



**Talmadge E. King, Jr., MD**  
Julius R. Krevans Distinguished Professorship  
in Internal Medicine  
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August 22, 2011

**TO: Department of Medicine Division Chiefs and Faculty**

**FROM: Talmadge King, MD**

**RE: Potential Nepotism Involving Department of Medicine  
Academic Positions Serving as Principal Investigators (PIs) and Co-  
Investigators (Co-I) on the Same Research Projects**

The PI of a grant is responsible and accountable to the funding agency and the University for the work performed under a funded research project, including the deliverables apportioned to key personnel and/or collaborators. When the relationship of the PI and other investigators on the same grant or contract are spouses, registered domestic partners, near relatives or members of the same household, the University is required to manage the potential for nepotism.

The NIH specifically establishes grants policy requiring grantee institutions have in place standards of conduct and safeguards to “prevent employees, consultants, members of governing bodies, and others who may be involved in grant-supported activities from using their positions for purposes that are, or give the appearance of being, motivated by a desire for private financial gain for themselves or others, such as those with whom they have family, business, or other ties.” [http://grants.nih.gov/grants/policy/nihgps\\_2010/nihgps\\_ch4.htm](http://grants.nih.gov/grants/policy/nihgps_2010/nihgps_ch4.htm).

This requirement is fulfilled by the Near Relative Policy, APM-520 found at <http://www.ucop.edu/acadpersonnel/apm/apm-520.pdf>. In the specific instance that a PI and Co-I on the same grant are near relatives, the Department requires that the following procedures be followed to ensure that potential conflict as described above has been managed. A letter signed by the Co-I’s direct supervisor (who should be an individual other than the PI) that includes the following should be included with grant proposals.

- Description of the Co-I’s relationship to the PI
- Title of proposed research project
- Statement that the author is the direct supervisor of the Co-I and is responsible for managing any potential conflicts or issues pertaining to nepotism
- Justification for why the Co-I must be on the proposed project
- Assurance by author that s/he will oversee the administrative and financial matters associated with the role of the Co-I, including performance reviews, salary considerations, approval of expense reports, and approval of effort reports.

For any questions related to this policy or guidance to adhere to it, please contact Suzanne Sutton, Controller and Director of Research Administration at [ssutton@medicine.ucsf.edu](mailto:ssutton@medicine.ucsf.edu).