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):
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
SUBJECT:
Reporting Outside Activities, Financial Interests, and a Potential Conflicts of Interest or Conflicts of Commitment in Research

Effective Date: 08-20-12
Policy Number: 4-504.23

Supersedes: 4-504, 4-504.12

Responsible Authority:
Vice President for Research & Commercialization
Director, Office of Compliance, Office of Research and Assistant Vice President for Compliance and Ethics

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 interest and conflicts of commitment. 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, 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 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 employment 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 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-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, 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 discloser's 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 completed 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

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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.
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 institutionsubrecipients 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
To: Youndy Cook, Interim General Counsel  
Christina Serra, Assistant Vice President for Compliance and Ethics, University Compliance Ethics, and Risk

From: Sherry Andrews, Associate General Counsel

Date: February 1, 2021

Re: Whether F.S. 1012.977 applies solely to sponsored research

Colleges and universities throughout the United States have come under increasing scrutiny from federal and state authorities in recent years for their ties to foreign governments, particularly China. In 2018, the National Institutes of Health (“NIH”) began to send letters to universities throughout the United States expressing concerns about foreign entities trying to influence U.S. research. In 2019 the U.S. Senate Homeland Security & Governmental Affairs Committee (“Committee”) held a hearing that identified China’s Thousand Talents Plan (“TTP”) as a significant risk to our economic and national security. Launched in 2008, the TTP incentivizes researchers to transmit knowledge and research to China in exchange for money. By 2017, China had recruited more 7,000 professionals, including Nobel laureates.  

The Committee’s findings led Florida Senator Rick Scott to send a letter to Florida university presidents asking them, *inter alia*, to “please explain your requirements for faculty members and university employees to disclose all research activities and all financial conflicts of commitment as it relates to foreign entities.” Shortly thereafter, on December 18, 2019, Moffitt Cancer Center announced the resignation of six researchers, including its CEO and the director of its research program. All six were participants in the TTP and failed to disclose their involvement. One month later, four faculty members at the University of Florida (“UF”) left after UF and the NIH found that they had undisclosed ties to Chinese universities or research institutes.  

Although much attention has been focused on faculty with undisclosed foreign ties who conduct taxpayer-funded research through contracts and grants from agencies such as NIH and the National Science Foundation (“NSF”), at least at the federal level investigators are looking at the problem more broadly.

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1 A 2020 DOE Report found that higher education institutions had self-reported over $6.6 billion from Qatar, Saudi Arabia, the United Arab Emirates, and China. [https://www2.ed.gov/policy/highered/leg/institutional-compliance-section-117.pdf](https://www2.ed.gov/policy/highered/leg/institutional-compliance-section-117.pdf)
Since 2019, the Department of Education (“DOE”) has launched investigations into more than dozen prominent universities for failure to properly disclose all foreign gifts and contracts under Section 117 of the Higher Education Act (the “ACT”). In October of 2020, the Department issued a report that concluded that fewer than 300 institutions have historically reported foreign gifts and contracts as required under the Act. Many of these gifts and sources of foreign funding are being used to project so-called “soft power.” The DOE Report noted that foreign sources hostile to the interests of the United States have been “targeting their investments in and partnerships with our colleges and universities to project soft power, to influence social and political decision makers, to steal sensitive proprietary research and to spread propaganda.”

Both the DOE Report and the Committee have cited the Confucius Institutes as a prime example of a Chinese entity engaged in the exercise of such soft power. The Confucius Institutes consist of schools and programs funded by the Chinese government that commonly teach language and culture. They are widely considered a propaganda machine and are also viewed as threat to academic freedom and the integrity of U.S academic programs. Haban, the headquarters of Confucius Institutes contributed $113 million dollars to U.S. schools between January 2012 and June 2018—more than seven times the amount originally reported. This led former Secretary of State Mike Pompeo to call for colleges to cut ties with the Confucius Institute.

It was against this backdrop of federal and state investigations, as well as the disclosures about Moffitt and UF, that the Florida legislature enacted F.S. 1012.977, which reads in pertinent part:

(1) Any person employed by a state university or entity 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 does not affect the integrity of the state university or entity.

(2)(a) “Financial interest” includes anything of value other than that provided directly by the university or entity.

(b) “Outside activity” includes anything an employee does for an organization or an individual, other than the university or entity, that is related to the employee’s expertise.

(3) An employee who has failed to disclose any outside activity or financial interest as required by subsection (1) 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.

History.—s. 18, ch. 2020-117.

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7 Id.
8 In 2018, Senator Marco Rubio called on our Florida colleges and universities that hosted Confucius Institutes to sever their relationships. All have since closed. [https://www.tampabay.com/breaking-news/usf-shutters-controversial-confucius-institute-on-new-years-eve-20190102/](https://www.tampabay.com/breaking-news/usf-shutters-controversial-confucius-institute-on-new-years-eve-20190102/)
Due to a certain imprecision in drafting, this section of the statute has raised questions as to how broadly it applies. Because it was drafted quickly at the end of session, there is no legislative history to provide guidance. However, the final staff analysis speaks to the intent behind the section and the effect of the proposed changes.

**Integrity of Research Institutions**

**Present Situation**

Postsecondary institutions in the United States, including Florida universities and academic medical centers, have been the targets of foreign governments, particularly the People’s Republic of China (PRC), which has developed research and academic relationships that led to intellectual property theft and advanced technology transfers. In 2018, the National Institute of Health warned institutions receiving federal grant money of potential threats to the integrity of research from foreign influence, including intellectual property and technology theft.

In response, the Florida House of Representatives created the Select Committee on the Integrity of Research Institutions (Select Committee), which launched a probe into whether Florida taxpayer-supported research institutions may have been, or are vulnerable to being, compromised. The Select Committee sought information related to each public university’s correspondence from federal agencies identifying concerns of foreign influence on research integrity, policies regulating and governing disclosures of conflicts by research scientists, and institutional initiatives regarding identifying influence of foreign governments, international organizations, or domestic organizations with potential ties to foreign governments.

While the United States government supports international collaborative scientific research to advance science and expand knowledge, such collaboration becomes problematic when relationships with foreign countries are not disclosed, lack transparency, lack proper vetting, or include terms and conditions that are at odds with taxpayer or institutional commitments....

