

**University of Central Florida  
Policy Submission Cover Memo Form**

**Policy No. and Title:** 4-504.3 Reporting Outside Activities, Financial Interests, and Potential Conflicts of Interest or Conflicts of Commitment in Research

**Date of Submission:** February 3, 2021

**Submitted by:** University Compliance, Ethics, and Risk and the Office of Research, Compliance Office

New Policy

Existing Policy

**Summary of Revisions:**

(For a new policy, please provide a summary of the policy. For an existing policy, please provide a summary of the revisions made to the policy. Please include if this submission is a five-year review or out-of-cycle revision. Please note, the text box will revise to fit the text as needed.)

This is an existing university policy addressing federal and state requirements associated with reporting outside activities, financial interests, and potential conflicts in research. In response to updates made to Florida Statutes Section 1012.977, effective July 1, 2020, the existing policy was reviewed and updated, and clarifications were made to support the University's compliance with the policy's regulations.

This policy aims to provide an inquiry process to address non-disclosure and includes the normal follow-up process and coordination with deans, directors, and COI coordinators, as well as to UCF employees to foster the completion of annual and ongoing disclosures. To meet the spirit of Florida Statutes Section 1012.977, failure to complete the annual disclosure process will result in an inquiry to identify foreign influence red flags. The inquiry will be performed as part of the university's Foreign Influence Red Flag Program. The implementation of the requirement of a 60-day suspension without pay is limited to when a Foreign Influence Red Flag inquiry results in evidence that supports potential misconduct and the need to conduct an investigation.

**Stakeholders included in the Review Process:**

(Provide a list of departments involved in the review/revision process. Please note, the text box will revise to fit the text as needed.)

Initial revisions to the policy were made to comply with the new statute and were posted for public review and comment October 6, 2020 – October 13, 2020, in advance of the October 21, 2020 University Policies and Procedures Committee meeting. Based on feedback and suggestions from faculty, it became clear that additional revisions to the proposed policy update were necessary. Working with the Faculty Senate, a faculty ad hoc committee was created to assist University Compliance, Ethics, and Risk and the Office of Research, Compliance Office to edit the materials to clarify the intent of the new law, and to address the questions and concerns raised by faculty and staff. Through consensus of the ad hoc committee, the policy and supplemental materials were edited, revised, and finalized, and are now being brought forward for review and comment.

We would like to thank the members of the faculty ad hoc committee for their time and devotion to the committee's work and for assisting us with improving the policy and supporting documents.

**Regulatory Requirements (if applicable):**

(Provide information on regulatory requirements pertaining to the policy, including specific statute or regulation number. Please note, the text box will revise to fit the text as needed.)

In recent years, higher education institutions in the United States, including Florida universities and academic medical centers, have been the targets of foreign governments which have led to intellectual property theft and advanced technology transfers. In response to this threat, the Florida House of Representatives created the Select Committee on the Integrity of Research Institutions and launched a probe into Florida taxpayer-supported research institutions' vulnerabilities. Resulting from the work of this committee, and with the purpose of requiring Florida's public postsecondary institutions to accurately reporting all sources of research support, financial interests and affiliations, on July 1, 2020, Florida Statutes Section 1012.977 became effective. University Regulation 3.018 Conflict of Interest or Commitment; Outside Activity or Employment was updated to include the statutory requirements. Subsequently, this policy and supplemental materials were updated to clarify how the new law will be implemented.

It is important to note that this policy addresses federal regulations related to sponsored research and research involving human subjects and animals, as well as the new requirements under Florida Statutes Section 1012.977, which focus primarily on reporting outside activities related to a researcher's UCF area of expertise and financial interests with foreign entities. The university's process for disclosing outside activities, financial interests, and potential conflicts have been updated to assist researchers with their reporting requirements.

Supplemental guidance documents have also been developed to assist with any questions regarding the requirements. The intended implementation of the penalty section outlined in Florida Statutes Section 1012.977 is explained in the "Procedure" section of this policy and is limited to situations where there is a Foreign Influence Red Flag and evidence of potential misconduct requiring further investigation.

**Presenters:**

(Provide the name(s), position title(s), and email address(s) for all individuals who will be presenting the policy to the university's Policies and Procedures Committee. Please note, the text box will revise to fit the text as needed.)

