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| University of Rochester | Office for Human Subject Protection | | |
| | Research Subjects Review Board | Effective Date: 08/03/2021 | |
| | Board Member Conflict of Interest | Policy 303 | Version: 1.4 |

POLICY

1. Purpose

To identify and manage real or perceived conflicts of interest of RSRB Chairs, Vice Chairs, and members, and to prevent these real or perceived conflicts from interfering with the research review process.

2. Scope

This policy applies to all RSRB Chairs, Vice Chairs, members, alternates and consultants regardless of the level or type of research reviewed by the RSRB.

3. Definitions

3.1. *Conflict of Interest* – A divergence between an individual’s private interests and his or her professional obligations to the University and its constituents.

3.2. *Family Members* – Members of the immediate family, specifically dependent children, spouses and domestic partners.

4. References

4.1. 45 CFR 46.107(e), 21 CFR 56.107(e)

4.2. [University of Rochester Faculty Conflict of Commitment and Interest policy](#)

4.3. RSRB Guideline Regarding Conflict of Commitment and Interest;
RSRB Member Conflict of Interest Statement

5. Responsibilities

5.1. The RSRB Director is responsible for ensuring that real or perceived conflicts of interest are identified and managed with respect to board membership and assignment of research to a particular board.

5.2. The RSRB Chair/Vice Chair is responsible for facilitating the identification and management of real or perceived conflicts of interest during the research review process (e.g., board meetings).

5.3. The RSRB Specialist is responsible for the identification and management of real or perceived conflicts of interest when assigning primary reviewers or other consultants as part of the research review process.

5.4. The RSRB members, alternates and consultants are responsible for identifying any real or perceived conflicts of interest.

5.4.1. Each new RSRB member will confirm review of this policy and the related guideline by signing the RSRB Member Conflict of Interest Statement.

5.4.2. All active members will sign the statement on an annual basis.

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5.4.3. In cases where a real or perceived conflict is identified during a convened meeting which results in a loss of quorum, the study or studies will be deferred to a subsequent meeting.

6. Requirements

- 6.1. No review board will have a member participate in the IRB's initial or continuing review of any project in which the member has a real or perceived conflicting interest, except to provide information requested by the IRB [45 CFR 46.107(e) and 21 CFR 56.107(e)].
- 6.2. The procedures outlined in the RSRB Guideline Regarding Conflict of Commitment and Interest will be followed to comply with this policy.

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Appendices:

None

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01/2015: Sect 5.3 added

01/2018: Sect 6.2.1 removed; Vice Chair added throughout; editorial changes

08/2021: Signatories updated, removed T.L Gommel; editorial changes

Supersedes Date:

01/19/2018

Approved By:

Kelley A. O'Donoghue

Kelley O'Donoghue
Director, OHSP

09/08/2021

Date