**Effect of Proposed Changes**

To ensure Florida’s postsecondary institutions are accurately reporting all sources of research support, financial interests and affiliations, the bill requires individuals to disclose contracts affecting the integrity of state universities or entities. The bill requires employees of a state university or entity engaging in research to comply with the policies of the institution, regulations of the BOG, and Florida law, which requires employees to disclose any outside activity or financial interest.

The staff analysis is supported by the plain language of the statute. The first sentence reads that employees of a state university or an entity engaging in research which was created or authorized pursuant to part II of chapter 1004, consent to the policies of the university or entity. Although a comma after state university would have been helpful, the meaning is clear. Employees of either a state university or an entity engaging in research which was created or authorized under part II of chapter 1004, such as Moffit Cancer Center or other similar research institution, must report all financial interests and outside activities as defined by the statute. Nowhere in this brief section does it state that only employees engaged in sponsored research are subject to the disclosure requirements. In fact, it repeatedly refers to “an employee” with no other qualifications.
It is clear that, at both federal and state levels, there is a heightened concern about significant foreign entanglement, often un-disclosed or under-reported, with America’s colleges and universities. This legislation appears to be aimed at achieving what Senator Scott requested in his 2019 letter to university presidents—full disclosure from all university employees of not just research activities, but all financial conflicts of interest and conflicts of commitment relating to foreign entities.
UNIVERSITY OF CENTRAL FLORIDA
POTENTIAL OUTSIDE ACTIVITY, EMPLOYMENT, AND CONFLICT OF INTEREST AND COMMITMENT DISCLOSURE (AA-21)

Reporting Period: 08/08/2019 - 08/07/2020

Purpose:
The purpose of this disclosure is to provide ensure that all faculty, executive service, post-doctoral employees, and select individuals identified in university positions of trust, and other employee types engaged in the design, conduct, and reporting of research at UCF a mechanism for reporting required outside activities, financial interests and potential conflicts. This disclosure conforms with Florida Statutes; policies of the Board of Governors (BOG) and the University of Central Florida UCF; provisions of the Board of Trustees-United Faculty of Florida Collective Bargaining Agreement; and current federal guidelines. This disclosure establishes specific facts to help your supervisor and other appropriate university officials determine whether a potential conflict exists so they can manage or eliminate the conflict when possible. If a conflict is identified by your supervisor or other appropriate university officials, you will be notified and the conflict must be resolved.

Procedure:
This form must be completed at least annually, regardless of whether or not there are any outside activities, interests, or commitments to report. Failure to disclose the required information in a timely fashion is insubordinate and subject to disciplinary action up to termination of your employment with the university. An amended disclosure form must be submitted at any subsequent point during the reporting period that it becomes necessary to disclose any new or anticipated outside activity, interest, or commitment expected to occur during that reporting period. Timely and complete disclosure of outside activities and potential conflicts of interest and commitment protects you from suspicion and accusations of noncompliance. Information on policies, regulations, and requirements, as well as directions for completing the potential outside activity, employment, and conflicts of interest & commitment disclosure form and the review process, is available on the University Compliance, Ethics and Risk Office website. A list of definitions for some of the terms referenced below is available by selecting the linked words. For assistance you may also contact the Potential Conflicts Administration email, PCA@ucf.edu.

NOTE: All questions in this disclosure form refer to activities planned during this reporting period, August 8, 2019 - 2020 through August 7, 20202021. Nine-month faculty must report activity for the 12-month period. An amended disclosure form must be submitted at any subsequent point during the reporting period to disclose new or anticipated outside activities, interests, or commitments expected to occur during that reporting period. All outside activities must be submitted for review and approval in advance of engaging in the outside activity. For each question answered "Yes", all sub-questions that appear are required and must be answered. Upon answering all sub-questions, use the "Add/Save Response" button to submit your answers to the question. Multiple responses may be submitted to each question.

Sponsored and Non-Sponsored Research or Research Involving Human Subjects or Animals
The university promotes objectivity in research by establishing policies and procedures that provide a reasonable expectation that the design, conduct, and reporting of research will be free from bias resulting from an investigator's financial conflict of interest.

Questions 1, 2, & 3 apply to individuals engaged in the design, conduct, and/or reporting of UCF research. Will you be engaging in sponsored research or research involving human subjects or animals through UCF during this reporting period?

☐ Yes (Answer questions 1-3)
☐ No Skip

1. Do you (investigator or your immediate family) have one or more of the following financial interests that reasonably appears to be related to your UCF institutional responsibilities:
   (1) compensation exceeding $5,000 from an entity,
(2) aggregate of both compensation and equity interest exceeding $5,000 in a publicly traded **entity**, or
(3) any equity interest in a privately owned **entity**?

[See reporting exclusions] *(New employees should report compensation and/or equity interests received in the last 12 months and during the current reporting period.)*

Response: ☐ Yes ☐ No

**Entity Name:** ☐ Entity Lookup

**Party:** ☐ Self ☐ Immediate Family Member ☐ Both Self & Immediate Family Member

**Self:**

**Position Type:**
- ☐ President
- ☐ CEO
- ☐ CFO
- ☐ Board Member
- ☐ Dir/Chief Research Officer
- ☐ Scientific Advisory Board Member
- ☐ Manager/Officer/Partner
- ☐ Other

**Type of Compensation and/or Equity:**
- ☐ Salary
- ☐ Consulting fees
- ☐ Honoraria
- ☐ Paid authorship
- ☐ Equity/Stock (non-publicly traded)
- ☐ Stock (publicly traded)
- ☐ Other ownership interest

Will compensation for services be provided by the sponsor of a covered clinical study?: ☐ Yes ☐ No

Is or will the amount of compensation exceed $25,000?: ☐ Yes ☐ No

**Hours:** [ ] from Start Date: [ ] - End Date: [ ]

Indicate the time(s) of the day, week, or month when this activity occurs and how the described activity interacts with your UCF assigned duties:
Describe in detail your role and responsibilities with the entity:

**Immediate Family Member:**

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<tr>
<th>Family Relationship:</th>
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<th>Position Type:</th>
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<td>President</td>
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<tr>
<td>CEO</td>
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<tr>
<td>CFO</td>
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<tr>
<td>Board Member</td>
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<td>Dir/Chief Research Officer</td>
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<td>Scientific Advisory Board Member</td>
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<td>Manager/Officer/Partner</td>
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<th>Type of Compensation and/or Equity:</th>
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<td>Salary</td>
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<td>Consulting fees</td>
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<td>Stock (publicly traded)</td>
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<tr>
<td>Other ownership interest</td>
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</table>

