These minutes are intended to provide a summary of action & follow up items; a few discussion highlights are included.

RESEARCH ADVISORY GROUP (RAB)
December 3, 2013  8:30-10:00 a.m.  S-30

Coordinator: Jamie Antonazzo  Guests: Eileen Kahaner, Eric Mah, Teresa Konstantinidis

Presentations:
Recommendations from the IDC Waiver Policy Task Force  Paul Volberding

The IDC Waiver Policy Task Force was created to develop a UCSF-specific Waiver Policy, implementation guidelines and procedures, and to develop methods for determining the level and source of institutional support for all large grants, ensuring alignment of policies for grants and gifts. This became necessary after UCOP announced that there would be no university-wide policy in regards to indirect cost recovery or for the waivers for grants that do not bring this in.

The rationale for approaching the issue focused on UCSF’s 10-year operating projections, which show near-term deficits. Despite anticipated recovery in later years (largely due to philanthropy), UCSF is losing approximately $75M/year in indirect costs not covered by non-federal awards, and the group sought out ways to recover this.

The two major changes recommended by the task force are as follows:
1. A large reduction in the number of proposals requiring a waiver – government sponsors or non-profit sponsors with a published F&A policy will no longer require waivers
2. The establishment of an infrastructure charge equivalent to the assessment on gifts for not-for-profit awards that provide less than a set minimum for indirect costs. The requirement will be for someone (the school, department, division, or individual) to pay the difference between what is paid by the sponsor and the set minimum. The plan is to start at a minimum rate of 10%. If all grants currently funded with less than 10% of indirect costs now carried this minimum, this would provide additional revenue of $3 million/year.

Paul also presented details on additional specific recommendations of the task force, and this information can be found in the slide deck. Highlights include:

1. Specific rates will not be included in the formal policy, as they are subject to change and would require a policy revision every time there is a rate change.
2. Consistent criteria will be created that will be used consistently to assess whether a waiver request should be granted, based on risk, and taking into account whether or not the research is of mission-critical value to UCSF.
3. Authority to approve waivers will be aligned with the responsibility to cover shortfalls. Control points (schools and departments) would be empowered to target F&A yield, with the rationale being that the control point is familiar with area-specific projects and funding mechanisms, is already accountable for achieving space-based indirect recovery cost goals, and is able to engage with faculty as partners in this process. In situations where PIs and control points do not agree, PIs would have the ability to appeal to a higher authority (EVCP, Chancellor).
4. An exception from the minimum infrastructure rate would be created for career development awards and fellowships.

Discussion:
• In regards to budget projections, has any room for NIH increases or decreases in funding percentiles been figured in? Yes, a lot of time is spent factoring in the numbers for research and for the early years the numbers used are very conservative.
• If we collectively pull in more NIH money, does this help or hurt us when it comes to the university budget as a whole? It helps.

Charge to the Research Advisory Group (RAB)
• To provide input to the Office of Research, and ultimately the EVC&P, about the needs of investigators and administrators in conducting research and administering extramural funds.
• To guide priority setting and critical assessment of quality improvement efforts in the Office of Research
• To work with the Office of Research staff to ensure the successful implementation of the current Quality Improvement Project
These minutes are intended to provide a summary of action & follow up items; a few discussion highlights are included

- The group discussed the decline in state funding - while critically important for smaller schools, in the context of academic medical centers such as UCSF it is a very small percentage of the total budget (5%), which is why the search for funding has been shifted to other areas.
- The group discussed data which show that the vast majority of current active awards with less than 10% IDC are submitted by full professors, and not younger professors, which allays some concerns about this.
- The group expressed concern about the control points making decisions on waivers – even though PIs can appeal to a higher authority, the chances support would be given to something without the dean’s support seems unlikely. Susanne explained that the rationale is that in the event of a disagreement, someone needs to be willing to convince higher authority that the grant is mission critical, which is not very different from what occurs now.
- Is there institutional knowledge about the benefit of seed grants? This could be critical for a PI making their case about a particular grant’s future benefits. Yes, we have this information, specifically from the Research Allocation Program (RAP), and it could certainly be shared.
- A comment was made about how with K99 and R00 grants, full indirect costs have to come out of total budget, which makes a large difference when recruiting younger faculty. It would be great to have a UCSF policy regarding this.
- Should we start disseminating this information? Yes, and pass along any feedback received. Members of the task force will be visiting many groups in the coming weeks and months to present this information as well.
- What is the implementation start date? The current target is July.

