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