

**UNIVERSITY OF CENTRAL FLORIDA
POTENTIAL OUTSIDE ACTIVITY, EMPLOYMENT, AND CONFLICT OF INTEREST AND
COMMITMENT REPORT**

**For A&P, Adjunct Faculty, OPS, and USPS employees assigned to and/or supporting sponsored programs activities
& Students assigned to sponsored and non-sponsored research (as applicable).**

If you have more than one activity for each question, you will need to complete [a separate disclosure for each](#) activity.

<p>Employee: _____</p> <p>Select your employee type:</p> <p><input type="checkbox"/> A&P Employee</p> <p><input type="checkbox"/> OPS Adjunct Faculty</p> <p><input type="checkbox"/> OPS Temporary research personnel (other than Student) (See Page 6)</p> <p><input type="checkbox"/> Student</p> <p><input type="checkbox"/> USPS</p> <p>Department/Institute/Center: _____</p>	<p align="center">Select type of disclosure:</p> <p><input type="checkbox"/> <u>New</u> annual disclosure</p> <p><input type="checkbox"/> <u>Amendment</u> to disclosure</p> <hr/> <p align="center">Reporting Period:</p> <p align="center"><u>CY January 1, 2013</u> through <u>December 31, 2013</u></p>
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PURPOSE:

UCF has established policies and procedures to identify and properly manage potential conflicts of interest that may be associated to non-faculty university employees who are engaged in sponsored program activity and students engaged in sponsored and non-sponsored research. Such procedures are intended to increase awareness of the fact that potential conflicts of interest (COI), including financial, and conflicts of commitment (COC) shall be avoided while carrying out their professional work, including participating in research efforts at UCF. Any reported and/or identified potential conflict shall be avoided or properly managed. UCF operates within a frame-work regulated by state and federal requirements. State and federal laws and regulations have been developed to define the governing and monitoring requirements for the handling of conflicts of interest involving significant financial interests, outside activities or conflicts of commitment. This form conforms to federal regulations relating to financial conflicts of interest; Florida Statutes; policies of the Board of Governors (BOG) and the University of Central Florida (UCF).

For purposes of this COI & COC disclosure form, any university A&P, Adjunct Faculty, OPS and USPS employees (“DISCLOSER”), who is directly assigned to and/or is administratively supporting a sponsored project or related activity is required to complete a COI & COC disclosure form. In addition, any student enrolled at the university (*undergraduate, graduate and doctoral*) is subject to COI reporting, whether or not he/she is engaged in sponsored program activity if any of the two criteria listed below applies: the student is assigned to sponsored program activity and the Principal Investigator and/or any Co-Principal Investigator of the sponsored project determines that the student is involved in the **design, conduct or reporting** of research; or the student has a financial interest, is involved in any activity or has an affiliation with an external entity that might be considered or perceived as a conflict of interest in regard to a company providing funding to UCF. Other criteria may apply and the ORC’s Director of Compliance and the COI Office staff will assess each student’s specific situation (on a one-to-one basis).

The purpose of the required submission of COI & COC disclosure by the UCF employee is to ensure that no unresolved conflict(s) involving their financial interests or primary university commitments and outside activities exists among employees holding employment classifications as defined above.

Information provided by DISCLOSERS under this COI & COC disclosure form will allow their supervisors in conjunction with the ORC’s Office of Compliance / Conflict of Interest Office (COI), to determine whether a potential conflict exists so that they may manage or eliminate such conflict. If a potential conflict that could directly and significantly affect the design, conduct or reporting of the research is identified upon review by your supervisor or other appropriate university officials, the DISCLOSER will be notified and the conflict must be resolved. This revised CY2012 COI disclosure form incorporates mandatory changes established by new federal financial conflict of interest regulations that became effective on August 24, 2012. For additional details, access: http://grants.nih.gov/grants/policy/coi/fcoi_final_rule.pdf.

The COI & COC’s disclosure form must be completed on an annual basis, regardless of whether or not the employee or student has any significant financial interests, outside activities, or commitments to report. Any changes occurring during the COI reporting period must be disclosed via an **Amendment**, using this same form by selecting “**Amendment to Disclosure**” under section “type of disclosure” located at top of this page. Notification of any change(s) to the disclosure shall be submitted immediately after identification, and **no later than 30 days** of discovering, acquiring, or committing to a new financial interest or commitment.

If you have any questions regarding the non-faculty COI disclosure process at UCF, please contact the COI Office staff at coi@ucf.edu.

Refer to Pages 4-5 for a description of most relevant definitions and criteria applicable to the content of this form.

