

NEXT GENERATION LEARNING CHALLENGES
CONFLICT OF INTEREST POLICY WITH RESPECT TO GRANTMAKING

Next Generation Learning Challenges (NGLC) staff and volunteers should avoid or minimize actual or apparent conflicts of interest. NGLC must earn the confidence of the educational community and of the general public in the integrity of its grant-making processes. The success of NGLC depends on its credibility. If NGLC processes or personnel are suspected of having conflicting interests, NGLC's effectiveness is compromised.

This Conflict of Interest Policy is designed to help members of NGLC's Executive Committee, its challenge panels, other volunteer reviewers of NGLC challenge proposals, and NGLC staff involved in grantmaking (each a "Responsible Person") identify situations that present potential conflicts of interest, and to provide NGLC with a procedure for addressing such conflicts of interest.

Definitions

A Responsible Person has a "Conflict of Interest" with respect to any application for an NGLC grant from:

- a. A Responsible Person or a Family Member; or
- b. An organization in which a Responsible Person or Family Member has a Material Financial Interest; or
- c. An organization of which the Responsible Person or Family Member is a director, officer, agent, partner, trustee, other legal representative, or employee; or
- d. An institution or organization with which the Responsible Person is affiliated through a consulting relationship, employment as a professor or otherwise (including visiting professor), membership on a visiting committee or similar body at the institution, current enrollment of the Responsible Person or Family Member as a student, receipt and retention of an honorarium or other form of compensation from the institution within the last 12 months, or a pending application for employment.

A "Family Member" is a spouse, ancestor, child by blood or adoption, step-child, son- or daughter- in law, brother or sister by whole or half blood or adoption, brother- or sister-in-law, grandchild or great-grandchild by whole or half blood or adoption, of a Responsible Person.

A "Material Financial Interest" is a financial interest of any kind that is substantial enough to affect a Responsible Person's judgment with respect to the transaction.

General Standards of Conduct

Each Responsible Person agrees to adhere to the following General Standards of Conduct in his/her role of evaluating and making grants on behalf of NGLC:

- Consider NGLC service as a public trust, requiring you to place laws and ethical principles above private gain.
- Disclose any Conflict of Interest or other conflicts that might impact the conscientious performance of your duties.
- Engage in no financial transactions using nonpublic information nor allow the improper use of such information for personal profit or advantage.
- Unless an exception is approved by the President of EDUCAUSE, solicit or accept no gift or other item of monetary value from a person or entity seeking a grant from NGLC under circumstances where it might be inferred that such action was intended to influence or possibly would influence the Responsible Person in the performance of his/her duties.
- Make no unauthorized commitments or promises of any kind purporting to bind NGLC.
- Act impartially and give no preferential treatment to any organization or individual.

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- Exercise care not to disclose confidential information acquired in connection with such status or information the disclosure of which might be adverse to the interests of NGLC, including without limitation information such as the grant selection guidelines, scoring selection criteria, and other confidential information provided to reviewers.
- Endeavor to avoid any actions creating the appearance that you are violating the law or other ethical standards.
- Receive no compensation from an NGLC award or grant which has been reviewed or approved by the Responsible Person on behalf of NGLC.

Procedure for Addressing Conflicts of Interest

1. Promptly after becoming a Responsible Person, and annually thereafter, each Responsible Person must review a copy of this Policy and acknowledge in writing that he or she has done so. Any changes to the Policy must be communicated immediately to all Responsible Persons.
2. Each Responsible Person must annually complete the disclosure form attached to this Policy and submit it to the Chairperson of the NGLC Executive Committee and any other person designated by the Chairperson. The Chairperson and any such designated person must treat the information on the forms as confidential and disclose it only as necessary to implement this Policy.
3. Each Responsible Person who serves as a member of a challenge panel or as a volunteer reviewer for a challenge will receive a list of applicants for that particular challenge and be asked to confirm that he/she does not have a Conflict of Interest with respect to such applicants or, if applicable, disclose any Conflict of Interest.
4. A Responsible Person who does have a Conflict of Interest will not be allowed to review any applications for a challenge with respect to which the Responsible Person has a Conflict of Interest but may review other applications for such challenge. For example, the Responsible Person shall not serve as a member of a challenge panel which is reviewing applications for a challenge for which an institution with respect to which such Responsible Person is affiliated (as described above) is applying; however, the Responsible Person may review applications of non-affiliated institutions which have applied for the same challenge as the affiliated institution.
5. If it is not entirely clear whether a Conflict of Interest exists, then the person with the potential Conflict of Interest must disclose the circumstances to the Chairperson of the NGLC Executive Committee who will determine whether there exists a Conflict of Interest that is subject to this Policy.
6. If the Chairperson of the NGLC Executive Committee has a Conflict of Interest, the Chair of the EDUCAUSE Board shall be substituted for the Chairperson of the NGLC Executive Committee in the application of this process.
7. If the President of EDUCAUSE or the Chairperson of the NGLC Executive Committee has reasonable cause to believe that a person covered by this Policy has failed to disclose an actual or possible Conflict of Interest or otherwise violated the Policy, he/she shall inform the person in writing of the basis for such belief and afford the individual an opportunity to explain the alleged failure to disclose or other violation. If, after consideration of the person's response and making such further inquiries as may be warranted in the circumstances, he/she determines that an individual has in fact failed to disclose an actual or possible Conflict of Interest or has otherwise violated the Policy, he/she shall take appropriate corrective action.

**NEXT GENERATION LEARNING CHALLENGES
CONFLICT OF INTEREST INFORMATION FORM**

Name: _____

Date: _____

Please describe below any relationships, positions, or circumstances in which you are involved that you believe could contribute to a Conflict of Interest (as defined in the Next Generation Learning Challenges Conflict of Interest Policy with Respect to Grantmaking):

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Next Generation Learning Challenges Conflict of Interest Policy with Respect to Grantmaking that is currently in effect.

Signature: _____

Date: _____

**NEXT GENERATION LEARNING CHALLENGES
CONFLICT OF INTEREST CONFIRMATION/DISCLOSURE FORM**

I have reviewed the attached list of applicants for the _____ learning challenge, and I hereby confirm that I do not have a Conflict of Interest, as defined by the NGLC Conflict of Interest Policy with Respect to Grantmaking, with respect to any of such applicants.

I have reviewed the attached list of applicants for the _____ learning challenge, and I hereby disclose the following Conflict of Interest or potential Conflict of Interest, as defined by and in accordance with the NGLC Conflict of Interest Policy with Respect to Grantmaking, with respect to the following applicants:

Signature: _____

Date: _____