

Astrophysical Research Consortium

Conflict of Interest Policy

Purpose of the Statement of Policy. The Astrophysical Research Consortium (ARC) is committed to integrity and fairness in the conduct of all its activities. Inevitably, the interests of Directors and employees will involve them in organizations, causes and other endeavors which intersect with the affairs of ARC. It would disadvantage ARC to deprive it of the involvement of interested colleagues, but their participation in ARC decision making cannot impair the fairness and integrity of ARC processes. This statement of principle is intended to further the work of ARC by facilitating the substantive contributions of ARC member institution employees and ARC Board members by providing for disclosure of other interests and by requiring abstention from decision-making actions which affect non-ARC affiliations or interests. In addition, ARC would suffer if there were any appearance of bias or self-interest in its activities. These principles are intended, as well, to preclude any such appearance.

This statement is not a codification of rules of conduct; rather it is an expression of intention and purpose which should be interpreted and applied to achieve its stated objective. Individuals who are affiliated with ARC will be expected to abide by that spirit.

Disclosure. Board members and ARC member institution employees are committed to communicating fully with ARC regarding any relationship or commitment which could affect the impartial fulfillment of their role in the affairs of ARC. This policy refers to such a relationship or commitment as affiliation. Affiliation may be defined as the close involvement with a vendor, service provider, or grantee on the part of (a) an ARC Board member, (b) an ARC member institution employee, or (c) the spouse or equivalent, parents, or children of an ARC Board member or ARC member institution employee. Affiliation includes, but is not limited to, serving as a board member, employee, or consultant to a current or potential grantee, service provider, or vendor, or doing business with the grantee, service provider, or vendor. Antecedent affiliations and indirect associations also warrant disclosure. In principle, extra-ARC affiliations or interests should be disclosed to other participants in the ARC's decision-making process whenever there is any uncertainty about whether disclosure is required.

Disclosures ordinarily should be made to the ARC Secretary/Treasurer by members of the collaboration and to the ARC Board Chair by other members of the Board of Governors. Formal notation of disclosures should be a part of the process.

Abstention from ARC Decision Making. In all situations in which disclosure of affecting relationships should be made, the ARC-affiliated individual should abstain from decision-taking actions, and that abstention should be formally noted in ARC's minutes. With disclosure to other participants, the work of ARC is furthered by the willingness of its employees and Board, however interested, to share information bearing upon the matter under consideration. Such participation is encouraged.

No Return Benefit. In considering any decision regarding an organization or person with which an ARC member institution employee or Board Member is affiliated, ARC shall avoid any transaction which results in any direct or indirect economic benefit to the affiliated person or which would constitute self-dealing under Internal Revenue Code Section 4941. Incidental and tenuous benefits to affiliated persons, such as name recognition or public acknowledgment, are permitted.

Avoid the Appearance of Conflict. Integrity and avoiding the appearance of conflict is an important collateral objective. To that end, ARC will not customarily make grants to, or contract with, organizations which employ affiliated persons. The Board Chair, with the concurrence of the Secretary, may approve exceptions to this policy when the work of ARC will be furthered thereby or where the grant or contract will not affect the job or compensation of the affiliated person in question.

No significant personal benefit of any nature may be derived by any affiliated person from any such organization.

Contacts. Questions related to the interpretation of this policy should be directed to the ARC Secretary/Treasurer.

Effective Date. November 2009