



1. INTRODUCTION

The University of Notre Dame maintains uniform policies and standards for identifying, and removing, *actual* Conflicts of Interest and has adopted policies and procedures for managing situations that could give rise to *potential* or *perceived* Conflicts of Interest. In determining whether an actual, potential, or perceived Conflict of Interest exists in a given situation, the University will consider the specific details of the situation and make a determination based on the totality of the circumstances. The University believes that clear guidelines and principles for reporting and managing actual, potential, and perceived Conflicts of Interest will assist our faculty, staff, and students in maintaining the highest level of integrity in their endeavors.

2. POLICY STATEMENT

An actual Conflict of Interest arises in a situation where financial or other personal or professional considerations compromise an individual's objectivity, professional judgment, professional integrity, and/or ability to perform his or her professional responsibilities to the University. In addition to situations that clearly give rise to an actual Conflict of Interest, individuals are cautioned also to consider gray areas that might create the perception of or the potential for a Conflict of Interest. Perceived or potential Conflicts of Interest can be said to exist in situations where an individual member of the University community (Member), a member of the individual's family (Family), or a close personal relation (Close Relation) has financial interests, personal relationships, or professional associations with an individual, individuals, or outside organization, such that his or her activities within the University could appear to be influenced by that interest or relationship.

All Members of the Notre Dame community are committed to identifying and avoiding situations and activities that constitute a Conflict of Interest in the execution of their duties for the University. Furthermore, activities, situations, and relationships that might create the perception of or potential for a Conflict of Interest must be identified and managed appropriately. In every instance, the University reserves the right to make a determination in light of its best interest.

On no less than an *annual* basis, all Members, whether they are engaged in activities that might create the perception of or potential for a Conflict of Interest or not, are required to submit a Conflict of Interest Disclosure Survey to their respective Reviewer. (*See* Appendix: Disclosure Reviewer Matrix)

Members are further charged with the responsibility of accurate and prompt disclosure to their respective Reviewer within *15 calendar days* of: (1) a change in status of an existing actual, perceived, or potential Conflict of Interest; and (2) the identification of a new actual, perceived, or potential Conflict of Interest.

Conflict of Interest Categories:

Situations and activities may be grouped into one of three categories under this Conflict of Interest Policy:

1. Category A: Not Significant and Generally Permissible Activities

Situations where any Financial Interest held by a Member, Member's Family, or Member's Close Relation does not indicate a Significant Financial Interest *and* where the situation suggests no actual, potential, or perceived Conflict of Interest. These situations may continue without special safeguards or oversight.

2. Category B: Potential or Perceived Conflicts of Interest

Activities which represent Potential or Perceived Conflicts of Interest would be permitted to go forward after disclosure with an approved Management Plan.

3. Category C: Actual Conflicts of Interest

Activities which represent *actual* Conflicts of Interest, and which may be permitted to go forward after disclosure only with an appropriate Management Plan to *eliminate* the conflict, safeguard against prejudice toward University activities, and provide continuing oversight.

3. SCOPE

This Policy applies to all Members of the University community (faculty, staff, and students) who are in a position to influence or commit University resources. *See* full definition of Member in Section 5.

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5. DEFINITIONS

Close Relation	A colleague or other individual with whom a Member has a relationship that is similar to a Family relationship in loyalty or importance. Some examples of close relations include a Member’s very close personal friend or a Member’s colleague from the University or an outside institution with whom there is a close professional relationship.
Conflict of Interest	A Conflict of Interest arises in a situation where financial or other personal or professional considerations compromise an individual’s objectivity, professional judgment, professional integrity, and/or ability to perform his or her responsibilities to the University.
Equity Interest	Any stock, stock options or other ownership of interest, as determined through reference to public prices or other reasonable measures of fair market value.

