

WORKSHEET: Financial Interest Management

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This worksheet is used to consider management plans for financial conflicts of interests of investigators. 1. Should the investigator be involved in: 1.1 • Subject recruitment? • Determination of whether the subject meets inclusion/exclusion criteria? 1.3 • Consent process? 1.4 • Research interventions or procedures? 1.5 Clinical treatment of subjects, separate from the research interventions or procedures? Clinical evaluation of subjects during the research, separate from the research interventions or procedures? 1.7 • Adverse event evaluation and reporting? 2. Considerations for a management plan 2.1 • Disclosure of the financial interests to subjects 2.2 • Public disclosure of the financial interests 2.3 • Appointment of an independent research monitor Change of personnel or personnel responsibilities 2.5 • Disqualification of personnel from participation in all or a portion of the research 2.6 Reduction of the financial interest 2.7 Elimination of the financial interest 2.8 • Severance of relationships that create financial conflicts 2.9 • Modification of the research plan 2.10 • Involvement of external individuals in key portions of the research 2.11 • Transfer of IRB responsibilities 2.12 • Retrospective review

2.13

Mitigation report

2.14 • Monitor the implementation of the management plan