

## Conflict of Interest – Annual Reminder

To::

Campus Community

Names and titles:

Edward Nasser, Chief Procurement Officer, Procurement and Contracting Services

Taren Ellis Langford, Conflict of Interest Officer, Conflict of Interest Program

Date::

June 1, 2018

The University of Arizona ("the University") has conflict of interest-related policies that may be applicable to you. Below, we would like to remind you of your obligations under four of those policies – PACS Conflict of Interest Policy, the Individual Conflict of Interest in Research Policy, the Conflict of Commitment Policy, and the Institutional Conflict of Interest Policy.

### 1. PACS Conflict of Interest Policy

The purpose of the Conflict of Interest statutes is to remove or limit the possibility of personal influence that might bear upon a University employee's decision in his or her capacity as a public employee. Accordingly, the Arizona Revised Statute (A.R.S. 38-501 et seq.) requires an employee who has, or whose relative has a substantial interest in any contract, sale, purchase, or service by or to the Board of Regents or the universities, as well as in any decision, to disclose said interest in the official records of the Board. Such disclosures for University employees and their relatives are submitted through the Procurement and Contracting Services (PACS) office for review and conflict determination.

If such an interest exists, the employee shall refrain from participating in the decision, contract, sale, or purchase in any manner.

Conflicts of interest can arise naturally from an individual's engagement with the world outside the University, and the mere existence of a conflict of interest does not necessarily imply wrongdoing on anyone's part. When conflicts of interest do arise, however, they must be recognized, disclosed and either eliminated or properly managed.

Please refer to University **[Purchasing Policy #1.4 – Conflict of Interest](#)**<sup>[1]</sup>, for more detailed information and the procedures for disclosing a substantial interest.

Please note that completion of the PACS conflict of interest disclosure does not take the place of any additional disclosure requirements to comply with other Federal, State or University conflict of interest requirements, including those listed below. For information regarding additional disclosure requirements please visit the University's COI Program **[website](#)**<sup>[2]</sup>.

\*There is no need to submit a disclosure form to PACS if no conflicts exist. (This is different than your research disclosure described below.)

\*\*If a Conflict of Interest has already been disclosed and a decision has been rendered by PACS, there is no need to re-submit the same disclosure unless there's been a change since the initial submittal.

### 2. Individual Conflict of Interest in Research Policy

If you participate in research under the auspices of the University, you are required to comply with the University's Individual Conflict of Interest in Research Policy (the "ICOIR Policy"). In particular, you are required to periodically disclose to the University whether you have any significant financial interests or significant personal interests that may be related to your research. You also must complete COI training once every four years. The COI Disclosure training course can be accessed through the COI Disclosure System.

The ICOIR Policy requires that your disclosure be updated when any of the following occur:

1. within 30 days of acquiring a new interest,
2. annually (even if you do not have anything new to report), and
3. for each new project, which includes each new proposal you submit through Sponsored Project Services, new or continuing awards, new non-sponsored projects and new IRB protocols.

The Conflict of Interest disclosure system can be accessed **[here](#)**<sup>[3]</sup>.

The ICOIR Policy also requires individuals who meet the definition of Research Administrator to disclose all outside interests that can reasonably be deemed related to his/her institutional responsibilities.

For more information about the University's COI requirements, please review the above-linked policy and visit the COI

Program's Website on the University's Research Gateway. If you have any questions, please reach out to us at [coi@email.arizona.edu](mailto:coi@email.arizona.edu) [4] or by phone at 520-626-6406.

### 3. Conflict of Commitment Policy

The University's Conflict of Commitment Policy requires Full Time (generally 0.5+ FTE) appointed personnel to request approval for any outside professional commitments or outside employment. Approval should be sought from your supervisor or, in the case of faculty, from your department head and dean. As of 8/1/2017, Conflict of Commitment approval requests should be submitted through the online Conflict of Commitment Form, available [here](#) [5].

Conflict of Commitment approval is different than the other COI disclosures, and relates to an individual's distribution of time and effort between his or her full-time duties as a University employee, and his or her responsibilities resulting from an outside activity.

Note: Unlike the ICOIR Policy requirements described above, if you do NOT engage in an Outside Activity, you do NOT need to submit a Conflict of Commitment Form. If you engage in MULTIPLE Outside Activities, you will need to submit a Conflict of Commitment Form for EACH one.

For more information on the Conflict of Commitment Policy, please visit this [website](#) [6]. An overview of the differences between the ICOIR Policy requirements and those of the COC Policy is available in [this](#) [7] comparison table.

For guidance on the application of the Conflict of Commitment Policy, please first consult your college, department or unit guidelines. For technical questions, please contact the COI Program at [coi@email.arizona.edu](mailto:coi@email.arizona.edu) [4] or by phone at 520-626-6406.

### 4. Institutional Conflict of Interest Policy

If you have a position of administrative leadership (e.g. Director, Head, Dean, etc.), you are required to comply with the University's Institutional Conflict of Interest Policy. In particular, you must disclose your Significant Financial Interests at the time of your appointment, annually thereafter, when you acquire a new Significant Financial Interest, and when you become aware of additional Significant Financial Interests of the University.

The Conflict of Interest disclosure system can be accessed [here](#) [8]. For more information about the University's COI requirements, please review the above-linked policy and visit the COI Program's website on the University's Research Gateway. If you have any questions, please reach out to us at [coi@email.arizona.edu](mailto:coi@email.arizona.edu) [4] or by phone at 520-626-6406.

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#### Links

[1] [http://pacs.arizona.edu/manual\\_page01#Conflict](http://pacs.arizona.edu/manual_page01#Conflict) [2] <https://rgw.arizona.edu/compliance/conflict-interest-program> [3] <https://uavpr.arizona.edu/COI> [4] <mailto:coi@email.arizona.edu> [5] <http://uavpr.arizona.edu/COC> [6] <https://rgw.arizona.edu/compliance/conflict-interest-program/information-university-employees-and-affiliates/conflict-commitment> [7] [https://rgw.arizona.edu/sites/default/files/coc\\_v\\_icoir\\_comparison\\_table\\_-\\_printable\\_rev\\_5.1.2018.pdf](https://rgw.arizona.edu/sites/default/files/coc_v_icoir_comparison_table_-_printable_rev_5.1.2018.pdf) [8] <http://uavpr.arizona.edu/COI>