



SOP: Organizational Financial Interests

| Document No.: | Edition No.: | Effective Date: | Page: |
|---------------|--------------|-----------------|-------------|
| HRP-121 | 001 | 29 JUN 2018 | Page 1 of 1 |

1. PURPOSE

- 1.1. This procedure establishes the process to evaluate and manage financial interests of the University.
- 1.2. This procedure begins when the Conflicts of Interest Review Committee 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 University's financial interests.

2. POLICY

- 2.1. An organizational financial conflict of interests exists when any of the following might affect the design, conduct, or reporting of research:
 - 2.1.1. Licensing, technology transfer, patents
 - 2.1.2. Investments of the University
 - 2.1.3. Gifts to the University when the donor has an interest in the research
 - 2.1.4. Financial interests of senior administrators
 - 2.1.5. Other financial interests
- 2.2. Senior administrators are required to disclose their financial interests to the Conflicts of Interest Review Committee:
 - 2.2.1. Upon joining the University
 - 2.2.2. Every year
 - 2.2.3. When there are changes to financial interests
- 2.3. The University 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 Interest Review Committee of any change in the University's financial holdings not controlled by the University's investment managers.
- 2.5. The evaluation and management of an organizational conflict of interest may not vary by funding or regulatory oversight.
- 2.6. Organizational financial interests are managed using "SOP: Management of Financial Interests (HRP-120)."

3. RESPONSIBILITY

- 3.1. The Conflicts of Interest Review Committee 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
- 5.2. 45 CFR §94