

Conflicts of Interest Disclosure Training Video — 2026 Transcript

Welcome to a brief walkthrough of CU Boulder's Conflicts of Interest and Commitment policy and the disclosure form.

CU Boulder encourages innovation, research, and scholarship that leads to business and consulting activities and global engagement. Such pursuits, however, can create potential conflicts of interest and commitment. A conflict of interest exists when financial or personal considerations compromise, appear to compromise, or have the potential to compromise professional judgment in research and other University responsibilities. The focus of conflicts of commitment is the amount of time spent on activities away from those that are performed as part of an individual's expected university responsibilities to students, obligations to colleagues, and scholarly work, including research.

The Office of Conflicts of Interest and Commitment works with faculty to preserve the university's innovative spirit and research integrity. Regent policy and government regulations require CU to have a robust conflict of interest policy, the centerpiece of which is disclosure. Federal research sponsors, including NIH, NSF, and the Department of Energy, all have conflict of interest policy requirements, and CU Boulder's policy fully complies with them. Our reputation for research excellence rests on confidence that research is done without bias due to personal financial interest in the outcome. Disclosure helps maintain public trust, creates transparency, and allows us to deal with potential conflicts before they become a problem. Requiring disclosure, vetting potential conflicts, and managing them through formal procedures protects you, your department and the University from adverse consequences that could affect research funding or result in other sanctions.

Who must disclose? All faculty and any other employee, student, affiliate, or other person with responsibility for the design, conduct, or reporting of research must disclose any significant financial interest and external professional activity related to their university responsibilities that could compromise their judgment in performing their duties.

Disclosure is required at least annually and within 30 days of a discloser's change in status. Examples of changes include: forming a new company; starting a new consulting engagement; or beginning a new foreign affiliation. PIs are responsible for ensuring that all research personnel on their projects have submitted a DEPA.

Examples of things to disclose include ownership in a company, consulting activities and other outside work, board membership, foreign activities of any kind, and reimbursed or sponsored travel. Disclosing foreign activities is especially important due to increased government scrutiny of them, particularly those that might involve working with entities subject to export or other restrictions that you may not be aware of. You do not have to disclose financial and personal interests unrelated to your university responsibilities or those that fall below the established thresholds.

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CU Boulder's threshold for financial Interests reasonably related to one's university responsibilities, is \$5,000. What this means is that if remuneration received from an entity meets or exceeds \$5,000, disclosure is required. In addition, for non-publicly traded entities, any Equity Interest must be disclosed. Travel reimbursement or sponsored travel to a U.S. destination from a single entity valued at or more than \$2,500 must be disclosed. And, travel reimbursement or sponsored travel to any *foreign* destination of *any* amount must be disclosed.

The DEPA has a section specifically for the disclosure of foreign research collaborations, where you can name the entity, organization and/or institutions you are collaborating with, country, what value you are receiving from the entity, and a brief description of the activity. This is important so they can be reviewed to be sure they comply with applicable laws and regulations, including for disclosures to sponsors.

The University is committed to supporting open scientific research, the intellectual exchange of ideas, and the international academic research collaborations and engagement that facilitate them. However, the University is also committed to ensuring research security. To that end, the University is obligated to monitor and regulate participation in certain Foreign Talent Recruitment Programs.

A foreign talent recruitment program is an effort by a foreign government to recruit science and technology professionals or students with the intent to acquire resources to further their military and economic goals. The Federal government has determined that some of these programs pose a threat to national and economic security, and the CHIPS and Science Act has prohibited participation in them for recipients of federal grants. Such programs are known as Malign Foreign Talent Recruitment Programs.

Faculty and students are prohibited from participating in malign foreign talent recruitment programs. If you are approached by a foreign government or entity and invited to participate in any program or activity or to accept an appointment to any position, you are required to seek guidance from the Office of Research Integrity prior to agreeing to do so, regardless of whether you believe it to be a malign foreign talent recruitment program.

New Research Security training is available on the Percipio learning platform. Applicants for Department of Energy and NSF grants are required to take it. It is highly recommended that you take advantage of this training if you engage in foreign research collaborations.

To help mitigate the potential for Conflicts of Commitment, all faculty must receive approval to engage in consulting and other outside work. To streamline the approval process, use the online form to submit your request. To begin the approval process, please visit our website, where the form is easily accessible.

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Thinking of starting a business? Has a company asked you to do some consulting? Have you been invited to serve on a corporate board of directors? The Office of Conflicts of Interest and Commitment is here to help you think through the implications of an outside opportunity or external affiliation. Uncertain about whether you need to disclose something? The COIC office can discuss it with you so you can make the right choice.

We invite you to check out our website for more information and guidance. There you will find resources including a list of frequently asked questions and additional short videos to assist you with disclosure.

The University of Colorado Boulder thanks you for your continued commitment to upholding the highest standards of ethics and compliance, in part through your annual disclosure.