management elements subject to individual circumstances*

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Outside professional activities with company sponsoring the research

E.g. consulting/providing professional advice, scientific advisory board

≥$5,000 in aggregate/year

NO

YES

No COI

Possible CI if HSR

HSR: COI

Disclosure in publications/presentations and study personnel; recommended disclosure in ICF; consulting caps

Non-HSR: COI

Disclosure in publications/presentations and study personnel

Outside professional activities with company sponsoring the research

IP owned by VCU used in research

Not reportable to the NIH

Individual receipt of license-related payments ≥$5,000 in aggregate

NO

YES

No COI

Possible CI if HSR

HSR: COI (and possible ICOI)

Disclosure in publications/presentations and study personnel; recommended disclosure in ICF

Non-HSR: COI

Disclosure in publications/presentations and study personnel

See the *Conflicts of Interest in Research* policy for definitions.
IP not owned by VCU used in research

Individual receipt of license-related payments ≥$5,000 in aggregate

NO

HSR: COI
Disclosure in publications/presentations and study personnel; recommended disclosure in ICF; alternate PI; no recruitment or access to identifiable data; alternate contact for study personnel

Non-HSR: COI
Disclosure in publications/presentations and study personnel; publication oversight; alternate PI; alternate contact for study personnel

YES

No COI
Possible CI if HSR

Officer or director for company sponsoring the research

≥$5,000 in aggregate/year

NO

Possible CI
Disclosure in publications/presentations and study personnel; recommended disclosure in ICF if HSR

HSR: COI*
Disclosure in publications/presentations and study personnel; recommended disclosure in ICF; alternate PI; no recruitment or access to identifiable data; alternate contact for study personnel

Non-HSR: COI*
Disclosure in publications/presentations and study personnel; publication oversight; alternate PI; alternate contact for study personnel

YES

State-prohibited contract requiring recommendation of C.8. exception
Equity interest in public company sponsoring the research

≥3% value or $5,000 in aggregate/year

NO

Yes

No COI
Possible CI if HSR

HSR: COI*
Disclosure in publications/presentations and study personnel; recommended disclosure in ICF; alternate PI; divesture to <$5,000 for duration of study

Non-HSR: COI*
Disclosure in publications/presentations and study personnel; alternate PI; divesture to <$5,000 for duration of study

Equity interest in non-public company sponsoring the research

≥3% value or $5,000 in aggregate/year

NO

Yes

Possible CI
Disclosure in publications/presentations and study personnel; recommended disclosure in ICF if HSR

HSR: COI* (and possible ICOI)
Disclosure in publications/presentations and study personnel; recommended disclosure in ICF; alternate PI; no recruitment or access to identifiable data; alternate contact for study personnel

Non-HSR: COI*
Disclosure in publications/presentations and study personnel; publication oversight; alternate PI; alternate contact for study personnel

*State-prohibited contract requiring recommendation of C.8. exception