

## POLICY #5.7

SUBJECT: Conflicts of Interest [TEMPORARY]

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### I. PURPOSE

The University promotes professional development and endeavors. While employees must devote applicable time and attention to their duties, the University also recognizes the value of external endeavors to employees' professional development. The purpose of this Policy is to promote professional development while implementing University requirements related to the State of Utah's legal, ethical, and other conflicts of interest-related requirements. This Policy is designed to promote the University's commitment to integrity, public confidence, trustworthiness, and stewardship of public resources.

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### II. REFERENCES

- A. 20 USC 1001: [General definition of institution of higher education](#)
- B. Southern Utah University [Policy 5.4 Board of Trustees Bylaws](#)
- C. Southern Utah University [Policy 5.18 Nepotism](#)
- D. Southern Utah University [Policy 5.24 Purchasing](#)
- E. Southern Utah University [Policy 5.52 Intellectual Property](#)

- F. Southern Utah University [Policy 6.9 Supplemental and Overload Compensation to Faculty and Academic Administrators](#)
- G. Southern Utah University [Policy 6.9.1 Faculty and Academic Administrators Consultation and External Employment](#)
- H. Southern Utah University [Policy 6.17 Faculty-Authored Materials](#)
- I. Southern Utah University [Policy 6.28 Faculty Professional Responsibility and Due Process](#)
- J. Southern Utah University [Policy 6.71 Disclosure of Financial Interests Related to Sponsored Projects](#)
- K. Southern Utah University [Policy 7.7 University Contracts](#)
- L. Southern Utah University [Policy 8.3.5 Termination of non-Academic Staff Employees and Disciplinary Sanctions](#)
- M. Southern Utah University [Policy 8.3.7 Consulting and External Employment Activities](#)
- N. Southern Utah University [Policy 8.3.8 Supplemental and Overload Compensation for Staff and non-Academic Administrators](#)
- O. Southern Utah University [Policy 8.4 Employment Grievances](#)
- P. Southern Utah University [Policy 8.5.1 Overtime \(non-Exempt Personnel\)](#)
- Q. Utah Code [§ 51-8-303 Requirements of member institutions of the state system of higher education](#)
- R. Utah Code [§ 63G-2 Government Records Access and Management Act](#)
- S. Utah Code [§ 67-16 Utah Public Officers' and Employees' Ethics Act](#)
- T. Utah System of Higher Education [Policy R122 Board Conflict of Interest Policy](#)

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### III. DEFINITIONS

- A. Annual Disclosure: An Employee's affirmative reporting of Outside Activities, and Conflict(s) of Interest, as applicable, on a yearly basis, typically before the start of the following fiscal year.
- B. Area Specialist: An Employee whose job duties identify that Employee as the most responsible person for development, implementation, management, and/or oversight of a critical University function related to an applicable Conflict of Interest.
- C. Board of Trustee Member / Trustee: An appointed or ex officio member of the University's Board of Trustees. See SUU [Policy 5.4](#).

- D. Conflict Management Plan: A written plan of action developed between the University and an Employee by which an actual or potential Conflict of Interest can be managed, mitigated, or eliminated. A Conflict Management Plan typically requires the oversight of the Employee's immediate supervisor. A Conflict Management Plan should be on the University's approved template. Any Conflict Management Plan automatically incorporates the prohibitions in this Policy and as otherwise set out in other University policies, whether or not expressly stated therein. If a Conflict Management Plan is approved, the supervisor should visit at least annually with the Employee with an aim of ensuring that the Conflict Management Plan is complete and adequate, and that the Conflict of Interest is not interfering with the Employee's University job duties or the safeguarding of University resources, as more fully set out in the Policy below.
- E. Conflict of Interest: When a University Employee owes a professional obligation to the University, which is or can be compromised by the pursuit of an Outside Activity or Financial or Other Interest.
1. Conflicts of Interest also include the following:
    - a. Actual Conflict of Interest: A situation where a Conflict of Interest is currently manifested.
    - b. Apparent Conflict of Interest: A situation that may appear to a reasonable observer as a Conflict of Interest, whether or not a Conflict of Interest actually exists.
    - c. Potential Conflict of Interest: A situation that may foreseeably develop into an Actual Conflict of Interest.
    - d. Conflict of Allegiance: When an Employee's loyalty and devotion is divided between Outside Activity and responsibilities to the University such that the appearance or potential for bias compromises an individual Employee's independence of judgment in the performance of the Employee's University duties and responsibilities.
    - e. Conflict of Commitment: A situation in which an Employee engages in an Outside Activity, paid or unpaid, that involves a commitment of time, allegiance, finances, or other obligation that may interfere, or appear to interfere, with the fulfillment of the Employee's

obligation to the University.

- i. Conflict of Time: When personal or professional activities external to the University position or appointment exceed reasonable time limits and adversely impact the Employee's professional responsibilities. A Conflict of Time can exist whether or not an Employee receives financial gain or remuneration for external or non-assigned activities.
- f. Sponsored Project Conflict of Interest: See SUU [Policy 6.71](#) or additional definitions of Conflicts of Interest for funded research, such as those required by federal regulations.

2. Examples of Outside Activities that do not generally create Conflicts of Interest.

- F. Conflict of Interest Review Working Group: A group of Employees (staff and faculty) designated on a rotating basis by the Provost or designee (faculty) and Human Resources (other staff) of 3-5 total Employee members, who have relevant experience or knowledge to review and provide input on Conflict of Interest-related matters to certain decision makers under this Policy.
- G. Disclosure Form: The University form for Employees to use to disclose Conflicts of Interest.
- H. Disclosure Process / Disclosure and Review Process: The process through which the University reviews Employees' Disclosure Forms, assesses Outside Activities and Conflicts of Interest, develops Conflict Management Plans when applicable, and determines whether to approve Outside Activities, all as further described in this Policy.
- I. Employee: A person employed by Southern Utah University.
- J. Family: A Relative or Household Member.
- K. Financial or Other Interest: Anything of monetary value, including but not limited to salary or other payments for services; equity interest (e.g., stocks, stock options, or other ownership interest); intellectual property rights (e.g., patents, copyrights, and royalties from such rights). Financial or Other

Interest also means the holding of a position as an officer, director, agent, or employee of an Outside Entity. Financial or Other Interest includes such interest held by an Employee or by an Employee's Family.

1. Financial or Other Interest does not include the following (though leave time may be required for subsections b and c, in accordance with University consulting policies if not performed on behalf of the University):

- a. Employee wages and salary, travel reimbursements, or other non-royalty remuneration from the University;
- b. Income less than \$100 from one-time seminars, lectures, or presentations at conferences;
- c. Income from service on advisory committees or review panels for a federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education; or
- d. Income from investment vehicles, such as mutual funds and retirement accounts, as long as the Employee does not directly control the investment decisions made in these vehicles.

L. Gift(s) and/or Contribution(s): A gift of substantial value or a substantial economic benefit tantamount to a gift. (See Utah Code 67-16-5)

M. Household Member: See SUU [Policy 5.18](#).

N. Outside Activity/ies: Any activity that is not performed as part of the University Employee's responsibilities for the University. (Employee responsibilities are articulated/enumerated in an Employee's job description, appointment and other employment documents, and/or University policy.)

O. Outside Entity: A sole proprietorship, partnership, association, joint venture, corporation, firm, trust, foundation, or other organization or entity that carries on a trade or business, including parent organizations of such entities, or any other arrangement in which an entity operates through a subsidiary.

P. Relative: See SUU [Policy 5.18](#).

Q. Substantial Interest: The ownership, either legally or equitably, by Employee, a Relative or Household Member, of at least 5% of the outstanding capital stock of a corporation or a 5% interest in any other Outside Entity. Generally,

a Substantial Interest has to exceed a total value of \$2,000. (USHE R122; Utah Code 67-16-3; 67-16-7) For University Employees involved in sponsored funding research or other programs or projects, refer to [Policy 6.71](#) for additional obligations related to what constitutes a “Substantial Interest.”

- R. University Administrator: University Employees in a position of administrative leadership of the University where a regular job requirement is to make institutional decisions on behalf of the University. University Resources include but are not limited to University-furnished email accounts, listservs, and letterhead.

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#### IV. POLICY

##### A. Scope of Policy

1. This Policy applies to all Employees and to all relationships, financial positions, business endeavors, or other conduct (see “Outside Activities” and “Financial or Other Interest” definitions) that may create a Conflict of Interest between the University and the Employee.
2. Employees who are subject to Conflict of Interest-related requirements under federal research laws are subject to both this Policy and SUU [Policy 6.71](#) and must comply with disclosures and other requirements in both policies. Disclosure requirements for sponsored funding may be included in the Annual Disclosure process described in this Policy.
3. This Policy does not prohibit Employee activities performed on behalf of the University within the scope of an Employee’s University employment, regardless of the Employee’s location when performing the duties. Supervisors, in consultation with Human Resources and Provost’s Office, as applicable, determine what activities are within the scope of an Employee’s University employment, typically based on job descriptions, University policies, and other relevant information.

##### B. General Policy Statements

1. University Employees have a primary professional obligation to act in the best interests of the University and to give their full measure

of time, talent, and loyalty to the University. This Policy is aimed at promoting public confidence in the University's integrity and accountability related to public employment. Employees may not engage in any Outside Activity or hold any Financial or Other Interest that creates a Conflict of Interest unless it is appropriately and adequately managed through a Conflict Management Plan. Provided however, Conflict Management Plans can often (but not always) be utilized to address a potential Conflict of Interest in a way that will allow the Employee to engage in Outside Activities that otherwise might create a Conflict of Interest.

2. Encouragement of Professional Development Opportunities. The University recognizes the importance of encouraging and supporting Employees in professional learning and career development opportunities, which may involve Outside Activities. The University desires for its Employees to have the same opportunities as other citizens of Utah, provided that the opportunities do not interfere with the Employees' duties or otherwise materially disadvantage the University.
3. Employees are subject to the Utah Public Officers' and Employees' Ethics Act, Utah Code Ann. § 67-16-1 et seq. (the Ethics Act). Each Employee has a personal obligation to know, understand, and abide by the Ethics Act as a public employee of the State of Utah. While standards from the Ethics Act are incorporated by this Policy, no Employee may rely on the University's interpretation of the University's standards in this Policy as related to the Employee's obligations under the Ethics Act.
4. Services provided by Employees, including former Employees who have worked at the University within the last 12 months, to the University may not be performed as an independent contractor or through another outside business entity arrangement with the University. Instead, those engagements will be considered and reviewed under applicable employment policies, such as SUU [Policy 8.5.1](#), SUU [Policy 6.9](#), and SUU [Policy 8.3.8](#). Any exceptions to the prohibition in this paragraph must be approved by the head administrator for Human Resources in advance of any services, and such exceptions will be extremely limited.

- C. Details from Utah Law About Conflicts of Interest. In addition to the above general rules about Conflicts of Interest, the following are provided in this

Policy to help inform supervisors and Employees about different types of Conflicts of Interest:

1. Without limiting the foregoing, Employees are bound by the following ethical requirements related to their public, University employment, which may constitute a Conflict of Interest:
  - a. Employees shall not have personal investments in any business entity which will create a Conflict of Interest between their private interests and their public duties. (Utah Code 67-16-9)
  - b. Employees shall not engage in Outside Activities with a person or entity that the Employee could provide to the person or entity within the course and scope of the Employee's employment.
  - c. Employee shall not engage in any Outside Activity that interferes with the hours or job duties (non-exempt [FLSA] Employees) or the scope and commitment required for University job duties (exempt [FLSA] Employees) that the Employee is expected to perform under the direction or control of the University, unless the Employee takes authorized leave during the time that the person engages in the Outside Activity.
  - d. Employee shall not use or attempt to use Employee's University position to:
    - i. further substantially the Employee's personal economic interest; or
    - ii. secure special privileges or exemptions for Employee or others; (Utah Code 67-16-4)
  - e. Employees shall not accept employment or engage in any business or professional activity or other Outside Activity that the Employee might reasonably expect would require or induce them to improperly disclose controlled, private, or protected information, including but not limited to University data, that the Employee has gained by reason of Employee's University position. (Utah Code 67-16-4)
  - f. Employees shall not disclose or improperly use controlled, private, or protected information, including but not limited to University data, acquired by reason of Employee's University position or in the course of official



duties in order to further substantially the officer's or Employee's personal economic interest or to secure special privileges or exemptions for Employee or others. (Utah Code 67-16-4)

- g. Employee shall not accept other employment that Employee might expect would impair Employee's independence of judgment in the performance of Employee's public duties or otherwise impact their ability to fulfill duties in the best interest of the University or otherwise would interfere with the ethical performance of the Employee's public duties. (Utah Code 67-16-4)

## 2. Misuse of University Authority in Academic Setting

- a. University Employees who evaluate students or Employees may not base these evaluations, in whole or in part, on participation (or refusal to participate) in Outside Activities involving business entities or organizations in which the evaluating Employees or their Relative or Household Members have a Financial or Other Interest. Supervising Employees may not require participation of Employees or students in non-university activities involving these types of businesses or organizations.
- b. Faculty members must adhere to [Policy 6.17](#) regarding the selection and sale of course materials from which they may derive royalties or other personal gain.

## 3. Activities Related to Family

- a. See SUU [Policy 5.18](#) for Nepotism rules.
- b. See Section IV.C.7. below regarding Purchasing rules related to Relative or Household Members.
- c. Employees may not participate in academic decisions directly affecting Relative or Household Members, including decisions about admissions, financial aid, grades, and academic advancement.
- d. Employees may teach students who are Relatives or Household Members in their courses. In the case of credit-bearing courses, the department chair, or the next-level authority in a course taught by a chair or dean,

will designate another appropriate Employee (who is not a Relative or Household Member of the student) such as a faculty member or teaching assistant to grade the student's academic coursework (including papers, exams, projects, portfolios, and demonstrations) and assign a final grade for the course.

- e. Employees may not assign their students, interns, or other trainees to University projects sponsored by or benefiting any business or organization in which Employees or their Relative or Household Members have a Financial or Other Interest.

#### 4. Consulting

- a. See SUU [Policy 6.9.1](#) for Faculty and Academic Administrator Consultation and External Employment.
- b. See SUU [Policy 8.3.7](#) for Consulting and External Employment Activities.
- c. Notwithstanding the terms of those University consulting policies, as part of implementing the review and approval process under this Policy, Employees must disclose any consulting activities in advance through the same platform as the Annual Disclosure process, and such arrangements are subject to and must receive the approval of applicable administrators prior to engaging in the Outside Activity (i.e., consulting activity, in this case).

#### 5. Intellectual Property

- a. Employees may not negotiate any transfer of intellectual property rights or royalties on behalf of the University with organizations or business entities in which Employees or their Relative or Household Members have a significant Financial or Other Interest, and must otherwise comply with SUU [Policy 5.52](#).
- b. Employees shall disclose when an Employee has a Financial or Other Interest in an Outside Entity related to or using intellectual property owned by the University.

#### 6. Procurement / Purchasing

- FORMER DRAFT
- a. An Employee may not, in the Employee's official capacity, participate in, or receive compensation as a result of, a transaction between the state or University and an Outside Entity of which the Employee or Employee's Family is an officer, director, agent, employee, or owner of a Substantial Interest.
    - i. If the Employee seeks an exception to this requirement, the Employee shall make that request through a sworn statement to the University Administrator with authority over University Purchasing, which is available through the Disclosure and Review Process. The statement is considered a public record. The statement shall disclose the Outside Entity relationship. The request is subject to approval by the University President (or designee), the Utah Attorney General's Office designee, and the Employee's immediate supervisor. (Utah Code 67-16-8; 67-16-7)
  - b. Employees, including previous Employees who have worked at the University in the last calendar year and/or who have future appointments with the University, may not provide goods or services to the University as an independent contractor or through contract on behalf of oneself or an Outside Entity. (See Section IV.C.1., above.) Any exceptions to this prohibition must be approved by the University President.
  - c. Generally, Employees' Relatives or Household Members may not provide services to the University through private business interests unless and until proper disclosures are made by the Employee (and approvals obtained through the Disclosure and Review Process) and a public process of disclosure or bidding is completed under applicable procurement law(s).
  - d. Employees of Relative or Household Members may not in any way advocate for or participate in a procurement process with the University that involves a Financial or Other Interest of their Relative or Household Member. This includes, for example, offering of goods or services,

or requesting, approving, or issuing orders or commitments for goods and/or services.

- i. Disclosure. Employees shall disclose any Financial Interest or Relative or Household Member connection, whether through a Relative or Household Member or otherwise, to any business dealings with the University. For example, if an Employee's Relative or Household Member does or attempts to do business with the University, the Employee shall disclose that relationship in advance. If an Employee has a Financial or Other Interest with any person or entity who does or attempts to do business with the University, the Employee shall disclose that relationship.
- ii. Examples of potential conflicts in the contracting and/or procurement process.
- e. If an Employee has a Financial or Other Interest in a non-University entity that provides goods or services, and the University provides the same or similar goods and services, and the Employee is in a position to direct potential purchasers of the goods and services away from the University and to the Outside Entity, the Employee must disclose that Financial or Other Interest on the Disclosure Form.
- f. The designated University Administrator responsible for compliance with Purchasing laws will review situations where a Conflict of Interest may exist related to state purchasing laws, and may give input to the applicable Employee's supervisor, and take steps to ensure the University's compliance with state procurement laws; provided however, any employment action against an Employee shall follow the University's applicable disciplinary and misconduct related employment policies (e.g., SUU Policy 6.28 and SUU Policy 8.4).
- g. This section is, in part, intended to implement Utah Code 67-16-7, and the University will construe it based on that

law and any amendments from time to time; provided however, the University may implement stricter requirements than the law.

7. Outside Compensation of University Employees. Generally, an Employee may not receive or agree to receive compensation for assisting any person or business entity in any transaction involving the University. In other words, Employees may not receive a bonus or "tip" from an outside entity for the Employee performing, avoiding, or altering their University duties. If the Employee wants to request an exception to this prohibition, the Employee shall file a sworn, written statement through the Disclosure and Review Process containing:

- a. the name and address of the public officer or public employee involved;
- b. the name of the public officer's or public employee's agency;
- c. the name and address of the person or business entity being or to be assisted; and
- d. a brief description of:
  - i. the transaction as to which service is rendered or is to be rendered; and
  - ii. the nature of the service performed or to be performed.
- e. Such a statement must be filed in advance of receiving the compensation and is subject to receiving the approval of at least the Office of the Attorney General, the University President, and the Employee's immediate supervisor.
- f. This section is intended to implement Utah Code 67-16-6, and the University will construe it based on that law and any amendments from time to time; provided however, the University may implement stricter requirements than the law.

- D. Accepting Gifts or Contributions. An Employee shall not knowingly receive, accept, take, seek, or solicit, directly or indirectly for the Employee a Gift or Contribution:

1. that would tend to improperly influence a reasonable person in the person's position to depart from the faithful and impartial discharge of the Employee's public duties;
2. that the Employee knows or that a reasonable person in that position should know under the circumstances is primarily for the purpose of rewarding the Employee for official action taken or avoided; or
3. if the Employee recently has been, is now, or in the near future may be involved in any governmental action directly affecting the donor or lender, unless a disclosure of the Gift, compensation, or loan and other relevant information has been made in the manner provided in Section IV.E.

E. Disclosure and Review Process for Employees. Employees shall disclose (and later update with changes as they occur) all Conflicts of Interest and manage through a Conflict Management Plan or eliminate Conflicts of Interest, as provided in this Policy. The disclosure and review process is outlined in the University's applicable disclosure forms and systems and in the online procedural guidance. Employees and supervisors are required to be familiar with the Disclosure Form and Process and complete it to the best of their knowledge. All Employees should engage in the process with an aim towards transparency, while Supervisors should engage in the process with an aim towards allowing the most opportunities for Outside Activities while protecting time devoted to, commitment to, and resources of the University.

1. Conflict Management Plan Requirements

- a. Employees and supervisors should draft Conflict Management Plans with the following goals:
  - i. Protect the University related to the Employee's time and commitment to the University;
  - ii. Safeguard the University's property and resources; AND
  - iii. Allow Employees to conduct their Outside Activities to the greatest extent possible, so long as the Conflict of Interest can be appropriately managed throughout the plan.
- b. Employees may not engage in the Outside Activity that is the subject of the proposed Conflict Management Plan until the Plan is approved through the process; provided

that there is a reasonable grace period for disclosures for the 2024-25 fiscal year.

2. **Compliance Office Designee Responsibility.** The University office designated as responsible for University compliance coordination (currently, the Office of Enterprise Risk Management, Compliance, and Safety), as designated by the Vice President of Operations, shall maintain responsibility for the administration of the forms and processes set out in this Policy, reminders about Annual Disclosure deadlines, and tracking completion of Disclosure Forms and Conflict Management Plans, when applicable. The Compliance designee may inform supervisors of any Employees that have not completed the Disclosure Process, but immediate supervisors remain responsible for monitoring and ensuring timely completion of Disclosure Forms and Conflict Management Plans by Employees under their supervision. The Compliance designee is not responsible for making determinations under this Policy, such as whether a Conflict of Interest exists or is adequately managed.
  3. **Human Resources Responsibility.** Human Resources is responsible for providing Disclosure Forms (or notifying them with relevant link[s]) to Employees at the start of a new position or new employment with the University, and coordinating with the Compliance designee for maintenance of those Disclosure Forms and any related documentation.
  4. **Training Responsibility.** Human Resources, in coordination with the Provost's designee, is responsible for training of Employees and supervisors on obligations under this Policy. Employees shall take training relevant to this Policy when notified.
- F. **Confidentiality.** Unless otherwise required by applicable law, all records and information provided by an Employee for the purpose of disclosure and management of a conflict shall be considered private and/or protected records under Government Records Access and Management Act (GRAMA) will be used only as necessary to administer University policy, and may not be used for any other purpose unless required by lawful court or government agency order or other law.
- G. **Violations by Employees.** Supervisors shall address violations of this Policy with employees who report to them, including but not limited to, failing to complete the Disclosure Form when required, consistent with prudent supervisor-Employee professional development and when necessary, applicable disciplinary policies.

H. Disclosure and Review Process for Trustees. Trustees must disclose all Conflicts of Interest and manage or eliminate Conflicts of Interest, as further detailed in this section:

1. Trustees must comply with all state laws, with particular attention to those that govern Conflicts of Interest and their service as public officials as noted in the references of this Policy.
2. Trustees who are officers, directors, or employees or who are owners of a Substantial Interest in any business entity that is or may be involved in any transaction with Southern Utah University or any of the university's subsidiaries shall disclose such facts in a sworn disclosure statement as set forth in subsections below before participating in their official capacities with respect to any such transactions and annually thereafter.
3. Trustees shall not receive or agree to receive compensation for assisting any person or business entity in any transaction involving the University, without first disclosing such facts in a sworn, written disclosure statement as set forth in the subsections below.
4. Trustees shall not use or attempt to use their official positions to further substantially their personal economic interest or to secure special privileges or exemptions for themselves or others.
5. Trustees must submit disclosure statements required by this Policy with respect to such transactions and annually thereafter. The Trustee shall submit another disclosure statement whenever his or her position or ownership interest in the business entity changes significantly.
6. The disclosure statement must be completed and submitted to the Assistant to the President, or other position serving in a function similar to a secretary of the Board of Trustees. The Assistant to the President shall then file the disclosure statement with the following offices as appropriate:
  - a. the USHE Commissioner's Office;
  - b. the state Attorney General's Office; and
  - c. the President.
7. When a conflict of interest is identified, the involved Trustee must work with USHE administrators, Board of Trustees leadership, and SUU's administrators, as applicable, to eliminate the Conflict of Interest or develop and comply with a Conflict Management Plan.



8. The disclosure statement is public information and shall be available for examination by the public.
- I. No Additional Rights. This Policy is implemented to govern University requirements for its Employees and Trustees related to Conflicts of Interest and relevant state ethics laws. It is not intended to and does not create any additional rights or contractual obligations for the benefit of Employees, Trustees, or other third parties.

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## V. RELEVANT FORMS/LINKS

- For relevant forms, contact the [Office of Human Resources](#)
- [Report a Concern](#)

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## VI. QUESTIONS/RESPONSIBLE OFFICE

The responsible offices for this Policy are the [Vice President for Finance](#) (staff employees) and the [Provost/Vice President for Academic Affairs](#) (faculty employees). For questions about this Policy, contact the [Provost's Office](#) for matters related to faculty, research, and/or intellectual property. Contact [Human Resources](#); [Office of Sponsored Programs, Agreements, Research, and Contracts \(SPARC\)](#); [Office of Enterprise Risk Management, Compliance, and Safety](#); or the [Purchasing Office](#) with other questions as applicable to their responsibilities listed under this Policy.

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## VII. POLICY ADOPTION AND AMENDMENT DATES

Date Approved: [November 29, 2001](#)

Amended: July 1, 2024 (temporary authorization)