Are you responsible (accountable) for the design, conduct, or reporting of sponsored research or research involving human or animal subjects conducted through UCF (e.g. includes but is not limited to role of PI/Co-I, Program Director)?:  Yes  No

Is any of your research sponsored or are you planning to apply for sponsored research during this reporting period?:  Yes  No

Please describe if the disclosed financial interest is or is not related to your sponsored research. (*The financial interest is related to your research when your financial interest or the entity’s financial interests could be affected by your funded research.*):

Add/Save Response

2. Will you receive paid or reimbursed travel from an outside entity that exceeds $5,000 (when aggregated per outside entity) that could reasonably appear to be related to your institutional responsibilities (e.g. the purpose of the travel relies upon the same expertise used to carry out your institutional responsibilities)? This does not include travel paid for by government agencies, teaching hospitals, medical centers or institutions of higher education in the US. [See reporting exclusions]

Response:  Yes  No
3. Are you responsible (accountable) for the design, conduct, or reporting of sponsored research or research involving human or animal subjects conducted through UCF (e.g. includes but is not limited to role of PI/Co-I, Program Director)?  
Yes  No

Add/Save Response

3. Will you or your immediate family receive income related to non-UCF intellectual property rights (e.g., patents, copyrights, trademarks), that when aggregated exceeds $5,000? (If not previously reported, disclose income exceeding $5,000 over the past 12 months.) [See reporting exclusions]

Response:  Yes  No

Entity Name:  

Party:  Self  Immediate Family Member  Both Self & Immediate Family Member

Self:

Identify type of IP:

Identify the source of IP income (e.g. technology license, royalties from publisher sales, ownership share options):
Describe if the intellectual property rights are related to products or processes being used or evaluated in your university research:

Immediate Family Member:

Family Member
Relationship:

Identify type of IP:

- [ ] Patents
- [ ] Copyrights
- [ ] Trademark

Identify the source of IP income (e.g. technology license, royalties from publisher sales, ownership share options):

Describe if the intellectual property rights are related to products or processes being used or evaluated in your university research:

Add/Save Response

Use of UCF Students, Personnel, or Other University Resources (e.g., equipment, facilities, supplies) in Outside Activities

4. Do you or an immediate family member intend to use the services of UCF students or personnel for whom you have supervisory or evaluative responsibilities at UCF to carry out an outside activity?

Response: [ ] Yes [ ] No

First Name: ___________________ Last Name: ___________________
Supervisory/Evaluative Role:

Proposed Use:

Is usage related to an outside activity with a non-UCF entity?:

Yes  No

Entity Name:  

Entity Lookup

Hours:  from  Start Date:  -  End Date:

Indicate the time(s) of the day, week, or month when this activity occurs and how the described activity interacts with your assigned duties:

Add/Save Response

5. Do you intend to use UCF resources (e.g., equipment, facilities, supplies) or services (including information technology resources) in carrying out any outside activity?

Response:  Yes  No

Department/Unit:  

Department Lookup

Upload Documentation or Approved Agreements (if any):
Type of resource or service:

Location of resource:

Describe anticipated use:

Hours: from Start Date: End Date:

Is usage related to an outside activity with a non-UCF entity?: Yes No

Is there a lease agreement in place with UCF?: Yes No

Entity Name: Entity Lookup

Add/Save Response

Other Activities, Interests and Commitments

6. Will you hold or do you expect to run for political office?

Response: Yes No

Political Office: 
7. Do you intend to engage in any teaching activity external to UCF (e.g., courses, workshops, lectures, training)?

Response: Yes No

Entity Name: 

Course/Activity Name: 

Instructional Method: 
- Face-to-face
- Web-based
- Video streaming
- Other

Is this a compensated activity?: Yes No
8. Do you require students to purchase works used in your classroom that you or your immediate family authored or co-authored (e.g., textbook(s), computer software, electronic or digital media) and for which you will receive, or anticipate receiving payment, loan, subscription, advance, deposit of money, service, or anything of value? Or, does your spouse require students to purchase works used in their classroom that you authored or co-authored?

Response: [ ] Yes [ ] No

Publisher, Distributor or Entity Name: [Entity Lookup]

Title and Type of Product:

Provide ISBN, ASIN, UPC, EAN, or any other product identification number: If not available or content requires electronic subscription, indicate all authors/contributors listed on product, URL, edition number, copyright date, published date, and information necessary to identify the product.
Describe what you will do with the income. (Royalties and Donation Form required for donations of royalties):

Upload Royalties and Donation Form (if any):

Add/Save Response

Florida State Conflict of Interest Standards of Conduct

Florida State conflict of interest statutes (FS 112.311) requires that no employee shall have any interest, financial or otherwise, direct or indirect; engage in any business transaction or professional activity; or incur any obligation of any nature which is in substantial conflict with the proper discharge of his or her duties in the public interest. In concert with the Florida Statute please answer the following Standards of Conduct (FS 112.313) questions:

9. Do you or your spouse or child serve as an officer, partner, director, proprietor, have ownership of more than 5% total assets or capital stock, or hold an employment or contractual relationship with an entity or agency that will (1) sell goods/services to UCF, (2) purchase goods/services from UCF, or (3) enter into a research contract or technology transfer agreement with UCF? You must report proposed sponsored funding (e.g. SBIR/STTR) or license agreements with the entity.

Response: ☐ Yes ☐ No

Entity Name: ☐ Entity Lookup

Are you aware of proposed or active sponsored research or technology transfer agreements between the Entity and UCF?: ☐ Yes ☐ No

Do you or will you engage in sponsored research with the Entity?: ☐ Yes ☐ No

Does or will the Entity license your UCF technology?: ☐ Yes ☐ No

Are you directly or indirectly authorizing business transactions between the entity and UCF?: ☐ Yes ☐ No

Does the Entity sell goods/services to UCF as a vendor?: ☐ Yes ☐ No

Does the Entity purchase goods/services from UCF?: ☐ Yes ☐ No

Are you an officer, partner, director or proprietor of the entity?: ☐ Yes ☐ No
10. Will you perform an **outside activity** in excess of your assigned UCF responsibilities (e.g., serving as a consultant or contractor, board member, expert witness, company officer, etc.) that you have not already reported in Q1 or Q9?

