Teachers College recognizes that it is in the best interests of the College community that faculty and staff have outside service, business, and professional interests. Those involvements allow the College to bring new information and resources into the College and to have an impact on the outside world. However, those outside interests and relationships can also potentially compromise the ability of faculty and staff members to fully meet their responsibilities to the College. The purpose of the College's policies on Conflicts of Interest and Conflicts of Commitment is to provide guidelines for entering into and conducting relationships with outside entities and individuals in a manner that will protect the interests of the College and the academic integrity of the instructional and research programs of the College.

The purpose of the College's policies on Conflicts of Interest and Conflicts of Commitment is to provide guidelines for entering into and conducting relationships with entities and individuals in a manner that will protect the interests of the College. By action of the College's Board of Trustees and approval of the faculty at the December 5, 2001 Faculty Meeting, these Policies have been incorporated into the terms and conditions of employment of faculty and professional staff. A copy of this approved policy, adopted December 6, 2001 and effective January, 2002, is attached. According to the Policy, all full-time faculty and professional staff are required to comply fully and promptly with the disclosure and consultation provisions of this policy by annually reporting on outside activities and financial interests that could give rise to an actual or potential conflict of interest or commitment. Members of the Senior Staff of Teachers College are held to the same disclosure and review process. The Trustees of Teachers College have a similar and more restrictive disclosure and review process created for them after consultation with legal counsel.

The Dean is the College officer responsible for interpreting and overseeing general implementation of and compliance with this policy. It is important that each question on the Disclosure Questionnaire be answered; an answer of “Yes” to any question does not in itself indicate the existence of a conflict of interest or conflict of commitment. Rather, it is an indication that an activity and the related relationships need to be fully described so that an informed decision may be made to determine whether the activity or interest creates an actual or apparent conflict. If the answer to any question is yes, a separate Narrative Explanation Form for each outside business or activity interest, including the nature of any ownership or other economic interests, must be completed.

The Dean is expected to ensure that this Policy is implemented with reasonable consistency across the College. To that end, with the concurrence of Department Chairs, the Faculty Executive Committee, Management Network and the Professional Staff Executive Committee, the Dean, with the Committee on Conflict & Commitment (CCC) may develop mechanisms to facilitate the disclosure and consultation provisions of this policy.
This Annual Disclosure Statement is the mechanism that has been developed. Attached please find a 1) Disclosure Questionnaire, 2) Narrative Explanation Form, 3) Certification and Reporting of Changed Circumstances, 4) Attachment A – Definitions, 5) Attachment B – Explanation of Faculty Appointment and, 6) Policy on Conflicts of Interest and Policy on Commitments. Please print out and return items 1, 2 and 3 no later than 10 days of employment to:

<table>
<thead>
<tr>
<th>Reporting Area</th>
<th>Designated Contact</th>
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<tbody>
<tr>
<td>Academic Affairs</td>
<td>Iraida Torres-Irizarry</td>
</tr>
<tr>
<td>Finance and Administration</td>
<td>Mary Rojas</td>
</tr>
<tr>
<td>Development and External Affairs</td>
<td>Scott Rubin</td>
</tr>
<tr>
<td>Directly to President</td>
<td>Jacquie Spano</td>
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</tbody>
</table>

Disclosure Statements are reviewed by the respective reporting area Vice President who determines if an actual or potential conflict of interest or conflict of commitment exists. (Note that for a select number of positions the review is done by the President.) If he or she determines that a conflict does not exist then the Statement is filed and no further action is required.

If the Vice President believes that an actual or potential conflict of interest or conflict of commitment does exist then the affected faculty or professional staff member will be contacted to discuss this concern. If, after discussion, it is determined that an actual conflict of interest or conflict of commitment does exist then the Vice President will inform the affected faculty or professional staff member of the measures that are necessary to avoid, minimize, or eliminate the conflict. The faculty member or professional staff member will be contacted within 30 days from the due date if he or she determines that an actual or potential conflict of interest or conflict of commitment exists or if a Disclosure Statement has not been received.

If remedial measures are not agreed upon then the Disclosure Statement will be reviewed by the Committee on Conflict and Commitment (CCC). The review process is designed to protect confidential information to the degree permitted by law. The faculty member or professional staff member will be contacted by the Vice President for Academic Affairs with a final written decision which designates an activity as permissible, permissible with certain conditions, or not permissible. Should a member of the faculty or professional staff wish to appeal a decision made by the Dean under this Policy, he or she may present the appeal to the President.

