

To: Deans, Directors and Department Heads

From: Rick Miranda, Provost and Executive Vice President

Date: June 25, 2015

RE: Conflict of Interest Guidelines and Resources

The State of Colorado, the Board of Governors, Colorado State University, and the Federal Government (where Federal contracts and grants are involved) all have policies that require disclosure concerning an individual's associations with businesses and organizations external to the University. Our method of collecting this information is the Annual Role and Responsibility Survey.

The Annual Role and Responsibility Survey, and consequent Conflict of Interest/Conflict of Commitment (COI/COC) assessment, are generally completed at the same time as the annual faculty and administrative professional evaluations. It is the responsibility of each department and unit to ascertain that a current Annual Role and Responsibility Survey is on file in the department or unit for each faculty member and administrative professional by May 15 of each year. A number of tools and resources are available on the Provost's website located at <http://provost.colostate.edu/faculty-administrative-professionals/>

Note that the COI section on the website is divided into two parts: Conflict of Interest and Conflict of Commitment. Conflict of Interest, in this case, usually refers to financial conflict of interest (FCOI). Briefly, the University policy and Colorado statutes on FCOI are stated in the Faculty Manual, Section D.7.7, as "External obligations, financial interests and activities that may conflict or interfere or may appear to conflict or interfere with the employee's obligation to the University". More information can be found in Section D.7.7 of the Academic Faculty and Administrative Professional Manual: <http://www.facultycouncil.colostate.edu/>

Conflict of Commitment (COC) can briefly be defined as "Any external commitments which substantially burden or interfere with the employee's primary obligations and commitments to the University". More information on COC can be found in the Faculty Manual, Section D.7.6 on the above website.

In your role as dean, director or department head, you will be asked to determine whether a FCOI and/or a COC exists for faculty members and administrative professionals based in part on their completion of the "Annual Role and Responsibility Survey". You will find a "COI/COC Assessment Guidelines" link on the Provost's website. This document is intended to guide the supervisor when meeting with employees to assess situations where potential or perceived FCOI or COC may arise. The completed "COI/COC Assessment Guidelines" need not be committed to writing.

If a real or perceived FCOI and/or COC is identified, then a Management Plan should be developed by the faculty member in consultation with the appropriate Research Associate Dean for the college. While Management Plans are specific to a situation and may involve many areas

such as role in contracts, use of University resources, regulatory approvals, reporting timelines and documentation of work performed, please bear in mind that the development of a Management Plan is responsible management oversight as well as University policy. Management Plans provide protection to the faculty member, you as the supervisor and the University and also ensure objectivity in research. A Management Plan template can be found on the Provost's website <http://provost.colostate.edu/faculty-administrative-professionals/> under "COI/COC Management Plan".

A memorandum certifying that the Annual Role and Responsibility Surveys for the Department have been completed and retained on file is available on the Provost's website (see "Template for Annual Memo to the Provost"). This memorandum is required by the auditors and needs to be submitted along with the annual evaluations. Timely and complete submission of the Survey protects the employee and the institution.

Evaluating and/or managing real or perceived COI/COC can be complicated. If you have any general or specific questions regarding FCOI and/or COC, please contact Vice Provost for Faculty Affairs, Dan Bush (d.bush@colostate.edu) or 491-6614.

Thank you for your attention to this important matter.