



A RESEARCHER'S GUIDE TO CONFLICT OF INTEREST AT UTSA

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 (HOP 1.33)?

- **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/wp-content/uploads/2014/10/RequestforPriorApprovalofOutsideEmploymentForm.pdf>) 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.
- **If you have any questions regarding request for prior approval or HOP 1.33 policy; Conflict of Interest, Conflict of Commitment, and Outside Activities, please contact the [Institutional Compliance and Risk Services](#) at (210) 458-4992.**

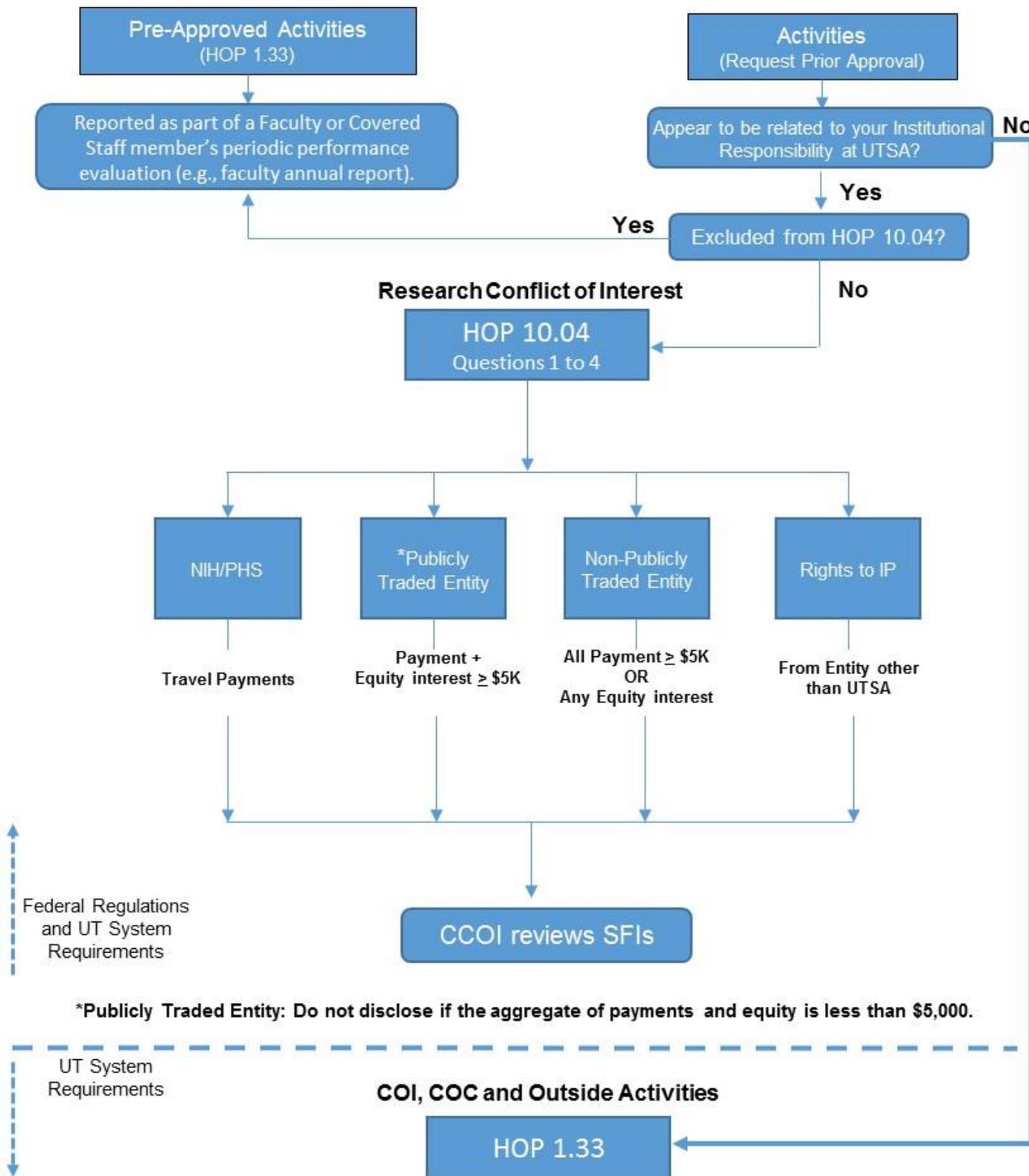
STEP 2: WHAT DO I REPORT ON MY **DISCLOSURE FORM** (HOP 10.04)?

- The Disclosure of Financial Interests form must be completed at the beginning of each calendar year. The Disclosure form 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.).
 - Items to report on the Disclosure Form (See the flowchart on the reverse page of this document):
 - If **appear to be related to your institutional responsibilities**, not excluded under HOP 10.04, and you answer "yes" to any of these questions, you must report the activity.
 - If it **doesn't appear to be related, then report the activity under UTSA HOP 1.33 policy utilizing an online portal hosted by UT System: <http://outsideactivity.utsystem.edu>, if applicable.**
 - **Activities that appear to be related and excluded under HOP 10.04 will be reported** on the Faculty Annual Report or other Annual Performance Evaluation. **For additional information please contact the Institutional Compliance and Risk Services at (210) 458-4992.**
 - UTSA is required to review the activity and determine if it poses a potential conflict of interest.



Disclosure Process by Researchers

UTSA Disclosure of Financial Interests



UTSA Faculty and Covered Staff should disclose all outside work or activities as required under UTSA HOP 1.33 policy utilizing an online portal hosted by UT System: <http://outsideactivity.utsystem.edu>. If you have any questions regarding request for prior approval or HOP 1.33 policy; Conflict of Interest, Conflict of Commitment, and Outside Activities, please contact the [Institutional Compliance and Risk Services](#) at (210) 458-4992.