

Policy Number: UFCD, HR, 1.08
Effective Date: February 2014
Last Revised Date: October 2021
Next Review Date: October 2022
Policy/Guideline Custodian: Director, HR
Category: Human Resources

Title

Disclosure of Outside Activities and Financial Interests

Policy

The University of Florida encourages its employees to engage in activities supporting their professional growth, creating new knowledge and ideas, and furthering the university’s mission of excellence in education, research, and service. University employees’ primary professional obligation, however, is to act in the best interest of the University and to maintain the highest ethical and professional standards. A university employee’s outside activities or interests must not conflict, or appear to conflict, with their professional obligations to the University of Florida. Accordingly, this policy establishes standards and requirements to protect the university’s financial wellbeing, reputation, and legal obligations and provides a system for identifying, reporting, and managing real or apparent conflicts.

Definitions

- **Outside Activity:** any paid or unpaid activity undertaken by an employee outside of the university which could create an actual or apparent Conflict of Commitment or Conflict of Interest. Outside Activities may include consulting, participating in civic or charitable organizations, working as a technical or professional advisor or practitioner, or holding a part-time job with another employer.
- **Conflict of Interest:** occurs when a University employee’s financial, professional, commercial or personal interests or activities outside of the University affects, or appears to affect, their professional judgement or obligations to the University.
- **Conflict of Commitment:** occurs when a University employee engages in an Outside Activity, either paid or unpaid, that could interfere with their professional obligations to the University.
- **Financial Interest:** Any monetary or equity interest held by or inuring to an employee or their immediate family member which would create an actual or apparent Conflict of Interest.

- Immediate Family Member: an employee’s spouse, domestic partner, child or stepchild, parent, parent-in-law, sibling, and anyone sharing the employee’s household (other than a tenant or employee).

References

- 1) [UF Regulation 6C1-1.011](#) Disclosure and Regulation of Outside Activities and Financial Interests
- 2) [Conflict of Commitment and Conflict of Interest Policy](#)
- 3) [UFOLIO Disclosure System](#)
- 4) [Disclosure Form/Instructions](#)
- 5) [UF Intellectual Property Policy](#)
- 6) [Request to Use University Equipment, Facilities and Services in Conjunction with Non-University Outside Activity](#)

Procedures

1. Disclosure of such activities is required prior to engaging in new outside activities or receiving new financial interests, as well as whenever there are changes in outside activities and financial interests that have been approved previously.
 - a. Faculty, Adjuncts and Postdoctoral Associates: All faculty at 0.26 FTE and above must complete a UFOLIO online disclosure yearly. Disclosure is required if no activities are disclosed, or if you propose to engage in any outside activity or have a potential conflict of interest. Faculty at 0.25 FTE and below must complete the Disclosure of Outside Activities and Financial Interests Form only if requesting to engage in such activity. You must disclose and receive approval from the College of Dentistry prior to engaging in such activities. Such notification must be done annually by July 1st.
 - b. Staff (TEAMS): High level TEAMS employees (Managers and above) will be required to complete a UFOLIO online disclosure yearly. Disclosure is required if no activities are disclosed, or if you propose to engage in any outside activity or have a potential conflict of interest. All other TEAMS employees must complete the Disclosure of Outside Activities and Financial Interest Form only if requesting to engage in such activity.
 - c. Key grant personnel listed in UFIRST: All are required to complete UFOLIO online disclosure yearly. This includes courtesy faculty listed as key grant personnel in UFIRST.

- d. All other employee types (Residents, OPS, Graduate Assistants, etc): All other employees must complete the Disclosure of Outside Activities and Financial Interest Form only if requesting to engage in such activity.
2. 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.
3. 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 below.
4. An employee must complete the form at least two weeks prior to the event/outside activity and receive approval from their supervisor and the dean. The required online disclosure or paper form and instructions can be found in reference below. In some cases, this may also require the review of the UFCO Office of Research (research-related circumstances) and other external offices, to include the UF Conflict of Interest Program, 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/Conflict of Interest Office will route to the appropriate office after the dean has completed the review.
5. Records are maintained in the Dean's Office, Office of Research (when applicable) and in the employee's personnel file.
6. 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.
7. If activities are completed during the typical work schedule, 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.
8. It is recommended that a disclosure occur for those who are participating 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.
9. 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 references.
10. 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 references.

11. An outside activity could also include a potential conflict in time commitment with the individual's university employment, even with no financial gain.
12. 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.

Contact Information

Policy Contact:

Amanda Phelps, Director of Human Resources
aphelps@dental.ufl.edu

Important Dates

- Original Effective Date: February 2014, Approver: Dr. Boyd Robinson, Int. Dean
- Revision and Review: January 2017, Approver: Dr. A. Isabel Garcia, Dean
- Revision and Review: October 2021, Approver: Dr. A. Isabel Garcia, Dean