 <b>TEXAS A&amp;M</b> UNIVERSITY	Institutional Conflicts of Interest		
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## 1 PURPOSE

- 1.1 This SOP establishes the process to identify institutional financial interests that may cause an institutional conflict of interest (ICOI).
- 1.2 The process begins when there is a reported change in the institution's financial holdings outside of standard investments.
- 1.3 The process ends when the HRPP staff are provided an updated list of the institution's financial holdings and there is no ICOI or any ICOI is managed in accordance with the Institution's policies and standard administrative procedures.


## 2 REVISIONS FROM PREVIOUS VERSION

- 2.1 Revised from 5/30/2017 version

## 3 SOP Statement

- 3.1 Texas A&M University manages financial conflicts of interest in research pursuant to Texas A&M System Policy 07.03 and Standard Administrative Procedure 15.99.01.M1.01.
- 3.2 An institutional conflict of interest exists where the financial interests of the University, or a university official, because of his or her position is acting within his or her authority on behalf of the institution, might affect, or reasonable appear to affect, university processes for the design, conduct, review, reporting or oversight of human subjects research.
- 3.3 University Officials are required to provide written disclosure of their financial interests in accordance with Texas A&M System Policy 07.03 'Conflicts of Interest, Dual Office Holding and Political Activities' through their CEO using the Texas A&M University System Annual Financial Disclosure Form and/or via the online Financial Conflict of Interest process in Maestro.
- 3.4 The definition of University Official includes the following:
  - 3.4.1 president
  - 3.4.2 provost
  - 3.4.3 executive vice president
  - 3.4.4 vice presidents
  - 3.4.5 associate vice presidents
  - 3.4.6 vice provosts,
  - 3.4.7 deans, department heads
  - 3.4.8 directors/unit heads of organized research units.
- 3.5 The Texas A&M University System Technology Commercialization Office (TTC) will provide quarterly reports and the Texas A&M Development Foundation will disclose on a bi-annual basis reports of the following:
  - 3.5.1 Licensing (e.g., licensing or technology transfer agreements)
  - 3.5.2 Investments of the institution
  - 3.5.3 Substantial Gifts to the institution (when the donor has an interest in the research)
  - 3.5.4 Financial interests of senior administrative officials
  - 3.5.5 Other financial interests
- 3.6 The university's Conflict of Interest Official or designee will obtain the reports from TTC and the Development Foundation.
- 3.7 If an institutional financial holding related to prospective or ongoing Human Research is identified, it will be managed according to Standard Administrative Procedure 15.99.01.MI.01.
- 3.8 After the Institutional COI is resolved in accordance Standard Administrative Procedure 15.99.01.MI.01 the IRB will review the research and determine if it meets the criteria for approval.
- 3.9 The evaluation and management of an institutional conflict of interest may not vary by funding or regulatory oversight.

## 4 RESPONSIBILITIES

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4.1 The University's Conflict of Interest Official or their designee will carry out these responsibilities in coordination with the HRPP.

**5 PROCEDURE**

5.1 Update the list of investments upon receipt of information regarding institutional financial interests. Include information about the name of the company, the names of related companies, and affected products or services.

5.2 Provide a copy of the updated list to the HRPP staff.

**6 MATERIALS**

6.1 System Policy 07.03 Conflicts of Interest, Dual Office Holding and Political Activities

6.2 Standard Administrative Procedure 15.99.01.M1.01. Institutional Conflict of Interest in Human Subjects Research

6.3 The Texas A&M University System Annual Financial Disclosure Form

**7 REFERENCES**

7.1 42 CFR §50

7.2 45 CFR §94

7.3 AAHRPP elements I.6.A, I-9