

SOP: Organizational Financial Interests

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1. PURPOSE

- 1.1. This procedure establishes the process to evaluate and manage financial interests of the [Organization].
- 1.2. This procedure begins when the [Conflicts of Interests Officer] identifies an organizational financial interest that can affect the conduct of research.
- 1.3. This procedure ends when the HRPP staff members have been provided an updated list of the [Organization]'s financial interests.

2. POLICY

- 2.1. The document "Policy on Institutional Conflict of Interest in Research (Policy Number: 02.52.13)":
 - 2.1.1. Provides a definition of organizational financial conflict of interest that as when any of the following might affect the design, conduct, reporting, review, or oversight of research:
 - 2.1.1.1. Licensing, technology transfer, and patents (as a form of equity)
 - 2.1.1.2. Investments of the [Organization]
 - 2.1.1.3. Gifts to the [Organization] when the donor has an interest in the research
 - 2.1.1.4. Financial interests of senior administrators
 - 2.1.1.5. Other financial interests
 - 2.1.2. Describes the process to identify or disclose financial conflicts of interest of the [Organization]
 - 2.1.3. Describes the committee and process that the [Organization] uses to evaluate and manage organizational conflicts of interest
- 2.2. Senior administrators are required to disclose their financial interests to the [Conflict of Interests Officer]:
 - 2.2.1. Upon joining the [Organization]
 - 2.2.2. Every year
 - 2.2.3. When there are changes to financial interests
- 2.3. The [Organization] considers investments under the control of independent investment managers (e.g., endowment) to be equivalent to diversified mutual funds and therefore not subject to disclosure under this policy.
- 2.4. Organizational officials are to notify the [Conflicts of Interests Officer] of any change in the [Organization]'s financial holdings not controlled by the [Organization]'s investment managers.
- 2.5. The evaluation and management of an organizational conflict of interest may not vary by funding or regulatory oversight.

3. RESPONSIBILITY

3.1. The [Conflicts of Interests Officer] carries out these procedures.

4. PROCEDURE

- 4.1. Update the list of investments with information about the name of the company, the names of related companies, and affected products or services.
- 4.2. Provide the updated list to the HRPP staff member handling the list of investments.

5. REFERENCES

5.1. 42 CFR §50



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5.2. 45 CFR §94