

Conflict of Interest, Conflict of Commitment, and Outside Activities Policy (COI/COC Policy)

July 2024



UNIVERSITY OF
OREGON

Office of the Vice President
for Research and Innovation

Overview



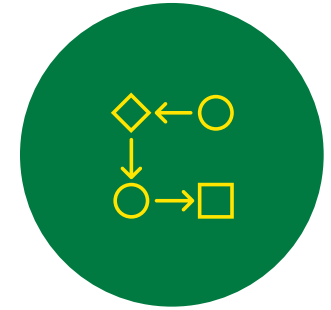
COI/COC Policy



Common Activities
Requiring Disclosure



How to Submit a
Disclosure



Management Plan
Process





What Is A Conflict of Interest?

- Any action, decision, or recommendation by a person acting in their capacity as a UO employee that would (for actual conflicts) or could (for potential conflicts) have a private financial impact on the person or their relative or any business with which either is associated. [ORS 244.020\(1\), \(13\)](#)
- This means employees are required to disclose activities for themselves, their spouse, and/or their relatives.
- Oregon state ethics statute defines “relative” as:
 - The spouse, parent, stepparent, child, sibling, stepsibling, son-in-law, or daughter-in-law of the public official
 - The parent, stepparent, child, sibling, stepsibling, son-in-law, or daughter-in-law of the public official’s spouse
 - Any individual for whom the public official has a legal support obligation
 - Any individual for whom the public official receives benefits arising from the individual’s employment.





The COI/COC Policy

- According to Oregon statute, the UO must authorize employees to receive outside compensation. ([ORS 352.232](#))
- [COI/COC Policy](#) provides a path to authorizing such activities while also complying with applicable state laws.
- UO encourages employees to engage in outside activities that comport with the UO mission, including:
 - Dissemination
 - Translation and application of research
 - Commercialization of research, scholarship, and creative activity
- Policy applies to all UO employees, including those on courtesy appointments and visiting faculty.





Exempt Activities...

- Unrelated to employee's UO job duties or not within field of expertise
- Reimbursement for travel (remains subject to [ORS 244.025](#) regarding gifts and [ORS 244.042](#) regarding honoraria)
- Appearances, performances, exhibits, or publications
- Outside activities of student or graduate employees
- Consulting as an individual or sole proprietor, unless...see next slide
- Uncompensated activities
- Employment that is not represented on the next slide





...Unless (Disclosure and Approval Required)

Even if that activity occurs during sabbatical or other approved leave

- Ownership of equity in an entity, including a consulting entity, that carries on activities closely related to the employee's UO job duties and/or within field of expertise
- Outside activities performed in exchange for equity in an entity, including a consulting entity, that carries on activities closely related to UO job duties and/or within field of expertise
- Outside activities that involve research and development and/or the creation of technological improvements, inventions, or software
- Managing or significant participation in the day-to-day operations of an entity that carries on activities closely related to the employee's UO job duties and/or within field of expertise
- Employment of UO students who the employee currently teaches, supervises, or advises or other UO employees who they supervise in the execution of outside activities





Regardless...

Regardless of whether an outside activity is exempt or requires approval, employees may not:

- Make private, commercial use without permission of UO supplies, facilities, equipment, employees, records, intellectual property, or any other UO resources
- Use non-public information accessed as a UO employee to obtain a private financial benefit
- Engage in activities that substantially interfere with the employee's duties to the UO (described on next slide)





Conflict of Commitment

- For full-time, 9-month faculty, time commitments to outside activities cannot exceed one day in every seven-day week, generally averaged over a quarter. Prorated by FTE.
- One-day-in-seven principle does not apply to summer months in which there is no UO FTE, during sabbatical or other approved leave, and UO holidays.
- For hourly and part-time employees, outside activities performed outside of that employment are not considered a conflict of commitment





Common Examples of Outside Activities That Require Disclosure & Approval

A research associate holds a courtesy appointment at another university to conduct research that will likely lead to a new process for removing metals from water, helping create clean water in countries that have limited access.

