

# **MEMORANDUM**

TO: Deans, Directors, Chairs, and Faculty – Norman Campus

FROM: André-Denis Wright

Senior Vice President and Provost

DATE: September 21, 2023

SUBJECT: Conflict of Interest Disclosure Requirements

In October 2019, the OU Board of Regents adopted a new Individual Conflicts of Interest policy designed to ensure the University's missions are carried out in an ethical and responsible manner. In response, Conflict of Interest requirements and procedures were updated, a new disclosure tool was implemented, and a new training module developed to educate the campus on the policy and procedures. Conflict of Interest training is completed every four years through the OnPoint system. Disclosures are required annually at the beginning of the fall semester.

All persons covered by this policy must promptly disclose any actual or potential conflicts. Outside activities, even permitted ones, are considered unauthorized without proper disclosure. Failure to complete the yearly response results in non-compliance with University policy and may lead to additional administrative actions.

### What is a Conflict of Interest?

Conflicts of interest are situations where an employee or employee's family member or someone with a close personal relationship has a financial or personal interest that interferes or could potentially interfere with employment responsibilities. This includes situations that have the appearance of or potential to affect an employee's objectivity. Conflicts of interest endanger the university's mission and may result in a loss of public trust. It is imperative to take appropriate actions in a manner that addresses potential conflicts.

For Conflict of Interest purposes, the definition of "employee" includes full- and part-time faculty and staff; student employees; post-doc fellows; visiting scholars; graduate research and teaching assistants; and any key personnel working on grants and contracts, whether paid or unpaid.

### **About the Disclosure**

Conflict of Interest disclosures must be completed annually, even if there are no changes from previous years. Disclosures should be completed even in situations where there is no known conflict. Yearly reporting begins on September 1<sup>st</sup> for the 2023-2024 school year. Additional disclosures should be completed within 30 days of acquiring a new interest or a change in an existing disclosure.

## **How to Complete the Disclosure**

Employees will receive a "Do Not Reply" email from Navexglobal.com on behalf of Linda Hall with instructions and a link to access the disclosure tool. The link for disclosure can be accessed here: 2023-2024 Conflict of Interest v.1 (navexone.com). You should be signed in to complete the disclosure automatically through SSO. If that does not happen, access the disclosure tool using your OUNet ID (4X4) rather than your email address. Disclosure should be completed within 30 days of assignment. Periodic reminders will be sent through email for incomplete responses.

After the disclosure is submitted, it may require review by the COI Officer and COI Committee. If additional information or action is necessary, you will be contacted directly by the COI Officer.

### **Policies and Additional Information**

More information about the university's policy on conflicts of interest is available at the links below.

- <u>Conflict of Interest (ou.edu)</u>
- University Conflict of Interest Policy (PDF)
- OU Faculty Handbook: Starting at <u>5.10</u>
- OU Staff Handbook: <u>5.2</u>, <u>5.3</u>

For any questions regarding the Conflict of Interest requirements and disclosure, University policy, or if you would like to discuss a Conflict of Interest matter, please contact Linda Hall, Conflict of Interest Officer, at (405) 325-2780 or coi@ou.edu.

#### ADW/md

cc: Chris Walker, Associate Provost for Academic Integrity Linda Hall, Conflict of Interest Officer