

Frequently Asked Questions

What is a conflict of interest or commitment?

Conflicts of Interest exist whenever an individual's personal, professional, commercial, or financial interests or activities outside of the Institute have the possibility—whether real or perceived—of:

- (1) compromising an employee's judgment;
- (2) biasing the nature or direction of scholarship;
- (3) influencing an employee's decision or behavior with respect to teaching and student affairs, promotions and appointments, uses of Institute resources, interactions with human subjects, or other matters of interest to the Institute; or
- (4) resulting in a personal or family member's gain or advancement at the expense of the Institute. Family members are defined as spouses, parents, siblings, in-laws, children, domestic partners, and dependents.

Conflicts of Commitment exist whenever an employee's external commitments, relationships, or activities have the possibility—whether real or perceived—of interfering or competing with the Institute's mission, or with that individual's ability or willingness to perform the full range of responsibilities associated with his or her position.

Why does RIT have a Conflict of Interest and Commitment Policy and Disclosure Requirement?

Conflicts of interest can compromise the quality of an employee's decision-making. They can also negatively impact the perception of the university and the individual involved. The purpose of this policy is to ensure that the university operates in compliance with applicable and regulatory requirements, and that the reputation, name, and integrity of the university are not compromised. The fundamental principle guiding employees should not have, or appear to have, any personal or financial interests, relationships, or affiliations that conflict with the interests of the university. Most conflicts can be managed as long as they are disclosed. By disclosing conflicts, you and your supervisor can develop a management plan to mitigate the conflict, ensure integrity and independence in research and business decisions, and promote ethical use of university resources.

How do I know when it is time to complete my disclosure?

When it is time for you to complete your annual COI disclosure, you will receive an email to complete the disclosure in the new platform. The automated email will come from ritnovelution@rit.edu. However, if you have a conflict situation arise prior to your annual disclosure due date, you can update your disclosure at any time by clicking the "[Submit your Conflict of Interest and Commitment Disclosure](#)" button at the top of this webpage.

I serve on a non-profit board. Do I need to disclose this?

Disclosure of service on non-profit organization boards is not usually required unless the organization does business with RIT or competes with RIT.

Who decides whether my situation represents a conflict of interest or commitment?

Your disclosure is sent to your immediate supervisor. Your supervisor will review your disclosure and determine whether a conflict exists. If your supervisor determines a conflict exists, you and your supervisor will work together to develop a Management Plan to eliminate or manage the conflict. If a conflict of interest or commitment cannot be resolved, supervisors should consult with the Office of Compliance and Ethics or, for researchers, Sponsored Research Services. Once you are in agreement, your second-level supervisor will have the opportunity to review and approve.

If you and your supervisor cannot agree on whether a conflict exists or agree on a conflict management plan, you or your supervisor may appeal the case to the Individual Conflict of Interest & Commitment Committee. The ICIC Committee will make a recommendation, with a final determination made by your divisional vice president.

What happens if I do have a conflict of interest?

If your supervisor determines that the disclosed activities or commitments constitute a real or perceived conflict of interest, then he/she will work with you to develop a plan of action to manage or eliminate the conflict. This conflict management plan will be submitted to the second-level supervisor for final approval.

If you and your supervisor cannot agree on the need for a conflict management plan, the second-level supervisor will refer your case to the Individual Conflict of Interest & Commitment Committee. The ICIC Committee will develop a conflict management plan for resolving the conflict.

Do staff members who are out of the country, on a leave of absence, on sabbatical, or on sick leave need to complete a conflict of interest disclosure?

Yes

Who must disclose their outside activities/commitments?

All regular staff and faculty as those terms are defined in Policy E01.0 [**Employee Work Classification**](#).

How does the disclosure process work?

The RIT conflict of interest/commitment management process begins with disclosure to one's immediate supervisor by submitting the Conflict of Interest and Commitment Questionnaire through Oracle employee self serve. After you complete the questionnaire, it

will be automatically emailed to your supervisor. Your supervisor will review the questionnaire and determine whether a real, perceived, or potential conflict exists.

