



Applies to: Faculty, staff, student researchers, student employees, graduate associates, applicants

Responsible Office

Office of University Compliance and Integrity

POLICY

Issued: 09/01/2022
Revised: 01/02/2024 (minor revision)

The university encourages individual participation in outside activities, such as collaborations with government, industry, and other private institutions, because such participation helps advance the university's mission through mutually beneficial partnerships and contributes to social and economic development and increased knowledge. Participation in outside activities therefore is permitted to the extent that the activity aligns with an individual's responsibilities to the university, and that participation does not create a conflict of commitment (COC) or conflict of interest (COI). Individuals conducting research also must avoid financial conflicts of interest (FCOI) in research.

All employees are required to devote their primary professional allegiance to the university and conduct their university responsibilities with integrity, demonstrating both honesty and transparency. Similarly, all healthcare professionals have an ethical obligation to provide safe, effective, patient-centered, timely, efficient, and high-quality care for their patients. Therefore, all employees must arrange outside obligations, financial interests, and activities so as not to conflict or interfere with this commitment to the university or the best interest of the patient. This policy will not be interpreted to interfere with any faculty member's academic freedom, including their freedom to exercise their constitutional rights as citizens without institutional censorship or discipline. See Faculty Rule 3335-5-01.

In keeping with these ethical commitments, employees engaged in research at the university, employees identified by their unit as having significant financial or fiduciary responsibilities, college and regional campus deans, and all President's Cabinet members must complete an electronic conflict of interest disclosure (eCOI) irrespective of their engagement in outside activities.

In addition, all employees who wish to engage in outside activities (excluding professional services as defined in the policy) must submit an Outside Activities Approval Form and obtain approval before engaging in any outside activities.

Purpose of the Policy

To delineate expectations and requirements for conducting outside activities; establish processes for transparency and accountability through the identification, disclosure, approval, and, when possible, management of COCs, COIs, and FCOIs; facilitate compliance with federal research regulations, state ethics laws, and unit-specific requirements; and notify employees and applicants of potential consequences of noncompliance with federal regulations, state laws, and this policy.

Definitions

Table with 2 columns: Term and Definition. Rows include Conflict of commitment (COC) and Conflict of interest (COI) with detailed definitions and numbered lists of conditions.



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Term	Definition
Conflict management plan (CMP)	A set of written obligations, created by the Conflict Approval Committee (CAC) and agreed to by the unit and the employee, to manage conflicts.
Designated work time	Hours agreed upon by a supervisor of when an employee will perform work for the university.
eCOI disclosure process	An annual process that requires certain employees to report outside activities using an internal online program.
Employees	Faculty, staff, graduate associates, and student employees.
Financial conflict of interest (FCOI) in research	An FCOI in research exists when financial interests could affect, or be perceived to affect, the design, conduct, or reporting of research.
Outside activities	Any activity, paid or unpaid, that is related or similar to an employee's university responsibilities and is performed outside the university (excluding professional service). This includes, but is not limited to, outside employment, consulting, advising, personally reimbursed or sponsored travel, conducting research outside Ohio State, roles on outside boards, financial interests, gifts, foreign government affiliations (any academic, scientific, professional, or institutional affiliation with a foreign government entity, including participation in a Foreign Government Talent Recruitment Program), and other compensated or uncompensated activities or interests.
Professional service	Service to governmental agencies and other entities such as peer review panels and advisory bodies to other universities and professional organizations; service to academic or professional journals; presentations to either professional or public audiences in such forums as professional societies and organizations, libraries, and other universities; and peer review activities undertaken for either for-profit or nonprofit publishers, including grant reviews and consultation.
Public health service (PHS) agencies	PHS agencies include, but are not limited to, the National Institutes of Health (NIH), Food and Drug Administration (FDA), Centers for Disease Control and Prevention (CDC), Indian Health Service (IHS), Health Resources and Services Administration (HRSA), Substance Abuse and Mental Health Services Administration (SAMHSA), Agency for Healthcare Research and Quality (AHRQ), Centers for Medicare & Medicaid Services (CMS), Administration for Children and Families (ACF), and Administration on Aging (AOA).
Research or conducting research	Any organized program of scientific inquiry, including designing research, directing or serving as a researcher performing laboratory experiments, having a role in soliciting consent from research subjects or making decisions related to eligibility of patients to participate in research, analyzing or reporting research data, or submitting manuscripts or abstracts concerning the research for publication. This includes projects for which outside support is requested and/or projects for which approval (or exemption) of an Institutional Review Board (IRB), Institutional Animal Care and Use Committee (IACUC), or Institutional Biosafety Committee (IBC) is required.
Researcher	Project director, principal investigator, and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of university research. This definition may include students, collaborators, or consultants. This definition does not include individuals who perform only incidental or isolated tasks related to a university research project.
Significant financial interest (SFI) (for researchers)	For researchers, outside activities that reasonably appear to be related to the researcher's university responsibilities during the twelve (12) months preceding disclosure, which include the following: <ol style="list-style-type: none"> <li>(1) Payments received, and/or equity interests held, in aggregate, exceeding \$10,000. For researchers engaged in PHS or Department of Energy (DOE) funded research, the aggregate threshold is \$5,000;</li> <li>(2) Any equity interest in a non-publicly traded entity;</li> <li>(3) Any equity interest in a publicly-traded company that is 5% or greater;</li> <li>(4) Intellectual property rights and interests from an organization other than The Ohio State University or its affiliates upon receipt of income.</li> </ol>
Unit	College or administrative unit.
University responsibilities	Collectively, the educational, healthcare, research, scholarship, service, and administration activities that constitute an employee's obligations to the university, including time and effort allocation and the protection of university resources and intellectual property. University responsibilities are the same as institutional responsibilities in federal regulations.



