



# Outside Activity Reporting

## Managing Conflicts of Interest & Commitment

**@ University of Cincinnati**

*Why, Who, When, What, How +*





# Outside Activity Reporting

## Integrity Matters

[mydisclosure.oar.uc.edu](https://mydisclosure.oar.uc.edu)

# Why must I disclose my outside activities to the university?







Disclosure is the first step to ensure legal compliance, protect integrity, and promote good stewardship of public resources.





**Federal**



**State**



**Institution**

**BEARCAT**

**BEARCAT**

**BEARCAT**





# CHIPS & Science Act



America invented the **semiconductor**, but today produces about 10% of the world's supply -- and none of the most advanced chips. The new Act -- worth nearly \$150 billion -- will return manufacturing to the US, lowering costs, creating jobs, and strengthening supply chains.



## THE ACT INCLUDES

\$39B



Manufacturing Incentives

\$13.2B



Education




## Code of Federal Regulation

A point in time eCFR system

Displaying title 42, up to date as of 8/15/2024. Title 42 was last amended 8/06/2024

Enter a search term or CFR reference (eg, fishing or 1 CFR 1.1)

Title 42 / Chapter I / Subchapter D / Part 50 / Subpart F

ECFR CONTENT

ENHANCED CONTENT

- View table of contents for this page.

Subpart F—Promoting Objectivity in Research

Authority: 42 U.S.C. 216, 289b-1, 299c-4; Sec. 219, Tit. II, Div. D, Pub. L.



Ohio Ethics Commission



## Ethics Law Overview

The Ohio Ethics Law requires that new public officials and employees receive a copy of the Ohio Ethics Law and related statutes within 15 days of beginning the performance of their official duties. The copy of the law must be provided by the public agency the public official or employee serves or the appointing authority. The new public official or employee must also acknowledge receipt of the law in writing. A PDF copy of the Ohio Ethics Law is attached below for your convenience in providing it to new public officials and employees.

We also recommend that you furnish new public officials and employees with the second document attached below. This Overview of the Ohio Ethics Law is a helpful accompaniment to the law itself which explains and describes the law in layperson easy-to-understand terms. The document also contains examples and links to sheets and advisory opinions that makes the Ethics Law understandable and relatable.

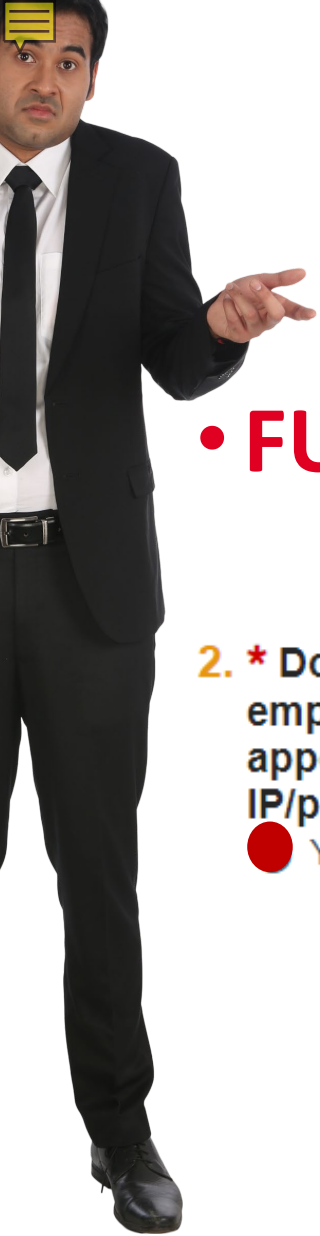
## Documents



# Do I have to disclose?







- **FULL TIME** Employees: Faculty & Staff

2. \* Do you attest you do not participate in any of the following outside activities: equity ownership, outside employment, consulting, expert witness, speaking, board service, scientific advisory board, outside academic appointment, foreign talent recruitment program, outside research, sponsored travel, IP/patents/copyrights/royalties, public candidate or office holder outside the University of Cincinnati?