Why This Requires Disclosure:

Under the [COI/COC Policy](#), research that becomes part of research and development or that could reasonably lead to technological improvements, inventions, or software must be disclosed and approved using a management plan.





Common Examples of Outside Activities That Require Disclosure & Approval

As an independent consultant, a professor consults for a company to develop curricular supports in math for elementary students with limited English proficiency.

Why This Requires Disclosure:

Research and development doesn't happen just in the hard sciences. Under the [COI/COC Policy](#), research that becomes part of research and development or that could reasonably lead to technological improvements, inventions, or software must be disclosed and approved using a management plan.





Common Examples of Outside Activities That Require Disclosure & Approval

An associate professor would like to hire a student she currently teaches to assist with a conference she is helping to organize for a professional association. The professor's work with the professional association is part of her 20% service.

Why This Requires Disclosure:

The professor's work with the professional association would be exempt under the COI/COC Policy since it is part of her service activities and thus not an outside activity. However, if the professor is going to hire the student through the professional association, employment of UO students who the employee currently teaches, directly supervises, or formally advises or employment of other UO employees the employee supervises in the execution of an outside activity requires disclosure and approval.





Common Examples of Outside Activities That Require Disclosure & Approval

A research assistant, in coordination with colleagues from other institutions, is launching a new nonprofit. There is a lot of work to do! He often finds himself reviewing nonprofit formation documents, responding to emails about the nonprofit, or drafting content for a new website in between meetings.

Why This Requires Disclosure:

This outside activity would rise to the level of managing or significantly participating in the day-to-day operations of an entity that carries on activity closely related to the employee's UO job duties and/or within their field of expertise. Under the [COI/COC Policy](#), disclosure and approval via a management plan is required.

In addition, there may be a conflict of commitment if the outside activity is interfering with his UO job duties. This analysis does not change just because he is not receiving payment nor because the outside entity is a nonprofit. The research assistant may also be using a UO laptop for the outside activity, and use of public resources in an outside activity is prohibited.





Common Examples of Outside Activities That Require Disclosure & Approval

An associate professor and a postdoctoral scholar working in his lab have identified a novel drug delivery system. After working with Industry, Innovation, and Translation, they cannot identify an existing company who might be a good fit to license the technology. They decide to launch their own company to bring the technology to market.

Why This Requires Disclosure:

Equity ownership in an entity that carries on activities closely related to an employee's job duties and/or within their field of expertise requires disclosure and approval via a management plan. Additional consideration must be made to ensure that public resources, such as lab space, laptops, or the time of graduate students working in the UO lab, are not used to benefit the spin-out company. Clear boundaries must also be made to protect the UO's intellectual property and determine ownership of potential revisions or derivative works.





Common Examples of Outside Activities That Require Disclosure & Approval

Remember: If you also receive sponsored research funding, you are subject to the UO's [Financial Conflict of Interest in Research Policy](#) (FCOI Policy).

You may be required to disclose outside activities and interests under the FCOI Policy. Learn more about [what must be disclosed under the FCOI Policy](#).

Unsure if your outside activity requires disclosure and approval?

Ask us!
coi@uoregon.edu

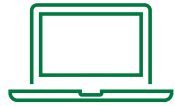




How to Disclose an Outside Activity

- Disclosures must be made *before* the outside activity begins and annually updated if the employee has an outside activity resulting in a management plan.
- Disclosures are submitted through the [Research Administration Portal](https://coi.rap.uoregon.edu) (RAP) at coi.rap.uoregon.edu. You will be prompted to enter your Duck ID.





How to Disclose an Outside Activity

UNIVERSITY OF OREGON
Office of the Vice President for Research and Innovation

COI Stage

Dashboard Facilities IACUC IRB COI

Hello Erin Moore
Switch User

Page for Erin Moore

Create

Recently Viewed

Recent Pinned

No browsing history data to display.

My Inbox My Reviews

My Inbox

Filter by ID Enter text to search + Add Filter X Clear All

ID	Name	Date Created	Date Modified	State	Coordinator
DP00004442	Disclosure Profile for Erin Moore	4/26/2023 6:03 AM	4/26/2023 6:03 AM	Action Required	Erin Moore

1 items

page 1 of 1

25 / page





How to Disclose an Outside Activity

UNIVERSITY OF OREGON
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COI Stage

Hello [Erin Moore](#) Switch User

Dashboard Facilities IACUC IRB COI Reports Meetings Help Center

Disclosures Requests Certifications Plans Triggering Events Reports Meetings Help Center

COI > Disclosures > Disclosure Profile for Erin Moore Help

Action Required

i Your training has expired

- Complete Disclosure Profile Update

Disclosure Profile for Erin Moore

Instruction Center	
Action Required	Reason
Click "Edit Disclosure Profile" and add disclosure information as needed or affirm you have nothing to declare. Click "Complete Disclosure Profile Update" button when update completed.	Disclosure profile has never been submitted
Click "Edit Disclosure Profile" and add disclosure information as needed or affirm you have nothing to declare. Click "Complete Disclosure Profile Update" button when update completed.	Review and update of your disclosure required.

[Edit Disclosure Profile](#)





How to Disclose an Outside Activity

☰ Validate Compare <<

Instructions and Policies

Entity Disclosure Information

Complete Disclosure Profile

◀ Go to forms menu Print ▾ ? Help

The UO has two distinct policies that require disclosures of certain types of outside financial interests and outside activities to prevent or manage conflicts of interest and conflicts of commitment. This RAP COI module solicits information from UO employees to help ensure compliance with both policies.

The *Conflict of Interest, Conflict of Commitment, and Outside Activities Policy* ("COI/COC policy") **applies to all UO employees**. This policy is tied to Oregon State ethics laws, and was developed to support the UO mission and its employees while ensuring compliance with Oregon State statutes. For more information about what must be disclosed under this policy, consult the [policy](#) and visit the UO's [website on Conflicts of Interest and Commitment](#).

- All employees are expected to be familiar with this policy and when possible, disclose outside activities and interests and secure approval in advance of obtaining the interest or engaging in the outside activity.
- Employees should complete and update their disclosure profile through this RAP COI module for activities or interests that do or may require disclosure and approval under the policy, even if they are unsure about whether or not disclosure is required.

The *Financial Conflict of Interest in Research Policy* ("FCOI policy") **applies only to sponsored researchers – specifically those who are identified as responsible for the design, conduct, or reporting of sponsored research at the proposal or award stage ("FCOI Investigators")**. This [policy](#) is tied to federal financial conflict of interest in research regulations, which have specific training and reporting requirements.

- If you are identified as a FCOI Investigator on a sponsored project, and your training is expired, you must complete COI training using the COI Researcher course through [CITI](#); this training is required by federal FCOI regulations and focuses on the requirements of the federal FCOI regulations.
- If you are a FCOI Investigator, you must disclose significant financial interests (SFIs) in accordance with federal FCOI regulations and UO's FCOI policy. If you are a FCOI Investigator, this RAP COI module will solicit information from you to help ensure your compliance with **both** the FCOI and COI/COC policy. For more information about what must be disclosed under both COI policies, visit the UO's [website on Conflicts of Interest and Commitment](#).

* I certify that I have read and understood the information presented to me above

✕ Exit

Save

Continue →





How to Disclose an Outside Activity

UNIVERSITY OF OREGON | Office of the Vice President for Research and Innovation | Hello, Erin Moore ▾

Validate Compare <<

Instructions and Policies

Entity Disclosure Information

Complete Disclosure Profile

Editing: DP00004442 Go to forms menu Print Help

Entity Disclosure Information

1. * Do you have any financial interests and/or outside activities related to your UO duties/responsibilities to report?
(Please refer to help text here) ?