Rhonda Bishop, Vice President, Compliance and Risk  
Doug Backman, Director, Office of Compliance, Office of Research  
Christina Serra, Assistant Vice President, Compliance and Ethics  
Ashley Guritza, Associate Director, Office of Export Controls Compliance

**DRAFT  
FEBRUARY 2021**

<b>SUBJECT:</b> Reporting <a href="#">Outside Activities, Financial Interests, and a Potential Conflicts of Interest or Conflicts of Commitment in Research</a>	<b>Effective Date:</b> <del>08-20-12</del>	<b>Policy Number:</b> 4-504. <del>23</del>
	<b>Supersedes:</b> <del>4-504, 4-504.12</del>	<b>Page</b> <b>Of</b> 1 <del>710</del>
	<b>Responsible Authority:</b> <a href="#">Vice President for Research &amp; Commercialization Director, Office of Compliance, Office of Research and Assistant Vice President for Compliance and Ethics</a>	

**DATES OF INITIAL ADOPTION AND EFFECTIVE DATES:** 2-18-08, ~~9-29-08~~

**APPLICABILITY/ACCOUNTABILITY**

This policy applies to all university faculty, [staff, student employees, and affiliates engaged in university research.](#) ~~members, Executive Service employees, postdoctoral associates, Administrative and Professional employees, University Support Personnel System employees, Other Personnel Support employees, and students engaged in both sponsored and non-sponsored research.~~

**PREAMBLE**

As a part of [the University of Central Florida's UCF's](#) academic and research mission, the university encourages its employees to participate in ~~sponsored~~ research, consulting, and other activities that benefit the university, participants, affiliates, and the public at large. In doing so, UCF employees are obligated to act in the best interest of the university and to ensure that outside activities or outside financial interests do not interfere with their obligation to the university. The existence of trust from the public and from the scientific community is paramount to the successful advancement of knowledge and the growth of the university's academic and research programs. In addition to the university's expectation that research be conducted with the highest ethical standards and professional integrity, federal laws and state statutes regulate conflicts of interest and establish related ethical and integrity standards. This policy establishes a process to comply with these regulations and statutes.

## BACKGROUND

Federal regulations and state statutes require institutions of higher education to bear primary responsibility for employees and affiliates to disclose [outside activities, financial interests, and potential conflicts of interests and conflicts of commitment, outside activity, and potential financial conflicts of interest](#). The university has the responsibility to establish conflict of interest policies and procedures to provide appropriate safeguards to protect the interests of the university and sponsored agencies, and to effectively communicate to faculty, [staff, members, employees](#), student [employees](#), and affiliates the university's conflict of interest and commitment policies and procedures.

[Additionally, in recent years higher education institutions in the United States, including Florida universities and academic medical centers, have been the targets of foreign governments which have led to intellectual property theft and advanced technology transfers. In response to this threat, the Florida House of Representatives created the Select Committee on the Integrity of Research Institutions and launched a probe into Florida taxpayer- supported research institutions' vulnerabilities. Resulting from the work of this committee, and with the purpose of ensuring that Florida's public postsecondary institutions are accurately reporting all sources of research support, financial interests and affiliations, on July 1, 2020, Florida Statutes Section 1012.977 became effective. This section of statute requires that all persons employed by a state university engaging in research which was created or authorized pursuant to part II of chapter 1004, consents to the policies of the university or entity, the regulations of the Board of Governors, and the laws of this state. At a minimum, such policies shall require employees engaged in the design, conduct, or reporting of research to disclose and receive a determination that the outside activity or financial interest of the employee does not affect the integrity of the state university or entity. The statute provides that an employee engaged in the design, conduct, or reporting of research who fails to disclose any outside activity or financial interest as defined by the statute shall be suspended without pay pending the outcome of an investigation which shall not exceed 60 days. Upon conclusion of the investigation, the university or entity may terminate the contract of the employee.](#)

## POLICY STATEMENT

[All employees and affiliates engaged in university research must comply with federal regulations, state statutes, and university regulations and policies in regard to disclosing, managing, and reporting outside activities and financial interests. Employees engaged in the design, conduct, or reporting of research are required to disclose applicable financial interests and outside activities and receive a determination by the university that the outside activity or financial interest does not affect the integrity of the university.](#)

[Outside activities and financial interests subject to reporting must be disclosed annually and throughout the year as circumstances change prior to committing to the new financial interest or](#)

outside activity. Newly acquired or discovered financial interests (e.g., through purchase, marriage, or inheritance) must be disclosed within 30-days.