Faculty Conflicts Committee (FCC)	A committee of faculty able to perform, at the discretion of the appropriate Dean, the initial review of faculty Conflict of Interest disclosures before final approval by the University Conflicts Committee. (See Appendix: Disclosure Reviewer Matrix)
Family	The spouse, in-law, child (including adopted and stepchildren), sibling (by whole, half-blood or adoption), parent, ancestor, grandchild or great grandchild of a Member. Family also includes the <i>wives</i> of all of these relations.
Financial Interest	Anything of value, including but not limited to salary or other payments (e.g., consulting fees or honoraria); forbearance or forgiveness of debt; gifts over \$90 in value; Equity Interests (e.g., stock options or other ownership interests); intellectual property rights (e.g., patents, copyrights, trademarks, trade secrets and royalties from such rights); and any other similar interest a Member, a Member's spouse or dependent child, or close relation, may have in an entity outside the University.
Management Plan	If it is determined that an actual, potential, or perceived Conflict of Interest exists, the Reviewer, with Member's input as needed, may be required to provide a Management Plan for approval by the University Conflicts Committee in order to ensure the reduction, management, or elimination of the conflict.
Member	All University employees (including full-time and part-time faculty and staff, visiting faculty, and postdoctoral scholars) who are in a position to influence or commit University resources are Members. Students (including undergraduates, graduate students, and postdoctoral fellows) who are in a position to influence or commit University resources are also Members. The Board of Trustees of the University is subject to a separate "Trustee Conflict of Interest Policy" and therefore is not considered a Member as defined by this Policy.
Non-Financial Consideration	Anything of non-monetary value, usually of reputational value, such as publication, professional recognition, and promotion.
Professional Responsibilities	Professional responsibilities to the University include research and scholarship, teaching and instruction, administrative service to the University, institutional committee membership and all other work and activities the University considers in its review of a faculty or staff member's performance as a University employee.
Reviewer	The person or committee responsible for reviewing a Member's disclosure to determine if an <i>actual</i> Conflict of Interest exists that must be removed or if the disclosed situation or proposed activity includes a <i>perceived</i> or <i>potential</i> Conflict of Interest that must be managed. (See Appendix: Disclosure Reviewer Matrix)
Remuneration	Includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship.)

Significant Financial Interest

A Significant Financial Interest exists for a Member when any of the following are true for the Member and/or the Member's spouse and/or the Member's dependent children:

1. Has received Remuneration from a publicly traded entity in the twelve months prior to a disclosure and/or has any Equity Interest in the publicly traded entity as of the date of disclosure, and the value of all such Remuneration and Equity Interests concerning that publicly traded entity exceeds \$5,000 in value when aggregated.
2. Has received Remuneration from a non-publicly traded entity in the twelve months prior to a disclosure, and the value of all such Remuneration exceeds \$5,000 in value when aggregated.
3. Has any Equity Interest in a non-publicly traded entity.
4. Has received income related to intellectual property rights and interests (e.g., patents, copyrights)
5. Significant Financial Interests do not include:
 - (a) salary, royalties, or other Remuneration paid by the University to employees (including intellectual property rights assigned to the University and agreements to share in royalties related to such rights);
 - (b) investment vehicles, such as mutual funds and retirement accounts, where the Member does not directly control the investment decisions made by such vehicles.
 - (c) income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education; or
 - (d) income from service on advisory committees or review panels for a Federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

Third Party Organization

Any group, organization, or legal entity (e.g., partnership, firm, trust, joint venture, and corporation) that is not part of the University.

University	The University of Notre Dame du Lac.
University Conflicts Committee (UCC)	The committee responsible for approving, amending, or vetoing a Member's proposed plan for managing a potential or perceived Conflict of Interest or eliminating an actual Conflict of Interest.

6. RESPONSIBILITIES

6.1. Responsibilities of Deans and Department Heads

It is a responsibility of Deans (for faculty) and Department Heads (for staff) to ensure that Members are familiar with University policies and procedures relative to Conflict of Interest. Specifically, Deans and Department Heads are charged with the following:

1. Educate Members about University Conflict of Interest Policy.
2. Advise Members with respect to existing and proposed relationships and activities so that they may seek to avoid an actual Conflict of Interest.
3. Review Conflict of Interest disclosures or assign review to designee or, in the case of Deans, to the Faculty Conflicts Committee (FCC). (*See Appendix: Disclosure Reviewer Matrix*)
4. Develop, with input from Member if needed, conflict Management Plans as required.
5. Monitor Member compliance with University Conflicts Committee (UCC) approved conflict Management Plans as required.

6.2. Responsibilities of Reviewer

It is the responsibility of the Reviewer to identify any actual, perceived, or potential Conflicts of Interest in a Member's disclosure and to make a recommendation for a plan to manage those conflicts. The Disclosure Reviewer Matrix appended of this Policy should be used to determine the appropriate Reviewer for a Member.

1. All disclosures received by the Reviewer shall be evaluated by the Reviewer for full and accurate information. In the case of an incomplete disclosure, the Reviewer shall communicate with the disclosing Member within *15 calendar days* to request the necessary additional information from the Member.
2. Disclosures identified by Reviewer as being *below* the threshold for Significant Financial Interest and which represent *no* Conflict of Interest (Category A) will

be allowed to proceed without special safeguards or oversight, i.e., no Management Plan will be needed. The Reviewer must submit these Category A disclosures to the Chair of the UCC and inform the Member that the proposed activity will be permitted without management or oversight.

3. Disclosures identified by Reviewer as having *potential* or *perceived* Conflicts of Interest (Category B) will be forwarded, along with a proposed Management Plan (*See* Section 7.3.1.), to the UCC. These Category B disclosures may be reviewed and related Management Plans may be approved on an expedited basis by the Chair of the UCC or designee upon request of Reviewer.
4. Disclosures identified by Reviewer as having *actual* Conflicts of Interest (Category C) will be forwarded, along with a proposed Management Plan (*See* Section 7.3.1.), to the full UCC for approval.
5. When the Reviewer determines that a disclosure contains Category B and/or Category C disclosures, the Reviewer will communicate this determination in writing to the Member.

6.3. Responsibilities of Faculty Conflicts Committee

Recognizing the value of peer review for faculty-specific issues, the Faculty Conflicts Committee (FCC) may be called upon as needed at the discretion of the appropriate Dean to perform the initial review of a faculty Conflict of Interest disclosure. If a Dean decides to have the FCC perform the initial review of a faculty Conflict of Interest disclosure, the FCC becomes the Reviewer as defined by this Policy and takes on all of the Reviewer's responsibilities as specified in this Policy.

6.3.1. FCC Membership

The FCC shall consist of seven voting members: one appointed by the Faculty Affairs Committee of the Academic Council, one appointed by the Faculty Senate, two Teaching and Research faculty members appointed by the Vice President for Research, and three Teaching and Research faculty members appointed by the Provost. Of the seven voting members of the FCC, at least three must be selected from the full-time, tenured faculty engaged in sponsored research activities.

6.3.2. FCC Meeting Frequency

The FCC will convene when called upon by the appropriate Dean to conduct an initial review of a faculty Conflict of Interest disclosure and conclude when a determination is submitted in the matter.

6.3.3. Review by the FCC

1. When a Dean designates the FCC to perform the initial review of faculty Conflict of Interest disclosure forms, the FCC will review the completed forms as the Reviewer (*See* Section 6.2.) in order to identify any actual, perceived, or potential Conflicts of Interest. If the FCC identifies an actual, perceived, or potential Conflict of Interest, the committee will develop an appropriate Management Plan, with input from the Member as needed.
2. Faculty disclosures requiring an expedited review shall not wait for a full meeting of the FCC. Instead, these faculty disclosures will be reviewed by a rotating member of the FCC. If the FCC member determines that the disclosure contains only Category A and/or Category B disclosures, the FCC member will forward this determination—along with a Management Plan, if one is necessary—to the Chair of the UCC with a request for expedited approval. If the FCC member determines that the disclosure contains a Category C disclosure, the FCC member will forward this determination—along with a Management Plan—to the full UCC for approval.
3. When necessary, the FCC may discuss the disclosure and the development of a Management Plan with the Member involved and may also consult with others who may have relevant information.
4. The FCC will attempt to conclude its review of a disclosure within *30 calendar days* after the matter is referred to the FCC by the Dean. When the FCC determines that a disclosure contains Category B and/or Category C disclosures, the FCC will communicate this determination and its recommended Management Plan in writing to the Member, the appropriate Dean, and the UCC.