Faculty and professional staff are subject to the regular disciplinary process of the College if they fail to fully and truthfully disclose potential or actual conflicts of interest or commitment, or fail to comply with any stipulated plan for managing the disclosed conflict. Given that the disclosure process was implemented in order to protect the interests and integrity of all College constituencies by clarifying fair and just practices involving college resources, the ability to receive annual salary increases, to employ students and pursue and maintain grants will be available only to employees who have completed and returned the Disclosure Statement.

Please Note: The covered time period is September 1, 2009 through August 31, 2010. Faculty, please review Appendix B for an explanation of faculty appointment.
Attachment A - Definitions

“Conflict of interest” arises if there is actual divergence between the private interests of a member of the College faculty or professional staff and his or her professional obligations to the College. A potential conflict of interest exists when circumstances may lead to a divergence between the private interests of an employee and his or her professional obligations to the College. Any narrative description may require further disclosure from you by the College. These circumstances may arise, for example, when one is in a position to influence any College business transactions, research, or other activity or decisions in a way that could lead to any manner or form of personal gain from any source, other than established compensation, for the employee, or for his or her family members. A perceived conflict of interest exists when an independent observer might reasonably question whether professional actions are determined or influenced by considerations of personal gain, financial or otherwise.

“Conflicts of commitment” can involve issues of time allocation and issues of the levels of responsibility one may have for outside activities.

"Commercial entity" means any corporation, partnership, sole proprietorship or other legal entity organized for profit or non-for-profit. The term does not include the College or any other entity controlled by the College. For faculty members, a commercial entity does not include a client to whom you provide individual professional services. The term does include a law firm, architectural firm or other professional firm or business enterprise with which one is affiliated (e.g., in an "of counsel" relationship or as a partner or member in such a firm).

"Family" includes your spouse or domestic partner, dependent children and any other family members living in your household.

"Financial interest" and "financial benefit" mean the receipt or expectation of anything of monetary value, including salary or other payments for services (e.g., consulting fees or honoraria), equity or other ownership interests, and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The terms do not include salary, royalties or other remuneration paid directly to an officer by Teachers College; income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities; income from service on review panels or advisory committees for public or nonprofit entities; income from writing or editing professional journals or textbooks; or a financial interest in a commercial entity if the value of such financial interest, when aggregated with the interests of your family, does not exceed $10,000 or represent more than a 5% ownership interest in such commercial entity.

"Consulting Activity" is defined as a relationship with an individual or a business or with an agent or other representative of such individual or business, service or advisory boards, and any other relationship whereby you receive, or have the right or expectation to receive, remuneration in exchange for services. Examples of service include service on a business's board of directors; professional services rendered for a business, industry, private individuals, government, other academic institutions or foundations; and, in limited circumstances, services for a colleague holding a sponsored research contract or grant at the College or sponsored research contract or grant not through the College. Faculty should note that work on grants given to Teachers College are not considered consulting activity. Consulting activities that are not through the College for which you intend to hire TC students should be disclosed to the Dean's Office before employment is offered to students.

“Support Staff” includes any individual currently employed by Teachers College who is not expected, as part of their position, to provide support for activities not directly related to his or her appointment.

“Significant” use of College facilities, equipment or support staff services refers to use that would reasonably be considered ongoing and/or more than occasional/incidental.

“Significant Professional Activities” are those activities that would reasonable be considered ongoing and/or more than occasional/incidental.
Attachment B – Explanation of Faculty Appointment

The nature of faculty work - particularly at our College - is not easily captured in any conventional time and effort measures. **During the academic year, faculty are permitted to use one day a week for outside consulting, field-based activities, or independent scholarship or can be paid, through the College, up to 20% overage for grant work, extra teaching or administrative work.**

To be more specific, the phrase “more than one day a week” is meant to be interpreted as more than an *average* of one day per week (Monday through Friday) over the period of the employee's contract period. For example, if a faculty member is on a nine-month contract, it would be more than an average of one day a week over that specific nine months. Unless on an annualized salary, consulting or outside activities in the summer would not count toward this conflict-of-commitment threshold. If a faculty member teaches a session of summer school, the rule would also apply during that six-week period, with an average of one day a week permitted if teaching two courses and an average of three days a week if teaching one course.

The Conflict of Interest and Conflict of Commitment questionnaire uses this basic rubric - i.e., if those outside activities exceed on average 1 day a week, then they raise the potential of a possible conflict of commitment. If your assessment of your outside commitments exceeds that threshold during the academic year, it simply surfaces that as something to be discussed with the Dean as a potential conflict of commitment.

For the summer, workload or time and effort rubrics are even more difficult to quantify. If a faculty member is not employed during the summer at all, then “outside activities” and the potential for a conflict of commitment may need to be seen through a different set of lenses. Less a function of a number of days, and more a function of whether or not the nature of those activities are potentially in conflict with your primary commitment to the College (which does extend beyond the academic year, as the place of on-going employment) summer “outside activities” could surface both questions of conflict of commitment and conflict of interest.
Attachment C - Policy on Conflicts of Interest and Conflicts of Commitment
Adopted: December 6, 2001, Effective: January 2002
Revised September 2, 2005 (KTE)
Adopted by Senior Staff September 6, 2005

The number, diversity, and complexity of relationships between institutions of higher education and members of their faculties and professional staffs on the one hand and private industry, government, and the nonprofit sector on the other hand have grown substantially in recent years. Such complex networks of relationships are likely to grow further in the years ahead. Indeed, the mission of Teachers College requires the engagement of the College and individual members of the College community in a wide range of relationships with individuals and organizations outside the College.

Teachers College recognizes that it is in its interest that faculty, in particular, have outside service, business, and professional interests. Outside interests and relationships, however, should enhance, not compromise, one's role as a member of the Teachers College community and ability to meet one’s College responsibilities.

The purpose of this policy on Conflicts of Interest and Conflicts of Commitment is to provide guidelines for entering into and conducting relationships in a manner that will protect the interests of the College and the academic integrity of the instructional and research programs of the College.

I. Conflicts of Interest
All decisions made by faculty and professional staff of the College in the course of their professional responsibilities are to be made in a manner to promote the best interests of the College and to avoid actual, perceived, or potential conflicts of interest.

A conflict of interest arises if there is actual divergence between the private interests of a member of the College faculty or professional staff and his or her professional obligations to the College. A potential conflict of interest exists when circumstances may lead to a divergence between the private interests of a member of the faculty or professional staff and his or her professional obligations to the College. These circumstances may arise, for example, when a member of the faculty or professional staff is in a position to influence any College business transaction, research, or other activity or decisions in a way that could lead to any manner or form of personal gain from any source, other than established compensation, for the employee, or for his or her family members. A perceived conflict of interest exists when an independent observer might reasonably question whether the professional actions of a member of the faculty or professional staff are determined or influenced by considerations of personal gain, financial or otherwise.

In the event that a member of the faculty or professional staff shall have a financial, personal, or professional interest that could constitute a conflict of interest in any transaction involving the College, he or she shall, as soon as he or she knows of the transaction: (1) disclose fully in writing the precise nature of his or her interest in such transaction to the Vice President for Academic Affairs and Dean of the College, and (2) refrain from participation (including acting individually or as a member of a committee or other group) in the College’s consideration of the proposed transaction unless expressly permitted in writing to do so by the Dean or President.
II. Conflicts of Commitment

Faculty and professional staff of the College owe their primary professional allegiance to the College, and their primary commitment of time and intellectual energies should be to the administrative, instructional and research programs of the College.

At the same time, faculty of the College, in particular, are encouraged to become involved in the transfer of knowledge from the College environment into the commercial and noncommercial marketplace. It is an appropriate role for the College to facilitate the transfer of the knowledge gained through academic research and scholarship to applications that can benefit the general population. Experience gained in the course of outside professional activities can enhance the work of the faculty member within the College and further the mission of the College. However, an outside activity that interferes with a faculty member’s capacity to meet his or her responsibilities to the College is a conflict of commitment.

Appointment as a full-time faculty member of the College requires a primary commitment of expertise, time, and energy in furtherance of the privileges and obligations of the appointment and the mission of the College, including the pursuit of teaching, scholarship, and research. Faculty members are expected to participate in the governance of the College, the formulation of academic policy, and the determination of the intellectual directions and academic priorities of the College. Faculty members have an obligation to have a significant presence on campus, to be accessible to students and staff during regular business hours, to coordinate work and availability with colleagues, department chair, and deans, and to be available to interact with College colleagues throughout every semester during which they are on active duty, unless the Dean and department chair have granted specific prior approval to the contrary.

Determining whether a conflict of commitment exists in the case of faculty of the College is often complicated both because the work of faculty is less consistently scheduled, visible, and separable from outside activities and because in many cases the outside work conducted by faculty can further the mission of the College. This situation places additional monitoring responsibilities on individual faculty members, department chairs, and the Dean. In seeking to avoid conflicts of commitment, faculty members, department chairs, and the Dean will be guided by the following considerations:

A. Conflicts of commitment can involve issues of time allocation. Whenever an individual faculty member's outside activities exceed one calendar day per week during any semester in which they are on active duty, the question of a conflict of commitment must be considered and discussed with the department chair and the Dean.

B. Conflicts of commitment can involve issues of the level of responsibility a faculty member may have for outside activities. Directing a research center or a program of research or scholarship at another institution, assuming a significant management role involving the supervision of others in a private enterprise, or undertaking a major directing role in pro bono government service can each create a conflict of commitment. Involvements of these types must be considered carefully and discussed with the department chair and the Dean.

Faculty participation in outside activities that involve excessive time allocations, significant levels of responsibility, or conflict or competition with the mission and programs of the College shall be permitted only upon the written approval of the Dean.

Updated - 11/20/2009
III. General Considerations
   A. Free and Open Exchange of Research Results

The integrity of the College as a community of scholars requires the free and open
exchange of ideas and the results of scholarly activities. This requires faculty, in particular,
to maintain an atmosphere free from unwarranted external influences. Students and
collaborators must be able to pursue topics of interest, have access to available information
and facilities, and be able to communicate the results of their work to other scholars and the
public. Therefore, faculty must ensure that:

1. the results of research or scholarship undertaken at the College are disseminated in an
   open and timely basis to the broader scholarly community and public;
2. the activities of students and other scholars are free from the personal commercial or
   other interests of the faculty involved;
3. the work of students, staff, and other scholars and collaborators is not exploited in the
   course of fulfilling outside obligations.

Accordingly, faculty must disclose to the Dean their involvement with and obligations to
outside third parties who could benefit from the work or ideas of their students, staff, and
colleagues. Similarly, students, staff, and colleagues must have access to information
about the sources of funds that support their research.

B. Appropriate Use of College Resources, including Facilities, Personnel, Equipment, and
   Information

Faculty and professional staff may not use College resources, including facilities,
personnel, equipment, or information, except in a purely incidental way as part of outside
consulting activities or for any other non-College purposes. Inappropriate use of College
resources includes the following:

1. assigning students, staff, or other scholars College tasks for the purposes of potential or
   real gain, whether financial or otherwise, of the faculty member or professional staff
   rather than the advancement of the scholarly field or the students' educational needs;
2. involvement of students or staff outside consulting or business activities without prior
   written approval of the Dean;
3. providing preferential access to research results, materials, or products generated from
   College teaching or research activities to an outside entity for personal gain, whether
   financial or otherwise;
4. granting access to external entities to College resources or services for purposes outside
   the College's mission, or offering inappropriate favors to outside entities in an attempt
   to unduly influence them in their dealings with the College;
5. using for personal gain, or granting unauthorized access to others of, confidential
   information acquired through conduct of College business or research activities.

C. Activities that are Routinely Allowable Without Disclosure Under this Policy
   The following activities that have traditionally occurred without detriment to the College
   or its mission are allowed without the need for disclosure:
1. receiving royalties for published scholarly works and other materials,
2. membership in or service to professional associations and learned societies; membership on professional review or advisory panels; presentation of lectures, papers, concerts, or exhibits; participation in seminars and conferences; reviewing or editing scholarly publications and books; and service to accreditation bodies,
3. ownership of or equity in a corporation used solely for the individual's consulting activities,
4. requiring or recommending one’s own textbook or other teaching aids, materials, software, equipment, or the like to be used in connection with College instructional programs.

D. Compliance
All full-time faculty and professional staff are required to comply fully and promptly with the disclosure and consultation provisions of this policy. The Vice President for Academic Affairs and Dean of the College is the College officer responsible for interpreting and overseeing general implementation of and compliance with this Policy. The Dean is expected to ensure that this Policy is implemented with reasonable consistency across the College. To that end, with the concurrence of Department Chairs, the Faculty Executive Committee and the Professional Staff Assembly, the Dean may develop mechanisms to facilitate the disclosure and consultation provisions of this policy.

Should a member of the faculty or professional staff wish to appeal a decision made by the Dean under this Policy, he or she may present the appeal to the President.