Yes No [Clear](#)

2. Entity disclosures:

[+ Add](#)

Entity	Foreign Entity?	Relation to Discloser	Disclosure Types	Total Value	Total Time Commitment (Days)	Last Modified
There are no items to display						

Exit Save **Continue** →





How to Disclose an Outside Activity

UNIVERSITY OF OREGON
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Validating... Compare

Instructions and Policies

Entity Disclosure Information

Complete Disclosure Profile

Editing: DPO

Entity Disclosure

1. * Do you have any outside activities?
(Please refer to the University of Oregon Outside Activity Policy.)
 Yes No

2. Entity disclosure

+ Add

Entity Foreign Entity

There are no entities to display.

General Information

1. Entity: ?

[Empty text box] ...

or

If you cannot find the entity in the above list, enter the details here:

[None] ...

2. * Relation to discloser: ?

Self
 Spouse
 Dependent Child

3. * Disclosure types:

Name	Description
Equity or Ownership	Stock, stock options, or ownership interest. Venture capital or capital financing investments supporting your

* Required

OK OK and Add Another Cancel





How to Disclose an Outside Activity

UNIVERSITY OF OREGON Office of the Vice President for Research and Innovation

Editing: DPO

Entity Disclosure

1. * Do you have (Please refer to the University Policy on Outside Activities) Yes No

2. Entity disclosure

+ Add

Entity Foreign Entity

There are no

3. * Disclosure types:

Name	Description
<input type="checkbox"/> Equity or Ownership Interests	Stock, stock options, or ownership interest. Venture capital or capital financing investments supporting your outside activities and/or interests must be entered as entities for this disclosure type.
<input type="checkbox"/> Consulting or Other Professional Services	Includes scientific advisory board, expert witness services, provision of professional expertise to an outside entity in a consulting or other professional services capacity
<input type="checkbox"/> Editorial Services	Journal services, scientific editor services
<input type="checkbox"/> Intellectual Property Rights	Patent, copyright, license, trademark, or royalties paid directly to individual
<input type="checkbox"/> Divestiture and Cash Pay-out	Sale of equity or membership
<input type="checkbox"/> Sponsored Travel	Travel which is paid on behalf of the individual or reimbursed to the individual
<input type="checkbox"/> Board Service	Service on the board of directors or board of trustees for an outside nonprofit or for-profit organization
<input type="checkbox"/> Outside Employment	Employment external to your institution

* Required

OK OK and Add Another Cancel





How to Disclose an Outside Activity

UNIVERSITY OF OREGON Office of the Vice President for Research and Innovation

Editing: DPO

Entity Disclosure

1. * Do you have (Please refer to) Yes No

2. Entity disclosure

Entity Foreign Entity
There are no

Outside Employment

Employment external to your institution _____

1. * Estimated compensation in the past 12 months: (If uncompensated, enter 0) ?

2. * What is the FTE (full-time equivalent) percent? ?

3. Additional information that would help clarify this disclosure: ?

* Required

OK OK and Add Another Cancel





How to Disclose an Outside Activity

UNIVERSITY OF OREGON Office of the Vice President for Research and Innovation

Validate Compare

Instructions and Policies

Entity Disclosure Information

Complete Disclosure Profile

Editing: DPO

Entity Disclosure

1. * Do you have... (Please refer to...)
 Yes No

2. Entity disclosure

Entity Foreign Entity
There are no items to display

4. Related documents:

There are no items to display

5. * Do you expect this activity or interest will continue in the future?
 Yes No [Clear](#)

* Required





How to Disclose an Outside Activity

UNIVERSITY OF OREGON | Office of the Vice President for Research and Innovation

Hello, [Erin Moore](#) ▾

Validate Compare <<

Instructions and Policies

Entity Disclosure Information

Complete Disclosure Profile

Editing: DP00004442

Go to forms menu Print ▾ Help

Complete Disclosure Profile

Click the Complete Disclosure Profile Update button to satisfy the following:

Disclosure profile has never been submitted

Review and update of your disclosure required.

