

## **SAMPLE COI-C POLICY SANCTION CLAUSES**

### **Vanderbilt: Article V: Enforcement and Penalties**

The Office of General Counsel is responsible for overseeing the implementation and enforcement of this policy. The Office of General Counsel will review all violations of this policy, including: (a) failure to comply with the disclosure process (by refusal to respond, by deliberately responding with incomplete, inaccurate, or misleading information, or otherwise); (b) failure to remedy conflicts of interest; and (c) failure to comply with a prescribed management or monitoring plan. Such cases may be forwarded to the University Conflicts Committee for review and recommendations by the Office of General Counsel.

Penalties for deliberate violations of this policy will be adjudicated in accordance with applicable disciplinary policies and procedures of the University in the *Faculty Manual* and the *Human Resources Staff Guidelines*. Possible penalties include reimbursement to the University for misused resources; formal admonition; inclusion in a faculty member's file of a letter from the dean indicating that the individual's good standing as a member of the faculty has been called into question; ineligibility of a faculty member for grant applications, Institutional Review Board approval, or supervision of graduate students; non-renewal of appointment; and dismissal from employment consistent with the *Staff Guidelines* and *Faculty Manual*. Any member of the University community or student may report a situation involving a conflict of interest or a violation of this policy to an appropriate University official, the Office of Compliance anonymous helpline at 322-1033, the Medical Center Compliance Office anonymous helpline at 343-0135, or the Office of General Counsel. The University will make every effort to protect anyone who reports a violation from reprisal.

### **USC: 6.0 Remedial Action for Non-Compliance**

Failure to disclose and manage actual or apparent conflicts of interest under this policy, including the expectations detailed above about what an individual should or should not do, may be cause for disciplinary action, which may result in termination. For faculty, such action shall observe all provisions of the policies published in the *Faculty Handbook*. Any disciplinary action against a faculty member or staff employee under this policy must take into account the scale of the offense, the individual's intent, and the degree of wrongdoing.

**University of Kansas:** Failure to comply with reporting and disclosure requirements for conflict of interest and time commitments will have one of the following consequences:

- Individuals will not be allowed to submit internal or external grant applications until they have complied.
- Failure to comply may result in disciplinary action.

**University of Florida:** An employee's failure to report outside activities and financial interests under the University's Rule 6C1-1.011, F.A.C., an employee's engaging in the activities or holding the financial interests without the University's approval, and an employee's failing to follow any conditions imposed pursuant to the University's approval of such activities are grounds for disciplinary action. Examples of sanctions are: disallowance or limiting outside activities, changes in assignment, limitations on research activities, fines, reduction in pay, demotion, written reprimand, suspension without pay, and termination for cause. The employee may be required to turn over to the University all or part of the compensation from an unapproved outside activity. If an activity or interest has not been properly disclosed, the employee may be required to disclose the activity or interest in all subsequent presentations of research results. Finally, as noted in the following section, a violation of the State's Code of Ethics may be grounds for various penalties imposed under state law.