6.4. Responsibilities of University Conflicts Committee

The University Conflicts Committee (UCC) is dedicated to properly identifying actual, potential, and perceived Conflicts of Interest at the University and to ensuring the proper management of such Conflicts of Interest. The UCC provides oversight for Conflict of Interest training and education, recommends amendments to this Conflict of Interest Policy to the University Policy Committee, and reviews those Conflict of Interest disclosures that suggest an actual, potential, or perceived Conflict of Interest (as initially recognized by Reviewers). If a Conflict of Interest situation arises that requires a Management Plan, the UCC works in cooperation with the Reviewer, and the Member as needed, to approve an appropriate Management Plan. The UCC reports directly to the President of the University.

6.4.1. UCC Membership

The UCC consists of four voting members: Executive Vice President, Provost, Vice President for Research, and Vice President and General Counsel (UCC Chair).

Representatives from the General Counsel's Office, Finance, Human Resources, and the Vice President for Research's Office will serve as ex officio non-voting UCC members. When a voting member of the UCC is under Conflict of Interest review, the President of the University will take the voting member's place for that voting member's review. The voting member of the UCC under review will be treated like any other Member as defined by this Policy and will not be present for or take part in review of his/her Conflict of Interest disclosure or in the approval of any Management Plan necessary for the management of his/her actual, perceived, or potential Conflict of Interest.

6.4.2. UCC Meeting Frequency

The UCC will meet at least once every semester during the academic year unless there is insufficient business before the UCC to warrant meeting in a given semester. During the summer months, the UCC will meet as needed.

6.4.3. Review by the UCC

1. After receiving a Reviewer's report on a disclosure, the UCC will determine whether an actual, perceived, or potential Conflict of Interest exists. If the UCC determines that such a Conflict of Interest exists, the UCC will approve, amend, or veto the proposed Management Plan. In making these determinations, the UCC will be guided by the principles discussed within this Policy.
2. If a Reviewer has requested expedited review of a Category A and/or Category B disclosure, the Chair of the UCC or designee will review the disclosure and approve, amend, or veto the related Management Plan. These expedited disclosures will be reported to the full UCC at its next meeting.
3. For situations in which the Reviewer has determined that a Member has an actual Conflict of Interest (Category C), the University will not normally allow these activities if an acceptable Management Plan cannot be developed to avoid the Conflict of Interest. These Category C disclosures must be reviewed and Management Plans approved by the full UCC.
4. When necessary, the UCC will discuss the disclosure and recommended Management Plan with the Reviewer and /or Member involved and may also consult with others who may have relevant information.

5. The UCC will attempt to conclude its review of a report from a Reviewer within *30 calendar days* after the matter is referred by the Reviewer, and will communicate its decision in writing to the Member, the Reviewer, and the appropriate Dean, Department Head, or member of the President's Leadership Council as appropriate.
6. If the UCC prescribes monitoring of a situation or an activity, it will describe specifically how the monitoring shall be performed and what records of the situation or activity are required.

6.4.4. Confidentiality

When sharing of UCC current review status or outcome is required for internal coordination of approvals for research or educational activities, the UCC will provide limited, non-specific information from the Member's disclosure form and/or Management Plan. The recipient of such information shall maintain confidentiality, except as required for the performance of University duties or as required by the federal government.

Disclosure forms, Management Plans, and other Conflict of Interest records will be kept in locked file drawers and/or within electronic databases with firewall and password protection.

7. PROCEDURES

7.1. Disclosure

The key to recognizing and dealing with Conflicts of Interest is disclosure. Full, accurate disclosure and consultation regarding actual, potential, or perceived Conflicts of Interest is in the best interest of both Members and the University. A Member should complete and promptly submit a disclosure to the appropriate Reviewer on an annual basis and also after the Member has discovered or suspects that an actual, potential, or perceived Conflict of Interest exists or could arise from a situation or activity of that Member, their Family, or a Close Relation, including situations or activities that are reasonably foreseeable or are anticipated. This requirement applies to but is not limited to Conflicts of Interest arising out of a Member's, Family's, or Close Relation's association with a Third Party Organization.

Members shall also be required to disclose Significant Financial Interests under this policy or related University guidelines and the University will determine whether or not such Significant Financial Interests present a Conflict of Interest and, if so, develop plans for managing the conflict.

