

## PRE APPROVAL REQUEST – SUPERVISOR REVIEWER

Supervisors review Pre Approval Requests in eDisclose prompted by a system email notification. To conduct the review, consider the following questions:

### 1. IS THE REQUEST FOR AN UNALLOWABLE ACTIVITY?

The <u>UF COI and COC Policy</u> prohibits: 1) Malign Foreign Talent Recruitment Programs and 2) Outside Research. If you identify one of these activities, deny the Pre Approval. The COI Program will then follow up with the discloser.

For additional assistance identifying a Malign Foreign Talent Recruitment Program, visit the <u>RISC website</u>.

For further clarification regarding what is considered Outside Research, consult <u>Guide to</u> <u>Outside Research Restrictions</u>.

If the discloser is a clinician, you must also consider the <u>UF College of Medicine – COI</u> <u>Policy and Covenant</u>.

#### 2. IS PRE APPROVAL REQUIRED?

Pre Approval Requests (PAR) are required only in limited circumstances (below). If a PAR is not required, request the discloser withdraw the PAR.

- a) Business with UF: Outside entity does business with the university.
- b) Use of UF Resources: Activity involves any use of university employees, students, facilities, equipment or other resources.
- c) Textbooks and Classroom Works: Works for which employee will receive anything of monetary value <u>and</u> will require students to purchase such works.
- d) Public Office: plan to be a candidate or hold public office.
- e) 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.
- f) Contracts with intellectual property terms that do not include the universityprovided Intellectual Property Rider.
- g) Innovation Inducement Prizes if participating as an Outside Activity.



# 3. DOES ANYTHING REQUESTED CREATE AN UNRESOLVABLE CONFLICT OF INTEREST OR CONFLICT OF COMMITMENT?

IF THE REQUESTED ACTIVITY PREVENTS THE EMPLOYEE FROM FAIRLY CARRYING OUT THEIR UF JOB OR RESULTS IN PERSONAL GAIN FROM THEIR PUBLIC JOB AS A UF EMPLOYEE, THAT IS A **CONFLICT OF INTEREST**.

If you identify a potential conflict of interest, request clarifications from the discloser. If in your discussions with the employee, they can alter their activities such that you are satisfied they can fairly carry out their UF position and they are not using UF resources or their UF position for personal gain, ensure the form accurately reflects these modifications and then recommend approval of the PAR.

If there is not a way for the employee to alter the activity such that the conflict of interest can be resolved, deny the PAR and explain the circumstances in the reviewer box. The COI Program will then receive the PAR for review.

IF A DISCLOSED INTEREST PREVENTS THE EMPLOYEE FROM EFFECTIVELY CARRYING OUT THEIR UF JOB DUE TO TIME CONSTRAINTS OR OBLIGATIONS TO THE OUTSIDE ENTITY, THIS IS AN UNRESOLVABLE **CONFLICT OF COMMITMENT**.

If you identify a conflict of commitment, request clarifications from the discloser. If in your discussions with the employee, they can reduce the time or alter the activities such that you are satisfied they can successfully carry out their UF position, proceed with recommending approval once the PAR form includes the modifications.

If there is not a way for the employee to alter their time commitment or the activity such that the conflict of commitment can be resolved, deny the PAR and explain the circumstances in the reviewer box. The COI Program will then receive the PAR for review.

#### SYSTEM NAVIGATION

For assistance navigating eDisclose, consult the eDisclose Resources website.