1. PURPOSE

1.1. This procedure establishes the process to evaluate and manage financial interests of the Institution.

1.2. This procedure begins when the [Conflicts of Interests Officer] identifies an Institutional financial interest that can affect the conduct of research.

1.3. This procedure ends when the [Conflicts of Interests Officer] and others, as needed decides that the institutional financial interest is not a conflict of interest, or informs the IRB of the management plan.

2. POLICY

2.1. An Institutional financial Conflict of Interest exists when any of the following might affect the design, conduct, or reporting of research:

2.1.1. Licensing, technology transfer, or patents

2.1.2. Investments of the Institution

2.1.3. Gifts to the Institution 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 [Conflict of Interests Officer]:

2.2.1. Upon joining the Institution

2.2.2. Every year

2.2.3. When there are changes to financial interests

2.3. The Institution 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. Institutional officials are to notify the [Conflicts of Interests Officer] of any change in the Institution’s financial holdings not controlled by the Institution’s investment managers.

2.5. The evaluation and management of an Institutional 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. If there is an institutional conflict of interest, the Conflict of Interest Officer will provide the IRB staff with the recommended management plan through MyIRB.

5. REFERENCES

5.1. 42 CFR §50

5.2. 45 CFR §94

5.3. UF Guidelines, Policies, and Procedures on Conflict of Interest and Outside Activities, including Financial Interest Website:
http://generalcounsel.ufl.edu/media/generalcounselufl.edu/documents/COI.pdf

5.4.