

APPENDIX S -- BENTLEY COLLEGE CONFLICT OF INTEREST
POLICIES FOR PARTICIPANTS IN EXTERNALLY-FUNDED
PROGRAMS, GRANTS OR CONTRACTS

APPENDIX S -- BENTLEY COLLEGE CONFLICT OF INTEREST POLICIES FOR PARTICIPANTS IN EXTERNALLY-FUNDED PROGRAMS, GRANTS OR CONTRACTS

Background

There has been an increase in the involvement of academic researchers and educators with industry and private entrepreneurial ventures. This activity is to be encouraged as an important bridge between theory and practice and as evidence of the important partnership between educational institutions and commercial enterprise.

However, since educational institutions and business and industry do not always share the same objectives, these arrangements also increase the potential for individuals to face conflicts of interest. The potential for conflict is exacerbated when the academic participant, or a relative, has a financial interest in the commercial or private entity, or may be financially affected by the results of research.

Prudent practices as well as the policies of federal granting agencies call for a formal policy to address potential conflicts of interest in the awarding and execution of externally-funded programs, grants and contracts.

Areas of Concern

Conflict of interest can arise in a wide variety of circumstances including:

- i. when institutional or externally-funded resources can be inappropriately reallocated, as, for example, when a member of the faculty directs the use of institution funds to benefit a private commercial entity or an administrator directs a member of the staff to perform work to benefit an entity in which he/she has an interest;
- ii. when research findings should be freely disclosed, but private interests require information to remain proprietary; and
- iii. when nepotism is practiced.

Reporting Process

This policy is intended to address potential conflicts of interest through reasonable requirements of financial disclosure. A review of financial arrangements is expected to support sound judgment and voluntary due diligence with regard to conflict of interest, with a minimum of formal reporting and approval requirements. (See attached.)

BENTLEY COLLEGE

CONFLICT OF INTEREST POLICIES FOR PARTICIPANTS IN EXTERNALLY-FUNDED PROGRAMS THROUGH GRANTS AND CONTRACTS

To whom this applies:

ALL FACULTY AND STAFF WHO PARTICIPATE IN EXTERNALLY-FUNDED PROJECTS VIA GRANTS OR CONTRACTS TO BENTLEY COLLEGE

- i. The Office of Sponsored Programs will provide these forms to individuals prior to the completion of proposals.

Appendix S – Bentley College Conflict of Interest Policies for Participants in Externally-Funded Programs, Grants or Contracts

ii. The forms must be completed and returned to the Office of Sponsored Programs prior to the submission of proposals.

The Office of Sponsored Programs will perform initial review of the forms. It is expected that in most cases, there will be a judgment of no potential for conflict of interest.

However, in the event that the Office of Sponsored Programs feels that there may be potential for conflict of interest, it will meet with the reporting individual to discuss the matter.

- If they agree that the potential for conflict of interest exists, they will propose safeguards which meet the interests of all parties. The Director of the Office of Sponsored Programs will review those proposed safeguards with the Vice President for Academic Affairs and Provost.
- If the reporting individual does not agree that the potential for conflict of interest exists, or if the reporting individual and OSP cannot agree on the appropriate proposed safeguards, the Director of the Office of Sponsored Programs will initiate a meeting of itself, the reporting individual, the head of the individual's department or unit, the Vice President for Academic Affairs and Provost and, when applicable, the reporting Vice President.

In the event that a judgment is made that there is a potential for conflict of interest, every effort will be made to facilitate appropriate safeguards which meet the interests of all parties.

iii. Disclosures of financial relationships are to exclude insubstantial financial connections (i.e. less than a 1% share of stock ownership or equity participation.)

iv. Bentley College will keep funding agencies appropriately informed if it finds that it is unable to satisfactorily manage an actual or potential conflict of interest.

Appendix S – Bentley College Conflict of Interest Policies for Participants in Externally-Funded Programs, Grants or Contracts

Please complete each of the following:

Name: _____

Academic and/or Administrative Title: _____

College Department or Unit: _____

Intended Sponsoring Agency: _____

Proposal Title: _____

1. Do you, your spouse or your dependent children have a consulting or other financial relationship with the intended sponsor of your research, program, grant or contract?

yes {If so, please list and explain in an attached statement}

no

2. Do you have a managerial, contractual or financial relationship [see iii. above] with a commercial entity [corporation, professional partnership, private enterprise, etc.]?

-in a field of your expertise?

and/or

-that does business with Bentley College?

yes {If so, please list and explain in an attached statement}

no

3. Do you have non-Bentley College professional or income-producing activities involving either Bentley College students, faculty and/or staff?

yes {If so, please list and explain in an attached statement}

no

4. Do you or any member of your immediate family have any other relationships, commitments, or activities that might present a conflict of interest or commitment with your employment at Bentley College?

yes {If so, please list and explain in an attached statement}

no

The above information is complete and accurate as of _____ (today's date). Should this information change before the completion of the program or project, I will report the change to the Office of Sponsored Programs.

(Signature)