

Carnegie Mellon University Organizational Conflict of Interest

Policy

It is the policy of Carnegie Mellon University to identify and avoid or manage actual or perceived Organizational Conflicts of Interest related to research activities in accordance with federal and other sponsor requirements.

Scope

This policy applies to all faculty, staff and students at Carnegie Mellon University including all campuses, locations and semi-autonomous units.

Background

Carnegie Mellon University (CMU) receives funding for research activities from a number of U.S. governmental agencies. As a condition of certain funding, CMU must adhere to requirements set forth in the Federal Acquisition Regulations (FAR), Defense Federal Acquisition Regulations, and/or contracts. Clauses relating to Organizational Conflicts of Interest (OCI) are common. The purpose of these requirements is to ensure that the research serves the national and public interest and is guided solely by the objective results of the scientific method. Furthermore, recipients of federal funds sometimes receive information considered to be proprietary, confidential and sensitive which must be protected from inappropriate disclosure.

An OCI is a circumstance in which CMU (or a representative thereof) may have unequal access to government information or the existence of a conflicting role(s) that might bias CMU's judgment in the proposal for, or conduct of, research. The existence of an OCI may mean that CMU is or potentially unable to render impartial assistance or advice to the Government. CMU's objectivity in performing the research may be impaired, or CMU may have an unfair competitive advantage.

An OCI can occur when a member of CMU's community is providing the Government with engineering, scientific and technical direction, or advisory, analysis, assistance, and evaluation services, preparing specifications and work statements, or acting in a capacity that gives them access to proprietary data. For purposes of this policy, OCIs occur only in relationship to government-sponsored research activities.

Types of OCI

- f* Unequal access to information: an unfair competitive advantage resulting from obtaining information not generally available to others seeking federal funding.
- f* Impaired objectivity: assessing performance or evaluating products of someone within your own organization or a direct competitor seeking federal funding.
- f* Biased ground rules: having provided engineering or technical assistance or written the work requirements for a funding opportunity where someone within your own organization is an applicant.

Examples

- f* A faculty member in the School of Computer Science provides DARPA with technical direction for the development of a Broad Agency Announcement (BAA). If anyone from CMU submits a proposal pursuant to that DARPA BAA an organizational conflict of interest exists. This potential organizational conflict may need to be disclosed to DARPA. There may be exceptions; for

