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CONFLICTS OF INTEREST AND CONFLICTS OF COMMITMENT

Outside Activity Review in the UTRMS System

Topic for Today

The update to [HOP 5-2011: *Conflict of Interest, Conflict of Commitment, and Outside Activities*](#) now requires:

- All university employees to complete an annual disclosure
- Full-time faculty and professional staff to receive prior approval for new outside professional activities through [UTRMS-COI](#)

Agenda

- Brief overview of policy
- Outline requirements for faculty members and professional research staff
- Describe role of ORSC Outside Activities team, role of Departmental Reviewers
- Review conflict management strategies
- Discuss timeline for integration of all faculty

University Policies related to COI:

HOP 7-1210

Promoting Objectivity in Research by Managing, Reducing or Eliminating Financial Conflict of Interest

Addresses FCOI in research according to federal funding agency regulations

HOP 5-2011

Conflict of Interest, Conflict of Commitment, and Outside Activities

Addresses COI or COC that compromise employee's ability to appropriately fulfill institutional responsibilities

HOP 5-2011: COI, COC, and Outside Activities

- Complies with UT System policy (UTS180)
- Defines conflict of interest and conflict of commitment
- Requires prior approval of outside activities, with some exceptions for professional activities
- Requires annual disclosure of outside activity and financial interests

Prior Approval and Disclosure Systems

- Faculty, PI eligible staff, and research personnel disclose in **UTRMS-COI**
 - Oversight by ORSC
- All others disclose in UTS Outside Activity Portal until conversion begins mid-2023
 - Reviewed by supervisor

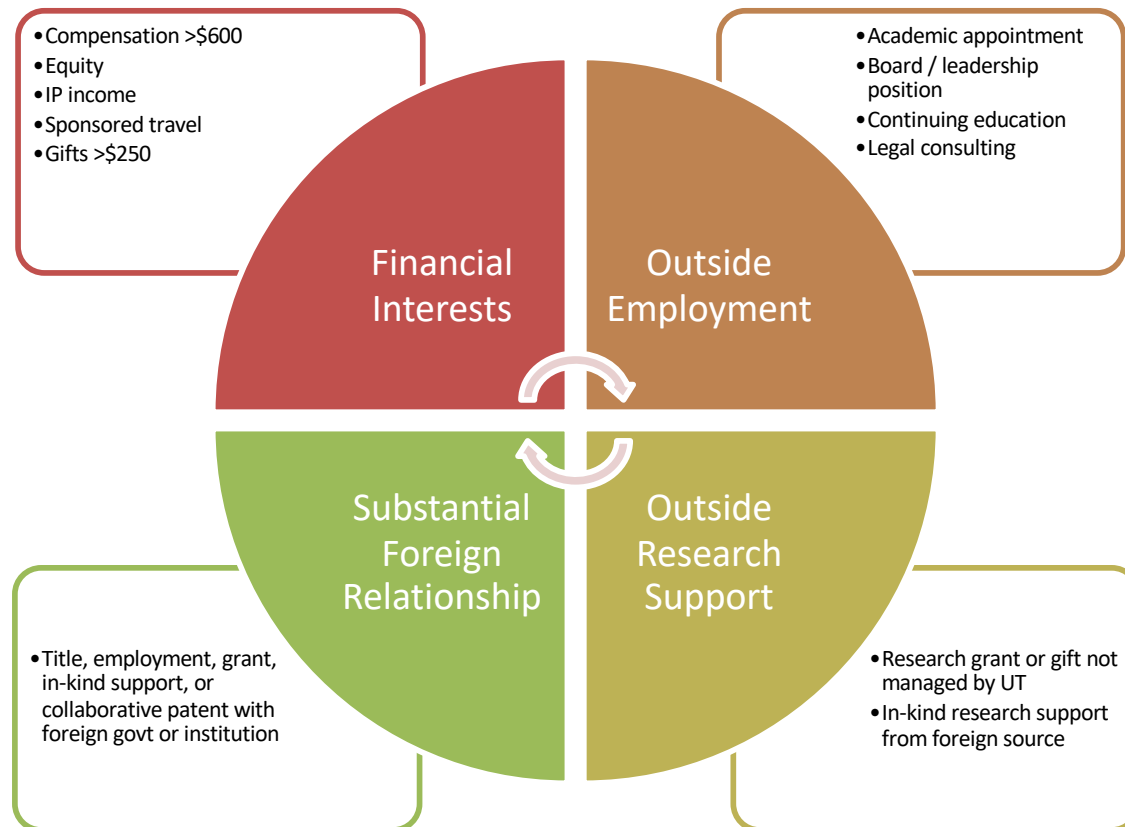
Faculty must take action in **UTRMS-COI**:

