

Conflict of Interest AdministrationProcedures for Conflict of
Interest Questionnaire

Notice. On an annual basis, the staff questionnaire for disclosure of conflicts of interest is distributed to staff members of Northwestern University. The dean, vice president, or other unit head notifies each staff member of the Conflict of Interest policy and procedures.

Staff response. Each staff member is required to complete a Conflict of Interest questionnaire, including explanations of responses as appropriate. The Conflict of Interest questionnaire is available through an on-line system, however a paper questionnaire is available for those without on-line access. For on-line questionnaires, the immediate supervisor is alerted when completed Conflict of Interest questionnaires are ready for review and approval. Staff members who complete paper questionnaires should submit them to their immediate supervisors for review and approval. Staff members may be contacted by their supervisors if there are any questions about their responses in the questionnaire, and any related explanatory material.

Guidance to Supervisors. For on-line questionnaires, the immediate supervisor will be notified when completed Conflict of Interest questionnaires are ready for review and approval. A supervisory guide for evaluating the staff responses is available on-line at the approval site.

Approvals. The immediate supervisor must review the completed questionnaires for approval. The supervisor may seek his or her supervisor's or department head's guidance on responses which he or she does not or cannot approve.

The office of the dean or vice president, and the office of human resources, are available to provide assistance in answering questions, providing guidance on approaches to resolving conflicts of interest in the schools or administrative departments, and in addressing more complex individual situations.

Recordkeeping. Upon approval, on-line questionnaires are available to the office of the dean or vice president to assure that all of the questionnaires are completed and reviewed. This office also maintains the file of any completed paper questionnaires.

Conflict of Interest Administration

Evaluating Conflicts of Interest

Purpose. The purpose of this evaluation procedure is to manage the resolution of staff conflicts of interest and to remove any question of a possible conflict. A staff member should be encouraged to seek the supervisor's help whenever there may be a question by any party that a conflict exists, even if in reality it is not a conflict. The Conflict of Interest policy and questionnaire are designed to protect staff members from conflict and its appearance, as well as to protect the University from decisions that might not be objective or in its own best interest.

Resolution. As the policy states, a conflict of interest exists when a staff member makes a decision about University resources in which the staff member's personal interest might favor an outcome that is not in the best interest of the University. The most common resolutions of such conflicts are to remove the conflicting interest or to have another party make the decision, usually the staff member's supervisor.

Where conflicts might occur. Conflicts may arise more frequently among staff members who make procurement decisions. It is not uncommon for vendors to offer enticements to purchasers to gain their favor over other vendors. These vary in nature from lunches and holiday candy and gift baskets to cash and expensive gifts. Sometimes the line of (in)appropriateness is difficult to discern. Some guidance is offered in the following materials.

Conflicts sometimes arise in the use of University-paid work time, during which staff members might engage in non-University work. Some professional activities are directly related to University work. Occasionally, civic or professional activities take time in incidental actions that are compatible with the job and insubstantial in amount, and thus do not result in a conflict of interest problem.

On the other hand, some activities unrelated to work may also be unrelated to University or departmental missions. On occasion, individuals may use University-paid time for work that is solely personally remunerative, with no University purpose (such as in some consulting arrangements) and they may even compete in the market for University needs.

Use of substantial amounts of time for non-university activities can diminish job performance and may be detrimental to the department or unit's mission. In the use of University-paid time, the supervisor or department head is called upon to judge when the use of University-paid time conflicts with the performance of the job or the work of the department.

Preventive action. In cases where there is a question of appropriateness, the question should be removed, even if the activity or decision making appears to be harmless. The *appearance* of a conflict of interest should be remedied as well as the *fact* of conflict. In many cases the potential conflict may be resolved by having another individual make the decision, usually the supervisor of the individual.

Alternatively, the individual and the supervisor may jointly reach a decision on the issue on the basis of information gathered by the individual in conflict. Joint decisions serve to reduce the likelihood of claims of self-interest, whether real or apparent.