If at any time a Member believes or suspects that a situation or activity in which he/she is involved may present a Conflict of Interest, or if there is a significant change in the personal, financial, or fiduciary status of a Member, their Family or a Close Relation, with respect to a Third Party Organization, it should be promptly disclosed within *15 calendar days* to the appropriate Reviewer.

The University respects the privacy of Members and does not require the disclosure of financial or personal information that does not relate to an actual, potential, or perceived Conflict of Interest. Any Reviewer who receives such information as part of the disclosure, review, and management process is responsible for taking reasonable steps to maintain the confidentiality of the information. However, the Reviewer may be required to share, within the University community, financial and/or personal information contained in an individual disclosure when necessary for the Reviewer to make a complete and informed decision regarding the existence and management of an actual, potential, or perceived Conflict of Interest.

7.2. Review

Upon receipt of a complete disclosure, the Reviewer will determine whether an actual, potential, or perceived Conflict of Interest exists. If the Reviewer determines that an actual, potential, or perceived Conflict of Interest exists, the Reviewer will make a recommendation to the University Conflicts Committee (UCC) as to what conditions or restrictions, if any, should be imposed by the University to manage, reduce or eliminate such conflicts. The Reviewer, with input from Member if needed, shall develop a Management Plan for submission to the UCC. If further guidance is needed, the Reviewer should consult the UCC before submission.

The Reviewer shall make a formal recommendation to the UCC for disposition of the actual, potential, or perceived conflict and, if applicable, the corresponding Management Plan. A Member can expect disposition within a reasonable amount of time (normally, *45 calendar days*) provided the Reviewer has received a full and accurate disclosure from the Member.

In the case of the President of the University, the Chair of the Board of Trustees shall act in the place of the UCC. (*See Appendix: Disclosure Reviewer Matrix*)

7.3. Management

The UCC shall make a decision regarding disposition of a disclosure based on the Reviewer's recommendation, the details regarding the Member's actual, potential, or perceived Conflict of Interest, and the proposed Management Plan.

7.3.1. Management Plans

At a minimum, all Management Plans submitted for review shall contain the following elements:

- 1.** A list of all relevant publications, proposals, and presentations and, for each such project, a statement disclosing support received from or Significant Financial Interests in any Third Party Organization involved in the project upon publication.
- 2.** A statement that the Member shall not engage in contractual negotiations on behalf of the University, including intellectual property negotiations, between the University and any Third Party Organization relevant to the proposed Management Plan.

3. A statement that the Member must notify students of any actual, potential, or perceived Conflict of Interest if students are to perform work on the project in question.

Management Plans may also contain additional elements, including, without limitation, the following:

A. Oversight

1. Providing copies to the UCC of any financial or other disclosure statements submitted to a journal for article publication.
2. Monitoring and oversight by a designated oversight manager, Dean, Department Head, supervisor, UCC-appointed subcommittee, or UCC.
3. Quarterly, semi-annual, or annual review of the impact, if any, of Member's participation in activity on Member's responsibilities to University.

B. Modification to Scope of Work or Duties

1. Reformulation of work plans or duties.
2. Restrictions on analysis of contracts, bids, or research data.
3. Close monitoring of projects by independent reviewers.
4. Termination or reduction of involvement in relevant projects.
5. Avoidance of inappropriate student involvement in projects.

C. Handling of Financial Interests

1. Divestiture of the Financial Interest.
2. Recusal from negotiations between the University and a Third Party Organization in which the Member, Member's Family, or Member's Close Relation has a Financial Interest.
3. Disqualification from participation in the portion of the activity that would be affected by the Financial Interest.
4. Disclosure of Financial Interest to all relevant parties involved in the activity.

7.4. Reconsideration Process

A Member may ask for reconsideration of a Conflict of Interest determination and disposition made by the UCC. A letter outlining the Member's reasons for requesting reconsideration must be submitted in writing to the UCC within *15 calendar days* of a Member's receipt of the UCC's determination and disposition. Reconsideration with respect to a Conflict of Interest shall be separate from the Grievance Process outlined in the Academic Articles.

