



Conflict of Interest and Commitment Disclosure Form

Instructions:

All University employees, independent contractors, and vendors must disclose any actual, potential, or perceived conflicts of interest or commitment as defined by WesternU's [Conflict of Interest and Commitment Policy](#). This form must be completed:

- At the time of hire or engagement
- Annually, as part of certification
- Whenever new outside activities, relationships, or financial interests arise that may create a conflict

Failure to disclose may result in corrective or disciplinary action, up to and including termination of employment or contract.

Section 1: Employee Information

- Name: _____
 - Title/Position: _____
 - Department/Unit: _____
 - Supervisor/Manager: _____
 - Email: _____
 - Date: _____
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Section 2: Disclosures

A. Close Relations

Do you have any Close Relations (as defined by policy) currently employed by WesternU, enrolled as students, or engaged as vendors/contractors?

- No
- Yes (please list name, relationship, and role at WesternU):
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B. Outside Activities

Do you participate in any Outside Activities (paid or unpaid) that could overlap or conflict with your University responsibilities?

- No
- Yes (please describe the activity, organization, and estimated time commitment):

C. Significant Financial Interests

Do you, or any Close Relation, hold any Significant Interest in a company or organization that does business with, seeks to do business with, or competes with WesternU?

No

Yes (please specify entity, nature of interest, and estimated value):

D. Personal Use of University Resources

Are you currently using, or do you anticipate using, University property, resources, or information for any non-University purpose?

No

Yes (please explain):

E. Confidential/Privileged Information

Have you used or disclosed, or do you anticipate using or disclosing, confidential or privileged University information for purposes outside your University role?

No

Yes (please explain):

F. Romantic or Personal Relationships

Do you have a romantic, personal, or supervisory relationship with another WesternU employee, student, or contractor that may present an actual or perceived conflict of interest?

No

Yes (please provide details):

G. Foreign Appointments

Do you hold, or have you been offered, any **foreign appointment** (paid or unpaid, full-time, part-time, honorary, visiting, adjunct, emeritus, etc.) with a non-U.S. institution, government, or organization?

No

Yes

- If Yes, please identify the organization, title/role, whether it is paid or unpaid, and the start/end dates.
- Have you reported this to your Supervisor, Dean, and the Office of Human Resources?

Yes

No (Please provide details):

H. Foreign Talent Recruitment Program (FTRP)

Are you currently participating in, or have you been invited to participate in, a **Foreign Talent Recruitment Program (FTRP)**? A FTRP is defined as **any** program, activity, or effort that is directly or indirectly organized, managed, or funded by a foreign government (or entity acting on its behalf) to recruit scientists and researchers. Programs considered “malign” by the U.S. government often include provisions that: Compel the sharing of confidential or unpublished data; Restrict publication or intellectual property rights or Create conflicts with U.S. funding agency policies.

No

Yes

- If Yes, please describe the program, sponsoring organization, and your role.
- Have you reported this to your Supervisor, Dean, and the Office of Human Resources?

Yes

No (please provide details):

I. Foreign Financial Support (Conflict of Commitment)

Have you received or do you anticipate receiving any **Foreign Financial Support (FFS)** (outside teaching, consulting, board roles, honoraria, consulting fees, remuneration, or other compensation) from a non-U.S. institution, government, or organization? FFS is defined as any monetary or in-kind support provided by a non-U.S. entity, including grants, gifts, contracts, donations, laboratory space, equipment, materials, personnel, or travel reimbursements.

No

Yes

- If Yes, please describe the nature of the activity, the source, the amount, and the time commitment involved.
- Have you reported this to your Supervisor, Dean, and the Office of Human Resources?

Yes

No (please provide details):

J. Foreign-Sponsored Travel

Have you received, or do you anticipate receiving, **travel support or honoraria totaling more than \$5,000 per year** from a non-U.S. source?

No

Yes

- If Yes, please list the source, purpose of travel, location(s), dates, and estimated value.
- Have you reported this to your Supervisor, Dean, and the Office of Human Resources within **30 days of travel**?

Yes

No (please provide details):

Section 3: Research-Related Conflict of Interest

Are you involved in research activities at WesternU or any off-campus or foreign entity?

No (Skip to Section 4)

Yes (Proceed)

1. Have you completed the required Financial Conflict of Interest Training?

Yes

No (Contact Sponsored Programs at x-8334 for assistance)

2. Do you, your spouse, any dependent children, and/or any Associated Corpus in aggregate have Significant Financial Interests that (1) would reasonably appear to be affected by any of your Institutional Responsibilities including but not limited to: activities funded or proposed for funding by the National Institute of Health, National Science Foundation or Public Health Service; or (2) in National and/or Foreign Entities not controlled by the University whose financial interests would reasonably appear to be affected by such activities?

No (Skip to Section 4)

Yes (Fill out below):

Name of Entity:

Activity or product of entity related to current or prospective university-based research or educational activities:

Nature of the Significant Financial Interest to you or your family:

- Participation as employee(s)
 - Equity interest in Non-Publicly traded entities
 - Consulting or occasional lecturing
 - Honoraria
 - Travel Reimbursement
 - Service on Advisory or Directors' Boards
 - Writing commissioned papers or reports
 - Payments, through Western's distribution plan, of royalties on patents and copyrights, etc.
 - Payments, not through Western's royalty distribution plan, for intellectual property rights
 - The interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value
 - Other (_____)
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Section 4: Certification

I have read and understand the WesternU *Conflict of Interest and Commitment Policy*. I hereby certify that the information provided above is true, complete, and accurate to the best of my knowledge. I agree to promptly update this disclosure if circumstances change.

I understand that failure to disclose relevant information, or providing false or misleading information, may result in disciplinary or corrective action, up to and including termination of employment or contract.

Signature: _____ **Date:** _____

Printed Name: _____

Section 4: Review and Determination (For Administrative Use Only)

- No conflict identified
- Conflict identified; management plan required
- Conflict identified; activity not permitted

Reviewer: _____

Title/Role: _____

Date: _____

Notes/Management Plan:
