

Policy Title: Conflict of Interest Policy	Procedure	340
	Effective Date	August 22, 2025

1.0 PURPOSE

This University of Arkansas - Pulaski Technical College (UA-PTC) Conflict of Interest Policy is established pursuant to Section IV of [University of Arkansas Board of Trustees Policy 330.1](#) which provides that “each campus, . . . of the University . . . shall establish conflict of interest policies applicable to their respective employees and to persons or entities contracting with the University through the campus, division, unit, or the System Office.” It is intended to assure adequate and timely disclosure of actual and potential conflicts of interest and to provide a method for resolving such conflicts.

2.0 REVISION HISTORY

Adopted on: August 22, 2025

Revised on:

3.0 PERSONS AFFECTED

All UA-PTC employees

4.0 DEFINITIONS

Conflict of Interest - Situations in which UA-PTC employees may have the opportunity to influence UA-PTC administrative, business, or academic decisions in ways that could lead to personal gain, give improper advantage to self or others, or interfere inappropriately with the preservation, generation, or public dissemination of knowledge such that an independent observer might reasonably question whether the individual’s professional actions or decisions are influenced by considerations of personal gain, financial or otherwise.

Employee - A person whose employment is not temporary and whose actual performance of duty requires one thousand (1,000) or more hours during a fiscal year.

Gift – Payment, entertainment, advance, services, or anything of value, unless consideration of equal or greater value has been given therefor. It doesn’t not include anything with a value of \$100 or less (NOTE: The value of an item shall be considered to be less than \$100 if the employee reimburses the person from whom the item was received any amount over \$100 and the reimbursement occurs within ten (10) days from the date the item was received. For more information, please refer to the Arkansas Ethics Commission for detailed rules on gifts at:

www.arkansasethics.com/wp-content/uploads/2019/12/FINAL-Rules-on-Gifts02.pdf

Immediate Family Member - Spouse, children, parents, brothers and sisters, and grandparents (A.C.A. §19-11-701 (11)).

5.0 PROCEDURE

All employees are required to disclose any relationships or activities that might give rise to conflicts, or the appearance thereof, with their duties, responsibilities, or obligations to UA-PTC. Employees engaged in contracting for expenditures or receipt of funds shall not accept gifts or gratuities from persons or entities contracting with or otherwise engaged in business with UA-PTC except as allowed by the “Rules on Gifts” of the Arkansas Ethics Commission.

A potential conflict of interest may arise when a UA-PTC employee’s extracurricular relationships interfere or compete with that individual’s relationship to UA-PTC. However, the nature of possible employee relationships outside of UA-PTC varies widely. Therefore, a precise and exhaustive definition of all possible relationships with the potential for conflict of interest is not possible. Section 5.1 offers a list of examples of potential conflicts of interest.

Conflicts of interest are not necessarily unwarranted, unethical, or illegal. Furthermore, conflicts of interest are not always avoidable. However, all actual or potential conflicts of interest must be disclosed. Disclosures should be made as early as possible to enable those reviewing them to consider what action, if any, needs to be taken regarding any potential conflicts of interest.

New employees after August 15th, will submit the Conflict of Interest Statement form during the time of orientation and entry into the UA-PTC personnel and payroll systems.

5.1 EXAMPLES OF ACTIVITIES THAT MAY CONSTITUTE A CONFLICT OF INTEREST

The following list provides examples of situations that may involve conflicts of interest requiring disclosure. This list of situations is not exhaustive. Situations, whether listed below or not, that have the appearance of, potential for, or involve actual conflicts of interest should be disclosed.

1. Acceptance of gifts, gratuities, travel expenses or transportation (including but not limited to plane, bus, train, or car), entertainment, expeditions, or special favors offered because of employee’s UA-PTC position.
2. Acceptance of gifts from suppliers, research sponsors, organizations, corporations, or persons who have dealings with UA-PTC. For the operative definition of the term “gift,” see the Arkansas Ethics Commission’s Rules on Gifts (www.arkansasethics.com/wp-content/uploads/2019/12/FINAL-Rules-on-Gifts02.pdf).
3. Use of UA-PTC credit, purchasing power, or facilities for non-UA-PTC activities.
4. Use of UA-PTC facilities, employees, or students in personal or commercial activities.
5. Employee or immediate family member ownership, management, or other business ties with a private or public organization that has dealings with UA-PTC.
6. Employee or immediate family member having a financial interest in UA-PTC decisions.

7. Appointment, promotion, supervision, or management of a relative. "Relative" means a husband, wife, mother, father, stepmother, stepfather, mother-in-law, father-in-law, brother, sister, stepbrother, stepsister, half-brother, half-sister, brother-in-law, sister-in-law, daughter, son, stepdaughter, stepson, daughter-in-law, son-in-law, uncle, aunt, first cousin, nephew, or niece (A.C.A. §25-16-1001(3)).
8. Payment for credit or noncredit courses, seminars, or workshops not for UA-PTC or fees provided for professional service including consulting or expert testimony.
9. Requiring material for use by students for which the instructor derives direct or indirect financial benefit.
10. Side agreements to any contracts or business dealings between UA-PTC suppliers, research sponsors, corporations, or other entities or persons.
11. Participation in UA-PTC committee, purchasing or contracting decisions that are related in any way to a business enterprise in which the employee has a significant financial interest.
12. Use of the name of UA-PTC, the University of Arkansas, a UA-PTC center or a department in a manner to produce personal financial benefit.
13. Memberships on board of directors, committees, advisory groups (or similar bodies) of governmental, for profit or not for profit entity.
14. Revenues from patents or licensed technology or the continuing role in the scientific and technical efforts of a commercial enterprise.
15. Service or financial interest in an entity that provides research grants or contracts.
16. Direct commercial or financial interests of immediate family members in employee's research.
17. Transfer of technology to an organization in which the employee or immediate family members have an interest.
18. Private remuneration for UA-PTC research provided by an individual or organization.
19. Advertising endorsements based upon employee's UA-PTC position.
20. Outside activities influencing decisions or behavior with respect to preservation, generation, and dissemination of knowledge (e.g., delaying dissemination of research information, diverting to external organizations research opportunities that UA-PTC would have a normal expectation to obtain).

6.0 POLICY IMPLEMENTATION

By September 30, 2025 every UA-PTC employee shall read, sign, and return a copy of the UA-PTC Conflict of Interest Statement form. Subsequently, on or before August 15th, each year, the Chancellor or designee shall distribute the Conflict of Interest Policy to all employees with a request that each employee re-read the policy, complete, sign, and return a copy of the Conflict of Interest Statement form by August 31st reporting any changes in relationships that may lead to the need to disclose a potential conflict of interest. New employees after August 15th, will submit the Conflict of Interest Statement form during the time of orientation and entry into the UA-PTC personnel and payroll systems.

7.0 DISCLOSING POTENTIAL CONFLICTS OF INTEREST

Any change in relationships resulting in a potential conflict of interest must be disclosed on the UA-PTC Conflict of Interest Statement form and filed with the appropriate department chair or director as soon as the potential conflict arises. It is the responsibility of the employee who has entered into potentially conflicting relationships to disclose the nature and degree of such relationships. Disclosures should be made as early as possible, but no later than 20 working days prior to the change in circumstances, to enable those reviewing them to consider what action, if any, needs to be taken regarding any potential conflicts of interest. A Conflict of Interest Disclosure Statement form, should be completed and filed prior to any arrangements, whether verbal or written, are agreed upon concerning the potential conflict. The failure to disclose potential or actual conflicts of interest situations may be unethical and/or illegal.

This disclosure policy provides a mechanism for:

- Identifying conflicting non-UA-PTC relationships or activities.
- Informing those with a need to know about conflicting relationships or activities through disclosure.
- Taking steps to resolve a conflict.

8.0 RESOLVING POTENTIAL CONFLICTS OF INTEREST

Within then (10) days after the submission of a potential conflict of interest the department chair or director shall consult with the employee, and determine if the event reveals a situation in which the objectivity of an employee could reasonably be questioned or which might be competitive with UA-PTC. If a conflict is found, the department chair or director shall review the facts and, depending upon the consequences for UA-PTC, notify the dean/vice chancellor of a recommendation of either approval of the activity along with a management plan with detailed measures for mitigation of the conflict or disapproval of the activity.

A conflict of interest management plan would be required when a conflict of interest may exist, but the activity is within the best interest of UA-PTC, and measures could be taken to mitigate

the conflict of interest. The management plan may include, but is not limited to, the following actions:

1. Monitoring of an employee's responsibilities, duties, or tasks;
2. Modification of an employee's responsibilities, duties, or tasks;
3. Public disclosure of the conflict of interest;
4. Divestiture of a financial interest creating a conflict of interest; or
5. Severance of the relationship creating the conflict of interest.


Within five (5) days of the receipt of the recommendation the dean/vice chancellor shall notify the employee of the approval or disapproval of the management plan. If both the employee and the dean/vice chancellor agree to and implement the recommendation of the department chair or director, no further action is required. If the employee disagrees with the recommendation, the employee must within five (5) days of receipt of the recommendation request a review by the chancellor and include the recommendation and all relevant concerns with the request.

The decision of the chancellor as to the resolution of the matter shall be final.

An employee who fails to make disclosures required by this policy, or who otherwise violates any of the provisions in this policy, may be subject to disciplinary action.

9.0 MAINTENANCE OF RECORDS

All conflict disclosures and records of actions taken by UA-Pulaski Tech with respect to each conflict shall be forwarded by the vice chancellors to the Department of Human Resources to be maintained there for at least three (3) years from the date the Conflict of Interest Statement form is filed or the date of any document resolving the conflict, whichever is later. Such records may be subject to disclosure under the Arkansas Freedom of Information Act.

REQUIRED APPROVALS	NAME/SIGNATURE	DATE
Originator(s) Name(s):	Rita Fleming / UAPTC CFO	8/22/25
Ratified by:	Joint Operations	
Recommended by Chancellor (Signature)		8/22/2025
UA Policy Alignment:	UA BOT Policy 330.1	