

CWRU Conflict of Interest Policy and Procedures

A. It is the policy of the University:

1. To expect its administrators, faculty, and staff, while acting for or engaging in an activity affecting the University, to do so with loyalty to the University and to maintain the highest standards of ethics, both in fact and in appearance;
2. To respect the rights of its administrators, faculty and staff to engage in activities outside the normal scope of their employment, provided such activities do not conflict with or reflect adversely on the University's interest, or deprive the University of an appropriate measure of their time and effort; this policy, however, shall not be construed so as to modify the University policy on academic freedom as stated in the *Faculty Handbook*;
3. To require every member of its administration, faculty and staff to avoid situations involving conflicts of interest, such as (but not limited to): financial dealings that are contrary to the University's best interests, membership or employment relationships that may be in conflict, acceptance of favors, money or other considerations, which might obligate the recipient to take actions adverse to the University's interest;
4. To circulate this policy periodically, and to provide procedures for its implementation;
5. To provide suitable mechanisms for resolving conflicts of interest, so that the best interests of the University will be protected and the highest standards of ethics will be observed.

B. The following procedures have been adopted to carry out the conflict of interest policy:

1. The President shall designate the University officers responsible for requesting confidential information periodically from Case Western Reserve University officers, administrators, staff, and faculty. They shall do so to aid in disclosing apparent conflicts of interest. It is understood that at this stage they may share confidential information only with each other and

the President. These officers may, in instances of apparent conflict involving faculty members, consult with the appropriate vice president and/or dean, with whom they may share confidential information for this purpose.

2. The designated University officers, having identified an apparent conflict of interest at Case Western Reserve University, shall consult with the individual involved in an attempt to resolve the apparent conflict in a manner consistent with the best interests of the University and the rights of the individual, while maintaining the highest ethical standards.

3. Said University officers shall refer such conflicts as they are unable to resolve as follows:

- a. In the case of University officers, administrators and staff, to the Audit Committee of the Board of Trustees for its recommendations, which shall be transmitted to the Executive Committee of the Board of Trustees.

- b. In the case of faculty members, to the President, who may inform the Audit Committee and who may discuss the problem with and seek the advice of the Executive Committee of the Board of Trustees. The President, with the concurrence of the Executive Committee, may invoke procedures for dealing with breaches of the standards of professional ethics, which are specified in Chapter 3, Section IV of *Policies and Procedures for the Faculty of Case Western Reserve University*.

4. The Executive Committee of the Board of Trustees shall resolve conflict of interest matters referred to it by determining a course of action that will best serve the University's interests and that will be in accordance with the highest ethical standards.

Note: Per federal regulations issued during 1995, persons involved in federally sponsored research projects must disclose "significant financial interests." A supplemental CWRU disclosure form and related directives have been issued for this purpose.