Conflict of Interest AdministrationEvaluating Questionnaire
Responses

On the Conflict of Interest questionnaire, for a “Yes” response to an individual item, the following table presents possible examples and resolutions for situations which staff members may report as a potential conflict. If there is no explanation provided, the reviewer/approver of the questionnaire should ask the staff member for a description of the activity. The examples below illustrate possible conflicts of interest but are only a few of the possibilities. Most conflict resolution is possible through supervisory participation in a decision; but the supervisor may also want to seek advice from his or her supervisor/manager before reaching a conclusion.

Evaluating Responses to the Staff Conflict of Interest Questionnaire

	Relationship, Issue or Activity	Entity	Illustrative Examples	Resolutions
1.	Personally being (or having an immediate family member be) a director, officer, owner, employee, or consultant to:	A supplier to NU	A supplier in this context might be a relative who owns an office supply business, or a travel agency, or installs computers or does programming, or works in an outside advertising agency for NU.	The staff member should engage the supervisor in the decision to use this service, removing any question about conflict of interest.
2.	Having a financial interest in:	A supplier to NU	A staff member has a relative who performs a service for NU as a business or as an individual contractor, such writing, teaching, or other services.	The staff member's supervisor should participate in the selection of the supplier.
3.	Receiving a gift from:	A supplier to NU	A supplier gives tickets to a professional sports event, or pays for a dinner cruise, or makes a resort available at no cost.	The value of the gift must be assessed to determine if it should be refused or returned because of its influence on future procurement decisions. The staff member's supervisor participates in this decision.
4.	Giving a gift to:	A supplier to NU	A staff member makes tickets available without charge to an NU sports or theater event, or admission to an NU recreational facility.	Either for reciprocity or favored business status, a decision may have a non-business influence and is to be avoided. The supervisor or manager should evaluate this.
5.	Having assigned NU job responsibilities that conflict with:	Personal activities outside of work, including outside employment	Providing to another employer the same services provided by the staff member to NU; or providing services incompatible with NU responsibilities, such as advising a competitor in a way that negatively affects NU's costs.	Aiding employers, student services providers, educators, or any others who may compete with NU, whether for services or commodities, or for creative efforts of the individual must be examined. Refer to the supervisor, dean, or VP to evaluate such activities.
6.	Using NU resources, including University-paid time, for:	Any non-NU professional entity, personal consulting client, charitable organization, or other enterprise.	Writing an article, maintaining a membership list, or organizing a professional or trade conference on NU time; or consulting with personal or consulting firm clients; or charitable solicitation not officially sponsored by NU.	The staff member's supervisor must determine if the use of NU resources for these activities is consistent with advancing the mission of the unit under the supervisor's management. If not, the activity may need to be stopped.

[SAMPLE LETTER FROM DEAN OR VICE PRESIDENT TO SCHOOL OR DEPARTMENT STAFF.]

To: Staff
From: Dean or Vice President
Subject: Disclosure of Conflicts of Interest

It is time again to examine our actions for possible conflicts of interest between our personal activities and interests, and our University responsibilities. In the next weeks, you will receive notice when the Conflict of Interest Policy and questionnaire are available on line for your review and completion.

This periodic review is intended to remove questions about conflict of interest and resolve any doubt about activities that might present a conflict. In these days of questioning conduct and accountability to those who support us, it is good practice to demonstrate to ourselves and for possible inquiry that our business practices are transparent and free from any question about our motivation and our dedication to the University mission.

Many of us are involved in activities outside of our University work that are wholly separate from the University. If there is a question or a doubt about the compatibility of that activity with our University work, it is good practice to have the doubt resolved in advance so that the integrity of our mission and efforts is unquestionable.

As has been required of faculty, staff are also required to complete a disclosure of activities that might present a conflict of interest. While most of us will have none, where a conflict exists, the disclosure can resolve any question and the individual can remove any doubt about a questionable activity.

When you receive your notice, please reacquaint yourself with the policy's provisions and the University standards for dealing with potential conflicts of interest. Then complete the disclosure questionnaire. After completing it on line, your supervisor will automatically receive it for approval. Even if all of your answers about conflicts of interest are negative, your response is required to assure that we are fully in compliance with the policy.