[Information on COI policies, regulations, and requirements is available at http: www.coi.ucf.edu.](http://www.coi.ucf.edu)

1. During the reporting period do you or your Immediate Family have a financial interest related to your Institutional responsibilities, in a publically or non-publically traded entity in the form of remuneration and/or equity interest, that when aggregated, equals or exceeds \$5,000? {See reporting exclusions} (New employees should report remuneration and/or equity interests received in the last 12 months and during the current reporting period)

Yes No

2. During the current reporting period have you been reimbursed, either directly or on your behalf for any extramural travel that is related to your institutional responsibilities? [See reporting exclusions] (New employees should report the value of extramural travel (paid directly to you or on your behalf) in the last 12 months and during the current reporting period).

Yes No

3. Will the value of intellectual property rights (e.g. patents, copyrights, trademarks), upon receipt of income to you and/or your immediate family, during the reporting period, equal or exceed \$5,000 [See reporting exclusions] (New employees should report intellectual property rights received in the last 12 months and during the current reporting period).

Yes No

4. During the current reporting period, 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, in carrying out any outside activity?

Yes No

5. During the current reporting period do you intend to use other university resources (e.g., equipment, facilities, supplies) or services (including information technology resources) in carrying out any outside activity? You **do not** need to report incidental use of such resources.

Yes No

6. During the current reporting period will you hold or do you expect to run for political office?

Yes No

7. During the current reporting period do you intend to commit university resources (i. e. personnel, materials and supplies, equipment use, departmental or project funds) to purchase goods and services from or provide services to any entity in which you or your Immediate Family are an officer, partner, or proprietor of the entity, have a material interest (direct or indirect ownership) of 5% or more of the total assets or capital stock of any business entity, and/or hold any employment or contractual relationship with the entity? You must report proposed subcontract SBIR/STTR sponsored funding activity to the university from any entity owned or managed by you and/or your Immediate Family members.

Yes No

8. Are you performing an outside activity in excess of your assigned teaching, research, and/or service responsibilities that could lead a person to believe that a conflict may exist, or that you otherwise wish to report, (e.g: consulting activities, board membership, expert witness, company officer? If you are an independent consultant, please indicate "Independent consultant" in the description of the activity and the name of each entity you are performing consulting services for.

Yes No

Note: For any question answered "yes", please attach the completed Additional Information page(s). Do not forward this form for signatures by reviewers on page 3 until the required additional information has been added. Please contact the COI Office staff at coi@ucf.edu or 407.882.1126 if you have any questions.

Certification:

I certify that the fYgdcbgYgdfcj]XYX'UWcj Y'UFYUWWW fUH'lc'h Y'VYghcZa mi_bck `YX[Y"=Ugc WffhZnh UhfjZUdd`VUV`Yc.outside employer(s) or recipient(s) of services understand that I am engaging in such outside activity as a private citizen, not as an employee, agent, or spokesperson of the university. I further certify that the statements and disclosures provided herein are current, accurate, and complete, and understand that any false or misleading representations may result in disciplinary action and/or termination of my employment.

Signature _____
 (Manual signature required)
 Telephone: _____

Print Name: _____
 Date: ____/____/20____
 E-mail: _____

 **Additional signatures are required for the completion of this form. See page 3.**

REMINDER TO THE DISCLOSER

- If you have more than one activity for each question, you will need to complete a separate disclosure for each activity.
- If all responses are "NO" to questions 1-8, please forward this form to your immediate supervisor (as Reviewer # 1) in order to initiate its internal review process.

THIS SECTION IS TO BE COMPLETED BY REVIEWERS ONLY

Reviewer # 1: {Discloser's direct supervisor}

- No conflict
- Conflict identified: Monitoring Plan & Request for an Exemption/Disclosure required
- Unapproved conflict (Please provide details below)

Comment(s):

Signature: _____
 Print name: _____
 Title: _____ Tel: _____
 Dept/College/Institute/Ctr: _____ Date: ____/____/20__

Reviewer # 2: {Supervisor of Discloser's direct supervisor}

- No conflict
- Conflict identified: Monitoring Plan & Request for an Exemption/Disclosure required
- Unapproved conflict (Please provide details below)

Comment(s):

Signature: _____
 Print name: _____
 Title: _____ Tel: _____
 Dept/College/Institute/Ctr: _____ Date: ____/____/20__

ORC/COI Regulatory Review

- No conflict
- Conflict identified: Monitoring Plan & Request for an Exemption/Disclosure required
- Unapproved conflict (Please provide details below)

Comment(s):

Signature: _____ Print name: _____
 Title: _____ Date: ____/____/20__
 Tel: _____

DEFINITIONS

Federal Conflict of Interest Criteria

A potential conflict of interest exists when a university employee's **Significant Financial Interest** (*anything of monetary value including salary, equity interests, and/or intellectual property rights*) could directly and significantly affect **the design, conduct or reporting of the research**. (See [National Institutes of Health Responsibility of Applicants for Promoting Objectivity in Research 42 CFR, Part 50.602, Part 50.603, and Part 50.604](#), [National Science Foundation Proposal & Award Policies and Procedures Guide, Part II, Chapter IV. A, Grantee Standards](#), and [U.S. Food and Drug Administration Financial Disclosure by Clinical Investigators 21 CFR, Part 54.1-3, and Part 54.4-6](#)). Under sponsored federal programs the potential conflict is between the investigator's personal financial interests and their ability to perform objective research. This criteria also applies to any other project participant involved in the design, conduct or reporting of the research.

