



CONFLICT OF INTEREST  
CU-GA-52

**POLICY**

**It is the policy of Concord University to** avoid conflicts of interest and the appearance of conflict in the conduct of university business.

**APPLICATION**

Members of the Board of Governors, President, and senior university administrators shall declare any known conflicts of interests including interests in companies wishing to contract with the organization. The Chief Human Resources Officer has the responsibility to interpret and apply the policy.

**PURPOSE**

**This policy has been enacted to** set forth guidance for employees of the university with regard to the recognition and declaration of conflicts of interest.

**SCOPE**

**This policy is applicable to** the Board of Governors and all university employees including faculty, staff, and administrators but specifically excluding student employees.

**RESPONSIBILITY**

**It is the responsibility of** each member of the Board of Governors and senior administrators to complete a Conflict of Interest Form annually.

Those employees with a known conflict, those associated with corporations or organizations that do business with the state, and those who might be in a position of a conflict of interest must disclose that information on a Conflict of Interest form annually.

**PROCEDURE**

The forms, including any requisite procedures, necessary to implement this policy are found on the Human Resources website. [A sample form is attached.]

The Board of Governors receive Conflict of Interest Forms from, and return forms to the Governor's Office.

Faculty, staff, and administrators return the Conflict of interest forms to Human Resources.

**AUTHORITY FOR INTERPRETATION**

The final authority for interpretation of this policy rests with the President or designee.

**APPROVAL**

<u>Intent to Plan Approved by Concord University Board of Governors:</u>	June 06, 2017
<u>Policy Approved by the Board:</u>	July 18, 2017
<u>Effective Date:</u>	July 18, 2017
<u>Affirmed by WVHEPC:</u>	

**CONFLICT(S) OF INTEREST DISCLOSURE**

<b>Name:</b>	<b>Title:</b>
<b>Department:</b>	<b>Date:</b>

**1. Do you have a relationship with any vendor, contractor, or business entity with which the Concord University does business or is likely to do business, for which you have an opportunity to influence a related university decision; include the relationship of any immediate family member** (indicate business entity's name, name of owner or manager, and relationship to employee or the employee's immediate family):

**2. Do you have economic interest in any vendor, contractor, or business entity with which the University does business or is likely to do business, for which you have an opportunity to influence a related University decision; include the economic interest of any immediate family member** (indicate the business entity's name, relationship to employee, the annual amount of any profits or compensation, market value of any equity, and any intellectual property rights):

**3. Indicate the specific vendor, contractor or business entity, relationship to employee, and University's purchase or contract:**

**4. Any other apparent or real financial conflict that could result in a personal financial benefit for you or a member of your immediate family, as related to any personal influence in University's operations or business decision:**

**5. Any other apparent or real conflict, financial or otherwise, that may compromise the employee's decisions or judgment in carrying out the University's responsibilities:**

## GOVERNANCE (GA)

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In the event that insufficient space is provided on this form for any disclosure, the employee should attach additional pages with reference to the above sections; also indicate in the associate section that additional material is attached.