

## CONFLICTS OF FINANCIAL INTEREST: WHEN IS DISCLOSURE REQUIRED?

The following are examples intended to illustrate the reporting requirements of the University of Oklahoma Conflicts of Financial Interest Policy. Examples are keyed to the Conflicts Policy Report Form. Further inquiries should be directed to the Office of the [Provost](#).

Do you have an interest in an entity or activity that . . .

(a) Does business with the University in an area in which you make spending decisions?

EXAMPLE A1. The director of a research unit intends to purchase a large piece of equipment. There are several possible vendors. One vendor is a small company owned by the director. *Purchasing decision reasonably appears affected by outside interest -- disclosure required.*

EXAMPLE A2. Same facts as above, but vendor is a large, multinational corporation in which director owns ten shares of stock worth less than \$10,000 in all. *Outside interest may profit from University activities, but interest is not significant -- disclosure not required.*

(b) Profits from the sale of course material (coursepacks, software, etc.) or other goods or services to students whom you teach or evaluate?

EXAMPLE B1. A faculty member has created a custom software package that provides interactive tutoring specifically for his calculus course. The faculty member invites all 500 students in his calculus class to purchase the package at a per-unit markup of \$20. *Outside interest profits from University activities -- disclosure required. Additionally, activity may implicate state law prohibition against private profit from public employment, and university policy*

EXAMPLE B2. An Accounting faculty member works each summer for a private corporation that offers test-preparation courses to students planning to take the CPA exam. *Outside interest related to University activities, but neither affected by the other -- disclosure not required.*

(c) Employs University faculty, staff, or students whom you directly supervise or evaluate in that employment and also supervise or evaluate at the University.

EXAMPLE C1. The husband of a faculty member in Engineering owns a small research company and wishes to hire graduate students whose thesis research the faculty member supervises. *Student evaluated by faculty member is directly supervised in private concern by spouse -- disclosure required.*

EXAMPLE C2. A faculty member in the Department of History is the director of a bank. Some of the bank's employees are students; some are students of the faculty member; but none are directly supervised in their employment by the faculty member. *Interest employs faculty member's students, but faculty member does not supervise them -- no disclosure required.*

- (d) Sponsors a project at the University over which you have any degree of control?

EXAMPLE D1. A faculty member is employed as a consultant by a corporation that makes computer chips and is also the principal investigator on a University research project funded by the corporation. *Interest profits from faculty member's University duties -- disclosure required.*

- (e) Profits from research you do at the University?

EXAMPLE E1. A faculty member works as a private consultant for a biotechnology company on projects related to his University research program. During the past year, he earned over \$10,000 in consultant fees. In addition, he has submitted a grant application to the National Institutes of Health for support of a research project related to the business interests of the company. *Outside interest may profit from research activities -- disclosure required.*

- (f) Competes with the University for project funding in the area of your University duties.

EXAMPLE F1. Through a contract between his department and a state agency, a faculty member provides training to state agency workers. The following year, the faculty member offers to contract personally with the agency to provide the same training. *Faculty member competes with the University for project funding -- disclosure is required.*

- (g) Uses University-owned intellectual property, or University equipment or facilities.

EXAMPLE G1. Faculty member provides information his private consulting service on his University website. *Interest profits from use of University facilities -- disclosure is required. Additionally, state law prohibiting private use of public property may be implicated.*