



## **BOARD OF REGENTS POLICY: *Institutional Conflict of Interest***

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### **SECTION I. SCOPE.**

This policy governs institutional conflict of interest at the University of Minnesota (University) and applies to members of the Board of Regents (Board), University officials, department/unit heads, and other individuals as required by administrative policies and procedures.

### **SECTION II. DEFINITIONS.**

#### **Subd. 1. Institutional Conflict of Interest.**

*Institutional conflict of interest* shall mean a situation in which the University's research, teaching, or outreach mission activities, or its institutional reputation may be compromised or appear to be compromised because of an external financial or business relationship held at the institutional level that may bring financial gain to the institution, any of its units, or the individuals covered by this policy.

#### **Subd. 2. University Official.**

*University official* shall mean persons holding the following positions, including those holding these positions in a temporary capacity:

- (a) Associate Vice President
- (b) Chancellor
- (c) Chief Auditor
- (d) Chief Compliance Officer
- (e) Dean
- (f) Director of Intercollegiate Athletics, Twin Cities campus
- (g) Executive Director and Corporate Secretary
- (h) Executive Vice President and Provost
- (i) General Counsel
- (j) President
- (k) Senior Assistant to the President
- (l) Senior Vice President for Finance and Operations
- (m) University Librarian and Dean of Libraries
- (n) Vice President

### **SECTION III. GUIDING PRINCIPLES.**

The following principles shall guide the University in addressing institutional conflict of interest:

- (a) Because it is critical to the mission and reputation of the University to maintain the public's trust, University research, teaching, outreach, and other activities must not be compromised or perceived as biased by financial and business considerations.
- (b) Because of its numerous and complex relationships with public and private entities, the University must be aware of any relationships involving financial gain that may compromise or appear to compromise its integrity.
- (c) The University shall establish and maintain an oversight process to manage, reduce, or eliminate institutional conflict of interest.

### **SECTION IV. RESERVATION OF AUTHORITY.**

The Board reserves authority to review and approve plans for managing, reducing, or eliminating institutional conflict of interest involving:

- (a) external relationships with an unusually significant financial impact that present a potential conflict;
- (b) potential conflicts involving the president;
- (c) potential conflicts that raise serious policy issues or have a significant public impact on the mission and reputation of the University; or
- (d) potential conflicts arising in matters that otherwise require Board review and action under Board of Regents Policy: Reservation and Delegation of Authority.

In these instances of conflict of interest, the president shall consult with the Board.

### **SECTION V. ASSURANCE, DELEGATION OF AUTHORITY, AND REPORTING.**

The president or delegate shall:

- (a) implement an oversight process and administrative policies and procedures to address institutional conflict of interest and to identify situations in which institutional conflict of interest may arise;
- (b) recommend and implement plans to manage, reduce, or eliminate institutional conflict of interest;
- (c) develop and present conflict of interest plans to the Board for review and action as required under Section IV;
- (d) ensure that individuals covered by this policy who act on behalf of the institution adhere to these policies and procedures, follow applicable conflict management plans, and do not engage in activities in which there is an actual conflict of interest; and
- (e) report to the Board annually all institutional conflict of interest matters that do not meet the thresholds identified in Section IV.

### **SECTION VI. DISCLOSURES.**

#### **Subd. 1. Regents.**

Regents shall file a financial disclosure statement annually and report conflicts of interest as required by Board of Regents Policy: *Code of Conduct for Members of the Board of Regents*.

#### **Subd. 2. University Officials.**

University officials shall, upon appointment and annually, file a financial disclosure statement with the president or delegate, disclosing significant economic interests and how those interests may relate to their

institutional responsibilities. Such disclosure shall be made in addition to any reporting requirement for individual conflicts of interest.

**Subd. 3. Department/Unit Heads.**

Annually and under circumstances described in administrative policy, department/unit heads shall disclose relevant financial and business interests by filing a *Report of External Professional Activities*.

**Subd. 4. Other Individuals.**

The president or delegate may designate other individuals who shall file a financial disclosure statement.

**REVISION HISTORY**

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**Adopted:** June 10, 2005

**Amended:** July 11, 2012; October 13, 2017

**Technical Correction:** March 31, 2016; October 13, 2017; January 28, 2020; February 14, 2020

**Supersedes:** Financial Disclosure for Senior University Officials, Dated November 10, 1995

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