

# CONFLICTS OF INTEREST AND COMMITMENT 101

OFFICE OF

## Conflicts of Interest and Commitment

Helps protect employees, students, departments and the university from adverse outcomes resulting from potential conflicts of interest related to scholarship and research.

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## Campus Controller's OFFICE

Oversees the post-award financial administration of sponsored projects and research for CU Boulder, directly managing accounts for restricted funds 30 and 31.

PRESENTED BY:

**Paul Myers, Ph.D.**

Director, Office of Conflicts of  
Interest & Commitment

A knowledge-based learning session  
hosted by the Campus Controllers Office

# Ask Questions at Any Time

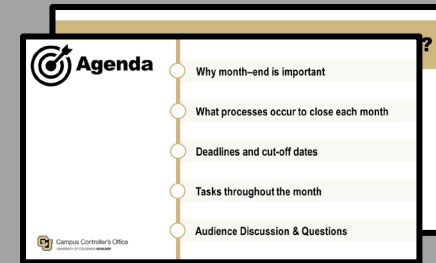
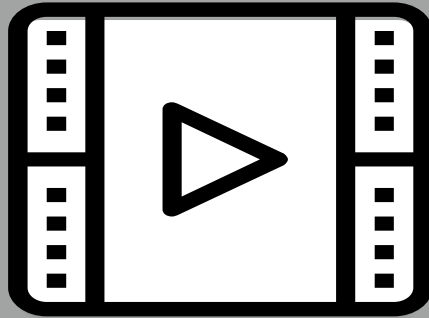
Using the Q&A Feature



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# Recording and Slides Available:

[colorado.edu/controller/training](https://colorado.edu/controller/training)





# Conflicts of Interest and Commitment 101

A professor consults with a company that stands to benefit from his research





# Conflicts of Interest and Commitment 101

A faculty member is on the board of a company that funds research at CU





## Conflicts of Interest and Commitment 101

A researcher is president and 50% owner of a startup that wants to sell its product to the university





## Conflicts of Interest and Commitment 101

A graduate student takes a part-time job at a company partially owned by his advisor





## Conflicts of Interest and Commitment 101

A researcher is owner of a company that serves as a sub-contractor to CU on a federally-sponsored grant for her research





# Conflicts of Interest and Commitment 101

What do these situations have in common?



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**Be Boulder.**

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# **Conflict of Interest**

when an employee's financial or personal considerations may compromise, or have the appearance of compromising, their personal judgment





# Managing COLC: The 5 R's

- RISK
  - Research integrity
  - Reputation
  - Regents
  - Requirements



# **Managing COLC: CU Boulder Policy**

## **Academic and Researcher Conflicts of Interest and Commitment Policy and Standards**





# **COLC Policy Foundations**

- Principles of Ethical Behavior: Board of Regents Law Article 8A3
- Conflicts of Interest - University Community Policy 8B1
- Conflicts of Interest and Commitment APS 5012
- Officer Disclosure of Interests APS 4013
- Outside Consulting and Service on External Boards Policy 8B2
- Fiscal Code of Ethics APS 4016
- Fiscal Misconduct Reporting APS 4012
- Section 510 of the National Science Foundation Grant Policy Manual
- Policies and Regulations of the National Institution of Health



# **Managing COLC: Disclosure**

## **Disclosure of External Professional Activities (DEPA)**

- Significant personal and financial interests and external activities
- At least annually
- Updated within 30 days of a change in status
- True, complete, and accurate





# **Managing COLC: Objective of Disclosure**

**Identify any potential:**

Conflicts of Interest

Conflicts of Commitment

- When time dedicated to outside activities interferes with an employee's paramount obligations to students, colleagues, and the primary missions of the university





# Managing COLC: Who Must Disclose?

All **faculty** members

All **staff, students, consultants, collaborators, sub-contractors, and volunteers** involved in the design, conduct, or reporting of research

Other **staff**:

- Office of Contracts and Grants
- Venture Partners
- Office of Research Integrity



# **Managing COLC: Assessment Principles**

- Risk-based
- Objective
- Transparent
- Consistent





# **Managing COLC: Assessment**

**Is there a potential conflict?**

- Similarity to research and university responsibilities
- Scope of relationship
- Size of interest
- Business with university
- Student involvement