Florida State Conflict of Interest Criteria

State of Florida statutes ([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.

Florida State Standards of Conduct ([FL Statute 112.313](#)). The State of Florida outlines standards of conduct for public officers and employees. Under Florida State statute the potential conflict is between the faculty member's private financial interests and their public responsibilities to the State. Three of the standards apply to outside activity that may create a conflict of interest. To assist with your review the three standards have been summarized within the context of university employment:

(1) **Doing business with the university** (*FL Statute 112.313(3)*)--A university employee cannot purchase goods or services from any entity of which the employee (or employee's immediate family) has an equity position and/or serves as an officer, director or other managerial position. A university employee cannot sell goods and services to the university from an entity in which the employee (or employee's immediate family) has an equity position and/or serves as an officer, director or other managerial position; (2) **Unauthorized Compensation** (*FL Statute 112.313(4)*)--A university employee (or employee's immediate family) cannot accept any compensation, payment or thing of value, when the employee knows or with the exercise of reasonable care, should know, that it (compensation, payment or thing of value) was given to influence the employee's actions in his or her employment capacity; (3) **Conflicting Employment or Contractual Relationship** (*FL Statute 112.313(7)*)--A university employee cannot purchase goods or services from any entity of which the employee (or employee's immediate family) has an equity position and/or serves as an officer, director or other managerial position. A university employee cannot sell goods and services to the university from an entity in which the employee (or employee's immediate family) has an equity position and/or serves as an officer, director or other managerial position.

Other relevant definitions

Conflict of Interest (COI): Means 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 decision are influenced or determined by considerations other than the best interest of the university.

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

Consulting: The use of scholarly or scientific expertise for the benefit of organizations outside of the university in return for compensation.

Covered clinical study: Covered clinical study means any study of a drug or device in humans submitted in a marketing application or reclassification petition subject to this part that the applicant or FDA relies on to establish that the product is effective (including studies that show equivalence to an effective product) or any study in which a single investigator makes a significant contribution to the demonstration of safety. This would, in general, not include phase I tolerance studies or pharmacokinetic studies, most clinical pharmacology studies (unless they are critical to an efficacy determination), large open safety studies conducted at multiple sites, treatment protocols, and parallel track protocols. An applicant may consult with FDA as to which clinical studies constitute "covered clinical studies" for purposes of complying with financial disclosure requirements.

Entity: Means any corporation, partnership, limited partnership, proprietorship, firm, enterprise, franchise, association, self-employed individual, or trust.

Immediate Family: For purposes of outside activity and potential conflict of interest and commitment reporting, immediate family shall refer to the investigator's spouse and dependent children.

Incidental use: Refers to use of university resources (e.g., equipment, facilities, supplies) that causes no more than normal depreciation of the resource and does not result in added expenses accruing to the university.

Institutional responsibilities: Refers to 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 committees or review panels, and any other activity assigned by the employee's supervisor in accordance with university policies.

Investigator: Project director (PD) or Principal Investigator (PI) and any other person, regardless of title or position 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.

Manage: Means taking action 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.

Non- Publicly traded entity: Means a privately owned company. A privately owned company is different from a publicly traded company in that its stock is not traded on public exchanges like the New York Stock Exchange, Nasdaq, American Stock Exchange, etc. Instead, shares of privately owned companies are offered, owned and traded privately among interested investors.

Outside Activity: 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.

OPS: (other than Students): include the following position classifications, among others: Programmer Analyst; Engineering Technician; Laboratory Manager or Technician; Engineer; Training Specialist and Research Manager.

Publicly traded entity: Means a public company, publicly traded company, publicly held company is a limited liability company that offers its securities (stock/shares, bonds/loans, etc.) for sale to the general public, typically through a stock exchange, or through market makers operating in over the counter markets. Public companies, including public limited companies, can be either unlisted or listed on a stock exchange depending on their size and local legislation.

Remuneration: Means reward; recompense; salary; compensation.

Research and Development: Research means 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 product development to include a diagnostic test or drug.

Significant management position: A position with a legal entity that ascribes to the incumbent the authority to make decisions that will determine whether or not the entity will or will not do business with the University of Central Florida.

Unauthorized Compensation: (FL. Statute 112.313(4)): A university employee (or employee's immediate family) cannot accept any compensation, payment or thing of value, when the employee knows or with the exercise of reasonable care, should know, that it (compensation, payment or thing of value) was given to influence the employee's actions in his or her employment capacity.