Response:  

- Yes  
- No

**Entity Type:**  

- Agency  
- College/Department
Describe Activity:

In the capacity for which you perform this activity, will you have any connection back to the university (e.g. you consult or contract with an entity also performing services to UCF)?:  
- Yes  
- No

Describe how the activity relates to UCF:

Upload supporting documentation (if any):

Is this a compensated activity?:  
- Yes  
- No

Hours: from Start Date: - End Date:

Indicate the time(s) of the day, week, or month when this activity occurs and how the described activity interacts with your assigned duties:

Sponsoring your UCF research:  
- Yes  
- No

Intellectual property rights:  
- Yes  
- No

Is the IP owned by UCF?:  
- Yes  
- No

License agreement:  
- Yes  
- No

Are you an officer, partner, director or proprietor of the entity?:  
- Yes  
- No

Position Held:
Is your immediate family member an officer, partner, director or proprietor of the entity?: Yes No

Position Held: 
Family Relationship:

Do you or your immediate family have a material interest?: Yes No

Describe material interest:

Party: Self Immediate Family Member Both Self & Immediate Family Member
Family Relationship:

Do you or your immediate family hold any employment or contractual relationship with the entity?: Yes No

Describe contractual relationship:

Party: Self Immediate Family Member Both Self & Immediate Family Member
Family Relationship:

Add/Save Response

11. Are any of your relatives employed by, or plan to work for UCF?

Response: Yes No

First Name:  Last Name: 
Activities with a Foreign Entity

Questions 12a-12d apply to individuals engaged in the design, conduct, and/or reporting of UCF research.

Will you be engaging in research through UCF during this reporting period?

☐ Yes (Answer questions 12a-12d)

☐ No (Skip question)

12a. Do you engage in a compensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise?

Answer “no” if you do not engage in a compensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise or if your outside activity is identified as a reporting exclusion in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.

Response: ☐ Yes ☐ No

Entity Name:

Entity Type (select all applicable):

- Academic institution
- Publicly Traded
- Privately Held
- Government
- Individual
Identify the financial interest(s) you have or will receive from this foreign entity (select all applicable):

- Stock/Equity/Ownership Interest
- Salary
- Gratuity
- Gift
- Donation
- Compensated travel (domestic and/or international)
- Remuneration for services rendered (research or academic)
- Other

What is the purpose and value of the financial interest:

Describe the activity (include entity role as applicable):

Do you have a foreign bank account that is tied to your compensated outside activity?
Response: ☐ Yes ☐ No

12b. Do you engage in an uncompensated outside activity(ies) with a foreign entity that relates to your UCF Area of expertise?
Answer "no" if you do not engage in an uncompensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise or if your outside activity is identified as a reporting exclusion in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.
Response: ☐ Yes ☐ No

Entity Name:  

Name the country of origin:  

Entity Type (select all applicable): ☐ Academic institution ☐ Publicly Traded ☐ Privately Held  

☐ Government ☐ Individual

Describe the activity (include entity role as applicable):  

12c. Do you participate in a foreign government talent or recruitment program?

Response: ☐ Yes ☐ No

Entity Name:  

Name the country of origin:  

Entity Type (select all applicable): ☐ Academic institution ☐ Publicly Traded ☐ Privately Held  

☐ Government ☐ Individual

Have you received or will you receive any of the following financial interests due to your participation in this program (select all applicable):  


Stock/Equity/Ownership Interest
Salary
Gratuity
Gift
Donation
Compensated travel (domestic and/or international)
Remuneration for services rendered (research or academic)
Other
N/A

What is the purpose and value of the financial interest:

Describe your role in the program:

Do you have a foreign bank account that is tied to your participation in a foreign talent or recruitment program?
Response: ☐ Yes ☐ No

12d. Do you have a financial interest with a foreign entity that has not already been disclosed in 12(a)-(c)?
Answer "no" if you do not have any additional financial interests to disclose or if the financial interest is identified as a reporting exclusion in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.
Response: ☐ Yes ☐ No

Entity Name: ____________________________

Entity Lookup

Name the country of origin: ____________________________

Entity Type (select all applicable): ☐ Academic institution ☐ Publicly Traded ☐ Privately Held

☐ Government ☐ Individual

Identify the financial interest(s) you have or will receive from this foreign entity (select all applicable):

☐ Stock/Equity/Ownership Interest
☐ Salary
☐ Gratuity
☐ Gift
☐ Donation
☐ Compensated travel (domestic and/or international)
☐ Remuneration for services rendered (research or academic)
☐ Other

What is the purpose and value of the financial interest:

________________________________________________________________________

________________________________________________________________________
Describe the activity (include entity role as applicable):

Do you have a foreign bank account that is tied to your compensated outside activity?

Response: [ ] Yes [ ] No
AA-21 Disclosure Guidance

The online AA-21 disclosure is provided by the university to all faculty, executive service, post-doctoral employees, select individuals identified in university positions of trust, and other employee types engaged in the design, conduct, and reporting of research at UCF to fulfill their responsibilities for reporting outside activities, financial interests and potential conflicts under applicable federal and state regulations as well as university regulations and policies. The below summary contains the purpose for each of the questions asked in the AA-21 and offers additional guidance. Please note that most activities and interests that are required to be reported in the AA-21 will not pose a potential conflict and will be approved without delay. For more information on the review process please refer to the Reporting Outside Activities, Financial Interests, and Potential Conflicts Guidance Document.

Questions 1-3
(Apply only to employees engaged in sponsored research or research involving human subjects or animals)

General Guidance:

- Questions in this section relate specifically to individuals engaged in sponsored research or research involving human subjects or animals at UCF.
- The $5,000 threshold is set by federal research regulations and establishes the criteria for a significant financial interest.
- The purpose of obtaining responses to the questions in this section is to allow reviewers to determine whether the researcher’s significant financial interest is related to UCF research, and if related, whether the interest is a financial conflict of interest.
- A conflict can occur when a researcher’s personal significant financial interests and that of the researcher’s immediate family could directly and significantly affect the design, conduct, or reporting of research at UCF.

