Reporting Outside Activities, Financial Interests, and Potential Conflicts Process

Who:
- 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)
- College of Medicine (COM) Personnel will use the AA-21 to also submit Outside Arrangements as required by the COM Industry Relations Policy

Where:
- Online through Huron COI: https://ucf6.huronresearchsuite.com/
- Employees will receive an email with a direct link at the start of the reporting period

When:
- Annually, at the beginning of each academic year
- During the course of the reporting period (August 8th- August 7th of the following year) any time there is a change in activity, or a new 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 resolve, mitigate, or manage actual or potential conflicts

What Happens Next?
- After you submit the AA-21, it will be routed through the review process
Review Levels:

- **1st Reviewer** – Supervisor or Chair/Dean/Director
  - If all questions are answered No, supervisors will receive a system generated email stating no financial interests or outside activities were reported and no review is required

- **Research Regulatory Review** – Office of Research Compliance in conjunction with Research Conflict of Interest Committee as applicable:
  - Researcher with significant financial interest(s) as defined in UCF Policy 4-504.3
  - Employee engaging in outside activity or financial interest(s) with entity doing business with UCF for purposes of sponsored research or technology transfer applicable to state statute 112.313

- **COM Industry Relations Review** - COM Industry Relations Committee as applicable:
  - COM Personnel engaging in Outside Arrangement(s) with Industry as defined in UCF COM Industry Relations Policy and Guidelines

- **Regulatory and Administrative Review** - University Compliance, Ethics, and Risk (UCER)
  - Ensures all assigned reviews are complete
  - Final review for all questions and determination of overall submission status
Reviewer Criteria:

**Supervisor or Chair/Dean/Director** -
- 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
  - would require a time commitment that interferes 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
- Disclosures containing actual or potential conflicts of interest in research will be reviewed by the Research Conflict of Interest Committee

**COM Industry Relations Committee** -
- Conducts review for COM Personnel engaged in activities with Industry partners for compliance with COM Industry Relations Policy and Guidelines

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

**Review Outcome:**
- **Approved - No Conflicts**
  - Selected when there is no identified conflict with the activity disclosed
- **Approved – With Monitoring Plan**
  - Used when a conflict is identified but the conflict can be mitigated through a monitoring plan
- **Unapproved - Requires Resolution**
  - 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 noting the final decision determination of the review with a link to your submission and reviewer comments