

Policy Manual

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II-18.5 Conflict of Interest in the Workplace

(Amended 10/1/13; 1/14; 3/20; 1/14/21; 6/1/25)

Effective June 1, 2025, this policy has been revised. For the most current version without redlining, return to [II-18.5](#).

- a. Policy. Conflicts of interest in the workplace involve situations in which UI employees have financial interests and/or ~~have~~ other personal considerations with a non-university entity that may compromise, or have the appearance of compromising, their professional judgment in performing their University duties (e.g., teaching, research, business decision-making). (See also [II-18.6](#) Conflict of Interest in Research [below] and [III-8](#) Conflict of Interest in Employment [Nepotism].) ~~Faculty and staff members are expected to disclose their own actual or potential conflicts of interest in the workplace per the guidelines below (see II-18).~~

Examples of conflicts of interest in the workplace that require disclosure, review, and management include, but are not limited to:

- (1) Owning or acquiring a financial interest in, holding a position in, or having a consulting or other relationship with, any non-university entity that supplies goods, services, or finances to the University when the employee has decision-making authority for those transactions (see also [V-11.14](#) Conflict of Interest -- Purchasing);
- (2) Promoting or providing information about goods or services to the University community when the employee or their immediate family has a financial interest in or other relationship with the relevant business entity (see also [III-17.17\(3\)](#) Royalties from Course Materials);
- (3) Assuming or accepting any non-University duties requiring, or appearing to require, the use of University data, processes, procedures, or proprietary or confidential information (see also [III-17.17\(1\)](#) Use of University Supplies);
- (4) Assigning duties or offering employment to another faculty or staff member to participate in or benefit the assigning employee's outside professional activity;
- (5) Assigning duties or offering employment related to the assigning employee's outside professional activities to a student, when the student is enrolled in a course being taught by the employee or the student's academic work (including work as a teaching or research assistant) is being supervised by the assigning employee;
- (6) Teaching a University course for academic credit that includes a member of employee's immediate family or a person with whom the instructor has a relationship that may compromise, or have the appearance of compromising, their professional judgment (see also [II-5](#) Consensual Relationships Involving Students).

- b. Scope of Policy. This policy applies to all University of Iowa employees -- faculty, staff, and student employees, including graduate assistants.

- c. Oversight of Policy. University Human Resources oversees this policy for employee-related conflicts of interest, doing so in consultation with the Office of the Executive Vice President and Provost for conflicts of interest involving faculty.

- d. Definitions.

- (1) "Financial interest" means anything of monetary value, whether or not the value is readily ascertainable, and may include compensation, equity (e.g., stock, stock options), or royalty/licensing income.
- (2) "Compensation" means anything of value received in exchange for work performed but does not include reimbursement for reasonable expenses.
- (3) "Immediate family" includes the employee's spouse/domestic partner and children for purposes of this policy. The definition may be different in the Conflicts of Interest in Employment ([III-8](#)) and Purchasing Conflicts of Interest ([V-11.14](#)) policies.
- (4) "Prohibited activities" are activities that are impermissible in accordance with state law governing the behavior of state employees. These include, but are not limited to:
- (a) Using University ~~property or facilities~~ **time (including directing UI personnel), facilities, equipment, or supplies** in a way that may result in personal financial gain to an employee without approval of and payment to the University.
- (b) Undertaking a business or research opportunity ordinarily conducted by or for the University before the University has been offered the right of first refusal. For faculty members and staff within a college, a written waiver of University interest must be obtained from the dean of the college. For other ~~faculty or staff members~~ **employees**, a written waiver must be obtained from the ~~director vice president, or their designee~~, of the unit in which the person is employed.
- (c) Using University stationery or letterhead in connection with outside activities, other than activities having a legitimate relationship to the performance of the employee's University obligations.
- (d) Receiving compensation without the approval of the President or the Iowa Board of Regents for serving on the board of directors of business entities when the employee is appointed to that position by the University or is serving as ~~the a~~ representative of the University.
- (e) Using University facilities or employee's position at the University to advocate, endorse, or market a product or a service, unless in conjunction with employee's University duties or requested or approved by employee's dean or other appropriate University official.
- (f) Other prohibited activities under related University policies may be found through the web links at the end of this policy (see [II-18.7](#)).

- e. Implementation of Policy.

- (1) Disclosure of Conflict of Interest in the Workplace: This policy requires that all University employees disclose any potential or actual conflicts of interest in the workplace in advance of initiating an activity or when the employee, in the exercise of reasonable diligence, first becomes aware of the ~~potential or actual conflict or the potential for conflict~~. ~~Supervisors who become aware of actual or potential conflicts of interest are expected to inform employees of the requirement to disclose such conflicts.~~ Disclosures must be made using the online eCOI system (<http://ecoi.uiowa.edu>). The existence of a ~~potential or actual~~ conflict of interest is not always clear-cut. University employees are expected to make a reasonable effort to determine whether their activities create, or appear to create, such conflicts. If there is any uncertainty, employees should consult their departmental executive officer (DEO) or equivalent, or supervisor.

