

## 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 [Organization] 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. 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 [Organization]
  - 2.1.3. Gifts to the [Organization] 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 [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 disclose 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
- 5.2. 45 CFR §94