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### Policy Details

- I. Expectations and Responsibilities
  - A. This policy conveys university practices and procedures to maintain compliance with laws, regulations, and policies while also protecting university employees pursuing outside activities.
  - B. All employees covered under this policy are required to devote their primary professional allegiance to the university. Outside activities, while often valuable in themselves, may interfere or appear to interfere with ones' expectations, obligations, and/or responsibilities to students, colleagues, and the university.
  - C. All employees must disclose outside activities, as set forth in this policy, for review and approval before engaging in them.
  - D. Employees must take all necessary steps to avoid, eliminate, remediate, and/or manage COCs, COIs, and FCOIs.
  - E. The ethical expectations and responsibilities for all employees are also requirements of various state and federal laws and regulations, a few of which are highlighted below.
    1. All university employees are subject to the Ohio Ethics Law found in [Ohio Revised Code Chapter 102, Section 2921.42](#), and [Section 2921.43](#). Employees may be exempt from certain restrictions based on their positions in accordance with applicable law. Additional information is available on the Ohio Ethics Commission's website and in the university's [Guide to the Ohio Ethics Law and Outside Activities](#). Under the Ohio Ethics Law, university employees may not:
      - a. Have a prohibited financial or fiduciary interest in a contract involving the university;
      - b. Use their authority or influence to obtain or authorize a contract between the university and themselves, a family member, or business associate;
      - c. Accept compensation for the performance of their university duties from any person or entity other than the university; or
      - d. Accept anything of value that may have a substantial and improper influence upon them with respect to their university duties.
    2. Federal regulations require the university to adopt a policy and procedures for identifying, managing, and reporting FCOIs. Specifically, the university must comply with the requirements of [42 C.F.R. 50, Subpart F, "Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought"](#) as implemented in the 2011 Final Rule for grants and cooperative agreements and [45 C.F.R., Part 94, "Responsible Prospective Contractors."](#)
    3. The [Creating Helpful Incentives to Produce Semiconductors and Science Act of 2022](#) (CHIPS and Science Act, Public Law No. 117-167) directs federal research agencies to issue policies requiring covered individuals to disclose if they are a party to a foreign talent recruitment program contract, agreement, or other arrangement. The act also directs agencies to prohibit researchers involved with federally funded research projects from participating in malign foreign talent recruitment programs. (See [Foreign Talent Programs \(FTP\) Standard Operating Procedure \(SOP\)](#) for more detail.)
  - F. Units may have additional, more restrictive requirements or patterns of administration, such as the [Ohio State Wexner Medical Center Vendor Interaction Policy](#) and the College of Medicine Guidance on Faculty Consulting.
  - G. All employees must disclose all outside activities to their unit, in accordance with Procedure I-II below. An employee also must provide additional relevant information concerning disclosed or undisclosed matters as may be requested by their supervising authority for the purpose of evaluating actual or potential COCs, COICs, and FCOIs.
- II. Conflict of Commitment (COC)
  - A. The responsibilities and professional activities that constitute an appropriate and primary commitment will differ among units but must be in accord with university policies and based on an understanding between the employee and their unit.
  - B. Faculty