Additional disclosure may be required under different policies (see ~~II-18.4 Conflicts of Commitment, II-18.6 Conflict of Interest in Research, II-18~~ Conflicts of Commitment and Interest and [II-18.8](#) Other University of Iowa Policies Related to Conflict of Interest, ~~and UI Health Care Conflict of Interest and Conflict of Commitment Policy~~).

- (2) Review: Each disclosure will be reviewed by ~~central university offices~~. ~~If further review is needed to evaluate a disclosure, it will be forwarded to~~ the respective Associate Dean for Faculty (for faculty), the Senior HR Representative (for staff), or other appropriate HR executive or designee. ~~When Unless~~ such individual determines that ~~a~~ **no** potential ~~or actual~~ conflict of interest exists, the disclosure also will be reviewed by the employee's supervisor and/or DEO. A copy of the disclosure form shall be retained in the college/organizational unit.

- (3) Management: If it is determined that the disclosed external activity or interest poses, or appears to pose, a conflict of interest in the workplace, the employee's supervisor and/or DEO ~~shall work with~~ and the respective Associate Dean for Faculty or the Senior HR Representative ~~to shall~~ develop a written management plan using templates provided by the Provost Office (see <https://provost.uiowa.edu/conflict-interest-workplace>). The proposed plan will be forwarded to the respective collegiate dean or vice president ~~or designee~~ for review and approval. A copy of this management plan shall be shared with the appropriate parties and maintained in the employee's personnel file. ~~Approval of management plans in UI Health Care will follow the procedures outlined in the UI Health Care Conflict of Interest and Conflict of Commitment Policy.~~ Management plan actions may include: ~~nothing beyond documentation of disclosure~~; strategies to eliminate the conflictual elements of the activity, and/or prohibition of the activity.

- (4) Monitoring: An employee's conflict of interest disclosures and any existing management plans will be reviewed at least annually, ~~or as~~ **but more frequently** if needed, by the central administrative office, the employee's employing unit, and the respective dean or vice president.

- (5) Annual Reporting: All 50 percent or greater regular faculty members, including administrators with faculty appointments, P&S staff members, ~~in executive classifications, professional and scientific classifications in pay levels 7-10, and administrative supervisors in professional and scientific classifications in pay levels 2-6~~ and merit staff members in revenue-generating units, are required to complete an online Annual Report of Outside Professional Activities and Interests for the previous calendar year by April 30 of each year. ~~However, all university employees are required to disclose conflicts of interest as described in II-18.5e(1) above, regardless of whether they are subject to the annual reporting process.~~

- f. Appeal. ~~If an employee wishes to dispute the proposed management plan, the governing procedures for faculty in the tenure, clinical, and research tracks are the Faculty Dispute Procedures (III-29) and that portion of those procedures dealing with faculty grievances (III-29.6); and the governing procedures for faculty in the instructional track are in the Instructional Faculty Policy (III-10.11). Staff and student employees, including graduate assistants, may appeal through Administrative Review (III-28.2):~~ Employees who are subject to a management plan and wish to challenge administrative actions that are taken pursuant to this policy may do so following the appropriate policy for their employment status: specifically, for faculty in the tenure track or any of the specialized tracks, the Faculty Dispute Procedures (III-29); for staff, III-28 Conflict Management Resources for University Staff; for graduate assistants, the Graduate Assistant Employment Standards; and for other student employees, the Grievance Procedure for Biweekly Student Employees (III-30).

- g. Noncompliance. Failure to disclose a conflict and/or comply with required management strategies constitutes a violation of ~~University~~ **this** policy and may also violate state and federal law. ~~A supervisor's failure to address a potential or actual conflict of which they become aware also constitutes a violation of this policy.~~ Employees may be subject to sanctions for violation of this policy, including disciplinary action up to and including termination of employment.

- h. Campus education. An annual notification will be sent to all UI **regular** employees by the Office of the Provost, University Human Resources, and the Office of Vice President for Research to remind the campus of the existence of conflicts of interest and commitment policies and the importance of campus compliance with the disclosure and management provisions. Additionally, campuswide resources will be available online for individuals and DEOs/supervisors regarding how to disclose, review, and manage conflicts.

- i. ~~Reporting. The University will provide initial and ongoing reports of its management of conflicts of interest to external governance bodies as required by law and in accordance with this policy:~~

- j. Records. Records relating to all employee disclosures and the University's review and management of such disclosures, will be maintained by the University for as long as the ~~conflict~~ situation exists ~~and/or~~ **but no less than** three years after the employee's termination.