Employees are prohibited from directly or indirectly authorizing business transactions related to university sponsored programs or technology transfer with an entity where they hold an employment or contractual relationship, ownership, or other financial interest without an executed Conflict of Interest Exemption under Florida Statutes 112.313(12)(h) approved by the University President and Chair of the University Board of Trustees. Exemptions require full disclosure of the proposed transaction/relationship in advance and must be approved prior to beginning the activity.

Prior to submitting research applications to sponsors, investigators must ensure that a completed annual disclosure form for the corresponding academic year has been submitted. Investigators must disclose significant financial interests related to a sponsored research proposal, human subjects research protocol, and institutional animal care and use protocol at the time of application. Additionally, investigators must complete conflict of interest training prior to engaging in research. Training must occur at least once every four years or sooner if an applicable change occurs.

If an investigator engages in university research through a subrecipient agreement and does not have a conflict of interest policy that is compliant with federal regulations and the sponsoring terms and conditions require a conflict of interest policy, the affiliate investigator is subject to university policy.

University faculty members, Executive Service employees, postdoctoral associates, Administrative and Professional employees, University Support Personnel System employees, Other Personnel Support employees, and affiliates engaged in both sponsored and non-sponsored research, must disclose conflicts of commitment, outside activity, and financial conflicts of interest to designated officials. All university employees (including students) and affiliates planning to participate in or are participating in sponsored and non-sponsored research activity must comply with federal regulations and state statutes in regard to disclosing, managing, and reporting significant financial interests. All employees engaging in research must annually or within 30 days of discovering, acquiring, or committing to a new financial interest or commitment, report potential conflicts of interest or commitment, or the appearance of a conflict. University faculty members, Executive Service employees, postdoctoral associates, Administrative and Professional employees, University Support Personnel System employees, Other Personnel Support employees, and affiliates responsible for the design, conduct, or reporting of research must complete conflict of interest training prior to engaging in research. Training must occur at least once every four years or sooner if an applicable change occurs.

The Office of Research, Compliance Office & Commercialization is charged with oversight of the sponsored research conflict of interest and commitment program for research and is responsible for applicable policies, procedures, guidelines, and training to communicate the program requirements. In addition, the Office of Research, Compliance Office & Commercialization is

responsible for the review of [sponsored research related](#) disclosures and, when applicable, the review and approval of monitoring and management plans.

~~The~~ University Compliance, Ethics, and Risk ~~Office~~ is charged with ~~the~~ oversight of the [university's](#) conflict of interest and commitment program.

### **Noncompliance**

[The University of Central Florida encourages its employees to participate in research, consulting, and other activities that benefit the university, participants, affiliates, and the public at large. Disclosing this activity fosters UCF's support of these efforts. However, failure by an employee to comply with this policy or a conflict of interest monitoring or management plan may result in disciplinary action up to and including termination for just cause. In accordance with Florida Statutes Section 1012.977 which became effective on July 1, 2020, state statute, any employee engaged in the design, conduct, or reporting of research who failed to disclose an outside activity related to their UCF area of expertise or a financial interest with a foreign entity shall be suspended without pay pending the outcome of an investigation which shall not exceed 60 days. Upon conclusion of the investigation, the university may terminate the contract of the employee.](#)

## **DEFINITIONS**

**Affiliate.** A compensated or uncompensated subcontractor, sub-recipient, consultant, or other third-party entity performing [sponsored](#) research services for the university under a written or verbal agreement.

**Conflict of Commitment.** An employee's devotion of time to activities that adversely affect [their his or her](#) capability to meet their primary university responsibilities. Examples may include but are not limited to outside employment, *pro bono* or volunteer work, and government service in the public interest.

**Conflict of Interest.** A divergence between an individual's private interests and [his or her their](#) employment [or service](#) obligations to the university such that an independent observer may reasonably question whether the individual's actions or decisions are influenced or determined by considerations other than the best interest of the university.

