The UT System requires UTSA to implement a two-stage process to identify and manage conflicts of interest and commitment: (1) prior approval requests and (2) annual disclosure reporting. This process is important to understand within the context of similar, but not identical, federal requirements related to financial conflicts of interest. The following summary is intended to provide guidance for UTSA researchers regarding these two university policies (HOP 1.33 and HOP 10.04).

**STEP 1: IS PRIOR APPROVAL REQUIRED BEFORE I ENGAGE IN AN OUTSIDE ACTIVITY?**

- **Yes** if the exclusions below do not apply and the activity occurs while you have a current UTSA appointment (e.g., during the academic semester). The most common examples are consulting and serving as a member of the board of directors (e.g., Chief Technology Officer or in an advisory role) of a for-profit company or entity.
- **No** if the activity falls into one or more of the following categories:
  - Serving on a federal, state, or local government agency, committee, panel, or commission (e.g., NIH grant review panel, city water authority advisory committee)
  - Acting in an editorial capacity for a professional journal.
  - Reviewing journal manuscripts, book manuscripts, or grant or contract proposals.
  - Attending and presenting talks at scholarly colloquia and conferences, even if you receive payment such as an honorarium or travel stipend/reimbursement.
  - Developing scholarly communications in the form of books or journal articles, movies, television productions, and similar works, even when such activities result in financial gain, consistent with intellectual property and other applicable System and institution policies and guidelines.
  - Serving as a committee member, an officer, or a board member of a professional or scholarly society, or school board.
  - Accepting a commission for an architectural, artistic work or performance that is considered an integral part of a faculty member’s academic portfolio (e.g., a work of art or a dance performance).

**How do I request prior approval?** Complete the “Request for Prior Approval of Outside Activity” form (available here: [http://research.utsa.edu/oric/coi/](http://research.utsa.edu/oric/coi/)) and submit to your supervisor (e.g., department chair) for review. Your supervisor should keep the signed copy of the form and any denied requests in your departmental personnel file. The form does not need to be routed to any other offices but should be available if there are any questions about your engagement in the activity.

**STEP 2: WHAT DO I REPORT ON MY DISCLOSURE FORM?**

- The Disclosure of Financial Interests form must be completed at the beginning of each calendar year. The Disclosure form contains two sections:
  - **Section I:** meets federal requirements for researchers to report all financial interests meeting specific criteria. Note that all tenured and tenure-track faculty are defined as researchers (per UT System) as well as all individuals listed on an IRB or IACUC protocol. Additionally, anyone else the Principal Investigator identifies as responsible for the design, conduct, or reporting of the research is required to complete a Disclosure form (including research technicians, collaborators, etc.).
  - **Section II:** meets UT System requirements for employees to report other activities that are not otherwise required to be disclosed.

**Items to report on the Disclosure form (See the flowchart on the reverse page of this document):**

- **Section I:**
  - If you answer “yes” to any of these questions and appear to be related to your institutional responsibilities, you must report the activity. If it doesn’t appear to be related, then report the activity in Section II, if applicable.
  - UTSA is required to review the activity and determine if it poses a potential conflict of interest
- **Section II:**
  - Activities that did NOT require prior approval should not be reported on the Disclosure form as long as they will be reported on the Faculty Annual Report or other Annual Performance Evaluation
  - Some of the activities should be evaluated by you and reported only if you determine that they may pose a conflict of interest or commitment.
Disclosure Process by Researchers
UTSA Disclosure of Financial Interests

Pre-Approved Activities (As reported in Annual Evaluation)
Research Conflict of Interest
HOP 10.04 Questions 1 to 4

Appear to be related to your Institutional Responsibility at UTSA?

Yes

NIH/PHS
Travel Payments

Publicly Traded Entity
Payment + Equity interest > $5K

Non-Publicly Traded Entity
Payment > $5K OR Any Equity interest

Rights to IP
From Entity other than UTSA

Federal Regulations and UT Requirements

COI, COC and Outside Activities
HOP 1.33 Questions 5 to 9

*All Outside Employment (Consultation, Teaching, etc.)

*All Outside Board Service

Uncompensated Activity appears to create COI/COC

*Other Outside Activity if appears to create COI/COC

Gifts over $250 If appears to create COI

Academic Affairs sends report of activities to Department Chairs

*Required to disclose Compensation > $5K if appear to be COI/COC and/or Equity Interest if appear to be COI.

Note: Under HOP 1.33, you are required to disclose any activity of immediate family member ONLY if appears to create COI.