1) Do you or your immediate family have one or more of the following financial interests that reasonably appears to be related to your UCF institutional responsibilities: (1) compensation exceeding $5,000 from an entity, (2) aggregate of both compensation and equity interest exceeding $5,000 in a publicly traded entity, or (3) any equity interest in a privately owned entity.

   a) The purpose of this question is to evaluate whether your significant financial interest in an entity requires further analysis under applicable laws and guidelines governing federally funded researchers and state statutes for researchers. Researchers are to disclose significant financial interests that would reasonably appear to be related to their institutional responsibilities. Generally, “institutional responsibilities” are responsibilities on behalf of the university as outlined in the employee’s annual assignment or position description that may include: administration, teaching/education, research, outreach, clinical service,
training, or public service done on behalf of UCF and directly related to the credentials, expertise and achievements upon which your UCF position is based.

b) Answer “yes” if you or your spouse or dependent child has an annual compensation of more than $5,000 from an entity, aggregated financial interests of more than $5,000 in a public entity, or ANY equity interest in a private entity where the financial interest appears reasonably related to your UCF responsibilities in any capacity. Examples include your spouse owning a startup company that will sponsor your UCF research, managing a UCF engineering program while holding stock in an engineering company; private consulting in the same field as your UCF assignment, owning an interest in a privately held company that licenses UCF technology related to your work, etc.

2) Will you receive paid or reimbursed travel from an outside entity that exceeds $5,000 (when aggregated per outside entity) that could reasonably appear to be related to your institutional responsibilities (e.g. the purpose of the travel relies upon the same expertise used to carry out your institutional responsibilities)?

a) The purpose of this question is to evaluate whether your significant financial interest in an entity requires further analysis under applicable laws and guidelines governing federally funded researchers and state statutes for researchers. Researchers are to disclose significant financial interests that would reasonably appear to be related to their institutional responsibilities. Generally, “institutional responsibilities” are responsibilities on behalf of the university as outlined in the employee’s annual assignment or position description that may include: administration, teaching/education, research, outreach, clinical service, training, or public service done on behalf of UCF and directly related to the credentials, expertise and achievements upon which your UCF position is based.

b) Answer “yes” if you receive travel paid to your person or paid on your behalf of more than $5,000 from a non-UCF entity where the financial interest appears reasonably related to your UCF responsibilities in any capacity. Examples include transportation expenses associated with an external consulting agreement or vendor reimbursed travel expenses for your participation as a subject matter expert at a conference.

3) Will you or your immediate family receive income related to non-UCF intellectual property rights (e.g., patents, copyrights, trademarks), that when aggregated exceeds $5,000?

a) The purpose of this question is to evaluate whether your significant financial interest related to non-UCF intellectual property rights requires further analysis under applicable laws and guidelines governing federally funded researchers and state statutes for researchers.

b) Answer “yes” if you receive royalties, licensing proceeds or any income related to intellectual property rights and interests (e.g. patents, copyrights) from an entity other than UCF. Examples include receiving royalties from a product you developed or licensing proceeds from technology you invented at your prior institution.
Questions 4-11

General Guidance:

- Questions in this section relate to all employees and are based on requirements set out in Florida statutes, university regulations and policies.
- Florida statutes require that no employee have any interest, financial or otherwise, direct or indirect; engage in any business transaction or professional activity; or incur any obligation of any nature which is in substantial conflict with the proper discharge of his or her duties in the public interest.
- The purpose of obtaining responses to the questions is to allow reviewers to determine whether there is a potential conflict of interest or conflict of commitment.
- This process of disclosure and review helps employees prevent actions that may be contrary to the standards of conduct for state employees.

4) Do you or an immediate family member intend to use the services of UCF students or personnel for whom you have supervisory or evaluative responsibilities at UCF to carry out an outside activity?

   a) The use of students and personnel within one’s supervisory or evaluative responsibility may pose a conflict.
   b) The purpose of obtaining a response to this question is to evaluate the situation to ensure that there is no perceived or actual conflict, and to mitigate the conflict should one exist.
   c) Answer “yes” if you or your immediate family member intends to hire a student you teach or employee you supervise for a position outside UCF.

5) Do you intend to use UCF resources (e.g., equipment, facilities, supplies) or services (including information technology resources) in carrying out any outside activity?

   a) University resources are intended for the sole purpose of university business and therefore any use of university resources to carry out an outside activity requires prior approval.
   b) The purpose of obtaining a response to this question is to allow reviewers to evaluate the request for use of resources and to confirm that it does not pose a perceived or actual conflict.
6) Will you hold or do you expect to run for political office?

a) Employees shall refrain from using their position to interfere with an election, command, coerce, or advise any other employee to contribute towards any political purpose, or advise where he or she might purchase commodities or interfere in any other way with the personal right of employees.

b) Further, employees may not participate in any political campaign for an election while on duty.

c) Answer “yes” if you hold an elected office or a petition has been filed to have your name added to a ballet for a political office.

7) Do you intend to engage in any teaching activity external to UCF (e.g., courses, workshops, lectures, training)?

a) Outside teaching activities external to UCF could pose a potential conflict with an employee’s UCF role and responsibilities.

b) The purpose of obtaining a response to this question is to allow reviewers to evaluate whether the outside teaching competes with UCF coursework or poses a conflict of interest or commitment for the employee.

c) Answer “yes” if you intend to teach courses at other educational institutions, workshops for corporations, training for non-profit organizations, etc. Note: internal UCF teaching activities that are not part of your regularly assigned duties should be reported in response to Question 10.

8) Do you require students to purchase works used in your classroom that you or your immediate family authored or co-authored (e.g., textbook(s), computer software, electronic or digital media) and for which you will receive, or anticipate receiving payment, loan, subscription, advance, deposit of money, service, or anything of value? Or, does your spouse require students to purchase works used in their classroom that you authored or co-authored?

a) The practice of collecting royalties or other compensation on intellectual property that you require students enrolled in your own course to purchase is a conflict of interest. UCF employees must report the use of their materials under these circumstances and take action to mitigate the conflict of interest created. Possible mitigation efforts include offering the materials to UCF students at no cost, declining royalties from the publisher, donating the royalties paid by UCF students, etc. When donating royalties, UCF employees will complete a Royalties and Donation Form.

b) Answer “yes” if you or your immediate family has a financial interest in any instructional material or resource that you assign to students as part of a UCF course or program. For example, authoring or co-authoring a book from which you receive copyright income and which you require your students to purchase for a UCF course you teach.
9) Do you, your spouse or child serve as an officer, partner, director, proprietor, have ownership of more than 5% total assets or capital stock, or hold an employment or contractual relationship with an entity or agency that will (1) sell goods/services to UCF, (2) purchase goods/services from UCF, (3) or enter into a research contract or technology transfer agreement with UCF?

a) Under Florida statutes, a conflict of interest could exist if you or your spouse, or your child serves as an officer, partner, director, or proprietor or owns more than 5% interest or holds an employment or contractual relationship in an entity or agency that does business with UCF.

b) Answering “yes” to this question does not necessarily mean you have a prohibited conflict of interest. Your answer will help us determine if an analysis is warranted under applicable laws which prohibit UCF employees from having certain types of relationships with outside entities that do business with UCF.

c) Answer “yes” if you or your spouse or child have a relationship or interest in an entity that is doing business with UCF, if you or your spouse or child have a relationship or interest in an entity that will sponsor UCF research or license intellectual property, or if you have the authority to commit university funds and/or resources (personnel, equipment & facilities) either directly or indirectly through other university employees, with the outside entity where you hold the material interest or roles listed.

