

# PROCEDURE 2300-PR1

## Disclosing Institutional Conflicts of Interest

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Associated Policy: 2300 Institutional Conflicts of Interest  
Effective Date: 8 MAR 2024  
Latest Revision: 5 JAN 2024  
Category: General Administration

### PURPOSE

This procedure sets forth specific disclosure requirements for outside interests held by Institutional Leaders and financial interests held by USU that could affect the design, conduct or reporting of Human Subjects Research (HSR). The procedure is associated with USU Policy 2300, "Institutional Conflicts of Interest." Policy requirements associated with this procedure include 2300.2.1, setting forth the need for disclosures of financial interests to allow for the assessment of those interests for existing or potential Institutional Conflicts of Interest. Disclosing financial interests related to outside entities is the first step in identifying and managing conflicts of interest. USU's duty to manage conflicts of interest is prospective and focuses on preventing biases that may arise based on outside interests held by USU or its employees from affecting USU's decision-making processes.

### PROCEDURES

#### Disclosure of Institutional Leaders' Outside Interests

As benefited employees, Institutional Leaders who have responsibilities for making, implementing or influencing operational and transactional decisions for USU are required under [Policy 2301, "Individual Conflicts of Interest,"](#) to disclose their outside interests that are, or could become, in conflict with their university duties. When disclosing outside interests, an Institutional Leader discloses the interests held by themselves and other close relatives, as addressed in the definition of Institutional Leader set forth in Policy 2300. When an Institutional Leader discloses a Significant Financial Interest (SFI) in an outside entity under this Policy 2301, "Individual Conflicts of Interest," it may also qualify as an Institutional Conflict of Interest (ICOI) if the outside entity is involved with USU in HSR. The COI disclosure and tracking systems shall provide information on each outside entity reported by Institutional Leaders.

#### Disclosure of Financial Interests Held Directly by USU

In addition to the requirement of USU's Institutional Leaders to disclose any financial interest(s) held in an outside entity that engages in HSR, USU's financial interests in outside entities must also be assessed. Access to institutional databases shall be provided to gather information from USU's Technology Transfer Office (TTO), USU's Sponsored Programs Office, USU Advancement, and the Office of Research to assess USU's outside interests. If database access is not directly achievable, officers in these units will timely cooperate with UEC and the IRB to provide information needed to assess outside interests. See USU Policy 2300 PR-2, "Outside Interest Assessment and Institutional Conflict of Interest Determination."

Interests held by USU that are monitored for ICOI are as set forth in Policy 2301.6.3, which defines Institutional Significant Financial Interests.

## **HISTORY**

NOV 2023 Initial Draft  
JAN 2024 Modifications to concentrate procedural matters in the procedure and harmonize with Policy 2300

## **RESOURCES**

Policy 2300, Institutional Conflicts of Interest

## **ADDITIONAL INFORMATION**

### **Contacts**

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