- Within 30 days of beginning employment with UT Austin
- Within 30 days of obtaining a new financial interest that requires disclosure or beginning a new outside activity
- Annually from the date of last disclosure
- To request approval for any new outside activity that is not on the pre-approved list

Faculty with sponsored research or IRB studies:

- New award/sponsored project
- New IRB protocol submission

Required Disclosures



Prior Approval Requirements

- Outside employment or compensation >\$600 annually
- Employment with another state agency
- Outside academic appointments
- Outside board service, with some exceptions
- Nonelective offices with state of Texas
- Substantial foreign relationships
- Research and scholarly activity support not managed by UT

UTRMS Pre-approval Request Types

* **Type of request:** [?](#)

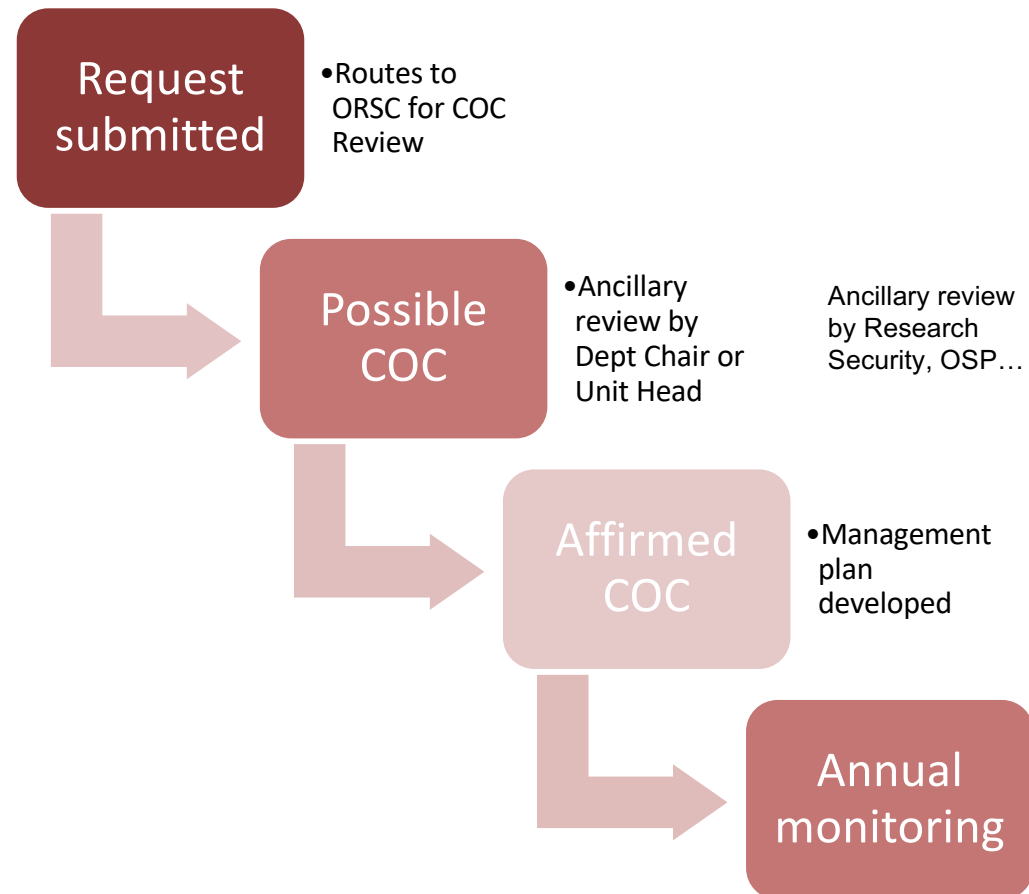
Name	Description
<input type="radio"/> Outside Academic Appointment	Academic and/or research appointments at an entity other than the institution (e.g. adjunct faculty)
<input type="radio"/> Other Appointment	Non-teaching appointments at an entity other than the University (e.g., honorary appointments, emeritus appointments, etc.)
<input type="radio"/> Management or Fiduciary Responsibilities (other than Board Service)	Assuming an executive or management position for a third party entity (e.g. President, Chief Scientific Officer, CEO, etc.)
<input type="radio"/> Board Service	Service on the Board of Trustees for an outside nonprofit or for profit organization
<input type="radio"/> Expert Witness	Serving as a witness or reviewing documents for a legal matter
<input type="radio"/> Consulting Activity and other Professional Services	Provision of professional expertise to an outside entity in a consulting or other professional services capacity
<input type="radio"/> Scientific Advisory Board	Provision of scientific expertise to outside entity (e.g., pharmaceutical or device manufacturer)
<input type="radio"/> Foreign Talent Program Participation	Participation in a talent program sponsored by a foreign government or organization
<input type="radio"/> Providing Continuing Education / Other Education Services	Presenting or creating educational material for continuing education programs (e.g., seminars, one time class, educational series, lectures, etc.)
<input type="radio"/> Other Outside Employment	Employment with an outside entity other than the activities specified above
<input type="radio"/> Involvement in sponsored research not managed by UT Austin	Participation in any proposed or awarded sponsored research not managed by UT Austin through the Office of Sponsored Projects, the Office of Industry Engagement, or Dell Medical School