**Next Steps:** The group will leave time at the next meeting to continue the discussion of indirect cost waivers.

**PRESENTATION: Physician Payment Sunshine Act**

Eileen Kahaner/Eric Mah

Eric and Eileen discussed the Sunshine Act, the new federal law that requires manufacturer reporting of payments and ownership interests of essentially any kind (over $10). The reporting period began in August, 2013, and information will be displayed via a searchable database on the Centers for Medicare and Medicaid Services (CMS) website in September 2014 and on an annual basis thereafter. CMS is not responsible for the accuracy of the information represented. Individuals have the right to review and challenge reports that are false, inaccurate or misleading, but once the information is published, it will remain on the website during the dispute process.

Some of the major challenges with this include the broad scope of reportable relationships, the possibility of payments and categories not matching with other reports, and the fact that the data accuracy is under manufacturer control. Further complications include the fact that state reporting periods do not match federal requirements.

The Office of Ethics and Compliance is working on ways to help individuals with this process, and eventually hopes to create an electronic system with a simple user interface that would assist with this and other compliance and regulatory requirements. The Conflict of Interest (COI) Smart tool is seen as a short-term solution, and Eric and others are working with the SOM to develop a single system which will be able to handle PHS, Departmental, and State reporting, though this will take a considerable amount of time to develop.

The Office of Ethics and Compliance encourages individuals to keep careful track of outside income activity, and to seek manufacturer input regarding categorization of transfers of value. Some manufacturers are already making this information available. In the future, CMS will also allow individuals to register to be notified when new information about an individual has been received, but there would be no central registration. Instead care providers would have to register separately with every relevant manufacturer.

The Office of Ethics and Compliance is also working on expanding opportunities for UCSF to be a party to consulting agreements, including professional service agreements, Advisory Boards, etc. This will allow UCSF to continue to encourage these partnerships while managing the new reporting requirements.

**Discussion:**

Charge to the Research Advisory Group (RAB)

- To provide input to the Office of Research, and ultimately the EVC&P, about the needs of investigators and administrators in conducting research and administering extramural funds.
- To guide priority setting and critical assessment of quality improvement efforts in the Office of Research
- To work with the Office of Research staff to ensure the successful implementation of the current Quality Improvement Project
Research Advisory Group Minutes 12_3_13  Prepared by J. Antonazzo

These minutes are intended to provide a summary of action & follow up items; a few discussion highlights are included

- Are PhDs included as well? No, this is just for MDs, but we do anticipate that other groups such as nurses and PhDs will likely come under similar scrutiny in the near future with the continued push towards transparency.

- The group expressed disappointment that UCOP does not plan on providing any resources to help with this effort. Eric explained that we did push very hard for this, but there was not larger support, likely because we could not get the necessary support outside of the 5 academic medical centers.

- Will legal affairs help with disputes? No, because the disputes would be with individuals and legal affairs represents the university/regents.

- The group expressed concern about not knowing what to report – many times with advisory boards and other opportunities, the funding source is not readily transparent.

- The group recommended that we create a place online to which faculty could be referred, and where they could view a display of the necessary information, ideally including some way for individuals to be aware of what they need to do in order to comply, and whom to contact for more information.

Charge to the Research Advisory Group (RAB)

- To provide input to the Office of Research, and ultimately the EVC&P, about the needs of investigators and administrators in conducting research and administering extramural funds.

