

## Skidmore Conflict of Interest and Lobbying Disclosure Form for Employees

Every Skidmore College employee has an obligation to act in the best interests of the College when performing his or her job. Outside financial interests and legal commitments should not be permitted to create conflicts of interest that interfere with that primary obligation. Such a conflict of interest exists if an employee has an external financial interest or fiduciary or other legal obligation that reasonably could be seen as creating an incentive for the individual to modify the conduct of his or her College activities or to influence the conduct of others. Conflicts of interest may arise from stock ownership, board memberships, consulting relationships, and any activity from which the individual derives legal obligations or expects to receive remuneration from an entity outside the College. Conflicts may arise from many ordinary and appropriate activities; the existence of a conflict does not imply wrongdoing on anyone's part. But when conflicts do arise, they must be recognized and disclosed, and then eliminated or resolved appropriately. Some relationships may create an appearance of conflict; those, too, are important to eliminate or resolve so that we may maintain public confidence in the integrity of our activities. Additionally, certain lobbying activities directly on behalf of the College must be disclosed.

You have been asked to complete this form because, as an employee, your role vests in you decision-making authority that could be compromised, actually or apparently, by your external financial interests or legal commitments. This form seeks to identify any conflicts of interest of the sort described above and to ensure that they are formally reported to the College and eliminated or resolved appropriately. This form also asks you to report significant lobbying activities on behalf of the College. Please answer the questions below as fully as you can. Submit the completed form to your supervisor or to the designated College official for review. You will be contacted if there is need for any further action.

These forms will be treated confidentially. You must complete one each year, and you must update this form if there are any significant changes in your outside interests or commitments or your Skidmore position during the year. If you have any questions about the form or about specific potential or actual conflicts of interest, or regarding lobbying activities, please feel free to contact the Office of the Vice President for Finance and Administration & Treasurer, Office of the President, or Chair of the Board of Trustees.

For purposes of this form:

“Family” includes spouse or domestic partner, and the dependent children of either.

“Related” means so linked or associated that a reasonable person would believe that your judgment about or conduct in your Skidmore responsibilities could be or appear to be influenced or affected.

“Related Person” means an individual so linked or associated with you that a reasonable person would believe that your judgment about or conduct in your Skidmore responsibilities could be or appear to be influenced or affected.

“Lobbying” means any attempt to influence the passage or defeat of legislation, executive orders, rules or regulations, ordinances, procurement decisions, or similar provisions having the force and effect of law at the national, state, or local level.

### Conflict of Interest Disclosure

*Please consult the College's Conflict of Interest Policy, including the examples of Permissible Activities, prior to completing this form.*  
*Individuals receiving grants from external sources must comply with all disclosure requirements of the granting agency.*

1. To the best of your knowledge, did you, any member of your Family, or any Related Person have an equity interest (including stock, stock options, or other securities, BUT NOT stock owned through mutual funds or stock in a public company, if the stock is valued at \$10,000 or less), or any ownership interest in any business entity whose business operations are related or potentially related to your responsibilities at the College?

Yes \_\_\_\_\_ No \_\_\_\_\_ (If yes, please disclose by adding pages or attachments as needed)

2. To the best of your knowledge, during the past twelve months, did you, any member of your Family, or any Related Person receive salary or consulting fees in an amount greater than \$5,000 from any person or entity that would result in an actual or potential conflict of interest with your responsibilities at the College, or in the next twelve months do you expect to do so?

Yes \_\_\_\_\_ No \_\_\_\_\_ (If yes, please disclose by adding pages or attachments as needed)

3. To the best of your knowledge, during the past twelve months, did you, any member of your Family, or any Related Person receive a gift with a value of more than \$100 from any person or entity that would result in an actual or potential conflict of interest with your responsibilities at the College, or in the next twelve months do you expect to do so?

Yes \_\_\_\_\_ No \_\_\_\_\_ (If yes, please disclose by adding pages or attachments as needed)

4. During the past twelve months, have you had a fiduciary or management role (such as service as a president, chief financial officer, director or trustee), or other legal obligation to any organization other than Skidmore, or in the next twelve months do you expect to do so?

Yes \_\_\_\_\_ No \_\_\_\_\_ (If yes, please provide the following information: name of organization and its for-profit/non-profit status; position(s) held; estimated time devoted to activity; and annual compensation, if any. (Note that service in a fiduciary or management role in a for-profit entity requires prior approval by the Vice President for Finance and Administration of the College.)

5. Please disclose any other associations that, during the past twelve months, a reasonable person would believe could constitute, or appear to constitute, a conflict of interest.

### **Lobbying Disclosure**

6. During the past twelve months, have you performed any lobbying activities directly or on behalf of the College to national, state, or local governmental officials, agencies, or entities, or in the next twelve months expect to do so?

Yes \_\_\_\_\_ No \_\_\_\_\_ (If yes, please disclose by adding pages or attachments as needed)

*By signing here, you are certifying that you have reviewed the College's Conflict of Interest Policy, that the information that you provide in this form is accurate to the best of your knowledge as of the date of your signature, and that you commit to providing an updated form to the College whenever a material change occurs in the information you have provided.*

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_