

## Conflict of Interest Management Plan

**Background:** Conflicts of Interest are required per IRS form 990, which requires officers, directors, or trustees, and key employees to disclose annually interests that could give rise to conflicts. This IRS requirement is implemented into BOT bylaws, Article XII and the Regis Conflict of Interest Policy, available at [www.regis.edu/policies/conflict-of-interest-policy](http://www.regis.edu/policies/conflict-of-interest-policy). In 2024, this expanded to include information required to maintain Regis' ability to provide financial aid under Title IV. In 2026, this was expanded to include all employees over 0.5 FTE.

On an annual basis, Regis sends the Conflict of Interest report to all employees over 0.5 FTE and Officers, Directors, Trustees, and key employees. Conflicts for Trustees are then referred to Audit and Risk Management for review and management, and conflicts for Employees are routed to the appropriate supervisor.

Individuals with known conflicts are displayed in a chart similar to the example below. The Audit and Risk committee is charged with evaluating the conflicts and recommending next steps to mitigate the risk for trustees. A Reviewer is charged with evaluating conflicts for employees. A Reviewer may be the President, a staff supervisor, an AVP/Dean, or their designee.

| <b>Example Chart</b> |                                                                                                                  |              |       |       |          |                                                                                                                                                                                                                                                                                                     |                                                                                    |
|----------------------|------------------------------------------------------------------------------------------------------------------|--------------|-------|-------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|
| Name                 | Risk                                                                                                             | Further Info | Waive | Limit | Restrict | Notes                                                                                                                                                                                                                                                                                               | Mitigation/ Management Plan                                                        |
| <i>John Doe</i>      | <i>FinAid admin has daughter at Regis who receives Regis Scholarships</i>                                        |              |       | x     |          | <i>Admin cannot select scholarships available for his own daughter. Admin must disclose his interest while scholarships are assigned.</i>                                                                                                                                                           | <i>Letter with management copied</i>                                               |
| <i>Jane Doe</i>      | <i>Physical Plant Manager hires a tree removal company that belongs to his daughter and manages the contract</i> |              |       |       | x        | <i>Physical Plant Manager cannot hire their family without a neutral selection process. Physical Plant cannot continue to manage the contract themselves. The contract should be put up for bid and if the daughter wins it then a non-Regis family member must own and manage the relationship</i> | <i>Letter with management copied<br/><br/>Escalation to manager for mitigation</i> |
| <i>Regi Ranger</i>   | <i>DEI supervisor recommended a friend for a position in HR.</i>                                                 |              | x     |       |          | <i>DEI Supervisor has no control over friend's hiring or ongoing employment, and therefore there is no conflict.</i>                                                                                                                                                                                | <i>None</i>                                                                        |

### **Treatment Plan Key:**

- **Further Information:** The incident may or may not be a conflict; it cannot be determined from the report. Please provide additional details so this may be resolved.
- **Waive:** The incident as reported does not pose a conflict because of an insufficient relationship to the interests at play.
- **Limit:** The incident as reported could pose a conflict if there is sufficient control over the involved interests. The conflict can be effectively managed through appropriate limitations on access to the situations or circumstances that could lead to a conflict.
- **Restrict:** The incident as reported is an active conflict that violates Regis' policies. Significant steps need to be taken to manage the conflict. Failure to revise the dynamics will result in ongoing and unmitigated conflicts.

**Mitigation/Management Plan Options:**

- **No Action:** There is no conflict, or the conflict is waived because of insufficient nexus to the issue.
- **Letter:** Letter to the individual with the conflict or potential conflict, stating the conflict must continue to be managed.
- **Employees: Letter with management copied:** Letter to the individual with the conflict or potential conflict, stating the conflict must continue to be managed, with their manager copied for the manager's knowledge and management of the ongoing risk.
- **Trustees: Letter with Chairs copied.** Letter to the individual with the conflict or potential conflict, stating the conflict must continue to be managed, with their committee chair and/or Board Chair and/or Vice Chair copied for the chairs' knowledge and management of the ongoing risk.
- **Employees: Escalation to Supervisor, Legal Counsel, or President for mitigation:** Supervisory lines, legal counsel, and/or the President are charged with removing the conflict where the conflict cannot be appropriately managed. Supervisory lines, legal counsel, and/or the President will discuss the risk mitigation with legal after formulating a plan.
- **Trustees: Escalation to Audit and Risk for mitigation:** Audit and Risk is charged with removing the conflict where the conflict cannot be appropriately managed. Audit and Risk will discuss the risk mitigation with legal after formulating a plan.