

## American University Procedures for Addressing Faculty Conflicts of Interest (COIs) Approved by the American University Faculty Senate – May 2013

### Introduction

Conflicts of interest (COIs) are an important source of potential biases in the performance of faculty assignments, (i.e., teaching, scholarship and service), biases in favor of personal financial or non-financial interests or personal relationships. Transparency in the performance of faculty annual assignments, through proactive disclosure and management of COIs, promotes the highest ethical standards for teaching, scholarship and service and protects the reputations of both the university and its faculty. The procedures described below supplement existing policies regarding professional standards on conflicts that are stated in the American University, the Washington College of Law, the American University Library, and the Pence Law Library faculty manuals, which are available at:

<http://www.american.edu/provost/academicaffairs/WCL-Library-Faculty-Manual-TOC.cfm>.

### Examples of potential COIs include but are not limited to:

Financial interests in the university's purchase or procurement of goods, services,



If the appropriate academic unit Dean determines that the disclosed conflict is a minor conflict, the activities are allowed to proceed. If the disclosed conflict is determined to be a potential or actual conflict, the appropriate academic unit Dean will try to resolve the conflict via a required management plan. Management plans are designed to reduce the magnitude of, eliminate or manage an actual or potential conflict. The form and content of management plans vary depending on the nature of the disclosed activity.

Management plans may involve multiple elements, including:

The inclusion of a written statement on all research publications, presentations, applications or proposals or projects, describing the disclosed significant financial interest, or how scholarly or creative activities were supported by the significant financial interest or by the relationship with a third party organization.

A signed statement that the faculty member subject to the management plan and his or her family members will recuse themselves from any contractual negotiations that involve a third party organization specifically included in the content of the management plan.

A written notification to students who are working on projects related to any disclosed actual or potential conflict. Where appropriate, a management plan may require that students have their work supervised by someone other than the faculty member whose project is related to the conflict.

Selection of an appropriate form of oversight relevant to the activity or situation covered by the management plan.

Modification of the financial interest in a way that is relevant to the activity or situation covered by the management plan.

Modification of the scope or content of the proposed activity, in a way that is relevant to the activity or situation covered by the management plan.

Written descriptions of the mechanisms by which monitoring of situations and activities in which conflicts exist will be implemented.

### **Appeal of Management Plan**

A faculty member may request an appeal of the appropriate academic unit Dean's decision by submitting a written appeal to the **DoF** within ten (10) days following receipt of the appropriate academic unit Dean's decision. The appeal must include the rationale for the request. The decision neanthal nea11(Mod1)-5 050000 request.

### COI Training Opportunities

American University provides annual COI training opportunities for all members of its faculty. In addition, related training materials and guidance will be posted on the University's Academic Affairs webpage.

### Compliance with Laws

These procedures are also intended to comply with regulations and policy pertaining to federally sponsored Research promulgated by the U.S. Public Health Service (42 CFR Part 50, subpart F) and the National Science Foundation (NSF Grants Policy Manual 510), as amended from time to time. In the event that at any time this policy is in conflict with the foregoing regulations and policy or any other laws or regulations, the applicable laws and regulations shall control, and this policy shall be applied in a manner consistent with such laws and regulations.

### Non-Compliance with the Stated Policy

Non-compliance with American University's *American University Procedures for Addressing Faculty Conflicts of Interest* may occur in multiple ways, including but not limited to:

- Failure to participate in the disclosure process altogether.
- Submissions of disclosure forms with inaccurate or incomplete information.
- Failure to address a conflict as instructed by an academic unit Dean or the .
- Failure to adhere to a management plan.

Noncompliance to the *American University Procedures for Addressing Faculty Conflicts of Interest* makes faculty involved in the noncompliance subject to disciplinary action in accordance with the appropriate faculty manual. Sanctions may range from a reprimand to termination of employment.