Yes  No [Clear](#)







- **FULL TIME** Employees: Faculty & Staff
- **ALL** faculty and staff **who engage in research, creative, and scholarly work**







- **FULL TIME** Employees: Faculty & Staff
- **ALL** faculty and staff **who engage in research, creative, and scholarly work**
- **ALL** graduate students, post-doctoral fellows, and **scholars** who are identified as **KEY PERSONNEL** on a project
- **Must submit an OAR, even if there are no outside activities.**







During the annual disclosure period in January

Updates within 30 days of a change

Prior approval is **REQUIRED** for all outside activities





**3361:30-21-01 Employment: reporting of out interests**

The university is subject to state and federal law contracting, and conflicts of interest. In addition, Administrative Code and rule 3361:30-21-03 of the A all employees to seek prior approval of any collateral er potential conflicts of interest and commitment. To faci laws and rules the university has established the outsid disclosure, review, approval and management of collat outside activities, relationships or interests in other conflicts of interest or commitment. All full time univ part time employees as the president or the president’s complete an OAR not less than annually and whene change in reportable outside activities. The president shall have the authority to adopt policies and procedure requirements of the OAR process.

Effective: April 13, 2012

Certification: Susan M. Stringer  
Susan M. Stringer  
Executive Assistant to the Board of Tru  
and Senior Vice President for Administ

Date: March 29, 2012

Promulgated und  
Statutory authorit

**3361:30-21-02 Employment: policy on collateral employment for faculty members and librarians.**

- (A) “Collateral employment” means any effort, whether within the university or with an external entity, including consulting work, that is in addition to an employee’s existing “UC” employment responsibilities.
- (B) Faculty members and librarians may engage in collateral employment consisting of institutional and/or non-institutional effort, including work of a consulting nature, if:
  - (1) The faculty member or librarian provides information regarding the proposed collateral employment in advance to the dean of the college or division concerned or the appropriate library administrator or vice president;
  - (2) Said dean or library administrator or vice president approves such collateral employment and agrees that the collateral employment:
    - (i) Does not interfere with nor is inconsistent with the performance of the individual’s university duties; and
    - (ii) Does not raise questions of conflict of interest in connection with other interests or work with which the individual, or the university, is involved.

Faculty members and librarians shall secure approval for all collateral employment utilizing on the university’s outside activity report system and shall include all collateral employment on the annual outside activity report form as required by rule 3361: 30-21-01 of the Administrative Code.

- (C) “Institutional effort” is service within the university or with an affiliated institution that is outside the scope of the faculty member’s or librarian’s normal employment.
- (D) “Non-institutional effort” is the service faculty members and librarians provide outside the university during the normal work week for which they receive non-university compensation. Non-institutional effort that meets the criteria specified in paragraphs (B)(2)(i) and (B)(2)(ii) of this rule will normally be permitted by the university for full-time faculty and librarians

**3361:30-21-02**

to the extent that such activities do not exceed an average of one day of the normal work week and provided that the faculty member or librarian continues to fulfill all of his or her full-time university duties. Exceptions to this limitation may be made upon approval of the dean and the vice president.

- (E) The provision of patient care by college of medicine clinical faculty is an essential and integral part of the responsibilities of such faculty. It is a condition of employment with the university that members of the college of medicine faculty who receive revenue from patient care and medically related activities requiring licensure shall conduct such patient care activities as participants in a practice plan of their respective clinical departments or units that has been approved by the dean of the college of medicine. The dean of the college of medicine has the responsibility to perform an annual review of the compensation received by clinical faculty from the practice plans of the respective clinical departments, together with such other financial information as he or she may reasonably require in order to perform his or her oversight function, to ensure that each such practice plan operates in fulfillment of the university’s mission and for its benefit. Participation in a practice plan that is approved by the dean of the college of medicine shall be deemed to be in compliance with this rule. Any other activities of college of medicine faculty, whether institutional or non-institutional in character, may be approved only if they meet all the requirements of this rule.

Effective: April 13, 2012

Certification: Susan M. Stringer  
Susan M. Stringer  
Executive Assistant to the Board of Trustees  
and Senior Vice President for Administration and Finance

Date: March 29, 2012

Promulgated under: R.C. Section 111.15  
Statutory authority: R.C. 3361.  
Rule amplifies: R.C. 3361.03;



# mydisclosure.oar.uc.edu



University of CINCINNATI

**Outside Activity Reporting**  
**Integrity Matters**

Login

  
**HURON**  
SSO Links

Client Login

Huron Login

## Web-based Disclosure System





Outside activities  
are permitted





# Outside activities are permitted



- properly disclosed in OAR,
- supervisor/dean approved,
- don't violate state/federal laws,
- and don't conflict with UC responsibilities

# Time Range for Disclosures

- **Outside activities in the past 12 months**
- **Anticipated activities for next 12 months**
- **New activity - immediately before starting for PRIOR Approval**

525,600 MINUTES

31,536,000 SECONDS



An aerial photograph of a university campus. In the foreground, there are several large, multi-story brick buildings with gabled roofs and dormer windows, surrounded by lush green trees. A paved road with a roundabout in the center is visible, with a few cars and pedestrians. To the right, there are green tennis courts and a red running track. In the background, more campus buildings and a clear blue sky with scattered white clouds are visible.

Institutional Responsibilities

≠

Outside Activities



An aerial photograph of a university campus. In the foreground, there are several large, multi-story brick buildings with gabled roofs and dormer windows. A paved road with a roundabout and a white car is visible. To the right, there is a green tennis court and a red running track. In the background, more campus buildings and a city skyline are visible under a blue sky with scattered clouds. A white text box with a blue border is overlaid on the center of the image.

Institutional Responsibilities

≠

Outside Activities





# Do not disclose!

- 1. Peer review of articles and grant proposals;**
- 2. Presentations and workshops at professional meetings or other similar gatherings;**
- 3. Leadership positions in professional societies;**
- 4. Preparation of scholarly publications;**
- 5. Service on advisory committees or evaluation panels for governmental funding agencies, nonprofit foundations, or educational organizations**
- 6. Musical and other creative performances and exhibitions.**

A photograph of the UC Gardner Neuroscience Institute building at dusk. The building is a modern structure with a prominent glass facade and a dark metal frame. The sky is a mix of purple, pink, and blue. In the foreground, there is a stone wall with the text "UC GARDNER NEUROSCIENCE INSTITUTE" engraved on it. The overall scene is well-lit, with the building's interior lights visible through the glass.

# OUTSIDE ACTIVITIES

Outside Activities are external obligations, either paid or unpaid, that are in the employee's general area of expertise but are beyond the scope of the individual's employment at the University. This includes being paid as a consultant and/or contractor for University activities, either directly as private consultants or through a third-party.





# Do disclose:

- Equity Ownership
- Outside Employment
- Consulting
- Expert Witness
- Speaking
- Board Service
- Scientific Advisory Board

- Outside Academic Appointment
- Foreign talent recruitment program
- Outside Research
- Sponsored Travel
- IP/patents/copyrights/royalties
- Public Candidate or Office Holder
- Editorial Services

# Domestic and International

# Do disclose:



## Outside Activity Reporting Integrity Matters

### 3. \* Disclosure types:

Name	Description
<input checked="" type="checkbox"/> Equity	Stock, Stock Options, or Ownership Interest in any company
<input checked="" type="checkbox"/> Consulting or Other Professional Services	Consulting, advisory or other professional services related to institutional expertise. Scientific advisory board, provision of scientific expertise to outside entity (e.g. pharmaceutical or device manufacturer). Expert witness services, serving as an expert witness and/or consulting in the area of their institutional expertise in a legal matter like a lawsuit or a potential lawsuit. Affiliates/subawardees need not report scientific advisory.
<input type="checkbox"/> Speaking	Speaking on behalf of a company/organization, e.g. speaker bureau.
<input type="checkbox"/> IP/Trademark/Royalty/Copyright/License Fee and/or Copyright Income	Intellectual Property Rights, patent royalties/licensing fees and/or copyright income in the area of their institutional expertise from an entity other than the University of Cincinnati paid directly to individual.
<input type="checkbox"/> Sponsored Travel	Travel which is paid on behalf of the Investigator and not reimbursed to the Investigator.

