

Texas Tech University Health Sciences Center El Paso Institutional Compliance Procedure

Conflict of Interest and Contract to Sponsor Comparison	Policy: HSCEP OP 10.05 PRO
	Effective Date: April 17, 2017
References: HSCEP OP 10.05, Texas Government Code 572, Regent's Rule Chapters 3 & 10	
TTUHSC El Paso Institutional Compliance Website: http://elpaso.ttuhscc.edu/compliance/	

Procedure Statement

The purpose of this procedure is to outline the process for comparing the current list of reported conflict of interests against the current list of individuals sponsoring contracts to assure that individuals are not the sponsoring contracts with their reported conflict.

Scope

To assist the compliance office with the oversight of conflicts of interest.

Procedure

1. On a monthly basis, the contract department will forward a list of pending contracts to the institutional compliance officer.
2. The institutional compliance officer or his or her designee will compare the contract sponsors to the current list of individuals with reported conflicts of interest.
3. If the contract sponsor appears on the list of individuals with a conflict of interest, the list will further be evaluated to determine if the contract is associated with the individual's conflict.
4. If the review determines that an individual with a conflict of interest is attempting to sponsor a contract with the entity in which he or she has a conflict, the institutional compliance officer will immediately contact the director of contracting to put a hold on the contract.
 - a. In this scenario, the compliance officer will also contact the individual and reemphasize the established conflict management plan.
5. The results of the review will be documented in the compliance investigation database.

Frequency of Review

Annually, during the month of July.

Review Date:

Revision Date: