



## AA-21 Disclosure Guidance

The online AA-21 disclosure is provided by the university to all faculty, executive service, post-doctoral employees, select individuals identified in university positions of trust, and other employee types engaged in the design, conduct, and reporting of research at UCF to fulfill their responsibilities for reporting outside activities, financial interests and potential conflicts under applicable federal and state regulations as well as university regulations and policies. The below summary contains the purpose for each of the questions asked in the AA-21 and offers additional guidance. Please note that most activities and interests that are required to be reported in the AA-21 will not pose a potential conflict and will be approved without delay. For more information on the review process please refer to the Reporting Outside Activities, Financial Interests, and Potential Conflicts Guidance Document.

### Questions 1- 3

**(Apply only to employees engaged in sponsored research or research involving human subjects or animals)**

#### General Guidance:

- ❖ Questions in this section relate specifically to individuals engaged in sponsored research or research involving human subjects or animals at UCF.
  - ❖ The \$5,000 threshold is set by federal research regulations and establishes the criteria for a significant financial interest.
  - ❖ The purpose of obtaining responses to the questions in this section is to allow reviewers to determine whether the researcher's significant financial interest is related to UCF research, and if related, whether the interest is a financial conflict of interest.
  - ❖ A conflict can occur when a researcher's personal significant financial interests and that of the researcher's immediate family could directly and significantly affect the design, conduct, or reporting of research at UCF.
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**1) Do you or your immediate family have one or more of the following financial interests that reasonably appears to be related to your UCF institutional responsibilities: (1) compensation exceeding \$5,000 from an entity, (2) aggregate of both compensation and equity interest exceeding \$5,000 in a publicly traded entity, or (3) any equity interest in a privately owned entity.**

- a) The purpose of this question is to evaluate whether your significant financial interest in an entity requires further analysis under applicable laws and guidelines governing federally funded researchers and state statutes for researchers. Researchers are to disclose significant financial interests that would reasonably appear to be related to their institutional responsibilities. Generally, "institutional responsibilities" are responsibilities on behalf of the university as outlined in the employee's annual assignment or position description that may include: administration, teaching/education, research, outreach, clinical service, training, or public service done on behalf of UCF and directly related to the credentials, expertise and achievements upon which your UCF position is based.



- b) Answer “yes” if you or your spouse or dependent child has an annual compensation of more than \$5,000 from an entity, aggregated financial interests of more than \$5,000 in a public entity, or ANY equity interest in a private entity where the financial interest appears reasonably related to your UCF responsibilities in any capacity. Examples include your spouse owning a startup company that will sponsor your UCF research, managing a UCF engineering program while holding stock in an engineering company; private consulting in the same field as your UCF assignment, owning an interest in a privately held company that licenses UCF technology related to your work, etc.

**2) Will you receive paid or reimbursed travel from an outside entity that exceeds \$5,000 (when aggregated per outside entity) that could reasonably appear to be related to your institutional responsibilities (e.g. the purpose of the travel relies upon the same expertise used to carry out your institutional responsibilities)?**

- a) The purpose of this question is to evaluate whether your significant financial interest in an entity requires further analysis under applicable laws and guidelines governing federally funded researchers and state statutes for researchers. Researchers are to disclose significant financial interests that would reasonably appear to be related to their institutional responsibilities. Generally, “institutional responsibilities” are responsibilities on behalf of the university as outlined in the employee’s annual assignment or position description that may include: administration, teaching/education, research, outreach, clinical service, training, or public service done on behalf of UCF and directly related to the credentials, expertise and achievements upon which your UCF position is based.
- b) Answer “yes” if you receive travel paid to your person or paid on your behalf of more than \$5,000 from a non-UCF entity where the financial interest appears reasonably related to your UCF responsibilities in any capacity. Examples include transportation expenses associated with an external consulting agreement or vendor reimbursed travel expenses for your participation as a subject matter expert at a conference.