<input type="checkbox"/> Board Service	Service on a Board of Directors, Board of Trustees for any outside nonprofit or for profit organization.
<input type="checkbox"/> Outside Employment or Activity	Employment external to the University of Cincinnati or if you receive additional compensation from UC or UCP that will be for services rendered outside of your primary role/job responsibilities (e.g., if your primary job is within the College of A&S, but you receive additional compensation for teaching a course in CCM). Affiliates/Subawardees need not report this.
<input checked="" type="checkbox"/> Other Appointments	Compensated or Uncompensated activity (e.g. positions, appointments, fellowships, outside research, elected public official) external to the University of Cincinnati. Outside research is research in the general area of ones institutional expertise at an entity external to the University of Cincinnati, including any external research resources or funding. Affiliates/Subawardees need not report this.
<input type="checkbox"/> Foreign Support	Compensated and Uncompensated foreign affiliations involving any outside professional appointments (including extra-institutional titles and affiliations), activities or relationships (paid or unpaid), regardless of the effort (full-time, part-time, or part-stay), including those involving a foreign institution of higher education, the government of another country, or participation in a foreign talk or curriculum program. (e.g., Townsend Trust Program, Fulbright Scholars, etc.) Foreign research, scholarship (including teaching), and/or creative work from foreign governments, foreign academic institutions, or other foreign organizations, including laboratory space, funding (awards, gifts, grants, stipends) or in-kind support. (e.g., you consult on a research study or serve as a PI for a foreign institution; you teach and/or mentor graduate students at a foreign entity). Foreign income or research support from foreign governments or from foreign institutions.
<input type="checkbox"/> Editorial Services	Journal services or scientific editor services, including serving as an editor for a journal, selecting articles for publication, or selecting proposals for award (not simply journal peer reviewer services).

# Domestic and International





# International Collaborations



**NIH/NSF/NASA/DOD/DOE \$\$\$**



<https://research.uc.edu/international-collaboration>

## Fundamental Research Security

Fundamental Research Security, JSR-19-2I, December 2019

1. Several incidents in recent years have led to concern that the openness of our academic fundamental research ecosystem is being taken advantage of by other countries. NSF has charged JASON to produce an unclassified report assessing these concerns that can be widely disseminated and discussed in the academic community
2. Are the terms of engagement made clear in writing? Is it fundamental research? If not, what are the institution's policies around creating the engagement?
3. Have all participants been identified and are they all known to the PI and the PI's Institution?
4. Is there any aspect of the engagement that seems unusual, unnecessary or poorly specified?
5. Are all the participants conflicts of interest and commitment documented? Are there any aspects of the engagement that are not to be disclosed to any of the participants? If so, what is the reason?
6. Where does the funding and other resources needed for the activity come from? Is it clear what each party is providing?

JASON  
The MITRE Corporation  
7515 Colshire Drive  
McLean, Virginia 22102  
(703) 983-6997





<https://research.uc.edu/international-collaboration>

- **U.S. academic values are not necessarily the same values elsewhere**
- **Make transparent disclosures in OAR and to funding agencies**

<https://research.uc.edu/international-collaboration>

- **U.S. academic values are not necessarily the same values elsewhere**
- **Make Transparent disclosures in OAR and to funding agencies**
- **Ask for guidance if something seems too good to be true**
- **Discuss outside opportunities with your department head and trusted colleagues**
- **Share any potential concerns with the Research Security and Ethics Office, or use the anonymous online reporting hotline: <https://uc.ethicspointvp.com/>**



## Research security at NSF: Why does it matter?

Securing the nation's research enterprise is part of the mission of the U.S. National Science Foundation and is essential to the national defense. NSF works closely on this effort with its funding agency counterparts and with the law enforcement and intelligence communities — consistently emphasizing the importance of balancing research security with international collaboration in science and engineering.

NSF has dedicated considerable effort and resources to working with the research community and its other partners to:

- Equip researchers with the information and tools necessary to ensure that their work is protected.
- Clarify security issues and mitigate risks.
- Foster transparency, disclosure and other practices that reflect the values of research integrity.

NSF's effort has led to ongoing initiatives aimed at clarifying proposal preparation and award administration requirements, as well as the issuance of new policies and directives in the proposal and award process.

