

**Texas Christian University**  
**Conflict of Interest**  
**Disclosure Guidelines and Procedures**

Faculty and staff of Texas Christian University have the duty to avoid activities that may result in a conflict of interest or the appearance of a conflict of interest.

Faculty and staff shall report any potential or real conflict of interest involving **significant ownership** in an entity which might compete with the University, or any business interest of the employee or **immediate family** member in an entity providing goods or services to the University as provided below.

A full disclosure by faculty and staff of any such interests shall be reported to the Office of the Vice Chancellor for Finance and Administration on at least an annual basis. While the University does not want to exclude any entity from providing it with quality goods and services, disclosure is required for interests by the faculty or staff member or his or her immediate family as follows:

1. All faculty and staff must report the existence of a potential or real conflict of interest prior to the commitment of funds. If a potential or real conflict exists, it must be reported to the Office of the Vice Chancellor on the attached Disclosure Report.
2. Potential or real conflicts of interest that must be reported include but are not limited to:
  - a.) **Significant ownership** in an entity providing services, supplies, or equipment to the University in an amount greater than \$2,500 in a fiscal year.
  - b.) **Immediate family** or business partner who is employed in companies used by the University and who stands to benefit directly from the purchases (i.e. sales representative, service employee, significant owner, etc.).
  - c.) Receipt of consulting fees, salary, or other items of monetary value from an entity seeking to or doing business with the University in amounts exceeding \$250 per occurrence or \$500 per fiscal year.
3. Each purchaser with a potential or real conflict is required to submit a Disclosure Report form to the Office of the Vice Chancellor stating the nature of the conflict. The report will detail the potential or real conflict of interest and will explain how the conflict will be managed, reduced, or eliminated.

**Definitions of Terms:**

**Significant ownership** - Defined as the lesser of 5% ownership or \$10,000.

**Immediate Family** - Defined as descendants, parents, aunts, uncles, brothers, sisters, wards or domestic partners of the faculty or staff member or his/her spouse.

## **EXCERPT FROM TEXAS CHRISTIAN UNIVERSITY CODE OF CONDUCT POLICY**

### **V. Conflicts of Interest**

This policy addresses situations where there might be a potential financial or personal conflict, or the appearance of such a conflict, between a particular outside interest of a member of the University community and the obligation that the community member owes to the University such that the community member's profit or advantage may be, or may reasonably appear to be, at the expense of the well-being of the University.

- Members of the University community may not have a direct or indirect interest, financial or otherwise, of any nature that is in conflict with the proper discharge of the community member's responsibilities on behalf of the University.
- Members of the University community shall adhere to the laws, rules, regulations and policies of applicable governmental and University authorities. With regard to employees, the failure to do so may be grounds for disciplinary action, up to and including termination of employment.
- No member of the University community shall accept or solicit any gift, favor or service that might reasonably influence the community member in the discharge of his or her duties or that the community member knows or should know is being offered with the intent to influence his or her official conduct.
- A member of the University community shall not accept other employment or engage in any business or professional activity that he or she might reasonably expect would require or induce the employee to disclose confidential information acquired by reason of the community member's official position.
- No member of the University community shall disclose confidential information gained by reason of his or her official position or otherwise use such information for his or her personal gain or benefit.
- No member of the University community shall transact any business in his or her official capacity with any business entity of which the person or a member of his/her immediate family is an officer, agent or member, or in which the member of the community or immediate family member owns a substantial interest unless a full disclosure has been made and approved as described in the following paragraph.
- Members of the University community must disclose potential conflicts of interest as soon as possible after they realize that a conflict or potential conflict may have arisen. Disclosure guidelines and procedures may be obtained from the Office of the Vice Chancellor for Finance and Administration at 817.257.7815 or downloaded from the human resources website at <http://www.hr.tcu.edu/Policy2.070attachment.pdf>
- If a conflict or potential conflict of interest is reported and allowed to exist under the advice of the Vice Chancellor's office, it is required that the conflict or potential conflict be reconsidered annually until it is resolved.