

Arkansas Tech University Grants, Contracts, and Sponsored Programs Code of Ethics and Conflict of Interest Policy

Arkansas Tech University maintains the following Code of Ethics and Conflict of Interest Policy in relation to grants, contracts and sponsored programs. This policy applies to employees and students of Arkansas Tech University who are directly involved in any grant, contract, or sponsored program activity including, but not limited to, the following (hereinafter referred to as program activities):

- Seeking and applying for funds, equipment, supplies or other sponsorship of a grant, contract or sponsored program.
- Working on or participating in grant, contract, or sponsored program activities or research.
- Administering, overseeing, and supervising grant, contract, or sponsored program activities.
- Purchasing or participating in procurement decisions utilizing grant, contract, or sponsored program funds.
- Compiling and submitting data, reports, reconciliations, inventories, efforts, protocols, proposals, and outcomes.
- Analyzing program activity and determining outcomes or program results.
- Contributing to and compiling programmatic and financial reports.
- Participating in any presentation of information related to grant, contract, or sponsored program activities or outcomes to any internal or external audience.

Code of Ethics:

In each instance of involvement in program activities, all persons with a role in grants, contracts, and sponsored programs, agree to adhere to the following code of ethics:

Represent the University in an honest, forthright, and ethical manner, demonstrating both personal and professional integrity.

Ensure that all efforts and funds are expended in accordance with program guidelines, rules, and regulations, and ensuring compliance with the intentions and objectives of the program.

Safeguard program funding, equipment, supplies, and intellectual property, and ensure they are used for approved activities.

Keep and maintain accurate and auditable records of program applications, approvals, objectives, guidelines, rules, regulations, timelines, expenditures, efforts, protocols, data and findings, as applicable, in a manner that is factual, truthful, complete, accurate, forthcoming, and not misleading.

Protect confidential and privileged information preventing disclosure to any unauthorized parties.

Diligently and productively perform the activities of the grant, contract, or sponsored program in a professional and accountable manner that will provide for completion of grant, contract, and sponsored program projects and activities within agreed upon timelines and budgets.

Communicate in a forthright and timely manner, including notification of problems, delays, or other unanticipated difficulties, disclosing all pertinent information and facts.

Comply with all applicable local, state, and federal civil and criminal laws as well as all Arkansas Tech University policies and procedures.

Follow established procedures for obtaining University approval of grants, contracts, and sponsored programs prior to inception of any program activities.

Make no promises, agreements, or assurances that cannot be supported by Arkansas Tech University and the outside agency conveying the funds.

Ensure that University resources are not utilized for grant, contract, or sponsored program activity except as specifically authorized.

Immediately report the discovery of any instance of dishonesty, fraud, cheating, plagiarism, theft, falsification, misuse, misrepresentation, or misappropriation of time, efforts, or assets related to grants, contracts, and sponsored programs.

Conflict of Interest

A conflict of interest exists when an individual (the Arkansas Tech University employee or student) is involved in multiple interests, creating a circumstance in which the decisions or actions of the individual could be affected or corrupted by circumstantially providing an incentive or motivation to favor or disfavor one interest over another. The conflict of interest exists due to the circumstance of multiple interests, regardless of the action, intention or motivation of the individual and regardless of whether or not any benefit is derived.

A conflict of interest includes, but is not limited to, financial conflict, conflict of commitment, conflict of time, or conflict of effort.

A financial conflict of interest shall include, in addition to the Arkansas Tech University employee or student, his/her immediate family members (spouse or domestic partner and dependent children).

In each instance of program activities, all persons with a role in grants, contracts, and sponsored programs agree to adhere to the following conflict of interest policy:

Avoid all actual, potential, and perceived conflicts of interest, including but not limited to financial, commitment, time, and effort.

When any conflict, potential conflict, or perceived conflict exists, it must be disclosed prior to involvement in any grant, contract, or sponsored program or as soon as discovered, if after program inception to the Budget and Special Program Office.

Any conflict, whether actual, potential or perceived, may preclude involvement in the grant, contract, or sponsored program in which the conflict exists.

Agreement and Disclosure

- Prior to submission of any grant, contract, or sponsored program proposal, all participating employees and students shall sign and submit a Code of Ethics and Conflict of Interest Policy agreement and disclosure form to the Code of Ethics/Conflict of Interest Committee (COE/COI Committee). Failure to comply with the section may result in the University refusing to allow the individual(s) to pursue the grant, contract, or sponsored program proposal. If the term of the grant, contract or sponsored program is longer than 12 months, a new agreement and disclosure form will be completed and submitted at the beginning of each calendar year by each participating individual. If all participants are not known at the time of the proposal, participants will complete the form before beginning work on the grant, contract, and/or sponsored program. It is the responsibility of the principal investigator or director of the program to ensure he/she and all participants have the agreement and disclosure form on file in the Budget and Special Programs Office.
- During the course of any grant, contract, or sponsored program, any changes in circumstance, or discovery of conflict not initially disclosed shall immediately be reported by submitting a Code of Ethics and Conflict of Interest Policy agreement and disclosure form to the COE/COI Committee.
- For certain grants, contracts, and sponsored programs, additional training, agreements, and/or disclosures may be required.

Reporting Violations

- Any violation of the Code of Ethics and Conflict of Interest Policy should be disclosed immediately upon discovery by submitting a Code of Ethics and Conflict of Interest Policy agreement and disclosure form to the Budget and Special Programs Office who will forward it to the COE/COI Committee.

COE/COI Committee

Arkansas Tech University will establish a Code of Ethics and Conflict of Interest Committee (COE/COI Committee) for grants, contracts, and sponsored programs consisting of the following members:

Director of Budget and Special Programs
Director of Grants and Sponsored Programs
University Legal Counsel

Director of Corporate, Foundation, and Government Relations
Academic Affairs Representative (selected by the Vice President for Academic Affairs)

The role of the COE/COI Committee will be to review all Code of Ethics and Conflict of Interest Policy Agreement and Disclosure Forms and make a determination of status for grants, contracts, and sponsored programs. Based upon the status determination, the COE/COI Committee will determine what further action, if any, is required in order to make a final determination.

No conflict or violation

- Individual is cleared to proceed with program activities.

Further action or investigation required

- Individual may be asked to provide additional information.
- Individual may be asked to remove conflict of interest.

Approved with conditions

- Involvement may be limited to certain aspects of program activities.
- Oversight may be required for certain program activities.
- Approval may be subject to periodic review.

Unacceptable conflict or violation

- Individual is determined to be ineligible to participate in program activities.
- In the case of ethical violations, information may be forwarded to appropriate human resources and supervisory personnel with a recommendation for disciplinary action.
- In the case of ethical violations, individuals may be precluded from participating in any and all grant, contract, or sponsored program activities indefinitely or for a specified period of time.

Decisions of the COE/COI Committee may be appealed in writing to the ATU President or a designee appointed by the president. Written appeals must be received within ten days of notification of COE/COI determination. The appeal decision will be final.

Additional Information

COE/COI Committee

Submit completed agreement and disclosure forms and other correspondence to this address: *Budget and Special Programs Office, 105 West O Street, Brown Hall, Room 406, Russellville, AR 72801*

The Code of Ethics and Conflict of Interest Policy and Code of Ethics and Conflict of Interest Policy Agreement and Disclosure Form are located on the Budget Office Forms website at <http://www.atu.edu/budget/forms.php>.