



INTER-AMERICAN DEFENSE COLLEGE
FORT LESLEY J. McNAIR
WASHINGTON, DC 20319-5066

CID/173-14
27 October 2014

MEMORANDUM FOR ALL IADC PERSONNEL

FROM: DIRECTOR

SUBJECT: Conflict of Interest Policy

References: (a) Department of Defense Directive 5500.07, "*Standards of Conduct*"
(b) Department of Defense 5500.07-R, "*The Joint Ethics Regulation*"
(c) 5 Code of Federal Regulations, Part 3601, "*Supplemental Standards of Conduct for Employees of the Department of Defense*"
(d) Inter-American Defense Board Order #6, "*Civilian Personnel Rules*"
(e) Inter-American Defense College Course Catalog and Student Handbook

1. Purpose: To ensure the name, reputation, and integrity of the Inter-American Defense College (IADC) are not compromised so that no person should have, or appear to have, any personal interests, relationships, or affiliations that conflict with the best interests of the IADC.

2. Applicability: This policy applies to all IADC staff members and students.

3. Policy:

a. Activities or behavior which conflict with the best interest of the IADC are prohibited. It is difficult to give an exhaustive list of situations that might present a conflict. However, among the most common situations that may constitute a conflict are:

(1) Misuse of College resources. To make unauthorized use of any College resources, including the services of College employees or students, for personal benefit.

(2) Non-Compliance with rules. To fail to strictly comply with any rules, regulations or standards of personal behavior applicable to the College.

(3) Disclosure of confidential information. Without proper authority, to give out or release to anyone not authorized to receive such information, any data of a confidential nature secured through his or her relationship to the College.

(4) Acceptance of gifts. For an IADC employee or student, or any dependent member of his or her immediate family, to accept from any organization or person doing or seeking to do business with the College, a loan or a favor of more than nominal value.

(5) Competition with the College. For an IADC employee or student, directly or through a corporation in which he or she has a substantial interest, to engage in any other enterprise for remuneration when the activity is in direct competition with the College, except with the knowledge and written consent of the Director.

b. The Director will have the final authority to determine the appropriate discipline for any policy violation. United States Department of Defense employees and students will be disciplined in accordance with references (a) through (c); IADB contracted employees with reference (d); other students with reference (e).

4. Responsibilities:

a. All IADC employees and students must promptly disclose to the Director all of their relationships and business affiliations that reasonably could give rise to a conflict of interest, or the appearance of a conflict of interest, involving the College.

b. The point of contact for this policy is the Coordinator, Administration Department.

5. Effective Dates: This policy supersedes CID/211-13 and remains in effect until superseded in writing.



MARTHA E. G. HERB, EdD
Rear Admiral, U.S. Navy
Director