Complete Disclosure Profile Update

Exit Save **Finish**





How to Disclose an Outside Activity

COI/COC & Export... **Complete Disclosure Profile Update** Mandy Gettler (she/her/hers)

O UNIV
OR

Validate Complete

Instructions and Policies

Entity Disclosure Information

Complete Disclosure Profile

By completing this disclosure profile update you are verifying that all disclosure information is accurate and current.

I certify that I understand what is required of me as an Investigator in the University of Oregon community participating in the design, conduct and reporting of research. I further certify that I have declared all Significant Financial Interests reasonably related to my Institutional Responsibilities on this form.

I understand that this Disclosure is required to obtain funding from the U.S. Government. I certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to U.S. Government's funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above.

OK Cancel





How to Disclose an Outside Activity

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COI Stage

Hello Erin Moore
Switch User

Dashboard Facilities IACUC IRB COI

Disclosures Requests Certifications Plans Triggering Events Reports Meetings Help Center

COI > Disclosures > Disclosure Profile for Erin Moore

Help

No Action Required

Disclosure profile last completed: 6/20/2024
Your training has expired

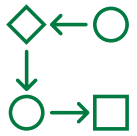
Disclosure Profile for Erin Moore

Instruction Center	
Action Required	Reason
If you have new or updated information to add to your Disclosure Profile, click "Edit Disclosure Profile" and add/edit disclosure information as needed. Click "Complete Disclosure Profile Update" button when update completed.	Discloser's disclosure profile is within the grace period. No action required unless the discloser has new or updated information to add to their disclosure profile.

Edit Disclosure Profile

Disclosures History

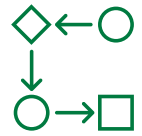




What Happens With Your Disclosure

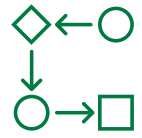
- Conflict of Interest Office reviews disclosures within 3 business days. Management plan drafts are ready within 1-2 weeks.
- If no conflict is identified, employee will not hear from our office.
- If a conflict is identified, employee will receive an email with next steps: the management plan.
- Disclosures in which a conflict is identified are subject to public records requests. Some responses to disclosure questions request amounts of compensation. It is OK to provide a range estimate. The compensation does not affect a COI/COC determination, but may be required under the [Financial Conflict of Interest in Research Policy](#), which applies to all researchers receiving sponsored awards.





Management Plan Process





Management Plan Process

- Depending on how quickly COI Office hears back from employee and signatories, process from start to finish can take as little as two weeks or as many as six.
- Employee can always view track changes and comments in the Sharepoint document.
- Management plans are subject to public records requests.



Links

- [COI/COC Policy](#)
- [Research Administration Portal \(RAP\)](#)
You will be prompted to enter your Duck ID.
- [FAQs](#)
- [COI Office website](#)



Definitions

- Conflict of commitment: A situation where an individual engages in outside activities, either paid or unpaid, that substantially interfere with the individual's duties to the University of Oregon.
- Conflict of interest: Any action, decision, or recommendation by a person acting in their capacity as a University employee that would (for actual conflicts) or could (for potential conflicts) have a private financial impact on the person or their relative, or any business with which either is associated. [ORS 244.020\(1\), \(13\)](#)
- Consulting: Providing expert knowledge or advice to an entity or person. It does not include conducting research and development or the creation of technological improvements, inventions, or software.
- Consulting entity: Any business, company, or other organization, including (but not limited to) any partnership, corporation, limited liability corporation, or other institution whether public, for-profit, or not-for-profit that provides expert knowledge or advice to an entity or person.
- Employee: Any employee, official, or agent as defined by state law.
- Entity: Any business, company, or other organization, including (but not limited to) any partnership, corporation, limited liability corporation, foreign government or agent, or other institution whether public, for-profit, or not-for-profit.
- Duties: Responsibilities expected and performed on behalf of the University for which people are employed by the University, as described in a position description, unit-level workload policy, assigned by a supervisor, or otherwise required of an employee by the University.
- Outside activities: Things that an employee does which are not duties and are not performed on behalf of the University





COI Office

coi@uoregon.edu

[Our Website](#)



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