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1. Faculty members, including administrators with faculty appointments, are encouraged to engage in outside activities to the extent that their unit supports such activities. However, any such activities must be clearly related to the mission of the university and the expertise of the faculty member, and must not create an unmanageable conflict.
2. The proportion of a full-time faculty member's professional effort devoted to outside activities is not to exceed one business day per week during a fiscal year. Faculty with an appointment of at least fifty percent but less than full-time may be allowed a prorated number of days for outside activities as determined by their employing unit within its sole discretion. Faculty with an appointment of less than fifty percent are not allowed to engage in outside activities during on-duty periods. See [Faculty Rule 3335-5-07](#) for an explanation of on-duty periods.
3. Absent prior unit approval, situations that create an actual or a perceived COC include, but are not limited to, the following examples:
  - a. Teaching at another university during on-duty periods, or otherwise representing yourself as a faculty member of another university.
  - b. Using one's professional or clinical expertise during on-duty periods to provide services that compete with those provided by the university.
  - c. Participating in outside activities to the detriment of your university responsibilities.
  - d. Participating in professional and/or private business activities that interfere with or reduce effort and time committed to awarded federal or other external funds.
  - e. Conducting research or novel scientific investigation as an employee of or a private consultant to an outside entity when such work may be conducted as research sponsored through the Office of Sponsored Programs.
4. Outside activities during off-duty periods are not subject to time limitations; however, to ensure a conflict does not exist, the outside activities are still subject to prior approval and disclosure requirements.

### C. Staff

1. Staff engaging in outside activities must avoid a COC with their assigned university responsibilities.
2. Staff must use accrued vacation, compensatory time (non-exempt staff only), and/or leave without pay for both paid and unpaid outside activities occurring during **designated work time**.
3. Staff may perform unpaid outside activities that advance the university interests during designated work time if prior approval from the staff member's supervisor is obtained and the activities otherwise comply with this policy.

### D. Employees involved in outside activities with foreign entities may raise unique COC concerns. COCs may exist in outside activities with foreign entities in a variety of situations, including but not limited to when:

1. Activities interfere with the employee's time commitment and work obligations to the university;
2. An employee cites a primary affiliation with the foreign entity on publications;
3. An employee's activities at the foreign entity compete with their obligations to carry out similar activities at the university; or
4. Intellectual property that would be the sole property of the university becomes jointly shared with the foreign entity.

### E. Researchers engaging in federally funded research are prohibited from participating in a malign foreign talent recruitment program. (See [FTP SOP](#).)

## III. Conflict of Interest (COI)

- A. All employees are prohibited from engaging in outside activities that create an improper influence on their university decisions. All employees are also prohibited from engaging in outside activities that create a prohibited interest in a university contract or transaction or that otherwise violate the Ohio Ethics Law. (For more information see the [Guide to the Ohio Ethics Law and Outside Activities](#).)
- B. Faculty members must be especially sensitive to potential conflicts between their outside activities and their teaching responsibilities relative to students and trainees working under their supervision and/or grants. To avoid such conflicts, a faculty member may not hire or directly supervise a university student in outside



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activities while simultaneously serving as the student's advisor, supervisor, or as a participant on that student's thesis or dissertation committee without prior approval of the Conflict Approval Committee (CAC).

#### IV. Financial Conflict of Interest (FCOI) in Research

- A. All individuals conducting university research must disclose outside activities so as to either avoid potential conflicts of interest or allow such conflicts to be managed as described in Procedure I-VIII and the [FCOI SOP](#).
- B. An FCOI may arise when the **researcher** (or the researcher's spouse or dependent child) holds a **significant financial interest (SFI)** that is related to the research. Examples include, but are not limited to, the following situations:
  - 1. The SFI is held in an entity that is funding the research, providing in-kind support for the research, or participating in the research, or the entity may otherwise financially benefit from the research.
  - 2. The SFI could affect the design, conduct, or reporting of the research.
  - 3. The SFI could be affected by the research.
- C. If the unit or the CAC determines that a research conflict cannot be managed, the researcher must eliminate the outside activity or refrain from participating in the research.

#### V. Use of University Resources, Name/Other Identifiers, and Employees for Outside Activities

- A. Employees may not use the university's facilities, equipment, services, supplies, or other resources for outside activities except when such use is pursuant to a contractual agreement with the university.
- B. Employees must ensure that any publicity or advertising relating to authorized outside activities is not detrimental to the reputation and/or interests of Ohio State.
- C. Employees may not use the university's name, trademarks, logos, indicia, or the fact that they are affiliated with the university in a manner that suggests that the university approves, disapproves, endorses, or promotes the following:
  - 1. A product or service provided by a for-profit, non-profit, or governmental entity;
  - 2. Research that the university has not performed or issued research findings when the university has not done so, or misleadingly states the results of university research; or
  - 3. Any communication that may be interpreted as the official position of the university on any issue, such as when providing expert testimony in a legal proceeding.
- D. Employees engaging in outside activities may not use other university employees to assist in the outside activity unless they obtain pre-approval from the CAC. In the case of graduate associates, prior approval of the applicable dean is also required.

#### VI. Intellectual Property

- A. Ohio law, federal law, and the university's [Intellectual Property policy](#) govern ownership of intellectual property rights. These laws and the university's Intellectual Property policy apply to university employees during both on-duty and off-duty periods.
- B. For outside activities, whether paid or unpaid, university employees must not agree to transfer, license, grant, or assign to other people or entities any intellectual property rights that the university owns pursuant to applicable laws or the university's Intellectual Property policy. Before signing any agreement that transfers, licenses, grants, or assigns any intellectual property rights, a university employee must contact the university's technology commercialization office to determine the applicability of Ohio law, federal law, and/or the university's Intellectual Property policy, and the university employee must abide by the university's requirements to protect the university's intellectual property rights, which may include adding the university's intellectual property addendum to agreements for outside activities.
- C. Employees who wish to participate in the commercialization of their university work must adhere to the specific standards and requirements as stated in the university's Intellectual Property policy and the University Rules Governing Faculty and Staff Participation in Companies Commercializing University Research. See [Rule 3335-13-07](#).



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### VII. Accountability

- A. Violations of this policy include the failure to report potential conflicts or to abide by a **conflict management plan (CMP)**. Violations of this policy also include the failure to obtain prior approval before engaging in outside activities and failure to disclose outside activities with foreign entities, particularly participation in foreign government talent programs or other programs that would require an individual to not disclose their participation in such a program to the university.
- B. Individuals who violate this policy may be subject to corrective or disciplinary action, up to and including termination or dismissal, in accordance with applicable policies, rules, collective bargaining agreements, or the [Code of Student Conduct](#).

