C. Conflict of Interest and/or Commitment for Faculty

The mission of Rensselaer Polytechnic Institute is that of education, i.e., the discovery and dissemination of knowledge. All full-time members of the faculty are afforded abundant opportunity for scholarly expression and development within the framework of their academic responsibilities. Outside activities within professional areas of expertise which involve research, consulting, publication, and public service are strongly encouraged.

Rensselaer's role as an educational institution is sustained and enriched by continuous, active interaction of its faculty with industry, business, government and other activities and institutions of our society. Such interaction is of greatest value when it contributes significantly to the public welfare, offers opportunities for professional challenge and growth, or otherwise enhances the effectiveness of service to Rensselaer.

All faculty are expected to be alert to the possible effects of outside activities on the objectivity of their decisions, their obligations to Rensselaer, and Rensselaer's responsibilities to others. Since the opportunities for outside activities are of such magnitude and encompass situations of such complexity and diversity, a basic set of guidelines is provided to assist faculty in avoiding or alleviating any potential conflicts of interest and/or commitment which may be presented by outside activities. It is the firm belief of Rensselaer, however, that no set of guidelines nor detailed regulations can substitute for personal integrity.

Guidelines:

1) An individual, upon acceptance of a full-time faculty appointment is expected to accord his or her primary professional loyalty to Rensselaer. Outside obligations, financial interests and activities should be arranged so as to avoid interference or conflict with this overriding commitment to Rensselaer.

2) When a conflict of interest and/or commitment develops or is anticipated, faculty are expected to recognize their obligation to resolve this conflict.

3) Full-time members of the faculty have the privilege of undertaking outside activities in their areas of professional expertise provided that these activities do not interfere with their responsibilities to Rensselaer and do not require time in excess of one equivalent business day per week when classes are in session during the academic year. Outside activities in excess of this limit must be specifically approved by the appropriate administrative officer. (In almost all cases the appropriate administrative officer is the department chair. Otherwise it is the administrative officer to whom the faculty member directly reports.)
4) Faculty are expected to inform their appropriate administrative officer, preferably in writing, of the probable dates for outside activities. Whenever possible, this notification should occur prior to the scheduling of normal academic responsibilities such as teaching, research, advising, and committee or administrative assignments. The administrative officer, when informed in advance, should attempt to accommodate outside activities as long as they conform to the spirit of guideline 1, meet the time constraints listed in guideline 3 and do not significantly interfere with the mission of the academic unit.

5) It is understood that some outside activities (which may involve remuneration), such as published works or other writings, commissioned papers and invited lectures, and service to professional and public (non-profit) organizations, are normally considered within the realm of faculty scholarship or service. Such activities are routinely reported to the appropriate administrative officer for the purpose of annual professional evaluation and may have no specific time constraints other than as implied by guideline 1. Advance notification of such activities should be provided to the appropriate administrative officer, however, as discussed in guideline 4, and care must be taken to avoid conflicts of interest and/or commitment.

6) Faculty who are considering entering into a contract for extended outside activities should carefully gauge whether such contract may conflict with agreements made with Rensselaer, or agreements and obligations on the part of Rensselaer. Appropriate advice and counsel should be sought from the appropriate administrative officer and the Office of Contracts and Grants. If there is the possibility for conflict, or if a patent agreement is involved, the proposed contract must be submitted for review to the director of the Office of Contracts and Grants and appropriate legal counsel in order to obtain advice and counsel. Such submission may exclude specific proprietary information and amounts of remuneration. It is expected that Rensselaer would respond to the potential for conflict within ten (10) working days.

7) Casual and incidental use of Rensselaer facilities for outside activities is not considered an issue of conflict of interest or commitment. Use of facilities for which there are usage charges requires that these usage charges be covered by the responsible individual(s). Costs for consumables must also be covered. Extensive use of Rensselaer facilities for outside activities should be conducted only by contract with Rensselaer. Faculty should consult with their appropriate administrative officer whenever other than casual or incidental use of facilities and/or consumables is anticipated for outside activities.
8) The open and objective interaction between faculty and students should be recognized as a crucial element of the educational mission of Rensselaer. The utilization of a student's skills and labor by faculty in the performance of outside activities must have as its paramount objective the furtherance of the educational program of the student. Since such utilization may involve potential or actual conflicts of interest and/or commitment, all such arrangements must be reported to the appropriate administrative officer, and where feasible, approved in advance.

9) Faculty have an obligation to file with their appropriate administrative officer an annual disclosure form concerning their outside activities. These disclosure forms should be revised as new situations arise during the year.

10) All conflict of interest and/or commitment situations require prompt resolution. It is expected that minor conflicts will be resolved primarily through individual discretion or consultation with the appropriate administrative officer. Serious conflicts will be resolved by the dean of the faculty, with appropriate legal advice. In extreme cases it is understood that faculty may be required to relinquish particular outside activities, or consider other than a full-time academic appointment.

See also section III-E in this Handbook.
D. Potential Conflicts of Interest, Officers and Staff

The following policy was initially adopted by the Rensselaer Board of Trustees at its October 7, 1978 meeting and revised at its May 22, 1982 meeting. The policy requires that the "Conflict of Interest Report" on page V-D-6 be requested of selected individuals and reviewed by the director of internal auditing and the audit committee on an annual basis. All members of the board of trustees and committee members, officers of the Institute and other staff members who routinely or on a significant occasional basis secure goods, labor, or services for the Institute must complete the conflict of interest statement.

1. Policy Statement

Rensselaer's Board of Trustees and administration accept as basic objectives to provide the best possible educational experience for Rensselaer's students, to provide the proper environment for Rensselaer's faculty to teach and do research, and to maintain the Institute on a sound financial footing. We cherish and will preserve the principles of academic freedom. Promoting secrecy harms the progress of science and diminishes the role of the Institute as an impartial and credible resource.

Officers and staff members of Rensselaer may also be owners, directors, officers, or employees of, investors in, or otherwise involved in businesses and organizations with which Rensselaer has active and ongoing affiliations. Such affiliations might include (but would not be limited to) restricted or unrestricted donations or grants to Rensselaer, contracts, consulting, investments or landlord-tenant arrangements. The very nature of officers' or staff members' responsibilities may involve conflicts of interest.

We shall not consider such real or apparent conflicts detrimental to Rensselaer if:

1. they are fully disclosed to the chair of the board and the president through the internal auditor;
2. their nature is known and understood by the employee's immediate supervisor and the appropriate vice president for staff employees, and the board of trustees for officers;
3. the commitment of time to these activities does not interfere with the employee's duties;
4. the employee refrains from participating in Institute matters related to such activities; and
5. the employee always acts to foster the objectives stated in the first paragraph of this policy statement.

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V-D-1
The board of trustees must approve all substantial, potential conflicting activities of officers; the appropriate vice president must approve all substantial, potential conflicting activities of staff members.

The administration has prepared the accompanying guidelines to assist in implementing the Institute's Conflict of Interest Policy.

2. Guidelines for Potential Conflict of Interest Situations

The Institute recognizes that in the course of its operations conflicts of interest may arise. The administration has prepared the following guidelines to supplement Rensselaer's Conflict of Interest Policy.

When making decisions which affect Rensselaer's assets and/or resources, individuals must adhere to the following:

a. Decision Standards

All actions or decisions shall be made or taken with the degree of prudence ordinarily expected of individuals in positions of responsibility.

Individuals shall only make decisions that they believe further the basic objectives of the Institute.

Individuals shall not make any decisions involving Rensselaer's assets and/or resources when those decisions affect their personal financial interests.

Individuals shall not use or dispose of Rensselaer's assets and/or resources in any way that impairs Institute standards or conflicts with Institute programs.

b. Disclosure Guidelines

Individuals shall fully disclose in writing any potential conflict of interest to the chair of the board of trustees and the president through the internal auditor. Disclosure is required for interests held by the reporting person and interests held by his or her immediate family.
3. **Potential Conflicts**

   a. **Outside Activities**

   Individuals may consult with firms in which the Institute has invested or proposes to invest, or with firms which use the Institute's assets or resources, and individuals may serve on the governing boards of such firms, provided that:

   The outside activity does not interfere with the individual's responsibilities to Rensselaer.

