CONFLICT OF INTEREST & OUTSIDE ACTIVITIES

WHAT IS A CONFLICT OF INTEREST?
A conflict of interest is described in the university policy as a situation in which a person serves or represents two distinct entities or persons and must choose between two conflicting interests or loyalties. A university employee has a conflict when their outside activity or financial interest could potentially interfere with the employee’s professional obligations to the university.

WHAT IS AN OUTSIDE ACTIVITY?
An outside activity is a non-university activity that is not part of an employee’s university duties. Outside activities, include but are not limited to employment, consulting, service on boards, and business activities including managerial positions. Such activities should be reported and approved by the university prior to commencing the activity. In addition, all financial interests, including but not limited to stock, cash and Limited Liability Company (LLC) interests should be reported and approved by the university.

CAN A UNIVERSITY EMPLOYEE ENGAGE IN AN OUTSIDE ACTIVITY?
Yes, however, employees must recognize that their main responsibility is to the university. They may engage in outside employment, consulting, and similar activities which aid the dissemination of knowledge and expertise developed at the university and advance the professional competence of employees. Thus, participation in outside activities often serves the mission of the university in addition to benefitting employees.

WHAT DO I DO IF I HAVE A RESEARCH CONFLICT?
- **Contact the Division of Research Compliance** at 352-846-3533
- **Send an email** to the Division of Research Compliance at compliance@research.ufl.edu
- **Come in person** to the Division of Research Compliance – 460 Grinter Hall
- The university’s Conflict of Interest and Outside Activities Policy provides the forms required for approval of conflicts. The federal regulations require disclosure of significant financial interests through the use of the NSF disclosure form and the PHS disclosure form. For conflicts that are not associated with a research project, contact your supervisor.

WHAT IS THE DIFFERENCE BETWEEN A FLORIDA AND A FEDERAL CONFLICT?
Florida statutes provide that a university employee may not have a contractual, employment or financial relationship with a company which is doing business with the university. An exemption is provided which allows an employee to have such a relationship when the company licenses the employee’s technology from the university or when an employee is an investigator on a research contract between the university and the company. However, such exemptions are allowed only with prior review and approval. The exemption procedure is done through the Division of Research Compliance and the appropriate college.

Federal regulations require that the university manage, reduce, or eliminate any Financial Conflict of Interest (FCOI) involving certain compensated outside activities and financial interests of persons involved in research projects funded by the Public Health Service (PHS), the American Heart Association, the National Science Foundation and other organizations that adopt the PHS regulations. The university’s Conflict of Interest and Outside Activities Policy (http://www.generalcounsel.ufl.edu/downloads/COI.pdf) contains a detailed description of what constitutes a conflict under both the Florida and Federal regulations. The Researcher’s Handbook (http://research.ufl.edu/research/handbook.html) also provides helpful information concerning conflicts of interest.

WHAT CONFLICT TRAINING IS AVAILABLE?
The PHS conflict of interest regulation requires that all investigators in a PHS-funded project must complete FCOI training before engaging in the research. The university has established a specific FCOI training class that satisfies the PHS requirement that is accessed through myUFL > My Self Service > Training and Development > Request Training Enrollment, Course Number: DSR810.