CONFLICTS OF INTEREST AND COMMITMENT POLICIES AND PROCEDURES AT IU
STAFF POLICIES AND PROCEDURES

- Research-Related Financial Conflicts of Interest
  - Managed by Office of Research Compliance
- State Financial Conflicts of Interest
  - Managed by General Counsel’s Office
- Conflicts of Interest
  - Managed by University Human Resources
- Conflicts of Commitment
  - Managed by University Human Resources
- Nepotism
  - Managed by University Human Resources
Faculty Policies and Procedures

- Research-Related Financial Conflicts of Interest
  - Managed by Office of Research Compliance
- State Financial Conflicts of Interest
  - Managed by General Counsel’s Office
- Conflicts of Commitment
  - Managed by Academic Affairs
- Nepotism
  - Managed by Academic Affairs
RESEARCH RELATED FINANCIAL CONFLICT OF INTEREST

- [http://policies.iu.edu/policies/categories/academic-faculty-students/conditions-academic-employment/financial-conflicts-of-interest-in-research.shtml](http://policies.iu.edu/policies/categories/academic-faculty-students/conditions-academic-employment/financial-conflicts-of-interest-in-research.shtml)

- Based on Department of Health and Human Services Regulations

- Anyone who is responsible for the design, conduct, or reporting of research or anyone who is listed on a human subjects study

- $5,000 or greater in compensation

- $5,000 or greater in equity interest in a publicly traded company

- Any equity interest in a nonpublicly traded company

- Includes interests of spouse, domestic partner, or dependents
RESEARCH RELATED FINANCIAL CONFLICT OF INTEREST – CON’T

- Annual online disclosure form (August)
- Update (complete a new form) within 30 days of a change in outside financial interest
- [http://researchcompliance.iu.edu/coi/coi_disclosure.html](http://researchcompliance.iu.edu/coi/coi_disclosure.html)
- Reviewed by Unit Head, Office of Research Compliance, Research-Related Conflict of Interest Committee
STATE FINANCIAL CONFLICT OF INTEREST

- [https://iga.in.gov/legislative/laws/2014/ic/](https://iga.in.gov/legislative/laws/2014/ic/)
- Indiana State Law (Title 35-44.1-1-4)
- Anyone who is employed with IU and could profit from a contract or purchase made by IU
  - Textbook royalties, contracting with family business
- Individual’s interest is greater than $250 in all contracts or purchases with IU
  - Includes dependents: spouse, child, stepchild, adoptee, an individual who receives more than ½ of support during the year from employee
STATE FINANCIAL CONFLICT OF INTEREST—CON’T

- One time or annual disclosure
- Must be filed within 15 days of final action on the contract or purchase
- [http://www.iub.edu/~vpgc/areas-of-law/conflicts-of-interest.shtml](http://www.iub.edu/~vpgc/areas-of-law/conflicts-of-interest.shtml)
- Reviewed by unit head, Provost, General Council, Board of Trustees, State Board of Accounts
- Once approved by State Board of Accounts, finalized form sent back to Board of Trustees
CONFLICT OF INTEREST (STAFF)

- [http://policies.iu.edu/policies/categories/human-resources/conduct/coi.shtml](http://policies.iu.edu/policies/categories/human-resources/conduct/coi.shtml)

- All staff and temporary employees (nonacademic)

- Whenever the employee has the opportunity to influence university operations or business decisions in ways that could result in a financial benefit to the employee or member of the employee’s immediate family

- No threshold
Disclosure required when the employee has a real or potential conflict of interest

Annual Disclosure

hr.iu.edu/pubs/forms/coi-disclose.pdf

Reviewed by unit head and managed by the unit

More than likely state conflict of interest form will need to be completed at the same time
CONFLICTS OF COMMITMENT (STAFF)

- http://policies.iu.edu/policies/categories/human-resources/conduct/coc.shtml
- All staff and temporary employees (nonacademic)
- An employee may not commit university resources to activities not in the interest of the university
- External activities should not impede fulfillment of university responsibilities and must occur outside of the employee’s designated work activities or during periods of authorized leave
- Employees shall not accept any compensation from another entity for work performed in the course of employee’s employment at IU
CONFLICT OF COMMITMENT (STAFF) — CON’T

- Employee should report any external activity representing a conflict of commitment or could interfere with fulfillment of university responsibilities.
- Unit heads and supervisors are responsibly for ensuring all employees adhere to this policy and are reminded of it at least every two years if not more frequently.
Nepotism (Staff)

- [http://policies.iu.edu/policies/categories/human-resources/employment/minors.shtml](http://policies.iu.edu/policies/categories/human-resources/employment/minors.shtml)
- All staff and temporary employees (nonacademic)
- Employees should not be employed in or transferred to a position that establishes an immediate supervisor/employee relationship between two related individuals
- If a marriage or same sex domestic partnership creates this kind of relationship, one of the employees affected must give up that position by the end of the fiscal year or within 6 months (whichever is greater)
- If an agreement can not be made then the employee with less university seniority date will be selected to leave the university
CONFLICT OF COMMITMENT (FACULTY)

- [http://www.iu.edu/~ufc/docs/policies/ConflictsCommitment.pdf](http://www.iu.edu/~ufc/docs/policies/ConflictsCommitment.pdf)
- All academic appointees
- Full-time tenure-track faculty shall be permitted to spend, on average, one non-weekend day each week on Outside Professional Activities
- University resources shall not be used in the performance of Outside Professional Activities without prior permission and compensating the University
CONFLICT OF COMMITMENT (FACULTY) – CON’T

- Activities that may represent a Conflict of Commitment must be disclosed in writing to the dean or unit head.
- All disclosure statements will be reviewed by the dean or unit head within 30 days.
- If a Conflict of Commitment is identified the dean/unit head and employee will work to eliminate or manage the conflict.
- All decisions will be documented in writing.
NEPOTISM (FACULTY)

- All academic appointees
- Employees should not be employed in or transferred to a position that establishes an immediate supervisor/employee relationship between two related individuals
- The determination of immediate supervisor is made by the Dean, Vice Provost for Faculty and Academic Affairs, and the Provost, Bloomington
Nepotism (Faculty) – Con’t

- Any instance of the potential employment of two family members in the same unit where supervision of one by the other might be issue should be disclosed to the Dean or Vice Provost for Faculty and Academic Affairs prior to employment.

- The Dean and Vice Provost, in consultation with the Provost, will designate an immediate supervisor in compliance with the policy.