   The individual discloses all substantial outside activities.

   The individual receives the appropriate administrative approval. Officers activities shall require Board approval and staff activities shall require approval by the appropriate vice president.

   The individual accepts that this document governs all resulting equity interests.

   If an individual wishes to involve Rensselaer faculty, staff and/or students in temporary activity (e.g., consulting):

   The individual shall obtain such involvement through a voluntary process.

   The individual shall promptly disclose such involvement before making contractual arrangements.

   b. **Investments**

   All investment decisions are subject to the investment policies set by Rensselaer's Board of Trustees.

   Disclosure of financial interests in any of the following circumstances is required for current holdings with a market value of more than $10,000 that amount to more than 10% of an individual's total investments:

   Individuals shall disclose any potential conflicting financial interest.

   If Rensselaer proposes to invest in a firm, and such investment either (1) is by subscription and not purchase, or (2) represents more than 1% of the firm's total assets:

   Knowledgeable individuals affiliated with Rensselaer shall promptly disclose any financial interest in such firm.

   Administrators with no such financial interest shall decide on such investment.
If Rensselaer and a majority of Rensselaer's administration have financial interests in the same firm, the trustees shall adopt measures to assess independently any decision regarding investment in such firm.

An individual may invest in a firm in which (1) Rensselaer has acquired financial interest by subscription, or (2) Rensselaer's investment represents more than 1% of such firm's total assets, provided that:

   The individual promptly discloses such investment before investing.

   Administrators with no such financial interest decide matters concerning Rensselaer's investment in such firm.

c. Outside Interests

An individual may be employed by or hold a financial interest in any company or association which conducts business with the Institute provided that:

   The outside interest does not interfere with the individual's responsibilities to Rensselaer.

   The individual discloses all substantial outside interests.

   The individual receives the appropriate administrative approval. Officers interests shall require board approval and staff interests shall require approval by the appropriate vice president.

   The individual accepts that this document governs all resulting equity interests.

d. Use of Rensselaer Resources

Where it is proposed that Rensselaer allow a firm access to its assets and/or resources:

   Individuals shall disclose any financial interest in such firm before permitting access.

   Administrators with no such interest shall decide to permit such access.

e. Operations

Officers and staff members of the Institute shall implement capital and operating programs in a manner that ensures:

   The Institute does not promote at its expense the interests of any firm.

   The Institute does not disadvantage faculty, staff and/or students to advance the interests of any firm.

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f. Gifts, Gratuities and Entertainment

Officers and staff of the Institute may accept items of nominal value which are not related to any particular transaction.

4. Reporting

The internal auditor shall annually solicit conflict of interest reports from officers and staff of the Institute. A copy of the Conflict of Interest Report form is printed on the following page.

Individuals shall promptly disclose all potential conflicts of interest to the chair of the board and the president through the internal auditor.

Institute vice presidents shall maintain files on staff activities; the president shall maintain files of Institute vice presidents.

The chair of the audit committee shall annually report all conflicts and resolutions to the board of trustees.
RENSSELAER POLYTECHNIC INSTITUTE CONFLICT OF INTEREST REPORT

I hereby state that I, or members of my immediate family, have the following interest and have participated in the following activities, which may constitute a conflict of interest when considered in relation to Rensselaer. If none, enter "none."

1. Outside Activities - identify outside activities as described in Potential Conflicts, page V-D-3.

2. Investments - identify investments as described in Potential Conflicts, page V-D-3.

3. Outside Interests - identify outside interests as described in Potential Conflicts, page V-D-4.

4. Other - list other activities which might constitute a conflict of interest, especially as identified in Potential Conflicts.

I hereby agree to disclose promptly any potential conflict of interest to the chair of the board and the president through the internal auditor.

______________________________________________  _________________
Name (Please Print)    Date

______________________________________________
Signature

______________________________________________
Position Title

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