



**TO:** University Council

**FROM:** Dr. Hagemeyer, Interim Vice Provost for Research  
Lori Erickson, Assistant Vice President for Human Resources  
Kay Lennon-McGrew, Assistant University Counsel and Policy Counsel

**DATE:** August 2, 2021

**RE:** Institutional Financial Conflicts of Interests  
Conflicts of Interest and Commitment

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**I. Introduction.**

The Institutional Financial Conflicts of Interests policy defines Financial Conflicts of Interests as it relates to Sponsored Activities; describes requirements for disclosure of Significant Financial Interests; and sets the process for reviewing and managing conflicts. This policy is needed for an accreditation review in August. The Conflicts of Interest and Commitment policy specifies how a Covered Employee should disclose Conflicts of Interest and Commitment and how a conflict is evaluated. These policies were posted for public comment from July 18, 2021-August 1, 2021.

**II. Public Comment Period.**

We received one public comment related to the Conflicts of Interest and Commitment policy.

Comment from Theresa McGarry: I think you should add a definition of "sole source supplier."

*Response from Policy Originator: We agree with this suggestion. A defined term was added to the policy.*

**III. Legal Review of the Proposed Policy.**

The applicable legal authority for each policy is as follows:

Institutional Financial Conflicts of Interests	Federal Acquisition Regulations 48 CFR 9.5 Organizational and Consultant Conflicts of Interest and Defense Federal Acquisition Regulations; Association for the Accreditation of Human Research Protections Program Element 1.6.A; and Veteran's Administration: VVHA Standards of Ethical Conduct for Employees of the Executive Branch; TN FOCUS Act.
Conflicts of Interest and Commitment	T. C. A. § 49-8-203, et seq.

