

UH RESEARCH CONFLICT OF INTEREST MEMO

Dear Dr. x,

Thank you for notifying the UH IRB of your potential conflict of interest as an inventor of the [technology]. It is understood that you are considered an inventor of the [technology] that is designed to [description].

While it has been determined that the inventorship status does not present a significant financial conflict of interest, this memo serves as our acknowledgement of this potential for a perceived conflict of interest.

UH IRB STUDY IMPACTED:			
Role	IRB Study Number	Study Title	Sponsor
Co-I			

You have confirmed that you:

- have not received remuneration from profits from the intervention or software, and do not have plans to commercialize [technology] in the future.
- will not be determining eligibility, consenting patients or administering [technology].
- have disclosed in the consent that you are the inventor of [technology].

The IRB has reviewed and agrees that you are following an appropriate mitigation strategy and is not requiring additional formal management. However, if an intent to commercialize arises in the future, please note a formal management will likely be required.

The Principal Investigator is responsible for ensuring conflicts of interest are accurately disclosed in the IRB submission. Failure to appropriately document a conflict of interest within an IRB submission or failure to comply with management requirements may be considered non-compliance. These instances will be considered by the IRB and referred to Hospital Compliance (per CE-08) and the Office of Research Compliance for remediation and education.

ATTESTATIONS

By accepting this correspondence via email or otherwise, I make the following attestations:

- I will maintain the confidentiality of all proprietary and confidential UH information, and I will not use any such information to benefit the outside entities, nor will I disclose any such information to the outside entities
- I certify that the information regarding my outside activities and financial interests, on which this document is based, is true and accurate to the best of my knowledge.

- I will notify the UH IRB and the UH Compliance & Ethics Department within 30 days of discovering or acquiring a new financial interest (e.g., through purchase, marriage, or inheritance).
- I will notify the UH IRB of any new research protocols related to the [technology].
- I will comply with all UH policies and the UH Code of Conduct, including without limitation, those policies and provisions related to conflicts of interest.

For questions, please contact UHResearchCompliance@UHhospitals.org.