

University of Oklahoma Health Sciences Center
Institutional Biosafety Committee
Conflict of Interest Policy

Approved May 30, 2013

All Institutional Biosafety Committee (IBC) members and *ad hoc* members shall disclose to the IBC all conflicts of interest for themselves and their spouses/domestic partners and dependent children. For purposes of this policy, a conflict of interest may be identified as either financial in nature (such as when an IBC member or *ad hoc* member holds an economic interest in the research) or non-financial in nature (such as when an IBC member or *ad hoc* member participates in the research or will be included as a co-author on a publication from the research), either of which could affect or appear to affect the design, conduct, oversight, or reporting of the research project.

Financial interests that require disclosure include but are not limited to:

- a. Ownership interest, stock options, or other economic interest related to the research unless it is all of the following:
 - i. Less than \$5,000 when aggregated for the individual, individual's spouse, domestic partner, and dependent children;
 - ii. Publicly traded on a stock exchange;
 - iii. An amount that will not be affected by the outcome of the research;
and
 - iv. Less than 5% interest in any one single entity.
- b. Compensation related to the research unless it is both of the following:
 - i. Less than \$5,000 in the past year when aggregated for the immediate family; and
 - ii. An amount that will not be affected by the outcome of the research.
- c. Proprietary interest related to the research including, but not limited to, a patent, trademark, copyright, or licensing agreement.
- d. Board, scientific officer, or executive relationship related to the research, regardless of compensation for that position.
- e. Interests that exceed \$1,000 in dividends or similar interests derived during the preceding calendar year.
- f. Annual income for professional or consulting activity from a company that are in excess of 25% of the individual's Institutional Base Salary.

Non-financial interests that require disclosure include but are not limited to:

- a. Participation in the research project as key personnel (PI, Co-PI, sub-investigator);
- b. Co-author on a publication of the research project's results;
- c. Other relationships which may influence judgment of the IBC member in reviewing the research project:
 - i. is a direct supervisor or trainee of the researcher(s)
 - ii. is related to a researcher whose protocol is under consideration
 - iii. has a prominent role in a directly competing research team or product
 - iv. has a close personal relationship with a researcher or for other reasons feels unable to render a fair and unbiased review.

An IBC member or *ad hoc* member with either a financial or non-financial conflict of interest in a research project may not participate in the IBC review of that research. The IBC shall not approve a research protocol where a conflict of interest is not eliminated,

and it has the final authority to determine whether a conflict of interest has been eliminated appropriately.

IBC member and *ad hoc* members shall cooperate fully with the IBC and any other individuals or groups involved in the review of the pertinent facts and circumstances regarding any conflict of interest disclosed.

This policy is not intended to prohibit IBC members' relationships with companies that have no influence on the design, conduct, or reporting of a study and that occur prior to the initiation of a sponsored study or after publication of its results. However, that notwithstanding, compensation in the form of an economic interest that may be affected by the outcome of the study shall be avoided. (Examples of conflicts of interest due to compensation that require disclosure pursuant to this Policy include, but are not limited to, consulting agreements, speaking or other fees, honoraria, gifts, licensing revenues, equity interests, loans or notes, including stock options, regardless of value, expectations of receiving equity interests, and/or other fees or compensation received from sponsors.)

Any IBC member or *ad hoc* member who has a conflict of interest with regard to a research project that will be reviewed at the convened IBC meeting will recuse him/herself from the convened IBC meeting for the voting on that research project. The member in conflict will not be present during discussion of the project unless the committee requests the member to stay to clarify aspects of the protocol.