How do I know if I have a conflict and what should I do about it?

What is a "conflict of interest?"

A conflict of interest is a situation in which the interests of a staff or faculty employee and the interests of the University diverge, or may appear to diverge. Conflicts often arise when there is the potential for the employee, the employee's immediate family members, or the employee's friends to benefit personally as a result of the employee's involvement in the University activity or decision. Conflicts also may arise when an employee has non-University interests or duties that could possibly influence how the employee acts in their duties on behalf of the University. Actual impropriety is *not* necessary for a conflict of interest to arise. The appearance or potential for a conflict can be just as damaging as actual self-dealing.

It is not possible to list every type of conflict situation. However, below are a few common conflict scenarios:

> **Financial conflicts**. For example, making University purchases from, or entering into agreements with an entity in which the employee has an ownership or significant financial interest; or accepting gifts from University contractors or vendors in exchange for favorable decisions on their behalf.

> **Employment conflicts**. For example, a University employee supervising a family member who also is a University employee.

> **Conflicts of loyalty**. For example, sharing confidential or propriety University information.

> **Conflicts of commitment**. For example, working for another entity while on University time.

> **Research conflicts**. For example, where a researcher's significant financial interest is related to their externally-funded research and could directly and significantly affect the design, conduct or reporting of that research.

What should I do if I think I may have a conflict?

1. **Review** the University's Conflict of Interest Policy for Staff and Faculty before making a decision or taking action on behalf of the University. If you are a faculty member you should also read the faculty Conflict of Commitment Policy and the Compensation from External Consulting Policy. If you are engaged in research, you should also read the Conflict of Interest Policy – Externally-Funded Research.

2. **Review** the University's Conflict of Interest Tutorial on the Compliance homepage.

3. **Report** the potential conflict to the appropriate University official identified in the applicable conflict policy.

4. **Obtain** advance approval to move forward with the decision or action.

What if I am still uncertain or need further guidance?

If you are uncertain whether a situation poses a potential conflict of interest or if you simply have a question contact the Chief Ethics and Compliance Officer at tel. (202) 319-6170 or CUA-COMPLIANCE@CUA.EDU).