**Financial Conflict of Interest.** A significant financial interest that could directly and significantly affect the design, conduct, or reporting of sponsored ~~and non-sponsored~~ research [and research involving human subjects and animals](#).

**Financial Interest.** [Anything of value other than that provided directly by the university.](#)

**Foreign Entity.** [Includes: 1\) a non-U.S. government, university, or company; or 2\) an individual who is physically located outside of the U.S.](#)

**Institutional Responsibilities.** An investigator's professional responsibilities on behalf of the university. The activities outlined in an employee's annual assignment or position description may include administration, teaching, research and creative activities, course preparation, curriculum development, lectures, evaluation of student efforts, academic advising, committee meetings and memberships, service on panels such as university review boards or data and safety monitoring boards, public service to include service on advisory committee's or review panels, and any other activity assigned by the employee's supervisor in accordance with university policies.

**Investigator.** The project director or principal investigator, [co-investigator](#), [key personnel](#), and any other person, regardless of title, ~~or~~ position, [or employment status](#), who is responsible for the design, conduct, or reporting of sponsored ~~and non-sponsored~~ research. The term includes key personnel, collaborators, or consultants who are responsible for the design, conduct, or reporting of sponsored ~~and non-sponsored~~ research.

**Monitoring and Management Plan.** ~~A Taking action plan~~ to address a financial conflict of interest, which can include reducing or eliminating the significant financial interest to ensure, to the extent possible, that the design, conduct, and reporting of research will be free from bias or personal financial gain.

**Outside Activity ~~or Employment~~.** Any compensated or uncompensated secondary employment or activity, private practice, private consulting, teaching, research, or other activity that is not part of the employee's assigned duties at the university.

**Research.** A systematic experiment, study, demonstration, or survey designed to develop or contribute general knowledge (basic research) or specific knowledge (applied research) in all fields by establishing, discovering, developing, elucidating, or confirming engineering, science, medicine, education, mathematics, humanities, and research involving human subjects or animals. The term includes [training](#), [public service](#), [and](#) product development to include a diagnostic test or drug.

### **Significant Financial Interest**

(1) A financial interest consisting of one or more of the following interests of the investigator (and those of the investigator's spouse and dependent children) that reasonably appears to be related to the investigator's university (institutional) responsibilities.

(i) with regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure and the value of any equity interest or fixed asset value of the entity as of the date of disclosure, when aggregated, equals or exceeds \$5,000;

(ii) with regard to any non-publically traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the 12 months preceding the disclosure, when aggregated, equals or exceeds \$5,000 or when the investigator (or the investigator's spouse and dependent children) holds any equity interest (e.g., stock, stock options, or other ownership interest); or (iii) intellectual property rights and

interests (e.g., patents, copyrights, trademarks) upon receipt of income related to such rights and interests.

(2) The occurrence of any reimbursed travel (i.e., that which is paid on behalf of the investigator and not reimbursed to the investigator) related to the investigator's institutional responsibilities. This disclosure requirement does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, or is funded through a sponsored contract or grant through the Office of Research & Commercialization.

(3) The term significant financial interest does not include the following:

- (i) salary, royalties, or other remuneration paid by the university,
- (ii) income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with the university,
- (iii) income from service on advisory committees, review panels for a federal, state, or local government agency, institution of higher education, an academic teaching hospital, medical center, or research institute affiliated with the university.

**Sponsored Research.** Research executed by university employees using any university space, facilities, materials, equipment, or property which is financed by contract payments, grants or gifts from any source (UCF Regulation UCF-2.027). Sponsored research supports research and development, but it also includes instruction, training, professional development, curriculum development, community and public service projects, and commercialization. Sponsored research funding instruments also includes cooperative agreement, consortium agreement, and donation.

**UCF Area of Expertise.** The disclosers field or discipline in which the discloser conducts research, teaches, and/or provides service activities for UCF.

