

To: UFC  
 From: Alex Tanford, Chair of Policy Review Committee  
 Date: November 30, 2020  
 Re: UA-17, Conflicts of Interest and Commitment

**A. The UFC Policy Review Committee has reviewed proposed amendments to UA-17 drafted by the office of the Vice-President for Research and finds:**

1. The amendments address the nepotism policy to clarify how conflicts are handled when family members are working on the same state or federal grant.
2. The amendments were proposed by the VP for Research as necessary to assure that our policy is in line with current state and federal grant requirements.
3. Under the Constitution, the faculty have shared legislative authority concurrent with the administration over regulations that indirectly affect the academic mission of the university

**B. The Committee moves that the UFC approve the following amendment to UA-17:**

4) Cases Involving State or Federal Grants or Contracts

a. In cases involving State or Federal grants or contracts, compensation for individuals with a familial or personal relationship with the PI or Co-PI cannot be allocated to the sponsored funding except under the following circumstances:

1. Cases involving relationships between two tenured or tenure track faculty who are acting as Co-Principle Investigators, or:

2. Cases that meet all of the requirements below:

- a. The department chair approves in advance the proposed compensation and reviews and agrees that the lower-ranked individual possesses the requisite skills, experience, and education to fulfill the role, and

- b. The proposed compensation is equivalent to that paid to other, similarly situated individuals.

3. All cases in this subsection must have the following in place prior to any compensation being paid to the lower-ranked individual:

- a. An approved, signed management plan, arranged through the Chief Compliance Officer, and

- b. Written disclosure of the situation to the funding agency from the Principle Investigator that outlines the justification for the hire and includes the management plan, with a copy provided to the Chief Compliance Officer.

b. Situations described by this subsection that are already in existence must be brought to the attention of the Chief Compliance Officer prior to <date 30 days after policy effective date> unless a management plan approved by the University Compliance Office is **already** in place. Thereafter, these situations will only be approved if addressed in advance of any compensation being paid to the lower-ranked individual.

c. Any exceptions to this prohibition require the prior written approval of the Chief Compliance Officer.