

Texas Tech University Health Sciences Center El Paso Institutional Compliance Procedure

Review of Disclosed Conflict of Interest	Policy: HSCEP OP 10.05 PRO
	Effective Date: June 1, 2017
References: HSCEP OP 10.05	
TTUHSC El Paso Institutional Compliance Website: http://elpaso.ttuhscc.edu/compliance/	

Procedure Statement

The purpose of this procedure is to provide guidance for the preparation of documents needed for the conflict of interest committee review, and to provide guidance concerning the committee's recommendations.

Scope

This procedure applies to conflict of interest submissions that require non-conflict of interest committee reviews.

Procedure

1. The institutional compliance officer or his/her designee will download the data on a bimonthly basis from the Qualtrics System. This process will happen on a monthly basis during the initial distribution of the annual conflict of interest statements.
2. If the information is to be reviewed and disclosed, conflicts of interest will be recorded on the spreadsheet utilized to track conflicts of interest. At the beginning of each month, the compliance officer will download the data, and record the information by the date the data starts. The date as referenced by the summation dates recorded in the Qualtrics System.
3. The compliance officer will screen the data for conflicts that require committee review. These include financial interests over \$10,000, significant positions held by the individual or their family members, or ownership in a non-publicly traded company.
4. The compliance officer will also review the reported conflicts of commitment and record those disclosures as described in item number two. Conflicts of commitment will be reported to the committee; however, the final determination will be made by the individual's supervisor.
5. Potential outcomes for conflicts of commitment include the following:
 - a. Development of a management plan for the individual to sign that is specific to the reported conflict.
 - b. Notification to the individual that he or she may not review, approve, or administratively control contracts or business relationships with the disclosed company.
 - c. In the event that the company is a non-publicly traded company, the individual may be required to notify the non-research conflict of interest committee of any future business engagements between Texas Tech University Health Sciences Center El Paso and the disclosed to company.

Texas Tech University Health Sciences Center El Paso Institutional Compliance Procedure

6. Conflicts of interest will be shared with the research conflict of interest committee, procurement, and contracting.
7. On a periodic basis, the contracts department will send the institutional compliance officer a report titled “pending contracts under business review” for review to ensure contract managers are not individuals with a conflict of interest with an associated company.

Frequency of Review

This procedure will be reviewed by the institutional compliance officer on an annual basis by July 1 of every year.

Review Date:

Revision Date: