1. PURPOSE
   1. This procedure establishes the process to evaluate and manage financial interests of the Organization.
   2. This procedure begins when the Conflicts of Interests Officer identifies an organizational financial interest that can affect the conduct of research.
   3. This procedure ends when the HRPP staff members have been provided an updated list of the Organization’s financial interests.
2. POLICY
   1. An organizational financial conflict of interests exists when any of the following might affect the design, conduct, or reporting of research:
      1. Licensing, technology transfer, patents
      2. Investments of the Organization
      3. Gifts to the Organization when the donor has an interest in the research
      4. Financial interests of senior administrators
      5. Other financial interests
   2. Senior administrators are required to disclose their financial interests to the Conflict of Interests Officer:
      1. Upon joining the Organization
      2. Every year
      3. When there are changes to financial interests
   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.
   4. Organizational officials are to notify the Conflicts of Interests Officer of any change in the Organization’s financial holdings not controlled by the Organization’s investment managers.
   5. The evaluation and management of an organizational conflict of interest may not vary by funding or regulatory oversight.
   6. Organizational financial interests are managed using “SOP: Management of Financial Interests (HRP-120).”
3. RESPONSIBILITY
   1. The Conflicts of Interests Officer carries out these procedures.
4. PROCEDURE
   1. Update the list of investments with information about the name of the company, the names of related companies, and affected products or services.
   2. Provide the updated list to the HRPP staff member handling the list of investments.
5. REFERENCES
   1. 42 CFR §50
   2. 45 CFR §94