Reporting Outside Activities, Financial Interests, and Potential Conflicts Process

Who:

All:
- Faculty
- Executive Service
- Post-doctoral employees
- Individuals in positions of trust (includes all employees in positions of director and above)
- Employees engaged in the design, conduct, and reporting of research or other types of sponsored projects at UCF

What:

Submit outside activities, financial interests, and potential conflicts using the online Potential Outside Activity, Employment, and Conflict of Interest and Commitment Disclosure (AA-21)

Where:

- Online: [https://argis.research.ucf.edu/coi](https://argis.research.ucf.edu/coi)
- Employees will receive an email with a direct link at the start of the reporting period

When:

- At the beginning of each academic year
  - Annual disclosure period runs from August 8th to August 7th of the following year
- Throughout the year using an Amendment at any time there is a new or anticipated activity, interest, or commitment
Why:

- The process of disclosing outside activities, financial interests, and potential conflicts helps to protect employees from unknowingly violating a state or federal law or university regulations and policies.
- Allows the university to mitigate potential conflicts before they become actual conflicts.

What Happens Next?

- After you submit the AA-21, it will be routed through the review process.

Reviewer Levels:

- **1st Reviewer** – Supervisor or Chair/Dean/Director
  - If all questions are answered No, this is the only review.

- **Regulatory Review for Research** – Office of Research Compliance
  - If Questions 1, 2, 3, and/or question 9 are answered Yes (and in some cases questions 10 and 11) the AA-21 is routed for research regulatory review.

- **Regulatory and Administrative Review - University Compliance, Ethics, and Risk (UCER)**
  - UCER serves as the final reviewer for all questions and determines the overall submission status.
Reviewer Criteria:

Supervisor/Chair/Dean -

- Ensures completeness and that enough information is provided to evaluate the activity
- Evaluates whether the activity disclosed:
  - would negatively impact the employee’s UCF job responsibilities or commitments
  - requires a time commitment that will interfere with UCF commitments
  - would compete with UCF programs or services
  - would be more appropriate to do as part of the employee’s role
  - is in line with college or department policies

Office of Research Compliance -

- Conducts a regulatory review for potential implications to sponsored research activities

UCER -

- Performs a regulatory review for compliance with state laws, including the state ethics laws
- Reviews for compliance with university regulations and policies

Reviewer Options:

- No Conflict
  - Selected when there is no identified conflict with the activity disclosed
- Conflict Identified, Monitoring Plan Required
  - Used when a conflict is identified but the conflict can be mitigated through a monitoring plan
- Unapproved Conflict
  - This option is rarely used but is selected when there is a conflict that cannot be mitigated and the activity must cease
Final Status:

- Once the review process is complete, you will receive an email with the final disposition of the review, as follows:
  - Reviewed, No Conflict
  - Reviewed, With Monitoring Plan
  - Reviewed, Unapproved Conflict Requires Resolution

Note:

Annually the university receives more than 3,000 AA-21 disclosures (includes Amendments received throughout the year). Of those disclosures, roughly 1,000 contain at least one activity requiring multiple reviewers. Less than 100 (roughly 1%) of these disclosures result in a finding of a potential conflict that requires a monitoring plan or an annual update to an existing monitoring plan.