Who does the Conflict of Interest policy apply to?
The UVU Conflict of Interest policy (see UVU Policy #114 Conflict of Interest) applies to all University faculty, staff, and students (including full-time and part-time faculty and staff, visiting faculty, undergraduates, and graduate students) who are in a position to influence or commit University resources.

Who is in a position to influence or commit University resources?
Anyone who can impact decision-making or offer advice on purchasing, hiring, or anything involving University funds or facilities is considered in a position to influence or commit University resources.

What is the difference between actual and potential or perceived Conflicts of Interest?
An actual Conflict of Interest arises in a situation where financial or other personal or professional considerations compromise an individual’s objectivity, professional judgment, professional integrity, and/or ability to perform his or her responsibilities to the University. Perceived or potential Conflicts of Interest exist in situations where an individual member of the University community, a member of the individual’s family, or a close personal relation has financial interests, personal relationships, or professional associations with an outside individual or organization, such that his or her activities within the University could appear to be biased against the University by that interest or relationship.

When should I fill out a Conflict of Interest disclosure?
You should complete a disclosure statement as soon as a situation comes up and before beginning the activity in question. Also, at first hire and annually thereafter, all members of the University, whether they are engaged in activities that might create the perception of or potential for a Conflict of Interest or not, are required to fill out a Conflict of Interest Disclosure Statement.
and submit it to their most immediate supervisor. The Disclosure Statement will be kept in a confidential file in the University Compliance Office.

**To whom should I submit my Conflict of Interest disclosure?**
If you are a new hire, submit the Conflict of Interest disclosure found in the Human Resource New Hire Packet, along with all other new hire paperwork. After hire, submit your disclosure statement to your most immediate supervisor.

**Who decides if I have a Conflict of Interest?**
Upon receipt of your complete disclosure, your supervisor will make the initial determination if an actual, potential, or perceived Conflict of Interest exists. If your supervisor determines that an actual, potential, or perceived Conflict of Interest exists, the supervisor will contact the University Compliance Office to discuss what conditions or restrictions, if any, should be imposed by the University to manage, reduce or eliminate such conflicts. The Compliance Officer is available to assist the supervisor in determining if a conflict exists.

If a conflict does exist, the employee, with input from their supervisor, will propose a Management Plan for submission to the University Compliance Officer. The University Compliance Officer is available to assist in drafting a Management Plan.

If further guidance is needed, the Compliance Officer will consult a University area specialist (i.e., purchasing agent, comptroller, human resource director, vice president, etc.).

**If I have a Conflict of Interest, can I still take part in the activity?**
You should not take part in the activity until a Management Plan has been properly approved.

**When is a Management Plan needed and who drafts it?**
If a supervisor determines that an actual, potential, or perceived Conflict of Interest exists, the employee, with input from their supervisor(s), will propose a Management Plan in order to ensure the reduction, management, or elimination of any conflict. The Management Plan will then need to be approved by the supervisor, an area specialist, and the appropriate vice president. The Compliance Officer is available to assist employees and supervisors in drafting a Management Plan.

**Can supervisors delegate the review of Conflict of Interest disclosures to someone else?**
Yes. Supervisors may delegate the review of Conflict of Interest disclosures to the University Compliance Officer who will consult with the appropriate area specialists.
Can the review of my Conflict of Interest disclosure be expedited?
Yes. If you need expedited review of your disclosure due to a deadline or other time constraint, please inform your supervisor when submitting your disclosure to him or her. If your supervisor determines that there may be a potential or perceived Conflict of Interest, he or she should request an expedited Management Plan review and approval. The University Compliance Officer will work to facilitate an expedited review.

Can my office or department get training on the Conflict of Interest Policy?
Yes. Please contact the University Compliance Office to arrange for training.