

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:

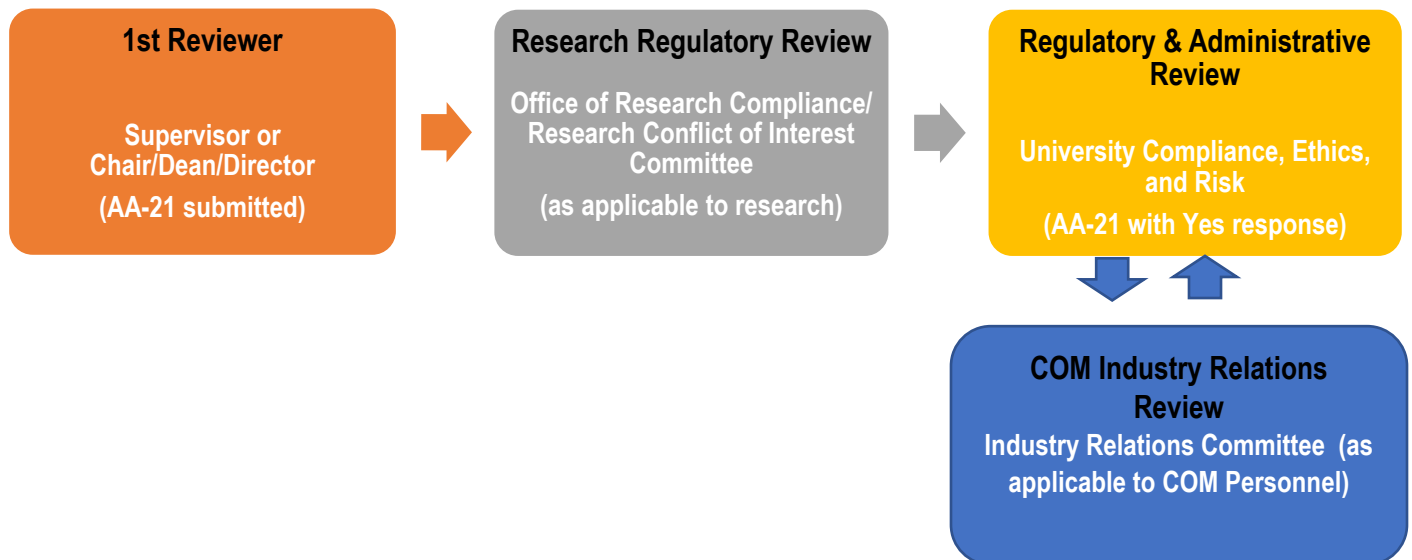
- ❖ The process of disclosing outside activities, financial interests, and potential conflicts helps to protect employees from unknowingly violating a state or federal law or university regulations and policies
- ❖ Allows the university to resolve, mitigate, or manage actual or potential conflicts

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