- To guide priority setting and critical assessment of quality improvement efforts in the Office of Research

- To work with the Office of Research staff to ensure the successful implementation of the current Quality Improvement Project
UCSF Facilities and Administration Policy and Waiver Implementation

Recommendations from the UCSF IDC Taskforce

For Discussion

Name, Forum, and Date

Background

- UCOP will delegate authority to grant finance and administration (also known as Indirect Costs, or IDC’s) and F&A waivers to the campuses
- UCSF has to develop its own policies and procedures related to F&A waivers
- UCSF Indirect Cost Waiver Policy Taskforce created to form recommendations
- Recommendations and Report created in Summer of 2013

Desired Goals of Today

- Share Recommendations and rationale
- Provide answers to FAQs
- Get your input and take it back to the taskforce before final policy finalization
Situation: Rationale

Overall

• UCSF is a business operating in competitive, market-driven areas
• 10-year operating projections show near term deficits and recovery in latter years
• UCSF is positioned to manage through challenges, yet requires constant vigilance

Research Revenue

• Long-term Federal research funding uncertainties, including sequestration
• Private research funding is not expected to outpace Federal funding in the near term
• Opportunity to grow new strategic programs while protecting critical existing programs will require choices, scenario planning and for each project to contribute to UCSF

Enterprise-wide strategic priorities drive UCSF’s business and financial planning efforts
In the near term, expenses will outpace revenues; but, recovery is possible with careful management.

During this same time period, undesignated campus core fund balances are projected to fall to minimum acceptable levels.
UCSF Indirect Costs: Some Details

FACT:
- In FY 11-12, the cost of supporting research at UCSF was $343 million
- UCSF only received $191.4M to cover those costs
- UCSF is losing approximately $75M/year (amount of indirect costs not covered by non-federal awards)
- Of that, $3M comes from awards with < 10% IDC

UCSF Indirect Costs: Steady Decline

Effective IDC on Total Directs
Trend from 2009-2013

From 2009 to 2013 drop of 3% = $17.6M
**UCSF Indirect Costs: Some Details**

- Current Active Awards with Less than 10% IDC
  - Prof: $5.5M
  - Assoc. Prof: $2.3M
  - Asst. Prof: $350K
  - Fellows: $15K; Other: $200K
- Total: $8.3M forgone IDC for 318 awards

**Comparative Practices**

**Waiver Practices at Peer Institutions: Public and Private**

<table>
<thead>
<tr>
<th>Entity</th>
<th>Waivers</th>
<th>Inst. Pool</th>
<th>Who Approves</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>U Michigan</td>
<td>Yes</td>
<td>No</td>
<td>VP Research</td>
<td>?</td>
</tr>
<tr>
<td>U Virginia</td>
<td>Yes</td>
<td>No</td>
<td>Dept. Chair, Dean or Associate dean, Associate Vice Provost for Research before University Comptroller makes final decision</td>
<td>?</td>
</tr>
<tr>
<td>U Wisconsin</td>
<td>Yes</td>
<td>No</td>
<td>Dir. of Research and Sponsored Programs</td>
<td>Infrequent</td>
</tr>
<tr>
<td>Harvard</td>
<td>Yes</td>
<td>Yes</td>
<td>Dean of each individual school</td>
<td>?</td>
</tr>
<tr>
<td>Stanford</td>
<td>Yes w. min. infrastructure charge</td>
<td>No</td>
<td>Vice Provost, Dean of Research, Dean, Dept. Chair</td>
<td>Rarely</td>
</tr>
<tr>
<td>Hopkins</td>
<td>Yes, but considered cost sharing with offset funding required</td>
<td>No</td>
<td>Research administration and business offices at each school</td>
<td>Negligible</td>
</tr>
<tr>
<td>MIT</td>
<td>No</td>
<td>Yes</td>
<td>N/A</td>
<td>None</td>
</tr>
<tr>
<td>Columbia</td>
<td>Yes, but departments are charged 17.5% assessment on all awards</td>
<td>No</td>
<td>Vice Dean for Administration</td>
<td>?</td>
</tr>
</tbody>
</table>

Source: UCOP Taskforce on Indirect Costs Waivers
UCSF IDC Waiver Taskforce

Charge

- Develop a UCSF-specific Waiver Policy, implementation guidelines and procedures
- Develop methods for determining the level and source of institutional support for all large grants, ensuring alignment of policies for grants and gifts.

Membership

Co Chairs:
Susanne Hildebrand Zanki, Office of Research
Eric Vermilion, Finance

Office of Research: John Radkowski, Erik Lium
Finance and Administrative Services: Nilo Mia
Academic Senate: Sharmila Majumdar, Matt Springer
School of Dentistry: Peter Rechmann, Deborah Greenspan, Stuart Gansky
School of Medicine: Jane Czech, June Chan, Paul Volberding
School of Nursing: Kathryn Lee, Kit Chesla, Patrick Fox
School of Pharmacy: Jim Wells, Stuart Heard
University Development and Alumni Relations: Jennifer Arnett

Guiding Principles: IDC Taskforce Recommendations

1. **Mission-Critical**: Work for which waivers are sought should support the mission of UCSF

2. **Equity**: Waiver guidelines should ensure equitable treatment of the faculty

3. **Infrastructure support**: That is included in the direct budget will be credited toward the requirement for F&A support

4. **Accountability**: Authority to approve waivers should be aligned with the responsibility to cover shortfalls

5. **Transparency**: The waiver process should be transparent
Two Major Changes

1. The recommendations will result in a large reduction in the number of proposals requiring a waiver

<table>
<thead>
<tr>
<th>Waiver Required</th>
<th>Now</th>
<th>Recommended</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government agreements</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Not for Profit with IDC policy</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Not for Profit without IDC policy</td>
<td>x</td>
<td></td>
</tr>
</tbody>
</table>

2. The recommendations call for the establishment of an infrastructure charge equivalent to the assessment on gifts for most not-for-profit awards

   This is a requirement to come up with the difference between what is paid by the sponsor and the infrastructure rate. At a rate of 10%, the additional revenue will be approximately $3 million/year.

<table>
<thead>
<tr>
<th>Infrastructure Charge Required</th>
<th>Recommended</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government sponsors</td>
<td></td>
</tr>
<tr>
<td>Not for Profit sponsors</td>
<td></td>
</tr>
<tr>
<td>Not for Profit Career development awards</td>
<td>x</td>
</tr>
</tbody>
</table>

Specific Taskforce Recommendations

1. Customization: Modify UCOP Facilities and Administrative (Indirect Cost) Policy language for UCSF
2. Guidelines: Create an Indirect Cost Waiver Implementation Guideline to accompany the policy; spelling out intent and procedure for obtaining an IDC waiver
3. Do not require a waiver request for government sponsors or non-profit sponsors with a published F&A policy
4. Criteria: Create a set of criteria that will be used consistently to assess whether a waiver request should be granted,
5. Authority/Accountability: Align authority to approve waivers with the responsibility to cover shortfalls
6. Alignment with Gifts: Implement an infrastructure charge for non-government awards and align the assessment on gifts and the infrastructure charge
7. Exemptions: Exempt career development awards and fellowships from the minimum rate.
8. Encourage the inclusion of relevant facilities and administrative costs as direct costs to non-federal sponsors in cases where indirect costs are not allowed
9. Process: Seek extensive input from the faculty and department chairs on the taskforce’s recommendations
10. Assess the policy and implementation of the guidelines after 1 year
Recommendations

Recommendation 1: Customize
Modify the UCOP Facilities and Administrative (Indirect Cost) Policy language for UCSF

Details:

• Incorporate UCOP policy requirements but provide UCSF-specific context: include infrastructure charge as a vehicle to offset impact of no or very low F&A (indirect charge) resources

• Do not include specific rates in the formal policy, as they are subject to change and would require a policy revision every time there is a rate change

• Specific rates should be incorporated into the implementation guideline and procedures

Recommendation 2: Guidelines
Create an Indirect Cost Waiver Implementation Guideline to accompany the policy; spelling out intent and procedure for obtaining an IDC waiver.

