

**UNIVERSITY OF FLORIDA
COLLEGE OF PUBLIC HEALTH AND HEALTH PROFESSIONS**

**GUIDELINES ON
CONFLICT OF INTEREST AND OUTSIDE ACTIVITIES**

The faculty of the College of Public Health and Health Professions (PHHP) must be committed to the College's mission of teaching, research, and service, and recognize that their primary professional responsibility is to the University. Under special circumstances, PHHP faculty may engage in outside financial interests, employment, consulting, and other similar activities, provided that such activities are approved in advance and do not result in conflicts with the employee's duties and responsibilities to the College and the University. PHHP faculty must pay particular attention to potential conflicts of interest in connection with industry in order to protect the integrity of professional judgments and to preserve public trust in service providers, researchers, administrators, teachers, and academic institutions. Therefore, the College has established these guidelines to define the boundaries regarding conflicts of interest and outside activities and to provide mechanisms to monitor these interactions.

Applicability of Guidelines

These guidelines apply to all PHHP faculty members, both part-time and full-time employees. This policy is supplemental to and does not supersede the University of Florida's policy regarding the disclosure of outside activities, financial interests, and conflict of interest, which is applicable to all University of Florida employees as set forth in University of Florida Regulation 1.011.

General Statement of Guidelines

All PHHP faculty members must become familiar with these guidelines and are expected to understand and adhere to them.

Basic Principles of Outside Consulting or Employment Activities

PHHP faculty are permitted to engage in outside financial interests, professional employment, consulting, and other similar compensated professional activities in addition to their PHHP employment provided that such activities:

- further the mission of the College, and
- do not conflict with the employee's duties and responsibilities to the College and the University.

Exempt are those activities that are not related to the faculty member's profession or discipline and that take place outside of regular business hours (8am to 5pm, Monday through Friday).

Parameters of Approval for Outside Activities

- (a) Outside consulting activities must be formalized in a written agreement between the parties and such written agreement must be submitted to the Department Chair and Dean with sufficient time (no less than 30 days) to review the agreement for adherence to University policies, procedures, and rules.
- (b) The faculty member must demonstrate how the outside activities further the mission of the College.
- (c) Activities must occur outside usual work schedule of 8am to 5pm Monday through Friday, or annual leave time must be taken. It is essential that times requested do not conflict with the faculty member's usual UF assignments. (Note: Annual leave time will not be required for service on NIH Study Sections and similar types of governmental peer review and professional service activities.)
- (d) All consulting activities must be permissible under applicable state and federal law and must have a limited time commitment (maximum of 80 hours annually).
- (e) Outside financial interests, employment, and consulting activities of PPHP faculty may be disallowed if they result in conflicts with the employee's duties, responsibilities, and obligations to the College as set forth in University of Florida regulations. It is the responsibility of the PPHP faculty to ensure that no outside financial interest, consulting, or employment agreement which he or she enters into violates any University of Florida regulations and policies or state and federal laws. Department Chairs are responsible for the initial evaluation of all Outside Activity requests and shall disapprove any such request upon a finding of any conflict of commitment. Outside Activity requests that are approved by the Department Chair will require final approval by the Dean.

Financial Parameters of Outside Activities

- (a) Payments for outside consulting activities must reflect Fair Market Value and generally may not exceed \$9,999 annually from all sources or \$5,000 from a single entity.
- (b) Federal regulations define remuneration of \$10,000 or more as a "Significant Financial Interest." Approval to engage in activities with remuneration of \$10,000 or more requires University as well as College approval and the completion of additional forms and processes as dictated by federal regulations (University Rule 6C1-1.011).
- (c) Outside employment activities associated with research funded by the Department of Veterans Affairs will be treated on a salary substitution basis wherein the employee's UF salary will be reduced by the salary amount provided by the Department of Veterans Affairs.

Disclosure and Notification

- (a) PPHP faculty wishing to engage in activities or hold financial interests that are required to be reported under University of Florida Regulation 1.011 have an obligation to disclose and receive approval prior to engaging in these activities, and to assure that

such activities do not infringe upon their responsibilities and obligations to the College and to the University of Florida. Each PPHP faculty member is responsible for complying with the regulations and laws concerning outside activities and financial interests.

- (b) PPHP faculty engaging in outside activities must take reasonable precautions to ensure that the outside employer or other recipient of services understands that he or she is engaging in the activities as an individual and not on behalf of the College or the University of Florida. PPHP faculty may not use the University's resources, including its name or addresses, without express written approval from an administrator designated by the University of Florida President to approve such use. A request for the use of University resources must be submitted pursuant to the University of Florida Regulation 1.011.
- (c) The disclosure of outside activities and financial interests are to be reported on the University of Florida's form titled, Disclosure of Outside Activities and Financial Interests (University Form OAA-GA-L-267/Rev. 04/02), which is to be reviewed by the Department Chair and forwarded to the Dean for authorization.
- (d) The Disclosure of Outside Activities and Financial Interests must be completed and filed annually prior to the beginning of the academic fiscal year (July 1). In those instances where new outside activities occur during the academic year (or there are changes to information previously presented for an approved activity), a new form must be submitted to the Chair, who will forward it to the Dean.
- (e) All reports of financial interests and other outside activities at the University of Florida, including all reports of any significant financial interests, are open to the public under Florida law.

Annual Reporting

- (a) *Total compensation.* Prior to the end of each academic year, PPHP faculty reporting outside activities and financial interests during the year shall report the total financial compensation received for such activities. This report should be included in the Faculty Activity Report (FAR).
- (b) *Annual Attestation.*
 - i. All paperwork associated with continuing outside employment/activity must be renewed on an annual basis.
 - ii. All faculty members must complete the Disclosure of Outside Activities and Financial Interests form at the beginning of each academic fiscal year (no later than July 15) and provide the form to their Department Chair who will review it and forward it to the Dean for final approval.
 - iii. PPHP faculty who have no outside activities or financial interests to report are required to provide an annual attestation to that effect using the same form (University Form OAA-GA-L-267/Rev. 04/02).

Penalties and Enforcement

PPHP faculty members who fail to abide by the provisions of the PPHP Guidelines on Conflict of

Interest and Outside Activities are subject to appropriate disciplinary action in accordance with University regulations. Examples of sanctions include: disallowance or limiting outside activities, changes in assignment, limitations on research activities, fines, reduction in pay, demotion, written reprimand, suspension without pay, and termination for cause. The employee may be required to turn over to the University all or part of the compensation from an unapproved outside activity.

Responsibilities of Department Chairs

Department Chairs are responsible for reviewing disclosures and for ascertaining that PPHP and University of Florida responsibilities are not being abrogated by the activity. They must review the disclosure and notify the PPHP faculty member whether or not the activity may be conducted (with concurrence of the Dean). If not approved, the reasons for not allowing the activity must be provided. If the activity is allowed with conditions, the administrator shall state the conditions under which the activity may be pursued. The University's Office of Research must authorize the activity if it involves waiving any rights to intellectual property.