



Institutional Compliance Policy and Procedure

Title: Conflict of Interest Assignment	Policy Number: 10.05 Pro
Reference: HSC OP 10.05, Texas Government Code 572, Regent’s Rule Chapters 3 and 10	Effective Date: 01/01/2017

Policy Statement:

The purpose of this policy is to outline the procedure for assigning the annual conflict of interest as well as assignment to newly hired individuals. This procedure also describes the compilation of data to be presented to the non-research conflict of interest committee.

Procedure:

Annual Conflict of Interest Distribution

1. During the first quarter of each calendar year (typically in February), the Institutional Compliance Department will assign the annual conflict of interest utilizing the Qualtrics System to the following positions or departments:
 - a. Faculty,
 - b. Student financial aid staff,
 - c. Procurement staff,
 - d. Contracting staff,
 - e. Information Technology staff,
 - f. Legal staff,
 - g. Fund managers,
 - h. Members of regulatory oversight committees dealing with sponsors (including but not limited to the Institutional Review Board),
 - i. Compliance staff, and
 - j. Staff members with the title manager or higher.
2. Individuals will have 60 days to complete the annual conflict of interest submission.
3. Compliance staff will provide a reminder to individuals that have not completed the conflict of interest submission after 30 days and weekly thereafter.
4. Individuals that failed to complete the conflict of interest form within the designated time frame will be sent a weekly reminders and the individual’s supervisor will be copied on the reminders.

Tracking of Completion

1. The Institutional Compliance officer will track completion of the annual conflict of interest by comparing the distribution list to reports generated by the Qualtrics system.
 - a. Reminders will be sent to individuals at the 30 day mark and weekly thereafter.
 - b. The final weekly reminder (prior to the past due date) will copy the individual’s supervisor or Chair if the individual is a faculty member.
- 2.

New Employee Conflict of Interest Distribution

1. During the third week of each month the compliance department executive associate will review the new employee orientation lists and assign the conflict of interest training (ACME system) and the conflict of interest form to the new employees that match the above listed in criteria.
- 2.

Tracking of Completion



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1. The Executive associate will track completion of the conflict of interest requirements by creating and maintaining a distribution list for new hires and will compare the report to reports generated by the Qualtrics system.
 - a. Reminders will be sent to individuals at the 30 day mark and weekly thereafter.
 - b. The final weekly reminder (prior to the past due date) will copy the individual's supervisor or Chair if the individual is a faculty member.

Data Compilation

1. The institutional compliance officer or his or her designee will download and review the information from the Qualtrics System. The submissions that contain data indicating that the individual has the conflict of interest will be summarized and will be presented to the non-research conflict of interest committee.
2. Review will follow the process described by HSC OP 10.05.

Review Date:

Revision Date: