COUNCIL ON UNDERGRADUATE RESEARCH (CUR)
CONFLICT OF INTEREST POLICY

ARTICLE I – PURPOSE

Members of the Board of Directors of the Council on Undergraduate Research (CUR) have a duty of loyalty to the organization. This duty requires them to place the interests of CUR above their personal or professional interests and to avoid conflicts of interest that could compromise decision-making or the organization's integrity.

All other CUR volunteers and employees are expected to act in the best interests of CUR when performing their official duties and to avoid situations where personal, professional, or financial interests could influence, or appear to influence, their actions. This includes disclosing any conflicts of interest to the appropriate CUR leadership as defined in Article III.

Conflicts of interest may be actual, potential, or perceived (apparent):

- **Actual Conflict of Interest** – occurs when a financial, positional, personal, or professional interest currently influences, or could reasonably influence, the person's decisions for CUR.
  - *Example:* A Board member stands to gain financially from a CUR contract they are approving.
- **Potential Conflict of Interest** – occurs when a financial, positional, personal, or professional interest might influence future decisions but has not yet affected decision-making.
  - *Example:* A volunteer is negotiating a consulting contract with CUR that has not yet been finalized.
- **Perceived (Apparent) Conflict of Interest** – occurs when an outside observer might reasonably question whether an individual's impartiality could be compromised, even if no actual conflict exists.
  - *Example:* An elected volunteer's colleague is applying for a CUR award or position (no actual involvement yet, but it could appear biased).

The purpose of this policy is to protect the integrity and interests of CUR, ensure transparency, and promote trust among members, stakeholders, and the public by:

- Preventing personal, professional, or positional interests from interfering with the responsibilities and duties owed to CUR;
- Ensuring that decisions are made solely in the best interests of the organization; and
- Avoiding any improper financial or non-financial gain.

Because CUR volunteers and staff often participate in other professional organizations, potential conflicts related to competing initiatives (such as funding proposals or partnerships) must be disclosed when relevant.

CUR leaders must maintain appropriate confidentiality regarding CUR's internal operations, including strategic discussions, internal documents, and grant proposals. Confidential information obtained through service to CUR must not be used for personal or professional gain.

This policy is intended to supplement, not replace, any applicable federal, state, or local laws governing conflicts of interest for nonprofit and charitable organizations.

ARTICLE II – DEFINITIONS

Interested Person

Any elected or appointed volunteer, officer, or employee who has a direct or indirect Financial Interest or Positional Interest is an Interested Person.

- **Financial Interest**: A person has a Financial Interest if they, or a family member, have, directly or indirectly, through business, investment, or employment:
  - An ownership or investment interest in any entity with which CUR has or is considering a transaction or arrangement;
  - A compensation arrangement with CUR or with any entity or individual with which CUR has or is considering a transaction or arrangement; or
  - A potential ownership, investment interest, or compensation arrangement with any entity or individual with which CUR is negotiating or considering a transaction or arrangement.

- **Positional Interest**: A person has a Positional Interest if their role, relationships, or affiliations, whether with CUR or external organizations, could influence or appear to influence their judgment, decisions, or actions in a CUR matter. Examples include, but are not limited to:
  - Serving on a selection committee for a grant, award, program, or leadership body in which the individual, a family member, a close associate, or their institution is being considered;
  - Holding a leadership, advisory, or governance position in an external organization that competes or collaborates with CUR in ways that could influence decision-making;
  - Any personal, professional, or reputational relationship that could reasonably be perceived to affect impartiality in CUR decisions or actions.

Note: Both Financial Interests and Positional Interests must be disclosed, and the Interested Person must recuse themselves from discussions or decisions where the interest could reasonably affect impartiality, as described in Article III.

Compensation

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

Family Member
A Family Member includes a spouse or partner, parents, children, siblings, or any individual living in the same household whose interests could reasonably influence the Interested Person.

Article III – Responsibilities and Procedures

Duty to Disclose
Interested Persons have a continuing obligation to disclose any actual, potential, or perceived conflict of interest.

Disclosure must occur:

- As soon as the individual becomes aware of a possible conflict; and
- Prior to any discussion, decision, or vote related to the matter.

The Interested Person must disclose all material facts relevant to the potential conflict.

Disclosure Pathways
Depending on the role of the Interested Person, disclosures should be made to the following CUR leadership:

- Board of Directors: President and Executive Officer
- Council: President-Elect and Executive Officer
- Division Representatives: Division Chair and Director of Organizational and Governance Ops
- Collaboration Groups: Chair and National Office Liaison
- Other Volunteers: National Office Liaison and applicable Chair
- Staff: Executive Officer and Director of Organizational and Governance Ops

Determining Whether a Conflict of Interest Exists
After disclosure of a Conflict of Interest and all material facts:

1. The Executive Committee will review and discuss the potential conflict of interest. The Interested Person shall not be present during this discussion. Legal counsel may be consulted as appropriate.
2. The Executive Committee will determine whether a conflict exists.

If the potential conflict involves a member of the Executive Committee, that individual must recuse themselves from deliberation and decision-making.

If all members of the Executive Committee are conflicted, CUR's legal representative will be designated to determine the conflict.

Procedures for Addressing a Disclosed Conflict of Interest
If a conflict of interest is determined to exist:

- The Interested Person must not participate in further discussions or voting related to the matter.
- When necessary, a disinterested individual or committee may be appointed to assist with the review.

A transaction, arrangement, or decision involving a conflict of interest, whether financial or non-financial, may be approved only if disinterested decision-makers determine:

1. The action or arrangement is fair, reasonable, and appropriate for CUR; and
2. The action or arrangement is in the best interests of CUR and advances the organization's mission.

Appropriate actions to address the conflict may include, but are not limited to:

- Recusal from discussion and voting
- Modification of the proposed arrangement
- Prohibition of participation in related decisions

Legal counsel may be consulted when necessary.

Affected parties within and outside of CUR, including volunteers, employees, independent contractors, or relevant stakeholders, may be notified when appropriate.

Documentation of alternatives considered must be maintained in accordance with Article IV.

Procedures for Addressing an Undisclosed Conflict of Interest
If there is reasonable cause to believe that an individual has failed to disclose a conflict:

1. Notification of the potential undisclosed conflict of interest should be made to the appropriate leadership (as outlined in Disclosure Pathways).
2. The individual will be informed of the basis for the concern and given an opportunity to explain the alleged failure.
3. After reviewing the explanation and conducting additional investigation, the Executive Committee will determine whether a conflict exists.

If failure to disclose is confirmed, appropriate action may include:

- Recusal from decision-making
- Removal from involvement in the matter
- Disciplinary action or removal from role, consistent with CUR Bylaws and policies

All conflicts will be reviewed on a case-by-case basis. Legal counsel may be consulted, and affected parties may be notified as appropriate.

Article IV – Documentation

The Executive Committee will document discussions and decisions addressing conflicts of interest. Documentation shall include:

- Names of individuals who disclosed or were determined to have a conflict of interest
- Nature of the conflict of interest
- Actions taken to determine whether a conflict existed
- Decision regarding whether a conflict was present
- Actions taken to address the conflict
- Names of individuals present during discussions and votes
- Alternatives considered to the proposed arrangement
- Record of votes taken

Retention: Documentation will be maintained in CUR records for at least seven years.

Article V – Compensation

All arrangements in which individuals receive compensation from CUR for work performed in an official capacity (for example, stipends for consulting facilitation services) must be documented and maintained in CUR records. The purpose of the compensation and the work performed must be clearly documented.

Individuals are responsible for reporting such income to the IRS as required by law.

CUR may, under limited circumstances, engage Board members or volunteers to perform services that would ordinarily be obtained externally, subject to:

- Same standards of competitive bid and review as outside sources
- Disclosure of Financial Interests or Positional Interests
- Recusal from discussion or voting related to the arrangement
- Written contracts approved by authorized CUR leadership and maintained in the National Office

Board members responsible for compensation who receive payment may not vote on their own compensation but may provide factual information if requested.

Article VI – Annual Disclosure Statements

All Board members must complete and sign a Conflict of Interest Disclosure Statement:

- At the start of their term; and
- Annually thereafter

All other volunteers and staff must comply with the ongoing duty to disclose outlined in Article III.

Disclosure statements are maintained in CUR's organizational records. Failure to sign does not exempt individuals from compliance.

Article VII – Acknowledgment

By signing the role-appropriate handbook and/or disclosure form, the individual acknowledges that they:

- Have received and reviewed the CUR Conflict of Interest Policy
- Understand what constitutes a conflict of interest (financial, positional, or other)
- Agree to disclose any actual, potential, or perceived conflicts of interest
- Agree to comply with the procedures set forth in this policy for the duration of their relationship with CUR

This acknowledgment does not limit the requirement to disclose conflicts as they arise between annual statements.