**3) Will you or your immediate family receive income related to non-UCF intellectual property rights (e.g., patents, copyrights, trademarks), that when aggregated exceeds \$5,000?**

- a) The purpose of this question is to evaluate whether your significant financial interest related to non-UCF intellectual property rights requires further analysis under applicable laws and guidelines governing federally funded researchers and state statutes for researchers.
  - b) Answer “yes” if you receive royalties, licensing proceeds or any income related to intellectual property rights and interests (e.g. patents, copyrights) from an entity other than UCF. Examples include receiving royalties from a product you developed or licensing proceeds from technology you invented at your prior institution.
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## Questions 4-11

### General Guidance:

- ❖ Questions in this section relate to all employees and are based on requirements set out in Florida statutes, university regulations and policies.
  - ❖ Florida statutes require that no employee have any interest, financial or otherwise, direct or indirect; engage in any business transaction or professional activity; or incur any obligation of any nature which is in substantial conflict with the proper discharge of his or her duties in the public interest.
  - ❖ The purpose of obtaining responses to the questions is to allow reviewers to determine whether there is a potential conflict of interest or conflict of commitment.
  - ❖ This process of disclosure and review helps employees prevent actions that may be contrary to the standards of conduct for state employees.
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**4) Do you or an immediate family member intend to use the services of UCF students or personnel for whom you have supervisory or evaluative responsibilities at UCF to carry out an outside activity?**

- a) The use of students and personnel within one's supervisory or evaluative responsibility may pose a conflict.
- b) The purpose of obtaining a response to this question is to evaluate the situation to ensure that there is no perceived or actual conflict, and to mitigate the conflict should one exist.
- c) Answer "yes" if you or your immediate family member intends to hire a student you teach or employee you supervise for a position outside UCF.

**5) Do you intend to use UCF resources (e.g., equipment, facilities, supplies) or services (including information technology resources) in carrying out any outside activity?**

- a) University resources are intended for the sole purpose of university business and therefore any use of university resources to carry out an outside activity requires prior approval.
- b) The purpose of obtaining a response to this question is to allow reviewers to evaluate the request for use of resources and to confirm that it does not pose a perceived or actual conflict.



**6) Will you hold or do you expect to run for political office?**

- a) Employees shall refrain from using their position to interfere with an election, command, coerce, or advise any other employee to contribute towards any political purpose, or advise where he or she might purchase commodities or interfere in any other way with the personal right of employees.
- b) Further, employees may not participate in any political campaign for an election while on duty.
- c) Answer “yes” if you hold an elected office or a petition has been filed to have your name added to a ballot for a political office.

**7) Do you intend to engage in any teaching activity external to UCF (e.g., courses, workshops, lectures, training)?**

- a) Outside teaching activities external to UCF could pose a potential conflict with an employee’s UCF role and responsibilities.
- b) The purpose of obtaining a response to this question is to allow reviewers to evaluate whether the outside teaching competes with UCF coursework or poses a conflict of interest or commitment for the employee.
- c) Answer “yes” if you intend to teach courses at other educational institutions, workshops for corporations, training for non-profit organizations, etc. Note: internal UCF teaching activities that are not part of your regularly assigned duties should be reported in response to Question 10.

**8) Do you require students to purchase works used in your classroom that you or your immediate family authored or co-authored (e.g., textbook(s), computer software, electronic or digital media) and for which you will receive, or anticipate receiving payment, loan, subscription, advance, deposit of money, service, or anything of value? Or, does your spouse require students to purchase works used in their classroom that you authored or co-authored?**

- a) The practice of collecting royalties or other compensation on intellectual property that you require students enrolled in your own course to purchase is a conflict of interest. UCF employees must report the use of their materials under these circumstances and take action to mitigate the conflict of interest created. Possible mitigation efforts include offering the materials to UCF students at no cost, declining royalties from the publisher, donating the royalties paid by UCF students, etc. When donating royalties, UCF employees will complete a Royalties and Donation Form.
- b) Answer “yes” if you or your immediate family has a financial interest in any instructional material or resource that you assign to students as part of a UCF course or program. For example, authoring or co-authoring a book from which you receive copyright income and which you require your students to purchase for a UCF course you teach.