## PROCEDURE

Issued: 09/01/2022

Revised: 12/22/2022 (minor revision)

### I. General Procedure – **Electronic Conflict of Interest (eCOI) Disclosure Process**

- A. Individuals engaged in university research activities (see [FCOI SOP](#)), employees otherwise identified by their unit, including those who have financial or fiduciary responsibilities, college/regional campus deans, and President’s Cabinet members must annually complete an eCOI disclosure form regardless of whether they are engaged in outside activities. Proper completion of the eCOI disclosure form promotes transparency and accountability. (See [Common Scenarios for eCOI](#) and [eCOI: What Not to Disclose](#).)
  1. Researchers must update their annual eCOI disclosure form within 30 days of when any disclosed activity changes or they engage in a new outside activity.
  2. All researchers must disclose all outside activities in eCOI and must complete the required formal COI training in eCOI before engaging in any PHS or Department of Energy (DOE) funded research. (See [FCOI SOP](#).)
  3. Disclosures are normally updated automatically when a new outside activity is approved by the unit or the CAC. However, the employee is responsible for ensuring that their eCOI disclosure is accurate.
  4. Units are responsible for identifying employees not engaged in research who are also required to complete an eCOI disclosure based on criteria identified in the eCOI Disclosure Criteria Document and the Ohio State University Wexner Medical Center Conflict of Interest Protocol/Process Document.

### II. General Procedure – Outside Activities Approval Form Submission, Review, and Approval

- A. Before participating in outside activities, all employees must submit an [Outside Activities Approval Form](#) to their unit, provide the required documentation, and obtain approval from the unit for all outside activities.
- B. The unit is responsible for reviewing the [Outside Activities Approval Form](#) and determining, in consultation with conflict administrators (see Procedure IV below) as needed, whether the unit will approve, deny, or obtain required Conflict Approval Committee (CAC) approval of the outside activity.
- C. If the unit determines that CAC approval is not required, the unit may approve or deny the outside activity using the [Outside Activities Approval Form](#).
- D. Individuals may appeal a unit’s denial by submitting an appeal in writing to the CAC chair. The CAC chair, in consultation with the CAC, will review the appeal and decide whether to issue an advisory opinion to the unit.
- E. CAC approval is required if the outside activity may:
  1. Create an FCOI that could affect the design, conduct, or reporting of research;
  2. Interfere with the employee’s time commitment to the university;
  3. Compete with coursework or services that are or may be provided by the university;
  4. Interfere with the employee’s ability to carry out their university responsibilities;
  5. Improperly influence the employee’s or another individual’s university decisions;
  6. Create a prohibited interest in a university contract or transaction;
  7. Involve the use of university resources, name/other identifiers, or employees; or



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8. Involve the use or generation of university-owned intellectual property
- F. Individuals must cooperate fully in the review of the pertinent facts and circumstances.
- G. Upon completing its review, the CAC will provide its decision to individuals in writing.
- H. If the CAC determines that a conflict exists, the CAC will require a CMP to manage the conflict whenever possible. Employees must fulfill the requirements of CMPs to engage in the desired outside activities.
- I. If an activity cannot be managed to avoid a conflict, the employee must refrain from participating in the activity.
- J. The CAC will review information regarding the approval and denial of outside activities on an annual basis.
- K. Employees do not need prior approval from their unit to engage in **professional service** within the U.S. However, employees do need prior approval from their unit to engage in professional service involving a foreign government agency or a foreign government institution. Approving units may consult with the Office of Secure Research for additional information.
- L. Unit approvers and employees are encouraged to consult with conflict administrators (see Procedure IV below) about complex outside activities requests.

### III. Financial Conflicts of Interest (FCOI) in Research

- A. The unit and/or conflict administrators (see Procedure IV below) will review eCOI disclosures with SFIs, or personally reimbursed or sponsored travel related to university responsibilities, and may refer such matters to the CAC for review if the activity presents a potential COI. (See [FCOI SOP](#).)
- B. As set forth in the [FCOI SOP](#), if an individual fails to disclose an SFI or comply with a CMP, or if the institution fails to review or manage an FCOI related to a PHS or DOE funded project, the university will complete a retrospective review of the research at issue to evaluate whether these actions created any bias in the design, conduct, or reporting of the research. If bias is found, the university will take corrective action as it deems appropriate. (See [FCOI SOP](#).)
- C. The vice president for research or designee (see [FCOI SOP](#)) is responsible for providing FCOI reports to outside funding agencies as required by federal regulations or the terms of sponsored research agreements.
- D. Potential conflicts involving human subjects research require special scrutiny. Given the real or perceived risks to the welfare and rights of human subjects, the CAC will advise the Institutional Review Board (IRB) regarding such conflicts. (See [FCOI SOP](#).)
  1. Conflicted researchers may not serve as principal investigators in projects deemed greater than minimal risk by the IRB. Limited exceptions may be made in specific cases.
  2. Researchers who believe that the conflict management measures adopted by an IRB are not appropriate or are based on erroneous information must follow applicable IRB procedures for requesting additional review. Decisions made by the IRB are final.

