IRB Member and Consultant Conflict of Interest
Policy and Procedure

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I. Policy

A. Financial conflicts of interest is defined in the glossary.

B. No regular or alternate IRB member may participate in review of any research in which the member has a conflict of interest (either financial or non-financial), except to provide information as requested. Such review includes review by a convened IRB, review using expedited procedure, initial review, continuation review, review of modifications, review of unanticipated problems involving risk to participants or others, review of noncompliance with the regulations or the requirements of the IRB and any other ad hoc reviews requested by the IRB.

C. A consultant may not participate in the review or provide information to the IRB for any research project in which the consultant has a conflict of interest (either financial or non-financial). Such review includes review by a convened IRB, review using expedited procedure, initial review, continuation review, review of modifications, review of unanticipated problems involving risk to participants or others, and review of noncompliance with the regulations or the requirements of the IRB and any other ad hoc reviews requested by the IRB.

D. Due to institutional conflict of interest, no individual from a developmental or business office may be appointed as an IRB member.

II. Procedure

A. It is the responsibility of each voting member or alternate member of the IRB to disclose any conflict of interest when conducting a review and to excuse him or herself from deliberations and voting.

B. The procedure for excusing a consultant, or IRB member, including the chair, from deliberating/voting on all full board review protocols for which there is a conflict of interest is detailed in the Conduct of IRB Meetings Policy and Procedure. The OIRB staff document all conflict of interest disclosures in the IRB meeting minutes.

C. The OIRB staff confirms that no conflict of interest exists:

   1. when contacting an IRB Member to serve as a reviewer by querying the member at the time of assignment to review; and

   2. when contacting an individual to serve as a consultant by querying the individual at the time of assignment to review. Once the OIRB staff has this confirmation, they distribute the confidentiality agreement to the consultant.

III. References

A. Definitions (see Glossary)

B. Regulatory (see Policy on Policies Policy and Procedure)