

UNIVERSITY OF FLORIDA COLLEGE OF MEDICINE-JACKSONVILLE

Approval Date: 6/7/2016	Subject: Outside Activities by Residents/Fellows	Page 1 of 3
Approved by: GMEC		Revised Date: 5/10/2016
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Policy on Resident/Fellow Outside Activities and Outside Activities Reporting Form

All residents and fellows appointed to University of Florida College of Medicine – Jacksonville accredited and non-accredited training programs must be in compliance with the University of Florida Regulation 5.0764 College of Medicine Policy on Pharmaceutical, Medical Device, and Biotechnology Industry Conflicts of Interest. All resident and fellow physicians will be required to report outside activities annually, using the form attached. Outside activities are any and all paid activities whether they involve direct or indirect patient care.

Outside activities that involve direct or indirect patient care, requiring an unrestricted Florida license and appropriate liability coverage are defined as moonlighting. As such, these activities require prior approval and reporting in compliance with the UFCOM-J Moonlighting policy and procedure document and reporting of duty hours in compliance with the ACGME Common Program Requirements. External moonlighting request for approval MUST be accompanied by a completed Outside Activities Form, in order to comply with UF rules and regulations.

Outside activities to be reported include, but are not limited to:

- Web-based business
- Non-medical work activities and employment
- Community speaking
- Writing of non-medical literature, publishing and royalties from same

If in doubt regarding reporting requirement, it is strongly recommended to report the activity to the Program Director, in the interest of full disclosure, and to avoid disciplinary action by engaging in unapproved, unreported outside activity.

These activities require approval by the Program Director and Designated Institutional Official, who will affirm that the reported activity may be conducted without conflict of interest with the University of Florida.

The Program Director, Associate/Assistant Program Director and Designated Institutional Official may **investigate the impact of and/or restrict participation in outside activities** (reported or unreported) at any time if there is suspicion of or concern for excessive fatigue, distraction from carrying out the assignments and requirements of the training program, impact on clinical or academic performance, and/or impact on personal wellness and safety.

All residents must read and acknowledge by their electronic signature that they have reviewed a copy of the Professional Expectations Policy through the evaluations module of New Innovations.

University of Florida
Instructions for Completing the Disclosure of
Outside Activities and Financial Interests Form

General Remarks

University of Florida faculty and staff members may engage in outside activities and hold financial interests subject to the requirements of University regulations, state law, and federal regulations and law, if applicable. Whenever a question, or appearance of conflict, could arise between the employee's obligation to the University and any activity or financial interest, the employee is expected to report the situation to the supervisor for discussion and, if required as set forth below, to provide a report disclosing the information prior to engaging in the activity or obtaining the financial interest. University officials are responsible for reviewing each disclosure to determine if the activity or interest is permitted, not permitted, or if there are conditions necessary to manage, reduce or eliminate the conflicts or potential conflicts before the activity or interest can be permitted.

In addition to completing the statement regarding activities and financial interests annually through effort reporting or the receipt of an evaluation, an annual disclosure should be submitted at the beginning of each academic year or other annual appointment for each existing outside activity or financial interest. A new disclosure should be submitted at such time as there is a significant change in an activity or financial interest (nature, extent, funding, etc.) or before a new outside activity or financial interest is undertaken. These reporting provisions shall apply to activities performed or interests held while an employee is in pay status, or is on a compensated leave, including a professional development leave, but shall not apply to activities performed wholly during a period in which the employee has no appointment with the University. The employee should still be aware of and deal with the conflict of interest considerations that may arise from the latter activities.

An employee's failure to report activities or financial interests under the University's regulation or the applicable collective bargaining agreement or to follow any conditions imposed pursuant to the University's approval of such activities or interests may be grounds for disciplinary action. Such actions may include, but are not limited to: reprimand, fine, reduction in salary, change of assignment, prohibition of outside activities, suspension without pay, and termination for cause.

Reporting Requirements

The following activities and financial interests must be reported and approved prior to engaging in the activity:

- a. Outside activities in which there is more than an incidental use of university facilities, equipment, and/or services. The completed Disclosure of Outside Activities and Financial Interests form is required to be attached to the Request to use these facilities, equipment or services.
- b. Outside activities in which a university student or university employee is directly or indirectly supervised by the employee if the employee in any way supervises or evaluates the student or the employee at the University.
- c. Management, employment, consulting, and contractual activities with, or ownership interests in, a business entity which does business or is proposing to do business with the University. In the cases of material financial and of managerial interests, the information required extends to the spouse and children of the employee, and for managerial interests, to relatives.
- d. Management, employment, consulting, and other contractual activities with, or ownership interest in, a business entity which competes with the University.
- e. Candidacy, election or appointment to a public office.
- f. Required use of books, supplies, equipment, or other instructional resources at the University when they are created or published by the employee or by an entity in which the employee has a financial interest.
- g. Professional compensated activities, including but not limited to, activities for which travel expenses, travel support, and honoraria are paid, teaching at another institution, or employment as an expert witness.
- h. Business activities, including service on the board of directors or other management interests or position, with regard to a business entity in the same discipline or field in which the faculty or staff member is employed.
- i. Any employment, contractual relationship, or financial interests of the employee which may create a continuing or recurring conflict between the employee's interests and the performance of the employee's public responsibilities and obligations, including time commitments. This includes any outside activity in which the employee is required to waive rights to intellectual property.
- j. Outside activities and financial interests required to be reported under certain federal contract and grant regulations. Such disclosures may also need to be made at the time of the submission of the proposal.
- k. Outside activities (employment, consulting, management and other contractual activities) and financial interests in an entity that supports the employee's research or training activities in any way.
- l. Outside activities (employment, consulting, management and other contractual activities) and financial interests in an entity that licenses technology invented by the employee.
- m. Any other employment outside the University.