### IV. Conflict Administrators

- A. The executive vice president and provost will appoint a conflict administrator in the Office of Academic Affairs (OAA) to support implementation of this policy, assist faculty in identifying conflicts, and inform the university community about the policy.
- B. The vice president for research will appoint a conflict administrator in the Office of Research Compliance (ORC) to support implementation of this policy; design procedures for reporting FCOIs to federal sponsors; assist faculty and other employees in the research community in identifying, managing, or COCs, COIs and FCOIs; and inform the university research community about regulatory or policy changes.
- C. The vice president and chief compliance officer will appoint a conflict administrator in the Office of University Compliance and Integrity (OUCI) to support implementation of this policy; assist employees in identifying conflicts; and inform the university community about the policy and issues relating to COCs, COIs, and compliance with the Ohio Ethics Law.
- D. The senior vice president for human resources will appoint a conflict administrator in the Office of Human Resources (OHR) to support implementation of this policy; assist employees in identifying conflicts; and inform the university community about the policy.



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- E. The Ohio State University Wexner Medical Center (OSUWMC) chief compliance officer will appoint a conflict of interest officer to support OSUWMC faculty and staff with implementing this policy and unit-specific policies.
  - F. The senior vice president and general counsel will appoint one or more attorneys to advise conflict administrators and the CAC on the requirements of the law and university policy.
- V. Conflict Approval Committee (CAC)
- A. CAC membership is comprised of the following:
    - 1. A chair selected by OUCI;
    - 2. Faculty or staff voting representatives recommended by units and approved by OUCI;
    - 3. Non-voting conflict administrators and representatives from major constituency groups, including ORC, OUCI, OSUWMC, OHR, OAA, Office of Legal Affairs, and Office of Responsible Research Practices.
  - B. A majority of the CAC voting members will be tenured faculty.
  - C. The CAC will review and approve or manage COC, COI, and FCOIs related to employees' outside activities, as described in Procedure II.
  - D. The CAC will periodically review the operations of this policy related to COCs, COIs, and FCOIs and make operational changes as needed, including those mandated by federal and state regulation or accreditation requirements.
  - E. CAC members will meet for annual training sessions provided by the ORC and the OUCI regarding the Outside Activities and Conflicts policy and related federal regulations and state ethics laws.
- VI. CAC Reconsideration Process
- A. Within seven (7) days of receiving a CAC decision, an employee may request reconsideration by submitting a written request to the CAC chair. A request for reconsideration must show that the CAC decision was not appropriate or was based on erroneous or incomplete information. Employees may present relevant new or additional information in their reconsideration requests.
  - B. The CAC chair, in consultation with the CAC, will review and consider requests for reconsideration.
  - C. In cases where a CAC decision prevents an employee from participating in an outside activity because it is incompatible with the interests of the university, the CAC may request an additional evaluation from other university officials with relevant knowledge or expertise.
  - D. The CAC chair will make every effort to respond in writing within fourteen (14) days to the employee requesting reconsideration.
  - E. Reconsideration decisions by the CAC are final.
- VII. Prospective Employees
- A. Job applicants must disclose potential COCs, COIs, and FCOIs and make acceptable arrangements with the unit, and if necessary, the CAC. These arrangements must be included in the offer letter. The inability to reach an acceptable arrangement regarding a conflict may result in revocation of the offer letter or non-selection.

