

DEPARTMENT: GENERAL UNIVERSITY	
SUBJECT: UNIVERSITY CONFLICT OF INTEREST POLICY FOR ADMINISTRATIVE PERSONNEL AND DESIGNATED FACULTY	Page 1 of 4
Policy Number:	Supersedes: NONE
Effective Date: 1993	Previously Issued: N/A

1. STATEMENT OF POLICY:

This policy outlines the scope, definitions, and rules for complying with the Loyola Marymount University Conflict of Interest (COI) Policy.

It is the policy of Loyola Marymount University that the highest standards of conduct and honesty are expected of all employees of the University. It is the obligation of those employed to avoid involvement in activities that might conflict -- or might appear to conflict -- with their institutional responsibilities. Decision making in matters in which a conflict of interest may exist may create an appearance of impropriety. The University believes that it is useful to attempt to reduce to written form some basic rules to which staff and faculty members with administrative responsibilities ("designated faculty") can refer in evaluating potential conflict situations. The University publishes these rules mindful of the fact that the good judgment of its staff and designated faculty is essential, and that no list of rules can provide direction for all the varied circumstances as they arise.

A mechanism shall be provided for disclosing and ethically resolving conflicts of interest, which may occur in the performance of employees' assigned duties. Further, a mechanism shall be provided for reporting a conflict of interest observed; that report may be made anonymously. If an employee believes he or she has knowledge of a potential conflict of interest, he or she should speak with his or her departmental manager or chair, Internal Audit or anonymously report the matter by accessing the Ethics Reporting tool at <http://www.lmu.edu/resources/contact/ethicsline.htm> or calling 866-294-6139.

2. SCOPE:

This policy applies to personnel within the University who might commit or cause to be committed the resources of the University. See separate policies relating to all Faculty, to Sponsored Research Investigators and to the Trustees of the Board. In connection with the completion of the university's IRS Form 990 certain designated employees will receive an additional request for information on business or personal relationships that require disclosure in the return.

3. DEFINITION:

A conflict of interest is considered to exist in any instance where an individual's actions or activities on behalf of the University also involve the obtaining of an improper gain or advantage to the individual or the individual's family or business associates or cause an adverse effect on the University's interests. It can also result when the conflict of interest prevents the employee from exercising due care, skill, and judgment on behalf of the University in the performance of the individual's assigned duties.

4. RULES:

4.1 Each staff or designated faculty member has a duty to act in the best interests of the University.

4.2 Staff and designated faculty members who have, directly or through family or business connections; an interest in suppliers of goods or services or in contractors or potential contractors with the University, must not undertake to act for the University in any transaction involving that interest. No staff or faculty member shall participate in the selection, award or administration of a contract with any party with whom s/he is negotiating respecting potential employment or has any arrangement concerning potential employment.

4.3 Staff and designated faculty members shall avoid outside employment or business activity involving obligations, which may in any way conflict, or appear to conflict, with the University's interests, including its interest in the full- or part-time services of its staff and faculty members. A conflict of time commitment is considered to exist if outside activities impact the employee's abilities to fulfill his or her responsibilities. Directorships or consultation arrangements for which the staff or faculty member will receive compensation must be cleared with the responsible divisional Senior Vice President, Dean of the Law School, Provost or President ("University Officers") of the University or his or her designee. Written approval must be obtained.

4.4 Each staff or designated faculty member shall provide full written disclosure of any business or financial enterprise or activity which might influence, or appear to have the capacity to influence, his or her official decisions or actions on University matters. Revised disclosure shall be made whenever a significant change in interest occurs. Employees who have the authority to spend or commit University funds shall make disclosure a matter of record through the annual completion of the attached disclosure statement. The annual statement will be maintained in a confidential file in the Internal Audit department after its review by the appropriate University Officer..

Staff and designated faculty members are encouraged to seek advance consultation from the appropriate University Officer, or his or her designee, on matters which might involve a conflict of interest or appear to involve one. Further, the staff or faculty member must refrain from participating in any way in the matter until and unless the person to whom the situation was disclosed has determined that no conflict exists or has authorized participation. That determination shall be written and be made promptly

4.5 Staff and designated faculty members shall refrain from personal activities, including but not limited to the purchase or sale of securities, real property or other goods or services in which they could use, or might appear to have the opportunity to use, for personal gain confidential information or special knowledge obtained as a result of their relationship with the University.

- 4.6 Each staff or designated faculty member shall refrain from unauthorized disclosure of non-public information concerning the University's intentions, its investments, its property development, sale or acquisition, its purchasing or its contracting activities.
- 4.7 No staff or designated faculty member shall make unauthorized use of University resources for his or her personal benefit or for the benefit of any other person.
- 4.8 It is sound practice to discourage personal gifts and favors from people with whom the University has a business relationship. Personal gifts of more than nominal value must be tactfully declined or returned to avoid any appearance or suggestion of improper influence. Those staff and designated faculty members involved in the awarding or administration of contracts using federal or other government funds must keep in mind that they are prohibited by law from soliciting or accepting gratuities, favors or anything of monetary value from contractors or potential contractors. See separate policy for Sponsored Research Investigators.
- 4.9 No staff or designated faculty member shall act in any University matter involving a member of his or her immediate family, including but not limited to matters affecting such family member's employment, evaluation or advancement in the University, without first making full disclosure. Such disclosure shall be in writing and include the nature of the familial relationship and the impact or potential impact of the staff or designated faculty member's action on such family member. The disclosure shall be made to the appropriate University Officer and shall be in advance of any action taken relevant to the family member.

Last reviewed by:	Date:
Approved by: Audit Committee of the Board of Trustees	Date: 1993
Denied/Postpone:	Date:
Notes: Revised:9/7/99 10/07/04 10/24/05 08/16/06 09/20/06 09/29/11	09/28/12

LOYOLA MARYMOUNT UNIVERSITY  
CONFLICT OF INTEREST POLICY  
ANNUAL DISCLOSURE

I have read and agree to comply with the Loyola Marymount University Conflict of Interest policy for Staff Personnel and Designated Faculty Members. To the best of my knowledge (except as disclosed below) I am currently in compliance with the policy.

(List here any exceptions to the statements above.)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print or Type Name

\_\_\_\_\_  
Department Name

\_\_\_\_\_  
Title