- 9) **Do you, your spouse or child serve as an officer, partner, director, proprietor, have ownership of more than 5% total assets or capital stock, or hold an employment or contractual relationship with an entity or agency that will (1) sell goods/services to UCF, (2) purchase goods/services from UCF, (3) or enter into a research contract or technology transfer agreement with UCF?**
- a) Under Florida statutes, a conflict of interest could exist if you or your spouse, or your child serves as an officer, partner, director, or proprietor or owns more than 5% interest or holds an employment or contractual relationship in an entity or agency that does business with UCF.
  - b) Answering “yes” to this question does not necessarily mean you have a prohibited conflict of interest. Your answer will help us determine if an analysis is warranted under applicable laws which prohibit UCF employees from having certain types of relationships with outside entities that do business with UCF.
  - c) Answer “yes” if you or your spouse or child have a relationship or interest in an entity that is doing business with UCF, if you or your spouse or child have a relationship or interest in an entity that will sponsor UCF research or license intellectual property, or if you have the authority to commit university funds and/or resources (personnel, equipment & facilities) either directly or indirectly through other university employees, with the outside entity where you hold the material interest or roles listed.
- 10) **Will you perform an outside activity in excess of your UCF responsibilities (e.g., serving as a consultant or contractor, board member, expert witness, company officer, etc.) that you have not already reported in Q1 or Q9?**  
*(Activities reported under Q1 or Q9 do not require duplicate reporting under Q10.)*
- a) UCF employees are subject to Florida’s ethics laws which require the disclosure of outside activities, understanding that our primary obligation is to fulfill our commitments to the university. Most outside activities will not create a conflict but to confirm that there is not a conflict, you are required to submit outside activities for review and approval prior to engaging in the activity. Your answer helps us determine whether an analysis is warranted under applicable laws which restrict UCF employees from having certain types of relationships with outside entities.
  - b) Answer “yes” if you receive compensation for a service you provide to any entity other than UCF, if you seek to represent someone in a legal capacity, if your uncompensated activity does not count as a service assignment and occurs during your regularly scheduled UCF commitments. Many uncompensated activities may not need to be disclosed if your supervisor reasonably considers them to be part of your UCF service activities (refer to examples in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix).



**11) Are any of your relatives employed by, or plan to work for UCF?**

- a) Because the employment of any relative creates a potential or real conflict of interest, no relatives shall be employed by, transferred to, or promoted within a single unit, department, or college where a direct or indirect supervisory relationship or conflict of interest exists, or any situation which places relatives in a foreseeable conflict between the interests of the university and the interests of the relatives.
  - b) Relative include those who are referred to as adopted, step-, foster, grand-, half-, in-law, or great- and persons who intend to marry or with whom the employee intends to form a domestic partnership or other intimate relationship. Answer “yes” if you are related to another UCF employee in any of the following ways:
    - i) Parent,
    - ii) Child
    - iii) Sibling
    - iv) Uncle or aunt
    - v) First cousin
    - vi) Nephew or niece
    - vii) Spouse, domestic partner, significant other
  - c) Answer “yes” if you have relatives working for UCF, planning to work for UCF, or you plan to marry or form an intimate relationship with a current UCF employee.
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## Question 12

### General Guidance:

- ❖ Question 12 only applies to individuals engaged in research at UCF. You do not need to respond to this question if you do not engage in research at UCF.
- ❖ Florida statutes and federal regulations require disclosure of financial interests and outside activities related to foreign entities.
- ❖ The purpose of obtaining responses to this question is to provide employees the mechanism to comply with the disclosure requirements under statute and allows reviewers to evaluate whether there is a potential foreign influence risk that requires additional review by the university. Congress, federal agencies, and the White House have all issued some form of guidance, regulation, or policy related to addressing foreign influence in higher education. The University of Central Florida (UCF) is committed to facilitating open and publicly accessible research and scholarly activities both domestically and internationally. However, in some instances, restrictions may be placed on such activities in the interest of national security or protection of trade.
- ❖ Activities disclosed under Question 12 must meet the definition of financial interest and/or outside activity.
- ❖ Before responding to question 12, review the AA-21 Definitions and the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix to familiarize yourself with several reporting exclusions.

### 12) Question 12 is broken down into three parts (see below)

- a) **Do you engage in a compensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise?**
  - i) Answer “no” if you do not engage in a compensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise or if your outside activity is identified as a reporting exclusion in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.
  - ii) Answer “yes” if you receive salary, gratuity, or other compensation or remuneration from a non-U.S. government, university, company, or an individual who is physically located outside of the U.S. that relates to your UCF area of expertise.
- b) **Do you engage in an uncompensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise?**
  - i) Answer “no” if you do not engage in an uncompensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise or if your outside activity is identified as a reporting exclusion in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.
  - ii) Answer “yes” if you conduct uncompensated activities for a non-U.S. government, university, company, or individual who is physically located outside of the U.S. that relates to your UCF area of expertise.



- c) **Do you participate in a foreign government talent or recruitment program?**
  - i) Answer “yes” if you participate in a foreign government talent or recruitment program
- d) **Do you have a financial interest with a foreign entity that has not already been disclosed in 12(a)-(c)?**
  - i) Answer “no” if you do not have any additional financial interests to disclose or if the financial interest is identified as a reporting exclusion in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.
  - ii) Answer “yes” if you have ownership or interest in a non-U.S. business that has not already been disclosed in 12(a)-(c)?