

## OUTSIDE ACTIVITIES AND DISCLOSABLE INTERESTS

Per [UF COI and COC Policy](#)\*, UF employees must request approval prior to participating in select outside activities (Pre Approval Request, “PAR”) and report actual Disclosable Interests related to their area of expertise on their Disclosure Profiles. This extended guide explains the disclosure requirements for outside activities and financial interests, when employees must submit a PAR and how to keep the Disclosure Profile up-to-date.

Consult one-page Guide to [What and When to Disclose](#) for a quick reference sheet on this topic.

\* For in-unit faculty, the current Article 26 applies until bargaining concludes. In-unit researchers must also complete and certify a Disclosure Profile of their Disclosable Interests in eDisclose (see Disclosable Interests and Disclosure Profile sections below).

### WHAT IS AN OUTSIDE ACTIVITY AND WHEN DO I HAVE TO REQUEST PRE APPROVAL FOR ONE?

An *Outside Activity* means any activity not directly associated with the fulfillment of an employee’s Institutional Responsibilities. Under the new [UF COI and COC Policy](#), employees only need to request approval prior to engaging in any Outside Activities when:

- (a) the outside entity does business with the university; or
- (b) involves any use of university employees, students, facilities, equipment or other resources (more than incrementally).

In addition, employees must request approval in advance for these circumstances:

- *Textbooks and Classroom Works*: Works for which employee will receive anything of monetary value and will require students to purchase such works.
- *Public Office*: plan to be a candidate or hold public office.
- *Expert Witness*: plan to serve as a witness or reviewing documents for a legal matter where the university, its employees or board members (in the course and scope of their university positions), UF Direct Support Organization (DSO), UF Health or UF affiliate is a party or in a medical matter.
- *Contracts with intellectual property terms* that do not include the university-provided [Intellectual Property Rider](#).
- *Innovation Inducement Prizes* if participating as an Outside Activity.

#### HOW DO EMPLOYEES SEEK PRIOR APPROVAL FOR AN OUTSIDE ACTIVITY?

For **in-unit faculty**, the current [Article 26](#) applies until bargaining concludes. This means in-unit faculty must:

1. Continue to submit DOI forms via **UFOLIO** to receive prior approval.
2. Submit a DOI for each Outside Activity related to Institutional Responsibilities, as outlined in Article 26.
  - a. Note: the limitations described above (e.g. not needing to seek prior approval if the university-provided IP rider is utilized with a consulting agreement) do not apply to in-unit faculty at this time.
3. Resubmit a DOI upon expiration of your approval, even if there is no change in circumstances.

**Out-of-unit employees** will now submit a PAR forms via **eDisclose** to request approval for an activity or interest. A PAR does not expire once approved; employees therefore do not need to ask permission for the outside activity or interest again, unless there is a significant change.

#### WHO REVIEWS A PRE APPROVAL REQUEST (PAR)?

The direct supervisor and COI program will review. If the PAR is to provide expert witness testimony related to a medical matter, the Self Insurance Program (SIP) will also review the PAR.

#### WHAT ARE DISCLOSABLE INTERESTS?

[UF COI and COC Policy](#)\* requires UF employees to report these Disclosable Interests: *equity, consulting or other professional services, intellectual property rights, divestiture and cash payout, sponsored or reimbursed travel, board service, outside employment, other appointments, and innovation inducement prizes.*

1. **Equity:** employee or a member of household have equity, including stock, stock options or other ownership interest in a publicly traded or privately held company, where the ownership interest reasonably appears to be related to the employee's Inside Activities or Institutional Expertise (excludes investments from mutual funds such as in a 401K). **Examples:**
  - Ownership interest in a startup company
  - Own a legal consulting company
  - Conduct research sponsored by the company while holding stock in the company

- Consultant for the company and receive a percentage of equity as compensation
2. *Consulting or other professional services:* provide professional services to an outside Entity in the area of the employee's Institutional Expertise. *Institutional Expertise* means an employee's expertise in their university discipline or area of Institutional Responsibility. **Examples:**
    - Consulting for an outside entity, such as advisory, scientific advisory board, or expert witness services
  3. *Intellectual property rights:* if you receive royalties, licensing fees, and/or copyright income from a non-UF entity in excess of \$5,000 over 12 months. **Examples:**
    - Receiving licensing fees of more than \$5,000 annually from a non-UF entity
  4. *Divestiture and cash pay-out: sale of equity or other ownership interest*  
**Example:** Receiving payment in the buyout of a startup company.
  5. *Sponsored or Reimbursed Travel:* Travel paid on behalf of the employee or reimbursed by a non-UF entity in excess of \$5,000 over 12 months
  6. *Board membership:* member of a board, to include private companies and nonprofit organizations. **Example:** Serving on the Board of Directors for a company
  7. *Outside employment:* Employment external to UF. **Examples:**
    - UF clinician and working as a temp on call for an external healthcare company
    - UF staff working at a business in a similar role to their UF job
  8. *Other appointments:* Compensated or uncompensated (e.g. positions, appointments, fellowships, or talent programs). **Examples:**
    - Adjunct teaching position at your former institution
    - Teaching an online course for another educational institution
  9. *Innovation Inducement Prizes:* competition, with a prize amount greater than \$5000, in the area of the employee's Institutional Expertise, if conducted as an Outside Activity. **Example:**
    - Participate in one's private capacity in competitions related to their Institutional Expertise that are distinct from grants, contracts, or gifts

- awarded in advance for proposed work or awarded to winners of competitions
- Includes challenge prizes by federal or non-profit agencies requiring the attainment, within a specific time frame, of specific material, technology translation, or commercialization goals

#### WHEN DO EMPLOYEES REPORT DISCLOSABLE INTERESTS?

Within 30 days of acquiring or discovering a disclosable interest, employees must update their Disclosure Profile via eDisclose to report the actual activity or interest while participating in the activity and/or receiving remuneration.

#### WHAT IS A DISCLOSURE PROFILE?

A *Disclosure Profile* is a form within eDisclose to report Disclosable Interests as they are acquired. Disclosure Profile must be current and accurate. Annual certification is required, even if there is nothing to disclose.

#### WHO REVIEWS DISCLOSURE PROFILES?

The direct supervisor reviews disclosable interests annually.

For researchers, if a disclosable interest meets the Significant Financial Interest (SFI) threshold, the COI program will also review the Disclosure Profile to assess whether there is a research Financial Conflict of Interest.

#### WHAT ACTIVITIES OR INTERESTS ARE NOT REQUIRED TO BE DISCLOSED?

Activities completed as part of UF Institutional Responsibilities do not qualify as Disclosable Interests. Examples of non-reportable activities:

- Required jury duty.
- Serving in the United States Armed Forces or other branches of the military.
- Signing an amicus brief when a university entity is not a party. When signing an amicus brief, an employee is permitted to state their position with the university but must make clear that they are signing the amicus brief solely in their personal capacity.
- Receiving honors, academic awards, or an honorary degree from a non-profit institution that are Cash Value Prizes and not Innovation Inducement Prizes.
- Taking Sabbatical or Professional Development Leave.

- Serving as a program manager for a United States federal agency or working on an assignment through the Intergovernmental Personnel Act or a similar federal program.
- Participating in the Fulbright (Scholar) Fellowship program.

See also Guide to [Understanding Institutional Responsibilities](#).