• Provide clear guidance that explains the intent of the policy (refer to Guiding Principles)

• Provide criteria for judging whether a waiver is appropriate (see Recommendation 4)

• Outline the decision process for obtaining a waiver (see Recommendations 5-7)

• Include applicable rates in the guidelines
Recommendations

Recommendation 3: Guidelines
Do not require a waiver request for government sponsors or non-profit sponsors with a published F&A policy

- Allow investigators to apply for funding from government and non-profit sponsors with current published F&A rates without institutional approval
  - For government awards the expectation is that Government Business Contracts staff will negotiate the best possible rate
  - For state government awards our effort to create a master agreement between the state and UC systemwide is intended to preempt individual instances of negotiation for state-paid indirect costs
- Awards from non-profit sponsors with F&A policies, as well as awards from sponsors requiring a waiver, are subject to any applicable infrastructure charge; government contracts are exempt.

Recommendation 4: Consistent Criteria
Create a set of criteria that will be used consistently to assess whether a waiver request should be granted, as below:

- **High Risk:** award would be jeopardized without a waiver and would have a substantial negative effect on the faculty member’s overall research program
- **Value/Mission:** the research is of mission-critical value to UCSF
- **Limited Options:** alternative funding sources, such as startup funds, pro fees, or gift funds, are unavailable to the PI (e.g., no FTE support)
- **Career Development:** the proposal is beneficial to the career development of new or junior faculty members
- **Innovation:** the proposal supports proposals research in new directions which might not be sufficiently developed to attract typical peer-reviewed awards
- **Financial and Administrative Considerations:**
  - to the extent reasonable, allowable F&A costs have been included in the direct cost budget
  - administrative burden of managing the award at UCSF is reasonable
  - total cost to UCSF is reasonable for the benefit the award potentially provides
**Recommendations**

**Recommendation 5: Authority/Accountability**
Align authority to approve waivers with the responsibility to cover shortfalls

- Empower Control Points (Schools and Depts) to target average F&A yield
- Control Points should be able to develop their own strategy to do this, including creating incentives for increasing F&A funds and to make appropriate decisions regarding allowance of low F&A awards

**Rationale:**
The Control Point is in the most appropriate position to make decisions on specific projects because:
- Is familiar with area-specific projects and funding mechanisms
- Is already accountable for achieving space based indirect recovery cost goals
- Is able to engage with faculty as partners in this process

**Recommendation 6: Infrastructure Charge/Gift Tax Alignment**
Implement an infrastructure charge for non-government awards and align gift tax and infrastructure charge

- To ensure that all awards provide necessary infrastructure support, each non-government sponsored project should generate infrastructure resources
- To avoid discrepancies between the infrastructure charge and assessment on gifts, the *infrastructure charge should be equal to and move with the gift tax*. Awards for purposes that are not subject to the gift tax are also exempt from the infrastructure charge
- In cases where the sponsor’s policy provides less than the 10% of IDC, the combination of sponsor-funded IDC rate and infrastructure charge should be capped at 10% of total direct costs. This charge could be offset by the provision of infrastructure resources via the direct budget
- Infrastructure charges can come from appropriate fund sources available to the investigator, the department, the school, or the EVCP, in that order
Recommendations

Recommendation 6 (Cont.): Infrastructure Charge/ Gift Assessment Alignment
Implement an infrastructure charge for non-government awards and align gift assessment and infrastructure charge

- A request for funding would have to be well justified using the waiver criteria and would need to include a justification why funding cannot be provided by the lower Control Points. (E.g. a request to the EVCP would need to be supported by the PI, the Department Chair, and the Dean with an explanation of why they cannot support all or part of the infrastructure charge.)

