

Conflict of Interest

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Purpose & Scope

To identify, manage, and mitigate conflicts of interest (COI), including financial conflicts, that may arise among the university's faculty, staff, administrators, and any individuals involved in the administration of sponsored awards. Colorado Mesa University (CMU) is committed to upholding the highest standards of integrity, transparency, and accountability in the administration of sponsored awards. This policy adheres to the principles outlined in [Federal Uniform Guidance 2 CFR Part 400.2 – Conflict of Interest](#) and aims to ensure that the administration of sponsored awards is free from any personal or financial interests that may compromise the university's objectivity, compliance, or public trust.

This policy applies to all students, faculty, consultants, contractors, and other individuals conducting activities with sponsored award dollars.

Definitions

- *Conflict of Interest*: When an individual's personal or financial interests could compromise their objectivity, independence, or decision-making in the administration of sponsored awards. This extends to an individual's immediate family or their partner. A personal interest refers to a tangible, personal benefit.
- *Covered Individuals*: Any individuals, including faculty, staff, administrators, or subcontractors, involved in the proposal development, submission, award administration, fiscal management, or reporting of sponsored awards

Disclosure of Conflicts

- a. *Covered individuals* must disclose in writing any actual, potential, or perceived COIs related to sponsored awards to the Grants & Research Compliance Specialist, Academic Department Head or supervisor, and the Provost (f.k.a. Vice President for Academic Affairs) within a reasonable timeframe.
- b. Disclosure should include all relevant facts, relationships with internal and external organizations or individuals who could have an interest in the sponsored

activity and its outcomes, or any other circumstances that may create a conflict. If an individual is uncertain if their situation would be considered a COI, they should discuss with the Grants & Research Compliance Specialist.

- c. *Covered individuals* may also be subject to additional COI requirements set forth by their funding sponsor. If an individual is uncertain about their sponsor's COI requirements, they should discuss with the Grants & Research Compliance Specialist.

Review and Evaluation

- a. The Grants & Research Compliance Specialist will review all disclosed COIs and evaluate their potential impact on the administration of sponsored awards.
- b. The review process will be fair, unbiased, and confidential to the extent possible, respecting the privacy of individuals involved.

Management & Mitigation

- a. Based on the review, the Grants Research & Compliance Specialist will determine the appropriate management strategies to mitigate conflicts of interest, including financial conflicts. Strategies may include, but are not limited to, the following:
 - i. *Recusal*: Covered individual may be required to abstain from participating in the development, evaluation, or decision-making processes where a conflict of interest exists.
 - ii. *Independent Review*: In cases where conflicts of interest are significant, an independent committee or expert may be involved in the review and decision-making processes.
 - iii. *Monitoring*: Implementing mechanisms to monitor activities related to the sponsored award.
 - iv. *Disclosure to Sponsors*: When required by the sponsor's policies or regulations, conflicts of interest, including financial conflicts, will be disclosed to the sponsor in a timely and accurate manner.

Monitoring and Compliance

- a. CMU will establish mechanisms to monitor compliance with this policy, including an annual review and attestation of any actual, potential, or perceived COIs.

- b. Non-compliance with this policy may result in disciplinary actions, which could include reassignment of responsibilities, suspension, termination, or other appropriate measures as determined by the Academic Department Head or supervisor and/or the Provost.

Training and Education

COI training will be required of all Principal Investigators through the institution's CITI Program training platform. This will be administered and tracked by the Grants & Research Compliance Specialist.

Record Keeping

Appropriate records of COI disclosures, review processes, management strategies, and compliance actions for sponsored award administration, must be maintained and made available as required by applicable laws, regulations, and sponsor requirements.