Affirmation

The signature on the completed disclosure form affirms and certifies an understanding of and compliance with the University's policies on conflict of interest, outside activities and financial interests as well as the completeness and accuracy of the responses. Information on the University's guidelines and procedures may be obtained from your academic or administrative units and are located on the web at <http://www.generalcounsel.ufl.edu/downloads/COI.pdf>.

**University of Florida
Disclosure of Outside Activities and Financial Interests**

Disclosure Period: July 1, _____ to June 30, _____

Name: _____
Title/Rank _____
Phone number _____
Email _____
% FTE _____

UFID _____
Department or Unit _____
College or Division _____
University Contract Period
_____ 9 month _____ 12 month

1. In accordance with University of Florida regulations, I report the following activity or financial interest. Please check the category or categories of the activity or financial interest as described in the Instructions to this form:

a. b. c. d. e. f. g. h. i. j. k. l. m.

2. Please provide the requested information on the activity or financial interest performed/proposed during the University contract period as identified above. Please use additional pages if necessary. All activities and financial interests for one entity should be disclosed on one form. Additional activities and financial interests should each be reported on separate forms.

(a) Name of entity (or person) with which the activity is to be conducted, or name of entity in which the financial interest is held, and nature of its business:

Is the entity a for-profit entity _____ or a not-for-profit entity _____?

Does the entity or parent, subsidiary or affiliated organization of the entity sponsor your research at UF or license technology from UF you invented? Yes _____ No _____

(b) Description of activity or financial interest. Please check all that apply.

Consultant

Director

Officer

Employee

Honorarium

Royalty recipient

Ownership interest

Percentage of ownership: _____

Value of ownership: _____

Type of ownership interest:

Stock (not publicly traded) ownership

Stock (publicly traded) ownership

LLC ownership

Partner

Sole proprietor

Other Describe _____

Stock Option or other Option Agreement

Other Describe _____

- (c) Source of and type of compensation: (e.g., company/organization/client and cash/expense reimbursement; in the case of legal representation or service as an expert witness, all parties to the matter must also be identified.):
 Source of compensation _____
 Type of compensation _____
 Amount or value of compensation _____
- (d) Location and anticipated dates of activity: _____
- (e) Is this a one time or continuing activity? One time Continuing
 If one time, estimated number of total hours, including travel time _____ hours
 If continuing activity, estimated number of hours per week spent on the reported activity, including travel time: _____
 If you earn vacation leave, indicate number of hours per week that will be taken _____
 If none, explain why no vacation is to be taken. _____
- (f) Will University of Florida employees and/or students be involved in connection with the outside activity? No ____ Yes ____ (Explain) _____
- (g) Will University equipment, facilities or services be used in connection with the outside activity?
 No ____ Yes ____
 (If yes, please attach a completed Request to Use University Equipment, Facilities and Services in connection with Non-University Activity form.)
- (h) Are you required, as a condition of the employment/activity, to waive any rights you or the University of Florida might have to intellectual property you develop, including copyrights or patent rights?
 No ____ Yes ____
 (If yes, the Office of Research must review and act on the employment/activity.)
- (i) Has this activity been reported before? No ____ Yes ____
- (j) Total number of outside activity and financial interest reports submitted during this contractual period including this report _____.
 Estimated total number of hours spent per week during this contractual period on all outside activities including this activity _____.

3. I understand that the activity and/or interests identified in the Instructions to this form must be reviewed and acted upon by the appropriate university officials as set forth below. For each activity or financial interest disclosed, other information may also be requested in order to completely review the activity or interest if there are potential conflicts involved.

4. I understand that if I (or my spouse, domestic partner, child or other relative) have a material financial interest or a managerial interest in an entity that proposes to do business with or does business with the University, I will submit a copy of this form to the University's Purchasing Services (with the purchase requisition if a purchase requisition is required) prior to the purchase being made or the University's entering into contract with the entity. I understand that if I am involved in the procurement or contractual process for the entity or for the University (including making recommendations) I must inform the University office making the procurement or entering into the contract of my financial interest prior to the procurement or the signing of the contract in order that determination may be made whether the procurement and/or contract is allowable under Florida law and University regulations.
5. I have read the University's Regulation 1.011, and I understand my obligations under the regulation.
6. I hereby certify that the information reported here is accurate and complete. Further, I understand that my engaging in a non-university activity must not create a conflict of interest, unless such conflict is allowable under the law and University regulations, or interfere with the full and faithful performance of my University professional responsibilities or other University obligations.

Employee's Signature

Date

REVIEWER	REVIEWER'S SIGNATURE	APPROVED	DISAPPROVED	DATE
Chair or Supervisor (Printed Name)				
Dean, Director or other Appropriate Administrator (Printed Name)				
Office of Research (if applicable) (Printed Name)				
Purchasing Services or other Contracting Authority(if applicable) (Printed Name)				

7. Was conference held to discuss this disclosure? No ____ Yes ____ If yes, please write a brief summary of action taken:
8. The form should be returned to the employee and others noted below whether the activity is authorized as presented, authorized with conditions or not authorized. The returned copy should include all appropriate signatures. A copy of the form must be sent to Purchasing Services or other applicable Contracting Authority if the disclosure is made under c (and as further described under item 4 above).