OP 74.12: Investigator Financial Disclosure Committee

DATE: June 11, 2018

PURPOSE: The purpose of this Operating Policy Procedure (OP) is to specify the charge, function, and composition of the Investigator Financial Disclosure Committee.

REVIEW: This OP will be reviewed in April of even-numbered years by the Associate Vice President for Research (Responsible Research) (AVPR) with substantive revisions presented to the Vice President for Research (VPR).

POLICY/PROCEDURE

1. Committee Charge

   a. The Investigator Financial Disclosure Committee (IFDC) will recommend to the vice president for research (VPR) or his/her compliance officers policies and procedures that promote objectivity in research and are in accordance with federal, state, and TTU regulations, and recognized best practices. The committee will:

      (1) Provide guidance about policy to manage TTU institutional financial conflicts of interest;

      (2) Review faculty business and financial interest disclosures and financial conflict of interest (FCOI) management plans, as requested by faculty and/or the VPR or the AVPR.

      (3) Provide guidance in the revision of OP 74.17, Disclosure of Significant Business or Financial Interests that may Represent Conflicts of Interest, to incorporate best practices and changes to applicable federal and state laws;

      (4) Provide guidance to the TTU community regarding objectivity in research and FCOI training; and

      (5) Provide guidance about TTU policies regarding investigator participation in human subjects research that may involve a FCOI.

   b. The committee will be charged with ensuring its work is confidential and will receive appropriate training and resources to conduct confidential reviews of faculty disclosures and management plans.
2. **Appointment of Committee Members**
   a. The VPR will appoint committee members and the chair.
   b. The compliance administrator for the Office of the Vice President for Research will serve as executive secretary for the committee.
   c. After an initial period of staggered appointments, each member's term will be for three years with reappointments permissible.

3. **Committee Operating Procedures**
   a. The committee will meet every month in which there is business to conduct. At a minimum, the committee shall meet once a quarter. The committee will develop its own operating procedures in accordance with federal, state, and local laws, subject to the approval of the VPR to whom the committee reports.
   b. Committee members should recuse themselves when they are directly involved in the research project being discussed by the committee or when they have significant business and financial interests in an entity being discussed by the committee.
   c. A quorum of at least half of the voting members will be required to conduct official business.
   d. When requested by the Faculty Senate, a member of the committee will be available to present a report to and respond to questions from Senators at a meeting of the Faculty Senate in the Spring term of each academic year.

4. **Committee Leadership**
   a. Chair
      The chair, who is appointed by the VPR, presides over all meetings and appoints subcommittees as necessary or required.
   b. Associate Chair
      The associate chair, who is elected by committee members, presides over all meetings in the absence of the chair and performs required committee chair duties in the chair’s absence.
   c. Executive Secretary
      The executive secretary of the committee is the compliance administrator in the Office of the Vice President for Research. The executive secretary is responsible for preparing the agenda for each committee meeting in consultation with the chair and preparing the official minutes of each meeting.

5. **Membership**
   a. The IFDC will consist of at least seven voting members including:
(1) Six faculty members (without administrative appointments), chosen from a pool nominated by the deans of all TTU schools and colleges and the Faculty Senate; and

(2) One member of the Research Advisory Council (RAC).

(3) At least one committee member shall be a member of the Faculty Senate at the time of appointment to the committee.

b. The composition of the committee will include:

(1) A minimum of two faculty members who have served as PIs or co-PIs of sponsored research projects;

(2) At least one member from each of the following schools and colleges: CAS, CASNR, COE, COHS, WCOE;

(3) The AVPR, ex officio; and

(4) IFDC executive secretary, ex officio