CONFLICT OF INTEREST (COI) DETERMINATIONS

The following table outlines rationale that may be used to guide decision making around COIs and management plans. Final determinations are made on a case-by-case basis between the COI Officer and the disclosing individual.

		<u>Threshold</u>
\downarrow	No determination of a COI when only one of the following exists	
\downarrow	Royalties for books or other authorship	< \$5,000
↓	Travel for professional societies, service on advisory boards, or direct payment through Harvard sponsored research award	> \$0
4	Patent application with no licensing agreement	\$0
4	Compensation	< \$5,000
\downarrow	Equity (public or private entity)	< \$5,000
\	Typically no COI when only one of the following exists	
↓	Royalties for books or other authorship	≥ \$5,000
↓	Royalties for inventions handled through Harvard's Office of Technology Development (OTD) when IP is not related to existing sponsored research	≥ \$5,000
↓	Compensation for non-profit advising (e.g., honoraria, advisory board, consulting payments)	≥ \$5,000
↓	Licensing/royalties for IP used by but not evaluated in sponsored research	≥ \$0
+	Potential COI determination and management plan needed when financial interest is related to sponsored research and one or more of the following exist	
\downarrow	Licensing/royalties for IP evaluated or enhanced by sponsored research	≥ \$0
\downarrow	Compensation for a for-profit entity (e.g., honoraria, advisory board, consulting payments)	≥ \$5,000
\downarrow	Equity (public or private entity)	≥ \$5,000
4	Board service (e.g., founder of startup company)	≥ \$0