- To ensure that departments have fungible resources to cover an infrastructure fee, the funds flow model will have to ensure that departments have access to fund sources that can be used to cover the infrastructure charge
  - Additionally, UCSF could create a pool that could be used for this purpose. This pool should be replenished with indirect cost recovery dollars that exceed the expected recovery for the year. This creates an incentive for faculty to press for higher indirects where they can, in order to be able to accept awards with lower indirects.
  - Gift funds that are considered appropriate to offset the assessment on gifts should also be considered appropriate to use for the infrastructure charge

Recommendation 7: Exceptions
Create an exception for career development awards and fellowships from the minimum infrastructure rate

- Indirect cost rate for training and career development awards should be pegged to the federal rate for F, K, and T type awards

- For career awards from sponsors who pay less than the federal rate, the infrastructure charge would be assessed up to the federal rate
Recommendations

Recommendation 8: Encourage the inclusion of relevant facilities and administrative costs as direct costs to non-federal sponsors in cases where indirect costs are not allowed

- Investigators are strongly encouraged to budget administrative costs to the extent allowed by the sponsor that is reasonable for the size of the budget, especially for budgets that are uncapped.
- The departmental or school resources freed up could then be used to cover all or a portion of the infrastructure charge.
- A list of potential items that could be direct-charged is available to PIs and research administrators.

Recommendation 9: Process
Seek extensive input from the faculty and department chairs on the taskforce’s recommendations.

To ensure that all who are potentially impacted by this policy have the opportunity to provide input, the committee members support the EVCP’s approach, as outlined in the charge letter: “Most importantly, the recommendations of this committee will be vetted broadly with the department chairs and faculty to ensure that we have a unified approach to the challenges.”

This is the purpose of our taskforce meetings with faculty and leadership forums.

Recommendation 10: Process
Assess the policy and implementation of the guidelines after 1 year.

- The policy and its implementation should be assessed to ensure that the policy is working as anticipated and make changes as necessary.
- Provide information back to the faculty on the financial impact of the policy at regular intervals.
Estimated Timeline: IDC Policy

**UCOP IDC Waiver Recommendations**  
July 2012  
UC wide task force report with recommendations developed

**UCSF IDC Taskforce Discussion & Recommendations**  
January- Sept. 2013  
- EVCP charged cross UCSF group to revisit UCOP recommendations and develop UCSF specific recommendations.
- Taskforce met regularly to develop report with recommendations in September

**UCSF IDC Recommendation Sharing and Input**  
Dec. 2013- Spring 2014  
- (Present) IDC taskforce members attending School and other leadership forums to share taskforce recommendations
- Goal is to obtain input and questions.

**UCSF IDC Policy Modification**  
Spring/Summer 2014 Ongoing  
- Based on input, taskforce or another forum may or may not be reconvened to modify policy as appropriate
- Once input is obtained and discussed, policy will be posted on website

**What We Need from You:**
- Your Input and Questions
- Sharing of this with others to get their input and questions
Faculty Financial Disclosures & the Sunshine Act

Eileen L. Kahaner, J.D.
Clinical Enterprise Compliance Program

Eric C. Mah
Research Compliance
Pre-August 2013 Disclosure Environment

- Public Health Service (NIH)
- APM 025, 670/671 Department Annual Disclosure
- State Reporting 700-U
Today’s Disclosure Environment

- Public Health Service (NIH)
- Dept. Annual Disclosure (APM 670/1)
- State Reporting: CA 700-U Form
- Sunshine Act (CMS)
What is New

• **Academic Personnel Manual (APM) 670/671**
  – Varied requirements, $ thresholds for turning over outside activity income to UCSF
  – Check with your Department
  – Guided also by faculty member individual comp plan

• **Sunshine Act (Federal Law)**
  – Manufacturer reporting of payments and ownership interests of essentially any kind (over $10)
  – Creation of single searchable CMS database
  – Reporting period began August 1 and CMS is not responsible for information accuracy
Sunshine Act Challenges

• Broad scope of reportable direct and indirect relationships

• Calendar, payments, and categories may not match with other reports

• Data accuracy is under manufacturer control
  – Voluntarily provide access before CMS submission
  – Formal review and correction period starts merely 60 days before information becomes public
  – Physician must individually seek corrections directly with manufacturer through dispute resolution process, which is untested
**CMS Summary:**

**2013 Program Cycle:** Publication

**Industry will:**
Collect information on payments and other transfers of value, as well as ownership or investment interests held by physicians and their family members

