

Amendments to CIRM Employee COI Policy

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General Counsel
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Employee COI Policy – Key 2025 Amendments

Clarified Definitions:

- Defines “immediate family member” consistent with the Political Reform Act.

Expanded Prohibitions:

- Broader restrictions tied to employee/family employment at applicant institutions.
- Definition of Financial Benefit aligned to PRA (direct or indirect).
- 3-year lookback for research collaborators, mentors, and trainees.
- Limits employee involvement in application preparation beyond public information.
- Updated investment restrictions: now includes companies with $\geq 20\%$ research budget in cell/gene therapy; exempts diversified mutual funds.

Employee COI Policy – Key 2025 Amendments (cont.)

Professional Activities:

- Allows uncompensated voluntary clinical faculty roles if no financial benefit and no link to CIRM-funded projects.

New Disclosure & Compliance Framework:

- Initial and annual disclosure requirement.
- Ongoing 5-day reporting obligation for new conflicts.
- Immediate recusal pending Legal review.
- Formal Legal Department determination and documentation.
- Disciplinary consequences for failure to disclose or comply.

Requested Action

CIRM requests ICOC approval of the proposed amendments to the CIRM Employee Conflict of Interest Policy.

Thank You!

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www.cirm.ca.gov

Questions?