10) Will you perform an outside activity in excess of your UCF responsibilities (e.g., serving as a consultant or contractor, board member, expert witness, company officer, etc.) that you have not already reported in Q1 or Q9? *(Activities reported under Q1 or Q9 do not require duplicate reporting under Q10.)*

a) UCF employees are subject to Florida’s ethics laws which require the disclosure of outside activities, understanding that our primary obligation is to fulfill our commitments to the university. Most outside activities will not create a conflict but to confirm that there is not a conflict, you are required to submit outside activities for review and approval prior to engaging in the activity. Your answer helps us determine whether an analysis is warranted under applicable laws which restrict UCF employees from having certain types of relationships with outside entities.

b) Answer “yes” if you receive compensation for a service you provide to any entity other than UCF, if you seek to represent someone in a legal capacity, if your uncompensated activity does not count as a service assignment and occurs during your regularly scheduled UCF commitments. Many uncompensated activities may not need to be disclosed if your supervisor reasonably considers them to be part of your UCF service activities (refer to examples in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix).
11) Are any of your relatives employed by, or plan to work for UCF?

a) Because the employment of any relative creates a potential or real conflict of interest, no relatives shall be employed by, transferred to, or promoted within a single unit, department, or college where a direct or indirect supervisory relationship or conflict of interest exists, or any situation which places relatives in a foreseeable conflict between the interests of the university and the interests of the relatives.

b) Relative include those who are referred to as adopted, step-, foster, grand-, half-, in-law, or great- and persons who intend to marry or with whom the employee intends to form a domestic partnership or other intimate relationship. Answer “yes” if you are related to another UCF employee in any of the following ways:
   i) Parent,
   ii) Child
   iii) Sibling
   iv) Uncle or aunt
   v) First cousin
   vi) Nephew or niece
   vii) Spouse, domestic partner, significant other

c) Answer “yes” if you have relatives working for UCF, planning to work for UCF, or you plan to marry or form an intimate relationship with a current UCF employee.

Question 12

General Guidance:

- Question 12 only applies to individuals engaged in research at UCF. You do not need to respond to this question if you do not engage in research at UCF.
- Florida statutes and federal regulations require disclosure of financial interests and outside activities related to foreign entities.
- The purpose of obtaining responses to this question is to provide employees the mechanism to comply with the disclosure requirements under statute and allows reviewers to evaluate whether there is a potential foreign influence risk that requires additional review by the university. Congress, federal agencies, and the White House have all issued some form of guidance, regulation, or policy related to addressing foreign influence in higher education. The University of Central Florida (UCF) is committed to facilitating open and publicly accessible research and scholarly activities both domestically and internationally. However, in some instances, restrictions may be placed on such activities in the interest of national security or protection of trade.

12) Question 12 is broken down into three parts (see below)

a) Do you engage in a compensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise?
i) Answer “no” if you do not engage in a compensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise or if your outside activity is identified as a reporting exclusion in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.

ii) Answer “yes” if you receive salary, gratuity, or other compensation or remuneration from a non-U.S. government, university, company, or an individual who is physically located outside of the U.S. that relates to your UCF area of expertise.

b) Do you engage in an uncompensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise?

i) Answer “no” if you do not engage in an uncompensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise or if your outside activity is identified as a reporting exclusion in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.

ii) Answer “yes” if you conduct uncompensated activities for a non-U.S. government, university, company, or individual who is physically located outside of the U.S. that relates to your UCF area of expertise.

c) Do you participate in a foreign government talent or recruitment program?

i) Answer “yes” if you participate in a foreign government talent or recruitment program.

b) Do you have a financial interest with a foreign entity that has not already been disclosed in 12(a)-(c)?

i) Answer “no” if you do not have any additional financial interests to disclose or if the financial interest is identified as a reporting exclusion in the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.

ii) Answer “yes” if you have ownership or interest in a non-U.S. business that has not already been disclosed in 12(a)-(c)?

