# CONFLICT OF INTEREST

**COLORADO STATE UNIVERSITY**

This Advisory Letter is provided pursuant to applicable Colorado state laws and policies of Colorado State University. Adhering to the requirements set forth below provides assurances to Colorado State University and the public that Outside Activities are conducted in a manner that will avoid bias to scholarship (where applicable), and safeguard against inappropriate use of Colorado State University resources, breach of fiduciary duty and the public trust, self-dealing, or the appearance of these. Please review the items below and reach out to Colorado State University's COI Office (vpr_coi@colostate.edu) should there be any questions.

## A. INTERACTIONS WITH STUDENTS AND STAFF

Colorado State University has a duty to ensure that the Outside Activities of its employees do not have a negative impact on students, trainees, or staff, especially on the academic progress of students. Your relationship with the Entity may not place restrictions on the ability of individuals under your supervision or influence to receive, analyze, or interpret data related to scholarly activities. In addition, students may not participate in research sponsored by the Entity without permission from your dean's office, the equivalent administrative unit, or their designee.

You must direct individuals under your supervision or influence with financial interests in the Entity to make an annual disclosure of Outside Activities using the online process in Kuali.

You must notify your dean's office, the equivalent administrative unit, or their designee if you wish for Colorado State University to hire an individual who you know has a financial interest in the Entity into a position over which you have a supervisory role, or if a current employee or student under your supervision obtains a financial interest in the Entity. You may not be directly involved in any final institutional decision-making regarding Colorado State University employment of any individual with a financial interest in the Entity. Any such decisions must be made by an impartial party selected by your dean's office, the equivalent administrative unit.

## B. CONTRACTS BETWEEN UNIVERSITY AND ENTITY

### B.1. Support from Entity

Before accepting any support (*e.g.*, grants, contracts, unrestricted gifts, materials, etc.) at Colorado State University from the Entity, you must disclose details of the support to your dean's office, the equivalent administrative unit, or their designee for approval, including the scope of the work and award terms and conditions.

### B.2. Sub-agreements to Entity

If you anticipate engaging in a scholarly project for which the Entity will be a sub-awardee or sub-contractor, you must contact your dean's office, the equivalent administrative unit, or their designee for approval prior to submitting a proposal.

### B.3. Contract Negotiation, Approval, and Signature

You may not negotiate, approve, or sign any contract with the Entity on behalf of Colorado State University. In addition, any such contract's terms and budget must be approved by your dean's office, the equivalent administrative unit, or their designee.

### B.4. Invoicing, Billing, and Issue Resolution

If Colorado State University has a contractual relationship with the Entity, you may not be responsible for invoicing or billing the Entity, or for institutional decision-making should any issue arise regarding the Entity's performance under the contract. Any such decision must be made by a non-conflicted party selected by your dean's office, the equivalent administrative unit, or their designee.

## C. PURCHASING

You may not be directly involved in institutional decision-making where the purchase of items from the Entity are involved. Any such decisions must be made by a non-conflicted party who is not under your supervision or influence designated by your dean's office, or the equivalent administrative structure, or their designee. This relationship must be additionally disclosed to the Office of Procurement Services at Colorado State University.

## D. SELECTION OF SELF-AUTHORED TEXTBOOKS

The selection of self-authored textbooks must be made according to processes established by your college or unit. You cannot be the final decision maker related to the selection of self-authored works.

## E. USE OF UNIVERSITY FACILITIES, SERVICES, AND NON-PUBLIC INFORMATION

Any activity involving the use of Colorado State University facilities, services, or non-public information for the benefit of the Entity must be conducted in accordance with all relevant Colorado State University policies and Colorado laws pertaining to the use of Colorado State University facilities, services, and access to non-public information. Except with respect to use of facilities and services made available to the public in accordance with established rates and conditions applicable to all users, any such activity must be approved by your dean's office, the equivalent administrative unit, or their designee, and a written and approved contract is required before the activity begins.

## F. UNIT REQUIREMENTS

You will follow all additional policies, practices, and/or guidelines established by your college or unit for engaging in Outside Activities.

## G. REPORTING OUTSIDE ACTIVIES

You are required to submit an annual report of Outside Activities each year using the online process in Kuali. In addition, if you have relevant changes in your Outside Activities between annual reports, you must update your report within 30 days of the change.

## H. AMENDMENTS

The COI Committee understands that relationships with Entities may change over time, including the scope, amount/type of remuneration, and time dedicated towards the Outside Activity; such changes may require a formal Management Plan assigned by the COI Committee.