

Document No.:	Edition No.:	Effective Date:	Page:
HRP-121	001	1/27/2017	Page 1 of 2

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.

POLICY: Institutional Financial Interests

Document No.:	Edition No.:	Effective Date:	Page:
HRP-121	001	1/27/2017	Page 2 of 2

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/generalcounselufledu/documents/COI.pdf>