

MBL Conflict of Interest and Conflict of Commitment Policy

Summary Guide

The [MBL Conflict of Interest and Conflict of Commitment Policy](#) has been significantly revised to meet the demands and requirements of today's regulatory standards. This policy serves as an educational and procedural document intended to provide MBL employees with guidance pertaining to the identification, disclosure, and management of potential conflicts with external activities.

Definitions:

Conflict of interest (COI) is a situation in which an individual is involved in external interests, financial or otherwise, and serving one interest could involve working against another.

Conflict of Commitment (COC) relates to an individual's distribution of time and effort between his/her full-time duties as an MBL employee, and his/her responsibilities resulting from external employment and external professional commitments.

Disclosure is the principal means by which the MBL can track potential conflict of interest issues. The disclosure involves submission of potential conflicts by using the MBL Conflict of Interest (COI) form.

Who will be affected?

- Revised policy applies to all full-time MBL employees
- Additional requirements for individuals supported by Federal grants

What needs to be disclosed?

- External affiliations or appointments; paid or unpaid. E.g. advisory board appointments, external teaching appointments, or adjunct status at another institution.
- Financial interests external of the MBL that could potentially impact your MBL responsibilities
- Any other professional or personal activities that could potentially result in a conflict with your MBL responsibilities

Questions regarding what needs to be disclosed, or potential disclosure items should be directed to your immediate supervisor.

When do disclosures take place?

- Employee disclosures (if applicable) will be due annually by August 15th
- Within 30 days of acquiring a new potential COI or COC

Why do you need to disclose?

As a recipient of Federal research support, the MBL is required to maintain a compliant COI policy. The MBL has a fiduciary responsibility to ensure that external influences outside the course and scope of one's MBL employment do not affect the performance of one's primary duties to the MBL.

It is not the MBL's intention to deter external activity. Rather, we seek to protect employees who have such activities and ensure that potential conflicts with external activities are properly and proactively managed.

For questions or additional information, please contact the Office of Sponsored Programs at awards@mbledu