*Before responding to question 12, please review the AA-21 Definitions and the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix. The Matrix includes a number of reporting exclusions to the disclosure requirements, including receiving certain remuneration from individuals who are physically located outside of the U.S.*
<table>
<thead>
<tr>
<th>AA-21 Question</th>
<th>Reference</th>
<th>Disclose</th>
<th>Examples</th>
<th>Reporting Exclusions (Do Not Disclose)</th>
</tr>
</thead>
</table>
| Compensation and Equity Interest | • DHHS CFR Part 50  
| Question 1: | • 45 CFR Part 94 Final Rule  
| Do you or your immediate family have one or more of the following financial interests that reasonably appears to be related to your UCF institutional responsibilities: | • 21 CFR, Chapter 1, Subchapter A  
| (1) compensation exceeding $5,000 from an entity, | • 54.1-6 NSF Guide Chapter IV  
| (2) aggregate of both compensation and equity interest exceeding $5,000 in a publicly traded entity, or | | You or your immediate family’s:  
| (3) any equity interest in a privately owned entity. | • Compensation >$5,000 from an entity,  
| | • Compensation and equity interest >$5,000 in public entity, or  
| | • Equity interest in a private entity, that reasonably appears to be related to your UCF institutional responsibilities  
| | • New employees should report compensation and/or equity interests received in the last 12 months and during the current reporting period | • Your spouse owns a startup company that will sponsor your UCF research  
| | | • You have equity in a company that has an interest in the results of your research or IP for commercial purposes  
| | | • You are a private consultant in the same field as your UCF assignment | • Salary, royalties, intellectual property rights, or other compensation paid by UCF and/or the UCF Research Foundation (UCFRF)  
| | | | • Income from investment vehicles, such as mutual funds and retirement account contributions made by UCF on your behalf  
<p>| | | | • Income from seminars, lectures, or teaching engagements, and service on advisory or review panels sponsored by a government agency, institution of higher education, academic teaching hospital, medical center, or research institute affiliated with an institution of higher education originating in the United States |</p>
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</table>
| **Reimbursed Travel**  
**Question 2:** Will you receive paid or reimbursed travel from an outside entity that exceeds $5,000 (when aggregated per outside entity) that could reasonably appear to be related to your institutional responsibilities (e.g. the purpose of the travel relies upon the same expertise used to carry out your institutional responsibilities)?  
*(Applies only to employees engaged in sponsored research or research involving human subjects or animals at UCF)* | • DHHS CFR Part 50  
• 45 CFR Part 94 Final Rule  
• 21 CFR, Chapter 1, Subchapter A  
• 54.1-6 NSF Guide Chapter IV | • Reimbursed travel or travel > $5,000 paid on your behalf that is related to your institutional responsibilities | • A company pays your transportation expenses associated with an external consulting agreement in your field of study  
• A vendor reimbursed travel expenses for your participation as a subject matter expert at their conference | • Travel reimbursed to you under a sponsored project (i.e. paid by a research sponsor through UCF)  
• Travel paid by a government agency, institution of higher education, academic teaching hospital, medical center, or research institute affiliated with an institution of higher education originating in the United States |
| **Intellectual Property Rights**  
**Question 3:** Will you or your immediate family receive income related to non-UCF intellectual property rights (e.g., patents, copyrights, trademarks), that when aggregated exceeds $5,000?  
*(Applies only to employees engaged in sponsored research or research involving human subjects or animals at UCF)* | • DHHS CFR Part 50  
• 45 CFR Part 94 Final Rule  
• 21 CFR, Chapter 1, Subchapter A  
• 54.1-6 NSF Guide Chapter IV | • Income >$5,00 related to non-UCF IP received by you or your immediate family  
• If not previously reported, disclose income exceeding $5,000 over the past 12 months | • You receive royalties from an IP license agreement for technology invented prior to UCF employment | • Royalties paid to you through UCF and/or the UCFRF  
• Compensation paid through UCF and/or UCFRF for:  
  • IP rights assigned to UCF related to your IP  
  • the value of royalty sharing agreements between you and UCF related to your IP |
### Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix

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<tr>
<td><strong>Use of UCF Students and Employees</strong></td>
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</tbody>
</table>
| **Question 4:** Do you or an immediate family member intend to use the services of UCF students or personnel for whom you have supervisory or evaluative responsibilities at UCF to carry out an outside activity? | Florida Statute 112.313(6)     | - Use of students or employees for whom you have a supervisory or evaluative responsibility at UCF to carry out your outside activity | - Your privately owned company intends to hire a student you teach at UCF  
- Asking employees that you supervise to provide administrative support for a compensated outside activity | - Employees for which you have no supervisory or evaluative responsibility in your UCF position  
- Participation by a student or employee in an uncompensated activity that counts towards a service-assignment |
| **Use of UCF Resources**                            |                                   |                                                                          |                                                                                                                                          |                                                                                                          |
| **Question 5:** Do you intend to use UCF resources (e.g., equipment, facilities, supplies) or services (including information technology resources) in carrying out any outside activity? | Florida Statute 112.313(6)     | - Use of any UCF resource to carry out an outside activity                      | - Using UCF space and technology to host a conference for an outside company  
- Using your computer and office supplies to perform consulting work  
- Your privately owned company (or company employee) will utilize shared research facilities as an external customer | - Use of resources that supports a service-assignment for which you receive no compensation and does not incur an additional cost to UCF |
| **Political Activities**                            |                                   |                                                                          |                                                                                                                                          |                                                                                                          |
| **Question 6:** Will you hold or do you expect to run for political office? | Florida Statute 104.31           | - If you hold a political office or plan to run for one                   | - Petition filed to have your name added to a ballot for a political office such as mayor                                                    | - Non-government office  
- Specific information about your political views or political party |
### Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix

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<tr>
<td><strong>Outside Teaching</strong>&lt;br&gt;Question 7: Do you intend to engage in any teaching activity external to UCF (e.g., courses, workshops, lectures, training)?</td>
<td>• Florida Statute 112.313(7)</td>
<td>• All compensated outside teaching&lt;br&gt;• Uncompensated teaching that does not count as a service-assignment and occurs during your regularly scheduled UCF commitments</td>
<td>• Receiving compensation to deliver a workshop at a local hospital</td>
<td>• Presentations, workshops, or other speaking engagements delivered on behalf of UCF&lt;br&gt;• Uncompensated teaching that is considered a service-assignment&lt;br&gt;• UCF teaching that is not part of your assigned duties (should be reported in Q10)</td>
</tr>
<tr>
<td><strong>Works Used in Classroom</strong>&lt;br&gt;Question 8: Do you require students to purchase works used in your classroom that you or your immediate family authored or co-authored (e.g., textbook(s), computer software, electronic or digital media) and for which you will receive, or anticipate receiving payment, loan, subscription, advance, deposit of money, service, or anything of value? Or, does your spouse require students to purchase works used in their classroom that you authored or co-authored?</td>
<td>• Florida Statute 1004.085</td>
<td>• When requiring students to purchase works used in your classroom that you or your immediate family authored or co-authored and for which you will receive anything of value</td>
<td>• A textbook you authored is required for your history course. Your publishing agreement entitles you to receive 1% of the sale each time the book is purchased.&lt;br&gt;• Your course requires students to purchase digital media from your spouse’s company website</td>
<td>• Student purchased works used in classes you or your immediate family members do not teach at UCF</td>
</tr>
</tbody>
</table>
### AA-21 Question

**Doing Business with UCF and Conflicting Employment**

**Question 9:**
Do you, your spouse or child serve as an officer, partner, director, proprietor, have ownership of more than 5% total assets or capital stock, or hold an employment or contractual relationship with an entity or agency that will:

1. sell goods/services to UCF,
2. purchase goods/services from UCF, or
3. enter into a research contract or technology transfer agreement with UCF?