After giving reconsideration to a Member, the subsequent decision of the UCC regarding the Conflict of Interest and any related Management Plan shall be *final*. The UCC shall notify the following individuals in writing within *15 calendar days* of reaching its final decision after reconsideration:

1. The Member who has the actual, potential, or perceived Conflict of Interest.
2. The relevant Dean, Department Head, member of the Officers Group, supervisor and/or Reviewer.
3. Other individuals on campus who have a "need to know" (e.g., the Vice President for Research or equivalent at the relevant school or college).

7.5. Records and Retention

Records of disclosures, Reviewer recommendations, UCC dispositions, conflict Management Plans, and all supporting documentation (e.g., meeting minutes) will be maintained in the University's Conflict of Interest Electronic Disclosure System managed by the Office of General Counsel.

Records shall be retained for a period of *3 years* following the later of the end of: (1) the situation presenting the actual, potential, or perceived Conflict of Interest; or (2) the management of the actual, potential, or perceived Conflict of Interest; or (3) "for at least three years from the date of submission of the final expenditures report" or other dates as specified in the Code of Federal Regulations (45 CFR 74.53(b)).

7.6. Non-Compliance

The University expects Members to comply fully and promptly with this Policy, including the requirements of disclosure. Examples of breaches of the disclosure, review, and approval process *include, but are not limited to*:

1. Failures to comply with the process, whether by virtue of a Member's refusal to disclose or respond, or by his/her disclosing or responding with incomplete or knowingly inaccurate information;
2. Failures to address a Conflict of Interest as instructed; or

3. Failures to comply with a prescribed conflict Management Plan.

The UCC is authorized to establish standard procedures for reporting, investigating, and resolving alleged breaches. These standard procedures must provide the Member with an opportunity to respond to allegations in writing and, upon invitation by the UCC, in person. If the UCC determines that a breach occurred, the UCC will include any written response submitted by the Member under investigation in its report specifying sanctions.

7.6.1. Sanctions for Non-Compliance

Members who deliberately or repeatedly fail to disclose fully and truthfully Conflict of Interest situations or fail to comply with any stipulated Management Plan for managing the disclosed conflict will be subject to the applicable University disciplinary processes.

Sanctions may include disciplinary action ranging from a letter of reprimand to termination of employment. Additionally, instances of a deliberate breach of Policy related to a federally sponsored research program will be reported to the appropriate federal funding agency and may result in the suspension of privileges to submit future grant proposals.

In addition to University sanctions, violations of full and prompt disclosure may result in the loss of grant funding and in sanctions regarding future funding from federal agencies. Members may also be subject to criminal sanctions or civil liability under federal or state law.

8. POLICY ENFORCEMENT

Enforcement	The University Conflicts Committee or its designee will investigate suspected violations, and may recommend disciplinary action in accordance with University codes of conduct, policies, or applicable laws.
Reporting Violations	Suspected violations of this Policy should be reported to the Office of General Counsel.

9. CONTACTS

Subject	Office Position or	Telephone Number	E-mail
Policy Content	Policy Specialist, Office of General Counsel	(574) 631-6411	policy@nd.edu
Online Conflict of Interest Disclosure System		http://conflictpolicy.nd.edu	
Web Address for this Policy		http://policy.nd.edu/policy_files/ConflictofInterestPolicy.pdf	

Conflict of Interest Regulatory Compliance Guidelines	http://or.nd.edu/compliance/compliance-overview/
Related Faculty Policy on Outside Activities	http://facultyhandbook.nd.edu/university-policies/outside-activities/

10. APPENDIX: DISCLOSURE REVIEWER MATRIX

<u>Member</u>	<u>Reviewer</u>	<u>Management Plan Approval</u>
Faculty	Dean, Faculty Conflicts Committee, or Designee	University Conflicts Committee
Academic Department Chair	Dean, Faculty Conflicts Committee, or Designee	University Conflicts Committee
Dean	Provost or Designee	University Conflicts Committee
Staff	Dean, Department Head or Designee	University Conflicts Committee
Staff Department Head, Associate Provost, Vice President, Assoc. Vice President, Athletic Director	Supervising Member of the Officers Group or Designee	University Conflicts Committee
Provost or Exec. Vice President	President or Designee	University Conflicts Committee
President	Board of Trustees	Chair of Board of Trustees
Students Engaged in Sponsored Research	Dean or Designee	University Conflicts Committee