Sample Techniques for Managing or Eliminating Conflicts of Interest and Conflicts of Commitment

Below is a sample list of techniques that have been used to manage or eliminate conflicts of interest and conflicts of commitment. The various management techniques described are not endorsed for any particular purpose. Rather, they are provided to give supervisors and managers ideas to draw upon when managing a potential conflict to best serve the University’s long-term health, and educational missions and business operations.

Units may take one or more of the actions described below:

- Reduce the faculty/employee effort level percentage to a lower percentage to adjust for his/her reduced UM effort due to outside activities.

- Adjust the work schedule for the faculty/employee so that the outside activity/employment does not cause a time conflict with UM activities.

- Prohibit the faculty/employee from participating in the outside activity/employment.

- Require faculty/employee to divest financial interest in an outside entity.

- Switch the supplier/vendor/consultant to avoid business with entity where the faculty member or staff member has a financial interest.

- Request competitive bids for a service/product provided by an entity where the faculty member or staff member has a financial interest.

- Proceed with contract but only after obtaining Regents’ approval where the faculty member of staff member has special interest (including financial) in the outside supplier/vendor/consultant.

- Prohibit the faculty member or staff member from being involved in decision-making related to the outside activity/employment. Examples: no involvement in drafting a Request for Qualifications (RFQ), no involvement in selecting consultants, no oversight of outside entity when that entity is doing work for UM, etc.

- Require the faculty member or staff member to clearly identify on whose behalf he/she is speaking or writing when he or she must issue communications that involve, affect or are related to the outside entity.

- Where the potential conflict involves publication as part of the substantive work, such publications disclose the potential conflict prominently.

- Disclose the situation to appropriate personnel within the University.
- Disclose the situation to appropriate persons or organizations not part of the University.

- Remove the faculty member or staff member’s duties with regard to managing, supervising, evaluating, or mentoring other persons where those activities contribute to the potential COI/COC.

Contact your Compliance Officer at 734-764-6986 if you have questions or need assistance in developing a Management Plan.