

OSU INSTITUTE OF TECHNOLOGY  
POLICY & PROCEDURES

**Financial Conflict of Interest**

**3-038  
FISCAL SERVICES  
December 2013**

POLICY

- 1.01 Employees of OSU Institute of Technology (OSUIT) have a primary professional responsibility of their obligations to the university. However, it is important that employees are allowed the opportunity to forge external relationships. While employees at OSUIT are not prohibited from developing external relationships with industry and private entrepreneurial ventures, such relationships carry an increased risk of a conflict of interest and commitment between obligations to the university and private concerns. Employees need to be sensitive to the possibility that outside obligations, financial interests, or employment may affect their responsibilities and decisions as members of the university community. OSUIT adheres to the following policies and procedures:
- A. OSU policy 4-0130 Research,
  - B. Procurement guidelines <http://faac.okstate.edu/pcard>,
  - C. Oklahoma state ethics commission, and
  - D. Gifts of \$10 or more to state officials.
- 1.02 It is the intent of this policy to ensure that the university is in compliance with all current federal, state, and the Board of Regents for Oklahoma A&M Colleges' regulations and to provide guidance for employees regarding external relationships. The policy is also intended to provide assurance to employees, the university, and the public, that potential conflicts of interest are recognized and managed.
- 1.03 A conflict of interest exists when a significant financial interest could substantially compromise an employee's judgment in the performance of university duties. A conflict of interest arises when an employee compromises federal, state, and/or the Board of Regents for Oklahoma A&M Colleges' professional standards, expectations, or laws in carrying out their job duties as a result of an external relationship that affects the financial interests of the employee, any family member, or associated entity.
- 1.04 All information and records supplied in accordance with this policy shall be deemed confidential, except where public disclosure is otherwise specifically required by law or where public disclosure is required as a resolution of a conflict of interest.

PROCEDURES

- 2.01 This policy shall apply to employees of OSUIT.

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- 2.02 The Vice President of Fiscal Services shall administer the policies in this document. Administration of the policy in this document shall include preparation and distribution of the Conflict of Interest Reporting Forms, collection of the form, maintenance of pertinent records, and examination of all pertinent information to determine the presence of conflict and necessary remedial steps.
- 2.03 Employees who are required to report are listed below, but are not limited to the following:
- A. faculty,
  - B. administrators,
  - C. grant investigators,
  - D. P-Card holders,
  - E. employees whose annual salary exceeds \$60,000,
  - F. other employees with potential conflict of interest, and/or
  - G. family members, where applicable.

The Fiscal Services Office can provide direction for the applicable forms.

- 2.04 Breaches of this policy may be considered forms of misconduct and handled accordingly. An employee may appeal a decision by the Vice President for Fiscal Services by submitting a written request describing the basis of the appeal within 10 (ten) working days after receiving notification of the decision for a hearing before an appeals committee.

A committee shall be appointed as needed by the Vice President for Fiscal Services to advise on issues pertaining to conflict of interest.

- 2.05 Access to the records and information maintained by the Office of the Vice President for Fiscal Services must follow the policies concerning release of information.

Effective: October 1996  
Revised: April 2006  
Revised: July 2009  
Revised: December 2013