## PROCEDURE

### **Annual Disclosure and Amendments**

Faculty, ~~staff, and student employees~~ ~~Executive Service employees, and postdoctoral employees participating in or planning to participate~~ ~~engaged in sponsored and non-sponsored research activity~~ must ~~submit an online complete the~~ Potential Outside Activity, Employment, and Conflict of Interest and Commitment Disclosure Report (Form AA-21) ~~through the university designated reporting system~~ on an annual basis and ~~throughout the year, submit an Amendment to the disclosure in advance of committing to a new outside activity or financial interest subject to AA-21 reporting. Newly acquired or discovered financial interests (e.g., through purchase, marriage, or inheritance) subject to AA-21 reporting must be submitted within 30 days of discovering, acquiring, or committing to a new financial interest or commitment.~~

~~Administrative and Professional employees, University Support Personnel System employees, Other Personnel Support employees, adjunct faculty, students, and affiliates planning to participate in or who are participating in sponsored and non-sponsored research activity must~~



complete the Potential Outside Activity, Employment, and Conflict of Interest and Commitment Report (Form ORC-COI) on an annual basis and within 30 days of discovering, acquiring, or committing to a new financial interest or commitment.

Disclosures of outside activities and financial interests related to sponsored research are routed to the Office of Research, Compliance Office & Commercialization after supervisory review. In conjunction with the University Compliance, Ethics, and Risk Office will review disclosures.

The Office of Research, Compliance Office will escalate disclosures containing actual or potential conflicts of interest related to sponsored research to will be reviewed by the Research Conflict of Interest Committee for review. The Research Conflict of Interest Committee will determine if a monitoring and management plan or other action is necessary.

University Compliance, Ethics, and Risk conducts the final review of all disclosures containing outside activities and financial interests.

### **Project Specific Financial Interest Disclosure**

Investigators applying for sponsored research or Institutional Review Board (IRB) approval, must complete the project specific Financial Interest Disclosure section with each proposal through the university's designated research enterprise management system. The Office of Research, Compliance Office will review the project specific disclosures to determine whether they are considered a significant financial interest requiring review by the Research Conflict of Interest Committee. Financial interests reported in project specific disclosures must also be reported in the online Potential Outside Activity, Employment, and Conflict of Interest and Commitment Disclosure (AA-21) if not previously reported during the annual reporting period. The university considers Investigators to be responsible for the design, conduct and/or reporting of the research and must complete the project specific Financial Interest Disclosure section with each proposal through the university's research enterprise management system.

### **Training**

The Office of Research, Compliance Office & Commercialization will provide conflict of interest training modules to investigators. Investigators are required to complete conflict of interest training prior to engaging in sponsored research at least every four years, and within a thirty-day period if one or more of the following occur:

- 1) the university revises its conflict of interest policies,
- 2) an investigator is new to the university, and
- 3) the university finds that an investigator is not in compliance with the university's conflict of interest policy and procedures.

### **Reporting Conflict of Interests to Sponsors**

The Office of Research, Compliance Office & Commercialization is responsible for reporting identified financial conflicts of interests held by investigators' significant financial interests to sponsors in accordance with sponsors' regulations and their policies and procedures, to include annual reports, changes to management or mitigation plans, and retrospective reports. Investigators will provide sufficient data to the Office of Research, Compliance Office &

[Commercialization](#) and other designated university officials to report the nature and extent of the financial conflict.

## **Records**

The Office of Research, [Compliance Office & Commercialization](#) is responsible for maintaining records relating to all investigator conflict of interest disclosures, the university's review and response to such disclosures, and all actions taken by the university in accordance with its policy and procedures for three years from the date the final expenditure report is submitted to the sponsor.

## **Noncompliance:**

~~Failure by an investigator to comply with the university's financial conflicts of interest policy or a financial conflict of interest management or mitigation plan will result in disciplinary action up to and including termination for just cause.~~

## **Subrecipients and other Affiliates**

The Office of Research & [Commercialization](#) will incorporate [terms](#) for [subrecipients \(includes affiliates\)](#) [terms](#) that establish whether the [financial](#)-conflict of interest policy of the university or that of the [affiliate's institutions](#) [subrecipients](#) will apply [as dictated in federal agency guidelines.](#) ~~to the subrecipients' investigators. Subrecipients shall certify as a part of the agreement that their conflict of interest policies adhere to the university's conflict of interest policy.~~

