

3.2 ERA Conflict of Interest – Advisory Board Membership



1. PURPOSE

- 1.1 This policy addresses potential conflicts of interest of advisory board members. It is written with guidance from the Board of Regents for the Oklahoma Agriculture & Mechanical Colleges (Ethics 3.10) and the Oklahoma State University Policy Manual (4-0130).

2. SCOPE

- 2.1 This policy applies to the Emergency Responder Administration Advisory Board.

3. POLICY STATEMENT

- 3.1 We recognize that conflicts of interest or commitment can interfere with the best interests of the advisory board and erode our credibility. A conflict of interest occurs when an individual is in a position to influence a decision on policies, purchases, programs, or decisions from which he/she or someone within the third degree of consanguinity or affinity or other associate might directly or indirectly receive a substantial benefit. A conflict of commitment arises when an individual's involvement in outside activities substantially interferes with his/her primary commitments to the advisory board or its members. We will promptly disclose such conflicts and take steps to mitigate or eliminate any that compromise our integrity or that of the OSU-Oklahoma City campus, in accordance with applicable law and policies (Adapted from Ethics 3.10). Furthermore, it is recognized that a conflict of interest exists when a Significant Financial Interest could substantially compromise an employee's judgment in the performance of University duties. A conflict of interest depends on the situation and not on the character or actions of an individual (Adapted from 4-0130; 2.06).
- 3.2 Sound professional discretion is an integral part of the University's conflict of interest system. Any review of a potential conflict of interest will be undertaken in light of four general propositions. First, conflicts of interest per se are inevitable, and do not necessarily represent any impropriety by advisory board members if disclosed in advance. Second, the failure to disclose a conflict of interest for board review and response would be a serious mistake for any member, and may be a breach of this policy. Third, there is a presumption in favor of allowing members to act in dual roles once the conflict of interest has been disclosed. Fourth, conflicts of interest may be so profound or substantial under some circumstances that it would be best for all concerned if the member did not participate in a particular agenda item (Adapted from 4-0130; 2.03).
- 3.3 It is not possible to completely eliminate the potential for conflict of interest because there are certain rewards and incentives that are inherent or appropriate in the structure of a university enterprise. Such conflicts become detrimental when the potential temptations, financial or otherwise, undermine reasonable objectivity in the design, conduct and reporting of advisory board activities. Furthermore, since allegations of conflicts of interest based on appearances can undermine public trust in ways that may not be adequately restored even when mitigating facts are brought to light, apparent conflicts should be avoided, when feasible and appropriate (Adapted from 4-0130; 2.04).
- 3.4 It is the ongoing responsibility of the advisory board member to abide by the provisions of all other applicable federal, state, and University's laws and policies relating to conflicts of interest; and to disclose and seek guidance on such matters from the advisory board membership (Adapted from 4-0130; 2.05).
- 3.5 Employees are responsible for disclosing Significant Financial Interests that would reasonably appear to be affected by or to affect their University duties. However, it is the responsibility of the University, not the discloser, to determine if the disclosed interest could significantly affect the performance of University responsibilities and to require the management, reduction, or elimination of the conflict ((Adapted from 4-0130; 2.07).
- 3.6 Significant Financial Interest (for all disclosures except those made as required by PHS regulations): Anything of monetary value, including, but not limited to, salary or other payment for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options, or other ownership interests); and intellectual property rights (e.g., patents, copyrights, and royalties from such rights) (Adapted from 4-0130; 3.08).
- 3.7 A Significant Final Interest is not the only type of conflict that may occur. A conflict of interest may occur if a member serves on another advisory board for another educational institution whose degree program is in direct completion with the Emergency Responder Administration bachelor's degree.

4. PROCEDURE

- 4.1 Advisory board members shall document all real or perceived conflicts of interest for the membership for consideration and discussion. These conflicts may be financial or nonfinancial.
- 4.2 Advisory board members shall submit a conflict of interest disclosure form to the Emergency Responder Administration program administrator. The form shall be signed, dated, and witnessed by the program administrator or other OSU-Oklahoma City administrative officer.
- 4.3 The conflict of interest form shall remain in effect for a period of three years or until such a time where a disclosure by an advisory board member must be made

5. RESPONSIBILITIES

Compliance, monitoring, and review

- 5.1 Compliance with this policy and procedure will be achieved as follows:
 - It is the responsibility of each member of the Advisory Board to inform OSU-Oklahoma City if a conflict is present.
 - The Department Head of the Emergency Responder Administration program is the point of contact for monitoring compliance with this policy and for conducting a review as noted below.

Reporting

- 5.2 Any conflict of interest of an Advisory Board member shall be reported to the Department Head of the Emergency Responder Administration program.
- 5.3 The Department Head of the Emergency Responder Administration program shall forward the notice on through the chain of command for consideration of any needed action by administration.

Records Management

- 5.4 Staff must maintain all records relevant to administering this policy and procedure in a recognized University recordkeeping system.
- 5.5 This document is retained by the Department Head of the Emergency Responder Administration program and made available to the public on the website.

6. DEFINITIONS

- 6.1 None.

7. RELATED LEGISLATION AND DOCUMENTS

Adapted from Board of Regents for the Oklahoma Agricultural & Mechanical Colleges Policy Manual 3.10 Ethics; and the Oklahoma State University Policy Manual 4-0130.

This policy complies with the International Fire Service Accreditation Congress criteria that states the following:

- G23.3.5(e) There shall be published policies that prohibit members of advisory committees from having financial or other interest that conflict with the proper discharge of their duties.
- G23.4.2(a) There shall be published policies that prohibit faculty, staff or advisory committee members from having financial or other interests that conflict with the proper discharge of their duties.

8. APPROVAL AND REVIEW DETAILS

Approval and Review	Details
Approval Authority	ERA Advisory Board
Administrator	ERA Department Head
Next Review Date	September 30, 2022

Approval and Review	Details
Approval and Amendment History	Details
Original Approval Authority and Date	ERA Advisory Board September 21, 2017
Amendment Authority and Date	None.
Notes	None.

9. APPENDICES

None.