Review of Financial Conflicts of Interest

1. Relying Institutions make determinations on financial conflict for their site’s study team members. Management plans set by the Relying Institution are submitted to the Reviewing IRB - the Reviewing IRB evaluates the plan prior to approval. Any additional changes have to be cleared by the Relying Institution’s COIC.

2. No IRB should review the management plan on a study that has institutional conflict with the Relying Institution.

3. If the lead PI of the study has a financial conflict that requires subject notification, subjects at all sites are to be notified.

4. Target return time for review of other IRB documents
   - 8-15 days

5. Significant modifications:
   a. Pre-approval – N/A
   b. Post-approval
      Any changes to the financial conflict of interest management plan are reviewed at the Relying Institution level. The change is then submitted to the Reviewing IRB for approval.