

<b>Procedure:</b>	Conflict of Interest	<b>Procedure No.:</b>	GA2004.1
<b>Authority:</b>	College President	<b>Associated Policy Reference No.:</b>	GA2004
<b>Procedure Owner:</b>	General Administration	<b>Responsible Party:</b>	Human Resources
<b>Approved:</b>	June 18, 2020		
<b>Revised:</b>			

**Statement of Purpose:**

The College prohibits undisclosed conflicts of interest or potential conflicts of interests. It is the responsibility and ethical duty of members of the campus community to avoid and eliminate conflicts and to disclose such conflicts to the appropriate person.

**Purpose:**

The purpose of this procedure is to set forth the process by which conflicts of interest are disclosed and addressed.

**Related Policies:**

Conflict of Interest Policy

**Definitions:**

Refer to the Conflict of Interest Policy for definitions and examples of conflicts of interest.

**Disclosure and Review Procedures**

1. On an annual basis, per Broome County request, a statement of financial disclosure is filed with the Broome County Board of Ethics. Disclosure statements are required by Broome County for the following individuals:
  - President of SUNY Broome Community College
  - Vice President of Academic Affairs
  - Vice President for Administration and Financial Affairs
  - Vice President for Student Affairs
  - SUNY Broome Community College Board of Trustees
2. Conflicts of interest should be disclosed to Deans/Directors/Supervisors, who will inform the appropriate Vice President.
3. If a conflict of interest involves a Vice President, disclosure of the conflict must be made to the President. If the conflict of interest involves the President, disclosure of the conflict must be made to the Board of Trustees (BOT).
4. BOT members will recuse themselves from any discussion or vote in which there is a potential conflict of interest by disclosing such to the Chairperson and refraining from engaging in the discussion/vote.

5. In the case of uncertainty about whether or not a conflict of interest exists, the employee/Trustee should speak with the appropriate supervisor.

**Handling of Disclosure of Conflicts of Interest:**

Following disclosure of an actual or potential conflict of interest, the appropriate Vice President, in consultation with the President, will investigate to determine whether a conflict of interest exists, and if so, the extent of its nature.

After investigating real or potential conflicts of interest, the Vice President, or President, may take one of several actions:

1. No action required beyond the disclosure.
2. Monitor activity related to the conflict of interest to prevent potential issues.
3. Develop and implement a plan, in writing, to manage and minimize the conflict.
4. Modulate responsibilities, as mutually agreed upon and in accordance with College policies and applicable contracts, to mitigate existing conflict.
5. Forbid engagement in the activity in cases where conflicts of interest are incongruent.
6. Take disciplinary action, up to and including termination of employment or of one's duties to the College, in cases of violations of the policies and procedures of the College.

At the very least, if a conflict of interest is deemed to exist, the person(s) involved must refrain from having any involvement in activities related to discussions or decision-making pertaining to the matter with respect to which the conflict exists, and refrain from any activities in which there is influence on deliberations about the matter.

Disclosure of conflicts of interest is a continuous duty of members of the SUNY Broome Community College campus and is not limited to those completed on an annual basis.

Disclosures of conflict should be made as soon as the employee or Trustee becomes aware of any actual or potential conflict.

<b>Action</b> <i>(Created, Reviewed, Retired)</i>	<b>Date</b>	<b>Initials</b>	<b>Position Title</b>
Created	05/25/2020	KM	Int. Dean of Institutional Effectiveness