### Reference
- Florida Statute 112.313(3)
- Florida Statute 112.313(7)

### Disclose
- Your spouse or child serve as an officer, partner, director, proprietor, have ownership in, or hold an employment or contractual relationship with an entity or agency that will:
  1. sell goods/services to UCF,
  2. purchase goods/services from UCF, or
  3. enter into a research contract or technology transfer agreement with UCF
- Report proposed sponsored funding (SBIR/STTR) or license agreements with the entity

### Examples
- You, your spouse or child own a company that will sponsor UCF research or license IP
- You have a part time position at an entity that contracts with UCF or funds UCF research
- Employment with a Florida state agency that sponsors your UCF research

### Reporting Exclusions (Do Not Disclose)
- Contractual or employment relationships with the U.S. government
# Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix

<table>
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<tbody>
<tr>
<td><strong>Outside Activities</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **Question 10:** Will you perform an outside activity in excess of your UCF responsibilities (e.g., serving as a consultant or contractor, board member, expert witness, company officer, etc.) that you have not already reported in Q1 or Q9? | - Florida Statute 112.313(7) | - Compensated activities (includes honoraria) for any service you provide to an entity other than UCF  
- Uncompensated activities that do not count as a service-assignment and occur during your regularly scheduled UCF commitments  
- When representing someone in a legal capacity, even if not compensated | - You have paid outside employment or receive an honorarium for services such as serving as a consultant, contractor, company officer, expert witness, etc.  
- You serve on a board that does not count as service and for which meetings regularly occur during your teaching or office hours  
- You have a law practice outside of UCF and take on pro bono cases | - Personal volunteer activities such as coaching your child’s little league team, volunteering at a place of worship or soup kitchen, etc.  
- Speaking at academic conferences while representing UCF  
- Serving on UCF formed committees or advisory groups  
- Uncompensated activity (other than legal representation) that is considered a service-assignment and does not involve a foreign entity (refer to Q12) |
| **Employment of Relatives** |           |          |          |                                        |
| **Question 11:** Are any of your relatives employed by, or plan to work for UCF? | - UCF 3-008 Employment of Relatives | - Relatives working for UCF or planning to work for UCF | - You plan to marry or form an intimate relationship with a current UCF employee  
- Your father-in-law recently accepted a faculty position | - Cousins second, third, or forth removed working for UCF  
- Relatives from a previous relationship that was dissolved |
### Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix

<table>
<thead>
<tr>
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<th>Examples</th>
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</tr>
</thead>
</table>
| Activities with a Foreign Entity | • Florida Statute 1012.977  
• DOD-3/20/19 Memorandum - Actions for the Protection of Intellectual Property, Controlled Information, Key Personnel and Critical Technologies  
• DOD- Sec. 1286 of the FY19 National Defense Authorization Act Initiative  
• DOE-Order DOE 0-486.1  
• DOE-Order DOE O 142.3A Change 2  
• NASA-Grant Information Circular 12-01A  
• NIH- NOT-OD-19-114 | • Engage in outside activities with a foreign entity that relate to your UCF area of expertise  
(Note: this includes activities conducted in the U.S. or outside the U.S.):  
• Agreement (verbal or written) to engage in collaborations (i.e. an agreement to publish an article or perform research tasks)  
• Community talks  
• Consultation with schools for programing  
• Developing and putting on workshops  
• Engaging in research  
• Honorary appointments  
• Organizing public lectures  
• Partnerships with agencies - volunteer  
• Presentations/Talks  
• Academic Program reviews for universities  
• Serving as a consultant  
• Serving as an officer | • You receive paid travel from a non-U.S. university  
• You provide services to a foreign entity and are compensated for those services  
• You are engaged in a foreign government talent program | • Investments made through the publicly traded stock markets or investment firms  
• Residences outside of the U.S.  
• Indirect financial interests (i.e. your spouses or parents’ financial interests)  
• Except for the personal inheritances and/or gifts identified in the “Disclose” column, do not disclose personal inheritances or gifts from family  
• Charitable donations that are unrelated to your area of expertise  
• Activities with entities incorporated in the U.S.  
• Activities funded by UCF  
• Activities through UCF (ex: An approved UCF travel acquisition request)  
• Presentations at U.S. government organized conferences  
• Contractual agreements through UCF  
• Discussions with potential collaborators  
• The following service-related activities:  
• Accreditation reviews  
• Adjudication (for performing arts)  
• Book reviews- paid and credit to use to purchase books from the publisher  
• Editing a journal/ also guest editing (one issue)  
• Editor of book (service in some disciplines research in others) |

**Question 12:**

(a) Do you engage in a compensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise?

(b) Do you engage in an uncompensated outside activity(ies) with a foreign entity that relates to your UCF area of expertise?

(c) Do you participate in a foreign government talent or recruitment program?

(d) Do you have a financial interest with a foreign entity that has not already been disclosed in 12(a)-(c)?

(Appplies only to employees engaged in research at UCF)
### Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix

<table>
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<tr>
<th>Outside Activities</th>
<th>Financial Interests</th>
<th>Potential Conflicts</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Serving as the chair/organizer/presenter for a conference session or program committee</td>
<td>- Serving on boards or commissions</td>
<td>- Serving on committees</td>
</tr>
<tr>
<td>- Serving on boards or commissions</td>
<td>- Visiting scholar</td>
<td>- Editorial boards where the only activity is book, grant, and/or journal reviews</td>
</tr>
<tr>
<td>- Visiting scholar</td>
<td>- Affiliation with a foreign government talent program</td>
<td>- Grant reviews - federal, foundations</td>
</tr>
<tr>
<td>- Affiliation with a foreign government talent program</td>
<td>- Ownership or financial interest in a non-U.S. business</td>
<td>- Journal reviews</td>
</tr>
<tr>
<td>- Ownership or financial interest in a non-U.S. business</td>
<td>- Receipt of salary, gratuity, or other compensation (includes gifts, donations and compensated travel) or remuneration from a foreign entity</td>
<td>- Promotion and/tenure reviews for other universities</td>
</tr>
<tr>
<td>- Receipt of salary, gratuity, or other compensation (includes gifts, donations and compensated travel) or remuneration from a foreign entity</td>
<td>- Personal inheritances or gifts from family that include an ownership or financial interest in a non-U.S. business or that relate to your UCF area of expertise (see above)</td>
<td>- Working with an international publishing company to publish a book/journal article</td>
</tr>
<tr>
<td>- Personal inheritances or gifts from family that include an ownership or financial interest in a non-U.S. business or that relate to your UCF area of expertise (see above)</td>
<td>- Serving as an expert witness in your area of expertise</td>
<td></td>
</tr>
</tbody>
</table>
Reporting Outside Activities, Financial Interests, and Potential Conflicts Guidance Document

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 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.