Disclosure of an Outside Interest or Activity

[Disclosure Form begins on page 4]

Overview: Per the OM Chapter 18: Conflicts of Commitment and Interest policy, a conflict exists whenever personal, professional, commercial, or financial interests or activities outside of the University have the possibility (either in actuality or in appearance) of: 1) interfering with UI employees’ ability to fulfill their employment obligations; 2) compromising a faculty or staff member’s professional judgment; 3) biasing research or compromising, or giving the appearance of compromising, the sound professional judgment of its investigators; or 4) resulting in personal gain for the employee or employee’s immediate family, at the expense of the University and/or the state. Because of this, UI employees have the obligation to disclose outside professional activities that pose or have the potential to pose a conflict of commitment or a conflict of interest in the workplace.

Multiple University policies govern various forms of conflicts of interest. For more information please see the respective policies:

- Research: https://research.uiowa.edu/coi/
- Employment-Nepotism: http://www.uiowa.edu/hr/administration/conflict.html
- Purchasing: http://www.uiowa.edu/purchasing/policy/coi.htm
- UI Health Care Conflicts of Interest: http://www.uihealthcare.org/ConflictofInterest/

Conflicts of Commitment and Conflicts of Interest in the Workplace (18.4 and 18.5):

The following form should be used when disclosing conflicts of commitment and conflicts of interest in the workplace. Effective January 2014, a consolidated online disclosure system will be available to comply with the annual reports required by the COI-Research, UI Health Care COI, Conflicts of Commitment and COI-Workplace policies. Until that time, this form should be used as a template.

To clarify the distinctions:

A. Conflicts of Commitment pertain to time and effort, and addresses situations “in which a faculty member (including administrators with faculty appointments) engages in an ‘external activity’ which requires time and/or effort such that the activity interferes, or appears to interfere, with fulfillment of the faculty member’s obligations to the University.” Generally these activities require someone to be physically absent from their place of employment or dedicated to the pursuit of outside interests during “business days.” Faculty members are encouraged to actively participate in external activities, but must also ensure that the activities do not compromise their ability to fulfill university duties. In general, the time allotted to external activities in lieu of university obligations and excluding “academic activities,” should
not exceed **nine business days per academic term** (i.e., Fall, Spring, and Summer session for fiscal year appointments).

Many external activities are an expected part of a faculty member’s academic portfolio and do not require disclosure as a potential conflict of commitment **unless** the commitment of time interferes with University responsibilities. Examples of academic activities not requiring disclosure include, but are not limited to:

1. Holding office in, or undertaking an editorial office or duties for a scholarly journal, academic press, or professional organization;
2. Serving as a referee for a scholarly journal or an academic press;
3. Serving on a professional review board or peer review bodies;
4. Attending or presenting at professional meetings, workshops, colloquia, symposia, seminars, or training programs;
5. Visiting other sites in connection with accreditation, audits, sponsored project reviews, research, or like activities;
6. Writing or producing academically related books, articles, software and similar materials, or other creative works ordinarily considered in decisions relating to the employee’s employment status or salary;
7. University-related public engagement; or
8. Participating in outside non-professional activities **unless** the time devoted requires a substantial commitment of a faculty member’s time.

**B. Conflicts of Interest in the Workplace** involve “situation[s] in which faculty, staff, or student employees have significant financial or other personal considerations that may compromise, or have the appearance of compromising, their professional judgment or integrity in teaching, conducting or reporting research, or performing other University obligations.” Examples of conflicts of interest in the workplace include, but are not limited to:

1. Owning or acquiring a financial interest in, holding a position in, or having a consulting or other relationship with, any non-university entity that supplies goods, services, or finances to the University when the employee has decision-making authority for those transactions (see also 11.14 Conflict of Interest-Purchasing);
2. Promoting or providing information about goods or services to the University community when the employee or his or her immediate family has a financial interest in or other-relationship with the relevant business entity (see also 17.17(3) Royalties from Course Materials);
3. Assuring or accepting any non-University duties requiring, or appearing to require, the use of University data, processes, procedures, or proprietary or confidential information (see also 17.17(1) Use of University Supplies);
4. Assigning duties or offering employment to another faculty or staff member to participate in or benefit the assigning employee’s outside professional activity;
5. Assigning duties or offering employment related to the assigning employee’s outside professional activities to a student, when the student is enrolled in a course being taught by the employee or the student's academic work (including work as a teaching or research assistant) is being supervised by the assigning employee;
6) Teaching a University course for academic credit that includes a member of employee’s immediate family or a person with whom the instructor has a relationship that may compromise, or have the appearance of compromising, his or her professional judgment (see also II-5 Consensual Relationships Involving Students).

C. Other Conflicts of Interest Policies: For matters related to conflicts of interest in employment (nepotism), research, health care, purchasing, and/or start-up companies, please see respective UI policies and procedures below.

- Research: https://research.uiowa.edu/col/
- Employment – Nepotism: http://www.uiowa.edu/hr/administration/conflict.html
- Purchasing: http://www.uiowa.edu/purchasing/policy/coi.htm
- UI Health Care Conflicts of Interest: http://www.uihealthcare.org/ConflictofInterest/
- Start-up Companies:

If you have questions about the Conflicts of Commitment and Interest Policy, contact Diane Finnerty, Office of the Provost, via email (diane-finnerty@uiowa.edu) or phone (335-3991).
Disclosure of an Outside Interest or Activity Form

PERSONAL INFORMATION

Name: _______________________________ Position: _______________________________

Department/Unit: __________________________ College: __________________________

Today’s Date: ____________________________

Please provide the information requested below for each activity that you believe poses or may appear to pose a conflict to the fulfillment of your University responsibilities according to the UI Conflicts of Commitment and Interest Policy (http://www.uiowa.edu/~our/opmanual/ii/18.htm). Please submit additional forms for each disclosure.

