

**INSTITUTIONAL REVIEW BOARD**  
**SOP 104: Conflict of Interest - IRB**

---

**POLICY**

In the environment of research, openness and honesty are indicators of integrity and responsibility, characteristics that promote quality research and can only strengthen the research process. Therefore, conflicts of interest (COI) should be eliminated when possible and effectively managed and disclosed when they cannot be eliminated.

**PROCEDURES**

**1. Definition of a COI**

- 1.1 A conflict of interest is defined as a close personal or professional association with the submitted Investigator(s); direct participation in the research (e.g., protocol development); or any significant financial interest in the sponsoring company defined as (example, \$10,000 or 5% ownership).
- 1.2 Questions regarding COI may be referred to the Institutional Official. The Institutional Official has the authority to determine when a COI exists as defined by institutional policy and to impose and enforce disciplinary action in the event that a COI is not disclosed.

**2. Disclosure and Documentation of Financial Interest and COI**

- 2.1 No regular or alternate member may participate in the initial or continuing review of any research project in which the member has a conflict of interest, except to provide information as requested.
- 2.2 It is the responsibility of each voting member or alternate member of the IRB to disclose any COI in a study submitted to the IRB and recuse himself or herself from deliberations and voting.
- 2.3 The procedures for recusal from deliberations and voting on all protocols for which there is a potential or actual financial conflict of interest are detailed in SOP IRB Meeting Administration.

**3. Education and Training in COI**

- 3.1 IRB Members and the IRB Administrator are required to participate in education and training activities related to financial conflict of interest issues, as webinars and other training materials become available.

**SCOPE**

This SOP applies to all IRB members and the IRB administrator.