

Individual Conflict Management Plans

The following chart indicates the applicable conflict management plan (CMP) based on the financial interests of the individual and the nature of the related research that creates a potential conflict of interest (COI). Potential COIs require review by the Conflict of Interest Division (COID), the supervisor of the conflicted investigator or the Conflict of Interest Committee (COIC). When a COI can be successfully managed, the applicable Standard or PI-Exclusion CMP will be executed, with modifications as necessary.

This chart addresses individual COIs. A potential institutional conflict of interest (ICOI) may exist when the University of Pittsburgh has certain financial interests in University research. ICOIs are reviewed by the Institutional Conflict of Interest Committee (ICOIC) and are subject to separate institutional CMPs.

Individual Financial Interests	Related Research		
	None	Human Subject	Non-Human Subject
Remuneration Only from Any Entity not exceeding \$10,000	N/A	N/A ¹	N/A ¹
Remuneration Only from Any Entity greater than \$10,000 but not exceeding \$20,000	N/A	Standard	Standard
Remuneration Only from Any Entity greater than \$20,000	N/A	PI-Exclusion ²	Standard
Equity in plus Remuneration from a Public For-Profit Entity in aggregate not exceeding \$10,000	N/A	N/A ¹	N/A ¹
Equity in plus Remuneration from a Public For-Profit Entity in aggregate greater than \$10,000 but not exceeding \$20,000	N/A	Standard	Standard
Equity in plus Remuneration from a Public For-Profit Entity in aggregate greater than \$20,000 or 5%	N/A	PI-Exclusion ²	Standard
Equity in a Private For-Profit Entity	N/A ³	PI-Exclusion ²	Standard
Management, Officer, or Board Position in a Nonprofit Entity	N/A	N/A	N/A
Management, Officer, or Board Position in a Public or Private For-Profit Entity	N/A ³	PI-Exclusion ²	Standard ⁴
Inventor of Intellectual Property and Receipt of Royalty or Other Payments that exceed \$10,000	N/A	PI-Exclusion ^{1, 2}	Standard ¹
Reimbursed or Sponsored Travel from Any Entity with amounts that are proportional to the disclosed outside activity	N/A	N/A	N/A
Reimbursed or Sponsored Travel from Any Entity with amounts that are not proportional to the disclosed outside activity	N/A	Review on a case-by-case basis	

¹ When 1) remuneration only, 2) equity in plus remuneration, or 3) intellectual property royalty or other payments exceed \$5,000 and the related research is funded by the Public Health Service (PHS), a CMP may be required when a financial conflict of interest exists, as defined by PHS regulations and University Policy RI 01.

² An exception to the PI-Exclusion CMP requirement may be made in rare occasions and generally when the human subject research entails no more than minimal risk. Any exceptions are subject to review and approval by the Conflict of Interest Committee (COIC) and, in some instances, the Senior Vice Chancellor for Research (SVCR).

³ When a University Member holds an equity interest in a private for-profit entity or a management, officer, or Board of Directors position in a public or private for-profit entity, Equity or Fiduciary Guidelines will be required. When a Standard or PI-Exclusion CMP is applicable, these Guidelines will be referenced within and required as part of the CMP.

⁴ Execution of a Standard CMP requires review by the COIC and approval from the SVCR. If approval is denied, the PI-Exclusion CMP is applicable.