

**Guidelines for College of Education  
Conflict of Interest Management  
Approved at the 10.5.16 Leadership Team Meeting**

Those who must file a conflict of interest disclosure form are:

- Tenured and tenure-track faculty
- Research professors, associate research professors, and assistant research professors
- Professors, associate professors, and assistant professors with renewable-term appointments
- Research scientists and senior research scientists
- Administrators
- Employees whose annual salary exceeds \$60,000
- Any employee who is responsible for the design, conduct, or reporting of a research project funded by or proposed for funding by Federal agencies that require such disclosures.

This will include Clinical faculty and who meet the above criteria.

It will be critical that all personnel read the policy #4-0130 to understand what constitutes a conflict of interest and employees' responsibility for disclosing any potential conflict of interests. Unit administrators should be especially familiar with the policy in order to answer questions of personnel in their unit. Every employee of the University is subject to this policy and is responsible for complying and filing the disclosure form if they meet the above criteria.

Failure to fully and truthfully disclose relationships that could be viewed as a conflict of interest or to comply with a management plan would be considered a breach of policy and could be subject to disciplinary processes of the University, as well as possible criminal sanctions or civil liability under federal and/or state law. In addition, proposals to request funding from external sponsors will not be allowed unless all personnel associated with the project are in compliance with the policy.

In order to comply with this policy in the college, school heads should notify all personnel in their department of the disclosure requirements and **request that the forms be submitted to them by September 15<sup>th</sup> of each year**. Personnel may submit the disclosure (1) by email if it is more convenient and they are not concerned with the confidentiality of the form, or (2) they may submit the disclosure to the unit head in a sealed envelope and they will forward the form without viewing it. School heads will also need to collect the disclosure form from all new employees that meet the criteria when they are hired into the department.

The College Research and Contracts Office will initiate the process and work with school heads to ensure that all personnel in their department/school who meet the criteria requiring disclosure submit the forms in a timely manner. All disclosures will be forwarded to the College R&Gs Office. The disclosures will be reviewed to determine if any conflict of interest exists and will be filed in the confidential personnel files. If there is no conflict of interest, this will be the only office where the information will be seen.

If a conflict is disclosed, the disclosure form will be forwarded to a COE Conflict of Interest Committee to review the conflict and recommend requirements for immediate action and plans for continued monitoring of the potential of actual conflict. This Committee will consist of one associate dean, one appointed school head, one appointed faculty member, and the R&Gs office manager for sponsored programs.