Wisconsin Partnership Program
Partnership Education and Research Committee (PERC) Conflict of Interest Policy

BACKGROUND
The Partnership Education and Research Committee (PERC) is entrusted with an endowment held as a public trust. Therefore, ethical stewardship of the Wisconsin Partnership Program (WPP) funds distributed by the committee requires the adoption of a Conflict of Interest Policy to identify and manage actual or apparent conflicts of interest. Moreover, the public expects the faculty and staff of the University of Wisconsin to abide by ethical standards that promote the public good. The PERC bears the ultimate responsibility for setting ethical standards and ensuring that those standards permeate the committee and inform its practices. Such standards are intended to identify and evaluate any conflict of interest, real or apparent, that could affect PERC, the UW School of Medicine and Public Health, the University of Wisconsin-Madison, and the University of Wisconsin System.

This policy also pertains to all subcommittees, review groups and taskforces authorized by PERC.

DEFINITIONS

Financial Interest: Financial interest includes the following interests, when held by the individual or a member of their immediate family: **Compensation or other financial benefit** from any entity other than UW for outside activities exceeding $3,000 per entity in the past 12 months; **Leadership positions** in any business or other organization (for profit or non-profit) during the past 12 months; and/or any **Ownership/equity interests** in stock, stock options, or another ownership interest in a business or other organization.

Immediate Family: Immediate family includes the individual’s spouse, and any person who receives, directly or indirectly, more than one half of their support from the individual or from whom the individual receives, directly or indirectly, more than one half of their support.

Individual: The individual is the person subject to this policy by virtue of their activities in connection with the PERC.

Personal Relationship: A personal relationship exists with a spouse, partner, parent, sibling, or child of the individual. A personal relationship also exists with other relatives or extended family residing in the individual’s household.

Professional Relationship: A professional relationship exists if within the last 12 months:
- There is a direct reporting relationship between the individual and the applicant (e.g., department chair – faculty member*, section head – faculty member, or advisor – advisee),
- There is a formal mentor relationship between the individual and the applicant (e.g., senior faculty who is assigned responsibility for guidance and annual evaluation of probationary faculty),
- The individual is an advisor, investigator or key personnel on the application or program being reviewed, or
- The individual serves (with or without compensation) as a member of or consultant to a Board of Directors of a not-for-profit organization or other professional association.

*A department chair – faculty member relationship does not constitute a direct reporting relationship between the individual and the applicant if the applicant reports to a section head (or its equivalent) in the department.
POLICY
It is the duty of the PERC members and other individuals engaged in fulfilling the PERC’S mission to exercise their responsibilities solely in the interest of the WPP and the PERC. The PERC members and other individuals shall not exercise their responsibilities in their own interests or in the interests of any person, constituency, or entity that may result in a conflict of interest. Members are held to a strict rule of honest and fair dealing. Members and other individuals have a duty at all times to exercise good faith in discharging their duties and to be alert and sensitive to any interest that may conflict with the interests of the PERC.

To ensure open and frank discussion and honest and fair dealing among the members and to protect the integrity of the committee, members and other individuals are not eligible to apply as Principal Investigators, Co-Principal Investigators, paid consultants or paid collaborators for PERC funding for any PERC grant mechanism during their membership terms.

An actual or apparent conflict of interest is present when a PERC member or other individual has any financial interest, directly or indirectly (e.g., an ownership interest in an entity that may receive a benefit from a potential award, such as through a sub-contract with the awardee for services under the grant) in a proposal under review by the PERC.

An actual or apparent conflict of interest is also present when a PERC member or other individual has a personal or professional relationship (as defined above) with a person or organization that has a proposal under review by the PERC.

PROCEDURES

Disclosure: The conflict of interest policy and disclosure form (i.e., conflict of interest questionnaire) will be presented, reviewed, and signed by each PERC member at the beginning of the member’s term. Thereafter, each member will sign the disclosure form annually. Individuals who are subject to this policy but not members of the PERC will be required to review the policy and sign the disclosure form upon undertaking activities subjecting them to this policy, with disclosures to be filed annually thereafter. Individuals who are University of Wisconsin employees also submit an annual Outside Activities Report. This report may be requested by WPP when questions or concerns pertaining to disclosures of conflicts of interest. Individuals should file updated disclosure forms to WPP as necessary.

In addition, whenever an actual or apparent conflict of interest relates to a matter of PERC action, a member or other individual shall promptly and fully disclose the conflict to the PERC prior to its acting on the matter. The member or other individual shall describe all facts material to the conflict of interest to the Chairperson. The member or other individual shall not attend the portion of a meeting in which the committee will act on a matter relating to the conflict of interest. The Chairperson shall report the disclosure of the conflict of interest at the meeting and the disclosure shall be reflected in the minutes of the meeting.

The duty to disclose a conflict of interest arises regardless of whether the proposal is approvable, whether the individual supports or opposes the proposal or the matter in question, and whether the individual will be present during the discussion of the matter.

Procedure After Disclosure: PERC members or other individuals who disclose a conflict of interest may not participate in the discussion of the proposal under review or the matter in question, and must not...
vote on the proposal at issue. The conflicted member may be counted in determining whether a quorum is present; however, the conflicted member is not counted in calculating the majority of the quorum necessary to carry the vote. The PERC may ask the member or other individual to answer relevant questions at the meeting, after which the member or other individual will be required to leave the meeting until discussion and voting on the proposal at issue have concluded.

**Minutes of Meeting:** When a disclosure of a conflict of interest occurs, the minutes of the meeting should reflect the disclosure made, the nature of the conflict of interest, the fact that the conflicted member did not vote on the proposal under review, the existence of a quorum, the names of the members present for the discussion and vote on the proposal under review, and the final determination of the matter requiring PERC action.

**Failure to Disclose:** If the committee has reasonable cause to believe that a member or other individual has failed to disclose apparent or actual conflict(s) of interest, it shall inform the member of the basis for such belief. The committee must afford the member or other individual the opportunity to explain the alleged failure to disclose. After hearing the member’s response, the committee may further investigate if warranted by the circumstances. If the PERC determines that the member or other individual has failed to disclose an apparent or actual conflict of interest, it shall take appropriate corrective action, including, for example, removal from the committee.

This policy was approved by PERC February 13, 2023.