- Section A. for questions related to conflicts of commitment (full-time faculty and administrators with faculty appointments);
- Section B. for questions related to conflicts of interest in the workplace (all UI employees);
- Section C. should be completed by all people submitting this form.
- For disclosures related to conflicts of interest in research, purchasing, or employment (nepotism), or UI Health Care, please see respective offices.

A. CONFLICT OF COMMITMENT DISCLOSURE (OM 18.4) (Required of full-time regular faculty and administrators with faculty appointments)

1) Do you plan to perform an outside professional activity with a non-university entity (excluding “academic activities” considered part of a faculty member’s professional portfolio) that will interfere or appear to interfere with fulfillment of your University obligations (e.g., requires you to be absent on a “business day” or during a scheduled class time or office hours; involves a position with fiduciary responsibilities). _____ Yes _____ No

a. If Yes, please provide additional information:
   - Name of outside entity/organization to which service will be provided:
   - Anticipated start and end dates: __________________________
   - Total anticipated “business days” that will be dedicated to activity: _________
   - Will you receive compensation for this activity? _____ Yes _____ No
     - If yes, type: ___ compensation, ___ expenses only, ___ expenses and compensation, ___ other.
   - Description of the activity:

b. Will you take vacation or use unpaid leave to conduct these activities?
   _____ Yes _____ No

c. If no vacation or unpaid leave will be used, what arrangements have you made to fulfill your work responsibilities while away from campus?
B. CONFLICT OF INTEREST in the WORKPLACE DISCLOSURE (OM 18.5) (For all UI employees)

1) Do you or a member of your immediate family have a financial interest with a non-UI entity that may compromise, or have the appearance of compromising, your professional judgment in performing your University duties (e.g., you own stock/stock interests in a company that is doing or hoping to do business with a unit within which you have business decision-making responsibilities, you are employed at an outside entity such that a referral to that entity could generate a personal benefit to you or a member of your immediate family; you receive/have potential to receive licensing income from a product used by the UI)? _____ Yes _____ No

If yes, please complete the following questions for each relevant entity:

a. If yes, enter name of entity with which you or an immediate family member has a financial interest related to your University duties: ______________________ ______________________

b. Please check all that apply to your relationship with this entity:
   - Stock, Stock Options, or Other Ownership Interests (does not include income from investment vehicles, such as mutual funds and retirement accounts, as long as you do not directly control the investment decisions)
   - Compensation (self or family member)
   - Licensing/Royalty Income
   - Fiduciary Responsibility
   - Other: ____________________________________________

c. What is the total amount of financial interests with this entity?
   - $5,000 or less
   - Greater than $5,000

d. Please explain the way in which this financial interest may pose or appear to pose a conflict of interest in conducting your University duties (check all that apply):
   - I participate in decision-making on behalf of the University related to this entity’s products/services (e.g., purchasing decisions; referral of students to a service of the entity),
   - I participate in research sponsored by this entity or evaluate its products/services in my research,
   - I use or prescribe products, medical devices, implants, or equipment manufactured or distributed by this entity,
   - I use this entity’s products/services in my teaching,
   - I use this entity’s products or services on behalf of the University,
   - I use my professional expertise/knowledge in my service to this entity,
   - Other - please describe:

2) Do you have any other relationships or outside activities that may create a real or perceived conflict of interest or commitment in the performance of your University responsibilities (e.g., teaching a member of your immediate family; employing a supervisee or student in an outside business in which you or an immediate family member have an interest). _____ Yes _____ No

a. If yes, please describe below the nature of the potential conflict of interest.
b. Which of your university duties is relevant in this situation?
   - Teaching
   - Research
   - Purchasing decisions
   - Business decisions
   - Use of University resources
   - Patient care
   - Other - please describe:

C. COMPLETING THE Disclosure FORM

Please attach any additional information to this form and submit to your supervisor/DEO or equivalent. Your DEO/supervisor will review the disclosure with the Associate Dean for Faculty (for faculty) or the Senior HR Representative (for staff), to determine if the development of a Management Plan is necessary.

Employee Signature: ____________________________  Date: ____________

D. FOR DEO/SUPERVISOR

If the disclosure pertains to Conflicts of Commitment:
   - I have reviewed the Disclosure of an Outside Interest or Activity form and believe that a further review and/or Management Plan is/is not needed (please circle).

If the disclosure pertains to Conflicts of Interest in the Workplace:
   - I have reviewed the Disclosure of an Outside Interest or Activity form and have forwarded the disclosure to the Associate Dean for Faculty (if for faculty) or to the Senior HR Representative (if for staff) with my recommendations.

DEO/Supervisor Signature: ____________________________  Date: ____________

E. FOR ASSOCIATE DEAN FOR FACULTY/SENIOR HR REPRESENTATIVE

I have reviewed the Disclosure and consulted with appropriate parties and I have determined that:
   - No further action is needed.
   - An actual/potential conflict exists and a Management Plan is required.
   - The behavior is prohibited by University policy and employee has been informed accordingly.

If a Management Plan is required, please send copies to the employee, supervisor/DEO, and place in employee’s personnel file.

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