

IRB Member Conflicts of Interest

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Policy Statement

In accordance with federal regulations, no IRB may have a member participate in the IRB's initial or continuing review of any project in which the member has a conflicting interest, except to provide information requested by the IRB (45 CFR 46.107(d), 21 CFR 56.107(e)).

Description and Procedures

In order to prevent actual or perceived conflict of interest, potential for coercion, or the appearance of any conflict of interest or coercion, the following conflict of interest procedures are outlined and must be adhered to:

1. An IRB Member may not review any application in which they serve as investigator, faculty supervisor, or other project personnel.
2. An IRB Member may not review any application from an investigator, faculty supervisor, or other project personnel with whom they are in direct competition.
3. An IRB Member may not review any application in which their department chair, academic dean, or program director serves as investigator, faculty supervisor, or other project personnel.
4. An IRB Member may not review any application in which a financial conflict of interest or perceived financial conflict of interest is present. This may include, but is not limited to:
 - a. applications which include funding from organizations in which an IRB Member or an IRB Member's immediate family holds employment, consultation positions, board appointments, or equity interest; and
 - b. applications which are presented with direct or indirect implication of financial benefit to the reviewer, their college/school, or the University in exchange for a positive review.

If an IRB Member recognizes a conflict of interest in reviewing any application, they must report it immediately to the Chair and Office of Research and Sponsored Projects Operations so the application may be assigned to another reviewer. During Full Board reviews, an abstention may be recorded when an IRB Member has any concern that their impartiality may be compromised.

If any person associated with the IRB experiences undue influence or coercion, either directly or indirectly, to make a favorable decision for a specific application or investigator, the person is asked to document the issues related to the case and report it to the IRB Chair, the Associate Provost for Research and Graduate Education, and the Office of Research and Sponsored Projects Operations.

Effective Date

August 24, 2020

Revision History

References

45 CFR 46

21 CFR 56