

## **College of Agricultural and Life Sciences Conflict of Interest Policy**

The College of Agricultural and Life Sciences (CALs) is committed to helping its faculty and staff secure extramural funding for their research, instruction, and outreach programs. The college also recognizes that faculty and staff activities outside the scope of one's university appointment, such as consulting, starting a business, or serving as an expert witness, bring innumerable benefits to the campus community. The college strongly supports such activities for its faculty and staff, and herein outlines a policy for effectively disclosing and managing the potential conflicts of interest that can arise from such activity.

Federal, State and University regulations and policies require annual disclosure of outside activities and financial interests from faculty and academic staff. At UW-Madison, the annual state disclosure process is comprised of an outside activities report completed by each faculty and academic staff member with an appointment of 50% or greater, followed by respective review from the Department Chair and the CALs Dean's Office. Federal policy requires the University to maintain a written, enforced policy on conflict of interest and inform investigators of the policy. The University must endeavor to eliminate, minimize, or manage any potential or actual conflicts of interest between an investigator's federally funded research and any significant financial interests that might reasonably appear to affect, or be affected by, the federally funded work. The Campus Conflict of Interest Committee provides guidelines to identify conflicts and take necessary action to manage, reduce or eliminate those conflicts. Currently, both the federal and state reports are consolidated into a single reporting system on the University of Wisconsin-Madison campus.

Whenever principal or co-investigators or key personnel have federally funded research or conduct human subjects research, the campus Conflict of Interest Committee is responsible for reviewing potential conflicts of interest and establishing appropriate management plans.

Conflicts of interest can also arise when research is funded from non-federal sources, which are not directly within the Campus Conflict of Interest Committee purview. In such cases, and according to campus policy, the Dean's Office may request that the Conflict of Interest Committee review the outside activities of any individual and recommend a course of action. This conflict of interest policy maintains the same thresholds for financial disclosure as does the campus conflict of interest policy.

If nexus<sup>1</sup> between the faculty or staff member's university duties and the faculty or staff member's financial interests is perceived, the CALs Dean, in consultation with the chair of the faculty or staff member's department and the Associate Dean for Research, shall formulate a management plan duly designed to reduce potential and actual conflict. Such determination, if

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<sup>1</sup> The UW campus policy describes nexus in the following way: "An outside activity has a nexus with an individual's research activities if the outside activity arises from or relies upon the academic expertise that qualifies that individual to participate in federally funded research or human subjects research. The potential for conflict with an outside activity or financial interest is strengthened by other relationships between the individual or his or her immediate family and the business entity associated with the financial interest or outside activity." In the context of this policy, nexus includes the scholarly activities within the portfolio of one's university duties, including both federal and non-federal funding for these activities.

federal funding is involved, may be based on Campus Conflict of Interest Committee findings, on Dean's Office review and assessment, or both. It is imperative that any plan include consideration of the tradition of trust established by the mentor-mentee relationship, which rests at the foundation of graduate and post-graduate study.

When financial interests (e.g., consulting businesses) are contained in an entity such as a corporation, a limited liability partnership (LLP), a limited liability company (LLC), or other entity in which the individual business interests are held within an overarching business structure, an individual will disclose the identity of individual sources of income greater than \$10,000 in writing to the Dean in order to ascertain whether nexus between sponsored research and personal interests or investments exists. Enforcement of this policy rests with the Dean's Office.