



## Provost and Senior Vice President

Division of Academic Affairs

101 Whitehurst

Stillwater, OK 74078

Phone: 405-744-5627

Fax: 405-744-5495

August 31, 2021

### **MEMORANDUM**

TO: Faculty, Deans, Assistant/Associate Deans and Department/School Heads

FROM: Jeanette M. Mendez, Interim Provost and Senior Vice President

Kenneth W. Sewell, Vice President for Research

SUBJECT: *Conflict of Interest Disclosures and New Processes*

Oklahoma State University is committed to ethical business practices and the responsible conduct of research through disclosure and management of actual and potential conflicts of interest. The purpose of this memo is to remind the campus community of their responsibility to disclose various potential and actual conflicts of interest through the appropriate process so these conflicts can be managed, reduced, or eliminated. Because OSU's disclosure processes are designed to comply with all applicable federal and state regulations, as well as institutional policies, the method and frequency of reporting conflict depend upon the nature of the conflict as well as the applicable regulations and guidance.

#### **Oklahoma State Ethics Rules**

[www.ok.gov/ethics/Ethics Laws, Guides & Forms/index.html](http://www.ok.gov/ethics/Ethics_Laws_Guides_&_Forms/index.html).

*All state employees are required to comply with the State Ethics Rules.*

#### **OSU/A&M Board of Regents' Ethics Policy 3.05**

<https://regents.okstate.edu/policy-manual/section-3/policy-manual-ethics.html>

*The policy applies to all individuals employed by, or acting on behalf of, Oklahoma State University. Violations of the Ethics Policy may result in disciplinary action including dismissal or termination.*

“We recognize that conflicts of interest or commitment can interfere with the best interests of the OSU/A&M System and erode our credibility. A conflict of interest occurs when an individual is in a position to influence a decision on policies, purchases, programs or decisions from which he/she or someone within the third degree of

consanguinity or affinity or other associate might directly or indirectly receive a substantial benefit. A conflict of commitment arises when an individual's involvement in outside activities substantially interferes with his/her primary commitments to the OSU/A&M System or its member institutions. We will promptly disclose such conflicts and take steps to mitigate or eliminate any that compromise our integrity or that of the OSU/A&M System, in accordance with applicable law and policies."

### **OSU Conflict of Interest in Sponsored Programs Policy (P&P 4-0130)**

<https://adminfinance.okstate.edu/site-files/documents/policies/conflict-of-interest-in-sponsored-programs.pdf>

*This policy applies to all OSU personnel at OSU Stillwater and OSU Tulsa, including but not limited to, administrators, faculty, staff, post-doctoral fellows, and students with responsibility for the design, conduct, or reporting of research, either funded or proposed for funding.*

All administrators, faculty, staff, post-doctoral fellows and students who apply for, receive or serve as key personnel on a sponsored program must submit a disclosure questionnaire before proposal submission at least annually during the period of award. Updates to Disclosures must be submitted within 30 days of discovering or acquiring a new financial interest.

### **OSU Procedures to Govern Overload Assignments, Outside Professional Activities, and Other Outside Activities of Faculty Members (P&P 2-0111)**

<https://adminfinance.okstate.edu/site-files/documents/policies/procedures-to-govern-overload-assignments-outside-professional-activities-and-other-outside-activities-of-faculty-members.pdf>

*This procedure applies to all OSU Faculty.*

"Activities outside the area of professional expertise and responsibilities of the faculty member are defined as "other outside activities." Faculty members, with the rights and responsibilities of all citizens, may become involved in these activities so long as such activities neither intrude upon the faculty member's professional responsibilities to the University nor reflect unfavorably upon the image of the University (section 2.03)."

"Administrative approval shall be obtained in advance from the faculty member's immediate supervisor for each proposed outside professional activity describing the nature and projected time commitment and any change as the activity progresses (section 4.04)."

### **OSU Purchasing Card Guidelines**

<https://adminfinance.okstate.edu/procurement/files/pcard/pcard-guidelines-2020.10.pdf>

*These guidelines apply to all Pcard holders.*

“Cardholders must fill out a new form by October 1 of each year or when an interest becomes reportable.”

**COMMON OSU CONFLICT OF INTEREST DISCLOSURES**

<b>Type</b>	<b>Disclosure Form</b>	<b>Instructions</b>
<p><b>OSU/A&amp;M Board of Regents' Ethics Policy 3.05</b></p> <p>Who? Any OSU person who makes business, policy or other decisions from which he/she may directly or indirectly receive a substantial benefit.</p> <p>This disclosure is <i>required if a potential or actual conflict exists.</i></p>	<p><a href="#"><u>OSU GENERAL CONFLICT OF INTEREST DISCLOSURE FORM.</u></a></p> <p><i>If you annually complete the Sponsored Programs Disclosure in COI Smart, you DO NOT also have to complete the General COI form.</i></p>	<p>Complete form and submit it to your supervisor. Supervisors should assess the conflict and determine next actions.</p> <p>When? When a potential conflict exists, prompt disclosure and management of conflict is required.</p>
<p><b>OSU Conflict of Interest in Sponsored Programs Policy (P&amp;P 4-0130)</b></p> <p>Who? OSU persons who apply for, receive or serve as key personnel on a sponsored program.</p> <p>This disclosure is required annually <i>regardless</i> of the existence of a conflict.</p>	<p><a href="#"><u>COI SMART</u></a></p> <p>If you need added to COI Smart system, contact your college grant administrator or University Research Compliance at <a href="mailto:rcio@okstate.edu"><u>rcio@okstate.edu</u></a></p>	<p>COI Smart will send forms to the Research Conflict of Interest Officer, and if needed, to the Conflict of Interest Review Committee.</p> <p>When? Prior to proposal submission and annually thereafter. Update within 30 days of changes in financial circumstances.</p>
<p><b>OSU Procedures to Govern Overload Assignments, Outside Professional Activities, and Other Outside Activities of Faculty Members (P&amp;P 2-0111)</b></p> <p>Who? Faculty who engage or plan to engage in outside professional activities.</p>	<p><a href="#"><u>NOTICE OF INTENT TO ENGAGE IN PROFESSIONAL ACTIVITY FOR EXTRA COMPENSATION</u></a></p>	<p>Complete the form and submit it to your immediate supervisor.</p> <p>When? Prior to engaging in outside activities.</p> <p>Supervisors should assess the conflict and determine next actions.</p>

<b>OSU Purchasing Card Guidelines</b>	<a href="#">PCARD COI FORM</a>	Return form directly to the appropriate departmental administrator.
Who? Cardholders		When? October 1 of each year or when an interest becomes reportable.

Further information on these policies is available on the Vice President for Research's Compliance webpage, <https://research.okstate.edu/compliance/coi/index.html> or contact Dr. Dawn Underwood, Associate Vice President for Research, 216 Scott Hall, 405-744-0405, [dawn.underwood@okstate.edu](mailto:dawn.underwood@okstate.edu).