If your supervisor determines that there is no conflict, your disclosure is approved and forwarded to the second-level supervisor for review before final approval. If you have a conflict, you and your supervisor will develop a plan of action to manage or eliminate the conflict. This conflict management plan will be submitted to the second-level supervisor for approval.

If you and your supervisor cannot agree on a conflict management plan, the second-level supervisor will refer your case to the Individual Conflict of Interest & Commitment Committee.

The ICIC Committee will make a recommendation for resolving the conflict through a conflict management plan. The ICIC Committee's decisions may be appealed to the Provost or ranking divisional officer, whose decision is final.

How do you define family members in terms of disclosure?

RIT defines immediate family and relatives in the Nepotism Policy (E01.2)

- spouse or domestic partner
- child, guardian/ward, step-child, foster child
- mother, father, step-mother, step-father, mother-in-law, father-in-law,
- brother, sister, step-brother, step-sister, half-brother, half-sister, brother-in-law, sister-in-law,
- aunt, uncle, first cousin, niece, nephew,
- grandparent, great-grandparent, grandchild,
- domestic partner's mother, domestic partner's father, domestic partner's child, or any member of the employee's household including co-habitation.

I am a faculty member at RIT. Am I allowed to teach at other institutions of higher education?

The offer to teach at the second institute should be disclosed and discussed with your Supervisor prior to accepting any employment or appointments at another institution of higher learning. While there may be situations where you are allowed to teach at a second institution of higher education, your first priority must be RIT, and the second position must not interfere with your role or responsibilities, both in and out of the classroom, at RIT.

A family member is a student at RIT and has declared a major in the department in which I am a faculty member. Do I need to disclose this?

Yes. Whenever possible, Employees should not teach their own children or other close relatives in a course for credit. The potential Conflict could have negative effects on both the student/child, as well as on the faculty member's relation to the other students in the course. In the rare instances in which such enrollment is unavoidable, such as when the parent is

teaching a course required for the student's major, the parent should discuss the situation with the chair of the department in advance of the course. All Employees should disclose to their supervisor the enrollment of his or her immediate family member in a class taught by the Employee or any other circumstance where the employee is in a position to deliver academic services to an immediate family member. Disclosure must occur prior to enrollment in the class or delivery of the other academic services. In no event should the Employee be grading their own child's work. To avoid an unbiased evaluation, another qualified faculty member should be asked to independently evaluate the work and decide upon the grade.

I published a textbook on the subject I teach at RIT. I want to require my students to purchase this textbook for my course. Is this a Conflict?

Yes, because your role of professor at RIT is in conflict with your personal motivation or opportunity to benefit financially from assigning your own book to your students, which calls into question your ability to be fair and unbiased. Indeed, you are not in the best position to judge impartially whether your book is the best book available for the students given the financial benefit you will receive. There is also the appearance of a Conflict. One way to resolve the Conflict may be to have an independent third party such as your dean, administrative chair, or a committee with sufficient expertise to establish a strict and transparent set of criteria for evaluating and reporting on the book to make an independent determination regarding whether the book should be assigned to the students.

Another way may be to forego the royalties from the sale of the books to the students to avoid both the actual and apparent Conflict. This can be achieved by either (i) offering the book at a reduced price based on the percentage of royalties earned from each sale, (ii) having the publisher deduct royalties for that portion of sales at payment time; or, (iii) if self-published as print-on-demand, by offering the book at cost. The ability to collect royalties from sales to all other institutions would not, however, present a Conflict. Additionally, you should review RIT's Intellectual Property Policy to ensure implementation of proper terms and conditions whereby RIT, Personnel, and Students establish and maintain their interests in Intellectual Property created by or used at RIT.

Are the financial values aggregated for all my interests?

No, they are aggregated for each single firm or corporation based on the limits. For example, if you and your family received more than \$10,000 from Company A in salary, honoraria, etc.; therefore, it must be reported for Company A. However, if you and your family received only \$8,000 in salary, honoraria etc. from Company B; then you do not have to report for Company B.