~~If the subrecipient does not have a conflict of interest policy that meets or exceeds the university's conflict of interest policy, the subrecipient investigators must be subject to the university's financial conflict of interest policy.~~

## **Public Accessibility**

When the Research Conflict of Interest Committee determines a significant financial interest is related to an investigator's Public Health Service (PHS) funded research, determines the significant financial interest is a financial conflict of interest, and the investigator still holds the significant financial interest, the University, through the Office of Research will ensure the following information is publicly accessible by a written response within five business days of a request:

- 1) the researcher's name, title, and research project role,
- 2) the name of the entity in which the significant financial interest is held,
- 3) the nature of the significant financial interest, and
- 4) the approximate dollar value of the significant financial interest (within dollar ranges) or a statement that a value cannot be readily determined.

~~The university will post the conflict of interest policy and procedure as well as corresponding conflict of interest guidelines on a publicly accessible Web site. When an investigator's significant financial interest is still held by the investigator and the conflict of interest committee determines the significant financial interest is related to the investigators sponsored research, the Office of Research & Commercialization will post the following information on a publically accessible Web site: 1) the investigator's name, title and research project role, 2) the name of the entity in which~~

the significant financial interest is held, 3) the nature of the significant financial interest, and 4) the approximate dollar value of the significant financial interest (within dollar ranges).

### **Failure to Disclose**

The following outlines the procedures that the Office of Research, Compliance Office and University Compliance, Ethics, and Risk will follow to address compliance with Florida Statutes Section 1012.977.

#### **A. Submission of the UCF Potential Outside Activity, Employment, and Conflict of Interest and Commitment Disclosure (AA-21)**

- 1. At the start of the academic year, employees identified as engaged in the design, conduct, or reporting of research will receive an email with a link to submit an online AA-21. From the time of receipt of the email invitation, the employee will have 30-days to submit applicable outside activities and financial interests.**
- 2. Employees will receive a series of automated e-mail reminders until the disclosure is submitted.**
- 3. Should an employee fail to submit the AA-21 by the deadline, University Compliance, Ethics, and Risk will initiate the office's follow up process that includes coordination with deans and directors through their designated COI Coordinators, direct emails to employees with copies to their supervisors, and providing a delinquent list to the provost's office for follow up and action.**
- 4. After 90 days (60 days delinquent), the employee is considered to have failed to complete the annual process prompting an inquiry by University Compliance, Ethics, and Risk.**
- 5. In the absence of a current AA-21, the office will review the employee's previous years' AA-21 disclosures, when available, to conduct a foreign influence red flag review.**
- 6. If a foreign influence red flag is identified University Compliance, Ethics, and Risk, the Office of Research, Compliance Office, and the Office of Export Controls Compliance will perform an inquiry.**
- 7. If the office does not identify a foreign influence red flag, it will follow the usual process working with the provost's office to obtain compliance with submitting the annual disclosure.**

#### **B. Outside activities or financial interests not disclosed on the AA-21**

- 1. During the academic year if University Compliance, Ethics, and Risk or the Office of Research, Compliance Office become aware of an outside activity related to the employee's UCF area of expertise or a financial interest with a foreign entity that an employee who is engaged in the design, conduct, or reporting of research was required to disclose but failed to disclose on the AA-21, the offices will notify the employee by email to immediately update or amend their existing AA-21.**

2. [If during an inquiry or investigation it is identified that an employee failed to disclose an outside activity related to the employee's UCF area of expertise or a financial interest with a foreign entity that they were required to disclose, the offices will evaluate the non-disclosure and integrate the request for appropriate disclosure during the process. Timing of requesting disclosure will align with the inquiry or investigation.](#)
3. [Upon receipt of the updated or amended AA-21, the offices will conduct a review to determine whether the activity qualifies as a foreign influence red flag.](#)
4. [If a foreign influence red flag is identified, the offices will perform an inquiry.](#)

### [C. Inquiry and investigation](#)

1. [If during the inquiry phase of a foreign influence red flag review, evidence supports potential misconduct, then an investigation will commence.](#)
2. [The employee who failed to initially disclose an outside activity related to the employee's UCF area of expertise or a financial interest with a foreign entity that they were required to disclose, will be suspended without pay pending the outcome of the investigation as required by Florida Statutes Section 1012.977.](#)
3. [The investigation shall last no longer than 60 days.](#)
4. [At the conclusion of the investigation, University Compliance, Ethics, and Risk will issue findings and where appropriate, corrective action including disciplinary action up to and including termination.](#)

