

# 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>
- ❖ 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 8<sup>th</sup> to August 7<sup>th</sup> of the following year
- ❖ Throughout the year using an Amendment at any time there is a new or anticipated activity, interest, or commitment

## Why:

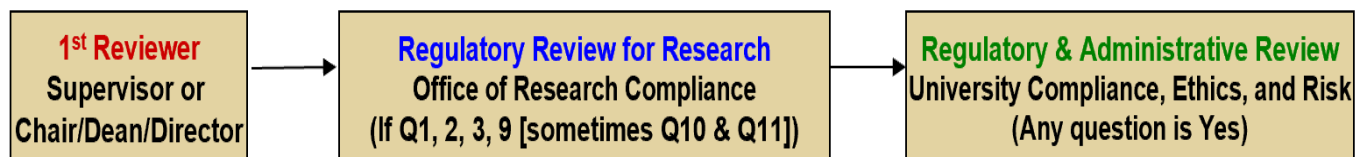
- ❖ The process of disclosing outside activities, financial interests, and potential conflicts helps to protect employees from unknowingly violating a state or federal law or university regulations and policies
- ❖ Allows the university to mitigate potential conflicts before they become actual conflicts

## What Happens Next?

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

## Reviewer Levels:

- ❖ 1<sup>st</sup> 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.