[Clear](#)

Prior Approval Review – Faculty & PI Eligible

Conflict of Commitment Assessment

- Exceeds allowed time for faculty & professional staff: 8 hrs/week
- Impedes ability to adequately fulfill teaching or mentoring obligations
- Conflicts with sponsored research commitments
- Restricts dissemination of research results
- Conflicts with IP ownership policies
- Potential for undue foreign influence
- Conflicts with university purchasing or other financial oversight rules



Department Reviewer Role in UTRMS-COI

1. Default reviewer for ancillary review requests
2. Special permissions to view “users” whose primary appointment is in the department, including:
 - a. Viewing all Disclosure Profiles
 - b. Viewing submitted Pre-approval Requests (PARs)
 - c. Running a custom report of PARs made within your department

Ancillary Review Requests

COI Department Reviewer receives system email inviting their response to the ancillary review request in [UTRMS-COI](#).

Department Reviewer has access to view the complete Pre-approval Request

Outside Activities Analyst summarizes concerns, asks specific questions for dept chair, or explains why dept chair input is requested

Department Reviewer can indicate approval or send comments back without approval.

Conflict of Commitment Management Strategies

- Appropriate use of university resources
- Recusal from any decision-making at the university related to the outside entity
- Data, technology, and intellectual property ownership
- Appropriate access to university developed research results
- Student involvement, credit for contribution, protection for publication
- Annual monitoring

Timing for annual disclosures

- Faculty/PI eligible who are not yet UTRMS-COI users will be “integrated” over the next several months
- Timing based on college/school (planning for CoLA & CNS first...)
- Robust reporting capabilities in UTRMS – may be used to monitor completion

Contact ORSC

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