

**University of Delaware College of Engineering
Policy on Conflicts of Interest and Academic Integrity for Graduate Students and Post-
Doctoral Scholars**

Developed March 2020, with input from a variety of sources from other institutions including Cal Tech, Maryland, Missouri, Lehigh, Michigan, and Stanford.

Conflicts of Interest

All post-doctoral scholars and graduate students who hold an assistantship or fellowship, or are student employees, are required to self-disclose at least annually any outside employment or business activities and interests that could interfere with or represent a conflict of interest. These disclosures need to be submitted to the faculty advisor and copied to the Department and College of Engineering.

Graduate Student Engagement with the Public or Private Sector

Graduate students are encouraged to engage with non-University entities and industry to further enhance and complement their academic pursuits. Participation through internships with industry for credit, accreditation requirements, or paid internships and fellowships are encouraged with the following provisions:

1. The academic pursuit of the student, including attainment of the degree, must remain the priority for the student, faculty advisor, and academic program. If the graduate student enters into a private or public sector arrangement outside of the University, their educational experience must be enhanced by this association.
2. A student must be able to retain the ability to change advisors or topic of research free from influence or pressures outside the realm of scientific appropriateness and personal choice.
3. A students' field of research should not be significantly or involuntarily narrowed as a result of involvement with an external private or public entity, nor should such involvement result in a significantly increased time to completion of the degree.
4. Collaborations with external public or private entities must not hinder publication of the student's academic work, particularly the thesis or dissertation.

Post-Doctoral Scholar and Student Engagement with Entities in which their Faculty Advisor has an Outside Interest

University of Delaware faculty members, through their research and academic pursuits, develop technologies, processes, and innovative procedures that are used and marketed outside UD. The processes for reducing or managing conflicts of interest for faculty become more complicated when Post-Doctoral Scholars or graduate students are involved in the faculty's business enterprise. A conflict of interest does not suggest wrongdoing, but rather

that a potential tension exists between the academic interests of the students and the business needs of the company.

To address the potential for conflicts of interest between scholar/student and employment with the faculty member's business enterprise, the faculty member must have in place an approved conflict of interest management plan (CMP). It is also important that any Post-Doctoral Scholars and graduate students involved in such activities understand their own rights and responsibilities when engaged in such activities.

1. Students/scholars must have freedom to publish. Freedom to publish and disseminate results are major criteria for assessing the appropriateness of any research project, particularly those involving graduate students. The integrity of a student's academic research experience shall be preserved, including the ability to complete and publish a thesis or dissertation. The opportunity to freely publish, present, or otherwise disclose the results of the research both within the academic community and to the public at large will be retained. UD precludes assigning to extramural sources the right to keep or make final decisions about what may or may not be published with respect to a student's dissertation or thesis project. Within this general understanding, however, UD also realizes that circumstances may arise where certain restrictions or limitations may be appropriate. Short, reasonable delays may be needed, for example, to allow the research sponsor to review publications for inadvertent disclosures of proprietary data, or to file potentially patentable inventions. The potential for these delays should be discussed with the student/scholar as far in advance as possible. In the case of a dissertation or thesis, such reviews must be completed before the final document is submitted. The dissertation, in its entirety, must not contain any proprietary information.
2. Freedom of Choice Regarding Involvement in Advisor's Company. Graduate students and post-doctoral scholars have the right to freely decided whether or not to participate in faculty research or external business activities. They may decline to participate at any time if they feel that the activities are outside of their own academic interests.
3. COI Management Plan (CMP) Requirement. Graduate students may not be involved in a company in which their dissertation / thesis advisor has an outside interest unless a CMP has been arranged for the faculty member in question, and a COI Student Monitor (defined below) has been assigned. "Involvement" here means that they may not be employed in the company in the company, undertake training in the company, or do their dissertation research in the company. In addition, if there are other faculty involved in that company, only one such faculty member may serve on that student's thesis or dissertation committee.

Outside Interest of the Faculty Advisor is defined as:

1. Employment, consulting, or other professional activity or service, paid or unpaid, for a third party that is not part of the employee's University Responsibilities, and such activity for third party that nonetheless relates to work within the scope of the faculty

member's University Responsibilities. This includes, without limitation, any activity or service that involves the faculty member's expertise, the practice of their profession, or any activity that contributes to the faculty member's professional competence or development

2. Direct or indirect financial interest in an entity that proposes to do business or is doing business within the University
3. Direct or indirect financial interest in an entity that proposes to acquire or has acquired rights to University-owned intellectual property
4. Duties including research or investigation on behalf an entity conducting research or business relevant to the scope of the employee's University responsibilities
5. Any other activity that could construed as relating to or overlapping with the core missions of the University.

A COI Student/Scholar Monitor (typically the Associate Dean for Research and Entrepreneurship or Associate Dean for Graduate and Post Graduate Education, or both) will be appointed when a student is involved with a company in which their advisor has an outside interest. The COI Student/Scholar Monitor is charged with monitoring the academic interests of the student. The Monitor verifies that every such student is knowledgeable of their rights and responsibilities regarding their industry relationship, and the faculty advisor's potential conflict of interest. The student, faculty advisor, department chair, and COI Monitor will all sign the COI Student/Scholar Awareness Document. These COI Student/Scholar Awareness documents will become part of the faculty members COI Management Plan. The COI Student/Scholar Awareness Document acknowledges the issues associated with such an arrangement and ensures that all parties involved are informed and educated about potential COI issues related to the arrangement.

1. COI Student/Scholar Monitors will be disinterested parties relative to the faculty member's outside interest and will preferably be at or above the rank of the faculty member of the COI. The typical appointees will be the ADRE and the ADGRAD of the COE.
2. COI Student monitors will review the CMP for the faculty member and will insure that recommendations for student monitoring and role of the student in the company are documented.
3. The COI student monitor will meet with the student upon request, and must insure that the COI Student Monitor report is included with the faculty members CMP. These reports will be reviewed to insure that the students education and academic interests remain primary, indicating that the student is making expected progress toward the degree without being unduly compromised or biased by their industry affiliation or responsibilities, and can openly discuss their work with retribution or unnecessary delay.