Our staff has the highest standards of conduct and dedication to our work. With this policy and disclosure, we will maintain those standards, both for ourselves and our public.

Thank you very much for your cooperation.

Staff Member Name _____ Department _____

Conflict of Interest Questionnaire for Staff
2008

Northwestern University's Staff Conflict of Interest Policy provides guidelines about business and personal relationships between Northwestern employees and suppliers and other business entities as well as guidelines regarding the use of University resources for purposes other than University business. You should read this policy, found at:

<http://www.northwestern.edu/hr/policies/conflict.pdf>

The policy provides cautions about situations that may improperly influence or even appear to influence the business decisions and transactions that we make on behalf of the University. In addition, we must examine outside activities that conflict with or appear to conflict with our primary employment obligations to Northwestern.

This annual questionnaire provides staff with an opportunity to review personal situations and disclose any such relationships or activities. A "Yes" answer does not necessarily constitute a conflict of interest. However, without complete disclosure of the facts, a fair and reasonable assessment of an individual's situation cannot be made.

If you answer "Yes" to a question, please use the comment box that follows the question to describe the potential conflict of interest.

If you or a family member (your spouse, child, parent, sibling, domestic partner, step child, step siblings, step parent, in law) is in a business providing services to the University, there is a potential conflict of interest that may be resolved by making the relationship known. This will help assure objectivity in decisions, but it does not necessarily mean the services need to stop.

1. Are you or is any member of your immediate family a director, officer, owner, partner, employee, an agent of, or a consultant to any firm that provides products or services to Northwestern University? Yes___ No___

If yes, please describe here the business and the nature of your relationship to it and that of your immediate family (limit of 256 characters per answer).

2. In the past twelve months, have you or has any member of your immediate family had a direct or indirect financial interest in any business that provides products or services to Northwestern University? Yes___ No___

If yes, please describe here the business and the nature of your relationship to it and that of your immediate family (limit of 256 characters per answer).

Gifts received from suppliers to the University or gifts given to suppliers can affect or appear to affect the objectivity of judgment regarding that supplier. Gifts can bring with them an expectation to return a favor. If you have a doubt about an item received or given, a discussion with your supervisor can help resolve a potential conflict of interest that a gift might represent.

3. At any time in the past twelve months, have you or has anyone from your immediate family received any gift (other than promotional items or an occasional meal) or unusual hospitality from a supplier or vendor of Northwestern University? Yes___ No___

If yes, please describe here the nature of any gifts and the parties giving them.

4. At any time in the past twelve months, have you or has anyone from your immediate family given any gift (other than promotional items) or unusual hospitality to a supplier or vendor of Northwestern University? Yes___ No___

If yes, please describe here the nature of any gifts and the parties receiving them (limit of 256 characters).

Providing other employers with the same services you provide to the University could be in conflict with University interests if the work subtracts from effort expected in your University job or if it competes with University interests. However, holding another job outside the university is not necessarily a conflict by itself. If there is any doubt, you should discuss the activity with your supervisor and resolve the doubt.

5. Are there any other personal activities of yours that you think might be a conflict of interest with respect to your work at Northwestern University? Yes___ No___

If yes, describe here the nature of the activity (limit of 256 characters).

Using university time or equipment or supplies for professional or civic activities related to your work or University employment is not a conflict insofar as these activities contribute to the University's interests. The amount of time or resources may be an issue requiring discussion with your supervisor to assure compatibility with performance of your job and affordability in drawing on the department's resources. Personal activities unrelated to work but using your time on the job or the department's resources require a "yes" response and a discussion with your supervisor.

6. Do you have occasion to use University resources (equipment, space, supplies or your paid work time other than incidental interruption) in performing paid or volunteer activity for entities other than Northwestern University or its affiliates? Yes___ No___

If yes, describe here the activity and the resources used (limit of 256 characters).

Signature: _____

Date: _____

Supervisor signature _____

Date: _____