

POLICY TITLE: Disclosure of Outside Activities and Financial Interests

POLICY: The University requires the annual completion of the Disclosure of Outside Activities and Financial Interests form by all paid UF employees, to include OPS, TEAMS, USPS and academic personnel in accordance with the policy.

APPROVING AUTHORITY: Dean, UF College of Dentistry

CUSTODIAN: Director of Human Resources

DEFINITION/S:

- “Outside activity” shall mean any private practice, private consulting, employment, teaching, research, business (including managerial interests or positions), or other activity, compensated or uncompensated, which is not part of the employee’s assigned duties and for which the University provides no compensation.”
- “Conflict of interest,” shall mean:
 - (1) Any conflict between the private interests of the employee and the public interests of the University of Florida or the State of Florida, including conflicts of interest specified under Florida Statutes; or
 - (2) Any outside activity or financial interest which interferes with the full and faithful performance of the employee’s professional or institutional responsibilities or obligations, including but not limited to conflicts of commitment.

REFERENCE/S:

- (1) UF Regulation 6C1-1.011
(<http://regulations.ufl.edu/wp-content/uploads/2012/09/1011.pdf>), the definitions of “outside activity” and “conflict of interest”
- (2) Disclosure Form/Instructions:
http://www.generalcounsel.ufl.edu/downloads/coi_appendices/AppendixB2.pdf
- (3) Use of University Equipment Form/Instructions:
<http://generalcounsel.ufl.edu/media/ufledu/content-assets/generalcounselufledu/documents/AppendixB6.pdf>
- (4) <http://generalcounsel.ufl.edu/media/generalcounselufledu/documents/COI.pdf>

PROCEDURE/S:

1. Employees are responsible for disclosing any activity or interest in which the appearance of a conflict could arise between the individual's employment with the university and the requested activity. The employee's supervisor and designated college administrators are responsible for reviewing each request to determine if the activity or interest is permitted (with or without manageable conditions, monitoring plan, etc.) or not permitted.
2. An employee's failure to report activities or financial interests could result in disciplinary action, fines, etc. as indicated in UF Regulations, as outlined in Reference one (1).
3. An employee must complete the form at least two weeks prior to the event/outside activity and receive approval from his/her supervisor and the dean. The required form and instructions can be found online in Reference two (2). In some cases, this may also require the review of the UFCD Office of Research (research-related circumstances) and other external offices, to include the HSC Self-Insurance Program Office, UF Purchasing Division or the UF Office of Research and Graduate Education. These reviews would take place after the dean has reviewed the request; the College's Human Resources Office will route to the appropriate office after the dean has completed the review.
4. Copies are maintained in the Dean's Office, Office of Research (when applicable) and in the employee's personnel file.
5. Questions related to the policy or completion of the Disclosure of Outside Activities and Financial Interests form should be directed to the employee's supervisor or the College's Human Resources Office.
6. If activities are completed during the typical work schedule of Monday-Friday, 8:00 am to 5:00 pm, annual leave must be used. Some examples include (though, not a complete list): receiving an honorarium for a speaking engagement in excess of travel expenses, teaching at another institution, consulting, and employment as an expert witness (this requires an additional review by the HSC Self-Insurance Program Office prior to approval). An exception to this rule regarding an honorarium occurs when an honorarium is surrendered to the University of Florida; in this case, vacation leave would not be required.

7. It is recommended that an Outside Activity form be filed for service as a grant reviewer for any national grant funding agency that involves travel. A travel authorization request should also be submitted prior to the actual travel to ensure that the individual is covered for University of Florida business. It is not required that annual leave be taken and any honorarium received does not need to be returned to UF.
8. Activities that involve employee's waiving their rights to intellectual property must be approved by the department chair, Associate Dean for Research, Dean and then must be authorized by the UF Office of Research and Graduate Education. Complete instructions are found in Reference four (4).
9. An employee may request permission to use University equipment, facilities or services of other staff in connection with an outside activity; however, an additional request form must accompany the Disclosure Form and must be approved prior to engaging in the outside activity. This information is also found in Reference three (3).
10. An outside activity could also include a potential conflict in time commitment with the individual's university employment, even with no financial gain.
11. Employees must ensure that the outside employer/recipient of services understands the employee is engaging in the activities as an individual and not on behalf of the University.