

Public and Community Service and Conflict of Interest Policy

The SOM encourages its full-time faculty to engage in public and community service that would enhance their professional competence and be beneficial to the University and the community. However, they may not engage in such service if it may interfere with the competent discharge of their duties, or it creates a conflict of interest with their employment.

Overview: A conflict of interest exists when your private interest interferes in any way – or could be perceived to interfere – with the interests of the University. A conflict of interest may also exist when your interests or activities appear to or do affect your ability to make objective decisions for the University. You are expected to use good judgment and avoid situations involving conflicts of interest, which can undermine the trust that others place in us and damage our reputation. A few points to generally follow are to:

- Always make business decisions in the best interest of the University.
- Disclose to Compliance any relationship, outside activity, financial interest or other situation that may present a possible conflict of interest or the appearance of a conflict of interest.
- Proactively address situations where you or a family member's financial interests may conflict with the University's best interests.

Outside Employment: We do not prohibit Faculty from engaging in outside employment, but Faculty cannot maintain outside employment that affects job performance, or any kind (including consulting or faculty positions) with a competitor, supplier or customer.

Personal Investments: Faculty are not permitted to have a substantial ownership interest in any organization that may do or does work with the University. This includes investments in property or any business providing goods or services directly to the University or to students, faculty, employees, contractors, vendors and other visitors traveling for or on behalf of the University, unless disclosed and approved through the annual disclosure process. This rule applies to a direct and indirect ownership interest.

- Direct or indirect interest may include interests held by a spouse, domestic partner, significant other, dependent children or siblings ("Family Members"), or friends and associates, who are deemed to benefit from any arrangement or transaction.
- A "substantial ownership interest" is an ownership interest of greater than 5 percent of total net worth of Faculty and Family Members, or greater than 1 percent of the outstanding equity securities of a company.

Advisory, Board or Civic Activities

Faculty may be invited to serve as members of boards of directors, advisory boards, accrediting teams or committees related to another organization. Approval may be granted if the outside organization does not compete with, oversee, accredit or impose regulations on the University, does not do business with the University, and if the obligations to serve can be met on your own time. In all such cases, the activity should be disclosed to your Department Chair, Dean of the Medical School and to the Chief Compliance Officer or the General Counsel.

Annual Disclosure: Circumstances can change and new conflicts can surface over time, which is why it is important to reassess your situation from time to time and discuss any potential conflicts with your Department Chair and Compliance. All Faculty must disclose and/or update any disclosures previously made on before June 30th each year to the Chief Compliance Officer. All disclosures affirm that Faculty have received a copy of the Conflict of Interest Policy ("COI Policy"), have read and understood the COI

Policy and, have agreed to comply with the COI Policy. In doing so, Faculty shall identify any relationships, positions or circumstances in which he or she is involved that he or she believes could contribute to a conflict of interest. If a conflict was disclosed and documented through this process previously, Faculty are only required to provide an update annually.

The annual disclosure form can be found at the following link: [**COI Disclosure Form**](#)