

<b>Applicability:</b> All employees	<b>Effective Date:</b> August 1, 2005	<b>Approved By</b> Signature on file Anthony J. Catanese, President	<b>Page:</b> 1 of 1
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**POLICY**

In order to protect the credibility of the university's faculty, staff and administration as well as ensure trust and confidence in all of its research, educational and professional activities, employees of Florida Institute of Technology shall not engage in any behavior that has a real, apparent and/or potential conflict of interest. Further, employees of Florida Institute of Technology shall not seek personal financial gain by virtue of their association with the university.

All employees are covered by this policy.

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**A. DEFINITIONS**

A conflict of interest exists if an individual covered by this policy has an actual or potential relationship or engages in an outside activity which:

1. Impairs or adversely influences his/her judgment with respect to promoting the best interests of the university.
2. Adversely influences the performance of his/her duties to the university.
3. Financially benefits the individual, either directly or indirectly, as a result of his/her employment by the university.

**B. PROCEDURES**

1. In any case where a conflict of interest exists or may exist, or the appearance of a conflict of interest may exist, it is the duty of the employee to disclose his/her interest, including any interest in the organization or entity which may benefit from the person's association with the university. Such disclosure includes beneficial interest that a member of the employee's immediate family may have because of the person's association with the university.
2. Employees who are employed part-time or on an adjunct basis may have obligations and commitments not only to the university, but also to one or more outside agencies. Accordingly, part-time employees and adjuncts are expected to disclose their conflicts in writing to the appropriate supervisory administrator and exercise special care in fulfilling their multiple obligations.
3. All employees are required to disclose any actual or apparent conflicts of interest to their dean or administrative unit head. A *Disclosure of Conflict of Interest* form is attached.
4. Disclosures must be made prior to the time that the research/educational/professional project is approved. If the conflict arises after the approval of the project, the individual must disclose the conflict of interest immediately.
5. Employees will complete a *Disclosure of Conflict of Interest* form on an annual basis. The forms will be used to create an annual report of employees disclosing a conflict of interest. The report will be updated through the year as additional conflicts are disclosed.
6. Failure to file a *Disclosure of Conflict of Interest* form (sample attached) or knowingly filing an incomplete, erroneous or misleading form may result in disciplinary action up to and including discharge.
7. In case of doubt as to whether acceptance of an outside appointment or participation in an outside activity would be in conflict with one's university responsibilities, the employee will disclose the opportunity for or current appointment or participation in writing, and will request in writing from his/her dean or administrative unit head, as well as the Provost for faculty issues or the Vice President for Financial Affairs for staff issues, an opinion as to whether a conflict exists.

**C. PENALTIES**

Should it be determined that an actual or apparent conflict of interest exists, the **dean or administrative unit head, and the Provost or Vice President for Financial Affairs** will determine what conditions, if any, should be imposed by the university to eliminate the conflict.

Possible conditions that may be imposed include but are not limited to:

- Public disclosure of significant financial or personal interests;
- Modification of the research/educational/professional plan;
- Review of the research/educational/professional plan by independent reviewers;
- Monitoring of the research/educational/professional plan by independent reviewers;
- Disqualification from participation in the portion of the research/educational/professional plan that would be affected by the significant financial or personal interests;
- Divestiture of the significant financial or personal interests; and/or
- Severance of the relationship that creates the actual or apparent conflicts.

**DISCLOSURE OF CONFLICT OF INTEREST**

Please complete the following and return this form to your immediate supervisor.

1. Are you aware of any relationships between Florida Institute of Technology and you and/or a member of your family as defined by the letter or spirit of this policy that may represent a conflict of interest? For example, does Florida Institute of Technology purchase goods or services from a company owned in whole or part by you and/or a member of your family?

Yes  No

If yes, please list or elaborate such relationships and the details of annual or potential financial benefit as you can best estimate them on a separate sheet of paper.

2. During the past 12 months, did you or a member of your family receive a gift of more than \$100.00 from any source from which the university buys goods or services or otherwise has significant business dealings?

Yes  No

If yes, please list such gifts, their source, and their approximate value on a separate sheet of paper.

3. Are you or a member of your family employed by another college or university that competes with Florida Institute of Technology for students or contributions?

Yes  No

If yes, please identify the institution(s) and provide the specifics of the employment on a separate piece of paper.

Name *(please type or print)* \_\_\_\_\_

Date *(please type or print)* \_\_\_\_\_

Signature \_\_\_\_\_