### On this page

- Research security at NSF: Why does it matter?
- Case studies
- The SECURE Center (Safeguarding the Entire Community U.S. Research Ecosystem)
- Research on Research Security Program (RoRS)
- The benefits of international collaboration
- NSF policies and actions
- NEW: Trusted Research Using Safeguards and Transparency (TRUST)
- Foreign interference and risk mitigation
- NEW: Foreign Financial Disclosure Report (FFDR)
- NEW: Malign Foreign Talent Recruitment Program
- How NSF addresses research security violations

The screenshot shows the CONGRESS.GOV website interface. At the top, there are navigation links for "Advanced Searches" and "Browse". A search bar contains the text "Examples: hr5, sres9, 'health care'". Below the search bar, the page title is "H.R.4346 - Chips and Science Act" for the 117th Congress (2021-2022). The page is categorized as "LAW" and includes a "Hide Overview" button. The main content area lists key details: Sponsor: Rep. Ryan, Tim (D-OH-13) (Introduced 07/01/2021); Committees: House - Appropriations | Senate - Appropriations; Committee Reports: H.Rept. 117-80; Committee Prints: H.Prt. 117-53; Latest Action: 08/09/2022 Became Public Law No. 117-167. (All Actions); Roll Call Votes: There have been 11 roll call votes; Tracker: A progress bar shows the bill's status: Introduced > Passed House > Passed Senate > Resolving Differences > To President > Became Law. On the right side, there are links for "More on This Bill" (CBO Cost Estimates [1]) and "Subject — Policy Area: Science, Technology, Communications" with a "View subjects >>" link. At the bottom right, there is a link for "All Information (Except Text)".

- As part of the CHIPS and Science Act of 2022, **participation in any foreign talent recruitment program that could be malign is prohibited.**
- As of May 20, 2024, **researchers will need to certify that they are not a party to a malign foreign talent recruitment program (MFTRP) as part of an NSF proposal.**

<https://ce.uc.edu/cpd>



Malign  
Foreign  
Talent  
Recruitment  
Training



# Err on the side of TRANSPARENCY



Reach out for help with  
any questions  
concerning what you  
need to disclose:  
[OARquestions@uc.edu](mailto:OARquestions@uc.edu)





# CONFLICT OF COMMITMENT

A Conflict of Commitment arises when an employee accepts or incurs external obligations, either paid or unpaid, that conflict or appear to conflict with their primary obligation and commitment to the University.



# CONFLICT OF COMMITMENT

**...when Outside Activities:**

- 1. Interfere with ability to fulfill University expectations, obligations, responsibilities**
- 2. Compete with services that the University provides to include educational, research, service missions**
- 3. Involve obligations to improperly share information with an entity outside the University**



# CONFLICT OF COMMITMENT

A man with short, graying hair, wearing a light yellow button-down shirt, is seated at a desk in an office. He is looking down at a document or laptop screen with a slight smile. The background is a blurred office environment with other desks and chairs.

**Approval for Outside Activities can be denied.**







# Do I have to report outside activities for which I'm not paid?

---



Board Service

Service on a Board of Directors, Board of Trustees for any outside nonprofit or for profit organization.



# Do I have to report work done under the auspices of another institution?

---



## Domestic or International

Compensated or Uncompensated activity (e.g. positions, appointments, fellowships, outside research, elected public official) external to the University of Cincinnati. Outside research is research in the general area of ones institutional expertise at an entity external to the



Other Appointments






## What if my activities occur during summer outside of my nine month academic appointment?

---

### Consulting or Other Professional Services



Consulting, advisory or other professional services related to institutional expertise.

Scientific advisory board, provision of scientific expertise to outside entity (e.g. pharmaceutical or device manufacturer).

Affiliates/subawardees need not report scientific advisory. Expert witness services, serving as an expert witness and/or consulting in the area of their institutional expertise in a legal matter like a lawsuit or a potential lawsuit.





Holly Bante, Ph.D.



Carol Ann Taylor



Luke Niederhelman



Sara Hughes

[OARquestions@uc.edu](mailto:OARquestions@uc.edu)