## **RELATED INFORMATION**

- 1) [UCF Regulation - 3.018 Conflict of Interest or Commitment; Outside Activity or Employment](#)
- 2) [UCF Regulation-4.029 Use of University Facilities; Definition; Priority of Use; Restrictions on Use](#)
- 3) [UCF Research Conflict of Interest Committee Charter](#)
- 4) [UCF Collective Bargaining Agreement](#)
- 5) [UCF Graduate Student Handbook](#)
- 6) [UCF College of Medicine Faculty Handbook](#)
- 7) [UCF Policy 3-008.2 Employment of Relatives](#)
- 8) [National Institutes of Health Grants Policy Statement, Part II, Terms and Conditions of NIH Grant Awards, Subpart A: General, Chapter 4.1.10, and Financial Conflict of Interest](#)
- 9) [The National Science Foundation Proposal and Award Policies and Procedures Guide, Chapter IX-Grantee Standards, Part A. Conflict of Interest Policies](#)
- 10) [Florida Statutes Title X, Part III Code of Ethics for Public Officers and Employees Chapter 112.313 - 112.326](#)
- 11) [Florida Statutes Title XLVIII Chapter 1012 Section 1012.977](#)
- 12) [Department of Health and Human Services 42 CFR Part 50 and 45 CFR Part 94 Final Rule](#)

[13\) Food and Drug Administration Department of Health and Human Services Financial Disclosure by Clinical Investigators - 21 CFR, Part 54](#)

### **RELATED UCF WEBSITES**

[Office of Research - COI](#)  
[University Ethics, Compliance, Risk - Conflict of Interest](#)

### **RELATED DOCUMENTS**

[Potential Outside Activity, Employment, and Conflict of Interest and Commitment Disclosure \(AA-21\)](#)  
[AA-21 Disclosure Guidance](#)  
[Outside Activity, Financial Interest, and Potential Conflict Disclosure Matrix](#)  
[Reporting Outside Activities, Financial Interests, and Potential Conflicts Guidance Document](#)

~~1) National Institutes of Health Grants Policy Statement, Part II, Terms and Conditions of NIH Grant Awards, Subpart A: General, Chapter 4.1.10, and Financial Conflict of Interest~~

~~2) National Science Foundation Award Administrative Guide, Chapter IV Grantee Standards, Part A~~

~~3) State of Florida Code of Ethics for Public Officers and Employees – Florida Statutes, Title X, – Chapter 112.313 – 112.326~~

~~4) UCF Regulation – UCF-3.018, Conflict of Interest or Commitment; Outside Activity or Employment~~

### ~~RELATED DOCUMENTS~~

~~1) Public Health Service Conflict of Interest Regulations – Title 42, CFR Part 50 and 45 CFR Part 94~~

~~2) National Science Foundation Conflict of Interest Regulations – Title 45, Part 680~~

~~3) Food and Drug Administration Regulations-Financial Disclosure by Clinical Investigators – 21 CFR, Part 54~~

~~4) UCF BOT-UFF Collective Bargaining Agreement~~

~~5) UCF Golden Rule Student Handbook~~

## ~~RELATED UCF WEB SITES~~

### ~~FORMS~~

- ~~1) AA21—Potential Outside Activity, Employment, and Conflict of Interest and Commitment Report (faculty, executive staff, and post-doctoral employees)~~
- ~~2) ORC COI—Potential Outside Activity, Employment, and Conflict of Interest and Commitment Report (A&P, USPS, OPS (to include adjunct faculty))~~
- ~~3) HR-11—Report of Potential Conflict of Interest, Outside Activity and Employment for A&P or USPS Employees~~
- ~~4) HR-12—Use of University Personnel, Equipment, Facilities, Students, or Services~~

### **INITIATING AUTHORITY**

Vice President for Research & ~~Commercialization~~ Dean, College of Graduate Studies and Vice President for Compliance and Risk

History: 4-504 4/21/2008; 4-504.1 10/8/2008; 4-504.2 8/20/2012