**Is there an export control or sponsor reporting issue?**

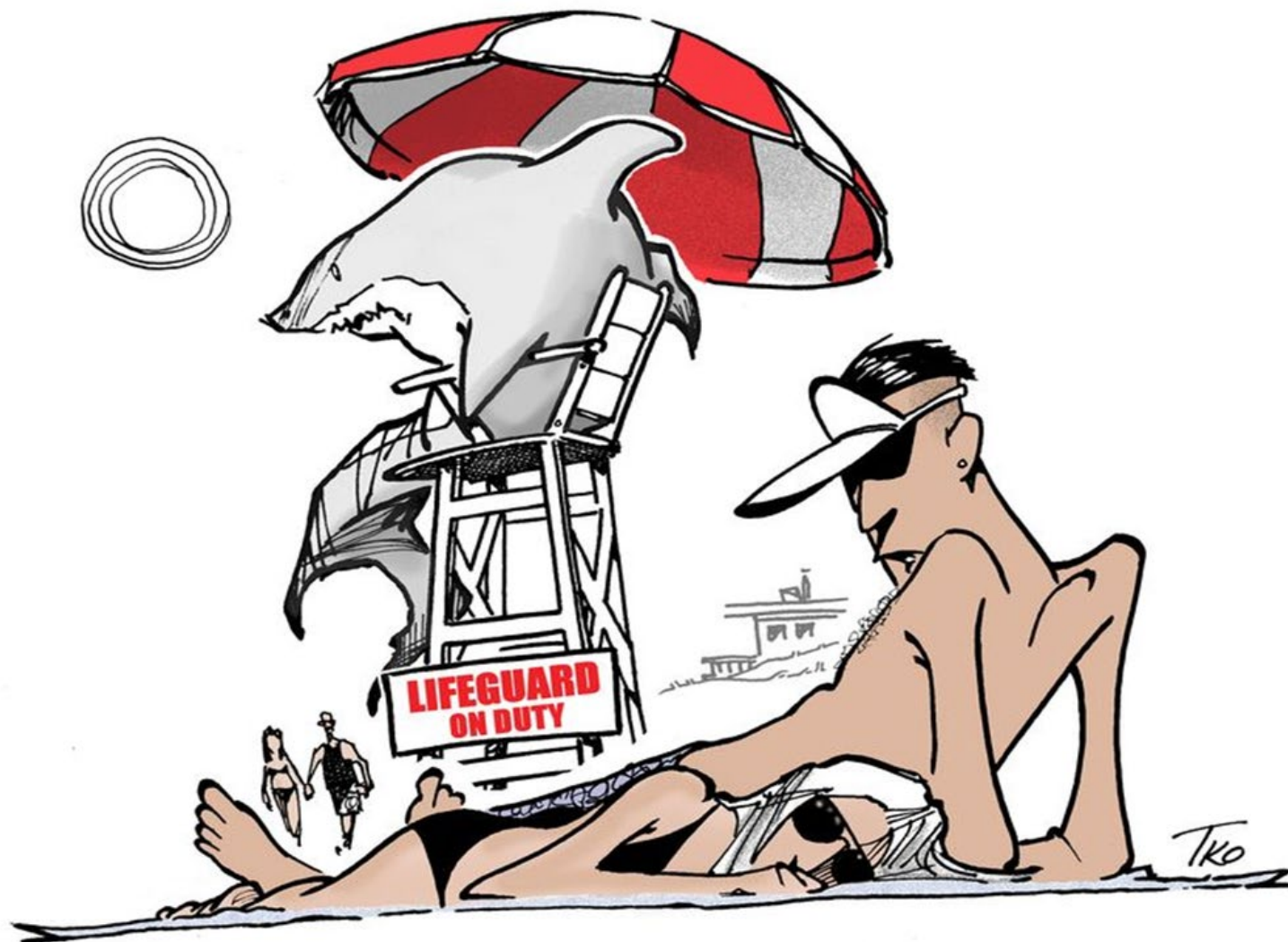




# **Managing COLC: Mitigation**

## **Management plans**

- Situation
- Commitments
- Fiscally disinterested person
- Annual monitoring report



*“So, I’m the only one who sees a  
conflict of interest here?”*





# For More Information

[colorado.edu/researchinnovation/coi](https://colorado.edu/researchinnovation/coi)

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# Questions