**Industry will:**
Register and submit 2013 information to CMS

**Industry will:**
Correct disputed information

**Physicians should:**
Keep track of payments and transfers of value made to you and be mindful of ownership and investment interests held by both you and your immediate family

**Physicians should:**
Register with CMS in order to receive notifications and information submitted by the industry

**Physicians should:**
Review your information for accuracy

**CMS Public Website:**
2013 Information Posted

**Timeline:**
- August – December 2013
- 1Q 2014
- 2Q 2014
- Sep 2014
Why Sunshine Act Matters to Non-Manufacturers

- Public availability of manufacturer reports
- Anticipate review and cross-check of information against other manufacturer, physician, and institutional reports
  - Similar activities across physicians and institutions
  - Payments that may fall under certain University policies or reporting requirements
- Reputation to public, patients, and colleagues
Where are we going?

• **COI-Smart** was a short-term solution to an impending regulation
  - Faculty workgroup identifying immediate enhancements/improvements

• Working with the School of Medicine to develop a single system which will handle PHS, Departmental, State reporting
Regulation is a 4-letter word…

“HELP”

Why so many requirements?
HELP...why so many requirements?

- Developing a unified electronic system which collects all required disclosures for federal and state, university policy

- Simple user-friendly interface is key

- Challenged by variations in department requirements, dozens of comp plans, differing stakeholder needs
On the horizon

• How to balance outside activity with scope and practice of appointment at UCSF
  – When can UCSF be party to a consulting agreement, if ever
    • Professional Service Agreements
    • Advisory Boards
    • Consulting…these are under discussion with UCSF leadership and Office of the President
  – Made more complicated because of state does not match federal reporting requirements
Three Things to Remember

• **Disclosure remains the best practice**
  – We have 3 processes, but creating one system with SOM support

• **Keep track of your outside income activity**
  – Dependent on your comp plan, department
  – Academic Affairs as an additional resource
  – Seek manufacturer input regarding categorization of transfers of value

• **Monitor CMS Sunshine Act activity**
  – Voluntary CMS registration and listserv
  – Consider free apps (*OPEN PAYMENTS Mobile for Physicians*) at Google Play™ or iOS Apple™
  – Dispute erroneous information
Thank you and...

Questions?
References for Sunshine Act

Centers of Medicare & Medicaid

OPEN PAYMENTS Mobile for Physicians at Google Play™ or iOS Apple™

American Medical Association
ama-assn.org/go/sunshine
Updating COI-Smart Disclosures

• Go through UCSF MyAccess
• Enter “My Questionnaires” to access your current disclosures
• Select your previous questionnaire for updating.
• Keep disclosures up to date within 30 days
This Questionnaire has been submitted. You may revise your answers by clicking on a "Revise" link below for a particular question.

Click on one of the icons to the right to view or email a copy of your answers to this questionnaire.

<table>
<thead>
<tr>
<th>QUESTION</th>
<th>STATUS</th>
<th>ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Complete</td>
<td><img src="image" alt="Revise" /></td>
</tr>
</tbody>
</table>

- Select the question that needs revision
REVISION NOTE: All previously submitted entries will be maintained for historical accuracy.

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**Have you:**

a) Worked as an independent consultant?

b) Served as a speaker/lecturer at a non-University setting and received compensation?

c) Received honoraria or other compensation not related to consulting or speaking?

d) Received royalty payments not related to intellectual property or patents (Question 3 will ask about payments from IP and patents)?

e) Received other non-UlCSF salary not described above (e.g., witness fees, expert testimony, etc.)?

- No
- Yes

*Click on the green “+” sign below if you need to add an additional source of income or activity.*

*Click here if you have another disclosure for this question*

Upload one or more files as attachments to this response if you wish to supply supporting documentation

- [Browse](#)  [UPLOAD] (5 MB Limit)

**Revision/Append Note:** Original answers are retained to provide history of disclosures. Your original and revised answers will appear if you print a copy of this questionnaire.

**SAVE & SUBMIT**

- You can modify your current response or add additional responses.