



Campus Administrative Policy

Policy Title: **Revenue Distribution from the Commercialization of Databases**

Policy Number: 2045A

Functional Area: Finance

Effective: August 20, 2026

Approved by: Donald M. Elliman, Jr., Chancellor

Applies to: CU Anschutz

A. Introduction

This policy addresses how the University will define and classify databases and data enhancement, and how revenue will be distributed derived from the commercialization thereof. Specifically, Data Enhancement differs significantly from Data Collection, and thus revenue distribution shall be adjusted accordingly. Any Discovery that falls outside of the definitions herein shall be governed by the Intellectual Property Policy on Discoveries and Patents for their Protection and Commercialization. Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in Campus Policy 2040A, *Intellectual Property on Discoveries and Patents*, as may be amended from time to time.

B. Policy Statement

1. Data Enhancer. For an Included Person to qualify as a “Data Enhancer” the Included Person must, through the application of substantive technical, analytical, or domain expertise, transform, structure, enrich, contextualize or organize collected data into a form that materially increases its scientific, operational, or commercial value over that of the original data, and that incorporates significant value not inherently present in the unaltered data. This may include, but is not limited to:

- a. Developing novel methods to clean, normalize, or annotate complex datasets;
 - b. Integrating disparate data sources to enable new forms of analysis or insight;
 - c. Applying proprietary algorithms or domain expertise to reveal non-obvious patterns or correlations; or
 - d. Enhancing raw experimental, clinical, or preclinical data such that it becomes critical to a discovery, platform, or product.
2. Data Collector. A “Data Collector” is any Included Person whose work involves the collection or organization of data, who does not qualify as a Data Enhancer as specified in Section B1.

C. Distribution of Revenue

1. The following allocation methodology applies to the distribution of Net Receipts from the commercialization from any Campus Database, unless otherwise agreed to in writing on a case-by-case basis by the Campus Chancellor, Executive Director of CU Innovations, and the Data Enhancer or Data Collector. The terms of such commercialization, including but not limited to the value assigned to the Campus Database, shall be decided by CU Innovations, in its sole authority. Net Revenue from the commercialization of any Campus Database will be distributed as follows:
 - a. Included Person is a Data Enhancer and Campus Database is a Physical Database and/or Digital Database:
 - 15% to the Data Enhancer(s);
 - 25% to the Department or Laboratory that supports the Discoverer(s)’ database;
 - 25% to CU Innovations; and
 - 35% to the campus Chancellor.
 - b. Included Person is a Data Collector and Campus Database is a Physical Database and/or Digital Database:
 - 25% to the Department or Laboratory that supports the Discoverer(s)’ database;
 - 25% to CU Innovations; and

- 50% to the campus Chancellor.

The campus Chancellor's share pursuant to the above will then be further distributed:

- 50% to the relevant dean to be used for investment in the research enterprise of the school; and
- 50% to the campus Chancellor.

2. If the Data Enhancer leaves the University's employment, distributions to him or her personally shall cease. If the Data Enhancer's department or laboratory continues to operate and maintain the program or project that generated the Net Revenue, the departmental/laboratory share of the Net Revenue shall continue to be paid.

D. Dispute Resolution

Included Persons may appeal any decisions made by CU Innovations regarding Campus Database commercialization to the Vice Chancellor for Innovation and Biotechnology or their designee. That decision may be appealed by request to the Chancellor or their designee. The Chancellor or their designee may refuse such requests. All decisions made by the Chancellor or their designee shall be final.

E. Definitions

"Campus Database" means a set of data comprising of data collected, curated, organized, enhanced, or otherwise generated by an Included Person, including but not limited to: research data, biobanks, healthcare data or electronic medical record data, or any other data derived from the fulfillment of an Included Person's Work Responsibility and/or derived from a Substantial Use of University Resources.

"Digital Database" means a database that is stored, maintained, or otherwise accessible in electronic form, regardless of platform, format, storage medium, or location, and that can be accessed, searched, or manipulated through digital means.

"Included Person(s)" means all faculty members and other employees of the University, including individuals receiving salaries, research stipends, fellowships or other remuneration from the University, part-time

employees, student employees, University employees on sabbatical who receive remuneration from the University, and employees on a paid leave of absence. Included Persons also includes University volunteers, students, and visitors who make Substantial Use of University Resources, and Visiting Scholars.

“Net Revenue” means all financial consideration received by the relevant University campus Technology Transfer Office or its agent from the transfer, license, assignment or commercial exploitation of a Campus Database, less unreimbursed expenses at CU Innovations sole discretion.

“Physical Database” means a collection of data, specimens, samples, or other tangible material, including but not limited to biobanks or tissue libraries.

“Substantial Use of University Resources” means use of University administered funds, Sponsored Programs, facilities, research equipment, including software, research space or other physical assets that goes above and beyond those customarily and currently provided to Included Persons in accordance with their University position as an employee, student, or volunteer. A Visiting Scholar or any other visitor makes Substantial Use of University Resources by using any University administered funds, Sponsored Programs, facilities, research equipment, including software, research space, or other physical assets. For purposes of this policy, offices, office equipment, library access, desktop and laptop computers, photocopy equipment, telephone, servers, and fax machines that are customarily provided, are excluded from Substantial Use of University Resources. Use of University resources as permitted under a separately executed facilities use agreement will not be considered Substantial Use of University Resources. (This provision is not intended to override any other University policy concerning reimbursement for facilities or equipment usage.)

“Work Responsibilities” means any work, including third party employment such as consulting activity, that is related to an Included Person’s activities or field of expertise at the University as evidenced by their

research focus, or as otherwise articulated in a faculty member's professional plan or an employee's position description.

Notes

1. History

- August 20, 2026: Adopted

2. Cross References/Appendix:

- [Regent Policy 5.I: Intellectual Property on Discoveries and Patents for their Protection and Commercialization](#)
- [University of Colorado Administrative Policy Statement 1013: Intellectual Property Policy on Discoveries and Patents for their Protection and Commercialization](#)
- [Campus Administrative Policy 2040A: Intellectual Property Policy on Discoveries and Patents for their Protection and Commercialization](#)

3. Responsible/Reviewing Offices:

- Executive Vice Chancellor for Administration & Finance
- Vice Chancellor for Innovation and Biotechnology
- Vice Chancellor for Financial Services & Controller