### Responsibilities

Position or Office	Responsibilities
Conflict administrator	1. Support implementation of this policy, assist employees in identifying conflicts, and inform university community about policy. 2. Consult with unit to review Outside Activities Approval Form as needed. 3. Review eCOI disclosures with SFIs or personally reimbursed or sponsored travel related to university responsibilities and design procedures for reporting FCOIs to federal sponsors (Conflict Administrator in ORC only).
Conflict Approval Committee (CAC)	1. Review and issue a decision on Outside Activities Approval Forms elevated by the unit. 2. Consult with CAC chair to review appeals of unit denials and requests for reconsideration of CAC decisions as set forth in the policy.





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Position or Office	Responsibilities
	<ol style="list-style-type: none"> <li>3. Review and approve or manage outside activities that meet any condition outlined in Procedure II.E.</li> <li>4. Require a CMP to manage a conflict, whenever possible, if a conflict is determined to exist.</li> <li>5. Review information regarding approval and denial of outside activities on an annual basis.</li> <li>6. Advise IRB regarding potential conflicts involving human subjects research.</li> <li>7. Periodically review the operations of this policy related to COCs, COIs, and FCOIs and make operational changes as needed.</li> <li>8. Meet for annual training sessions as set forth in the policy.</li> </ol>
CAC chair	<ol style="list-style-type: none"> <li>1. Review appeals of unit denials and requests for reconsideration of CAC decisions, in consultation with the CAC, as set forth in the policy.</li> <li>2. Make every effort to respond in writing within fourteen (14) days to employees requesting reconsideration.</li> </ol>
Employee	<ol style="list-style-type: none"> <li>1. Devote primary professional allegiance to the university and conduct university responsibilities with integrity.</li> <li>2. Arrange outside obligations, financial interests, and activities so as not to conflict or interfere with commitment to the university or best interests of patients.</li> <li>3. Submit an Outside Activities Approval Form and obtain approval before engaging in outside activities.</li> <li>4. Take all necessary steps to avoid, eliminate, remediate, and/or manage COCs, COIs, and FCOIs.</li> <li>5. Refrain from participating in activities if an activity cannot be managed to avoid a conflict.</li> <li>6. Ensure that any publicity or advertising relating to authorized outside activities is not detrimental to the reputation and/or interests of Ohio State.</li> <li>7. Contact TCO to determine applicability of Ohio law, federal law, and/or the university's Intellectual Property policy before signing any agreement that transfers, licenses, grants, or assigns any intellectual property rights.</li> <li>8. Ensure that any required eCOI disclosure is accurate.</li> <li>9. Fulfill requirements of CMPs, if required, to engage in the desired outside activities.</li> <li>10. Receive prior approval from their unit to engage in professional service involving a foreign government agency or foreign government institution.</li> </ol>
Employees engaged in research at the university, employees identified by unit as having significant financial or fiduciary responsibilities, college and regional campus deans, and President's Cabinet members	Annually complete eCOI disclosure form regardless of whether they are engaged in outside activities.
Executive vice president and provost	Appoint a conflict administrator in OAA.
Individuals conducting university research	<ol style="list-style-type: none"> <li>1. Update annual eCOI disclosure form within 30 days of when any disclosed activity changes or engaging in a new outside activity.</li> <li>2. Complete required formal COI training in eCOI before engaging in any PHS or DOE funded research.</li> </ol>
Job applicants	Disclose potential COCs, COIs, and FCOIs and make acceptable arrangements with unit, and if necessary, CAC.
Senior vice president and general counsel	Appoint one or more attorneys to advise conflict administrators and the CAC on the requirements of the law and university policy.
Office of University Compliance and Integrity (OUCI)	<ol style="list-style-type: none"> <li>1. Select CAC chair.</li> <li>2. Approve CAC faculty or staff voting representatives recommended by units.</li> <li>3. Provide annual training sessions to CAC members as set forth in the policy.</li> </ol>
OSUWMC chief compliance officer	Appoint a conflict of interest officer to support OSUWMC faculty and staff with implementing this policy and unit-specific policies.
Office of Research Compliance (ORC)	Provide annual training sessions to CAC members as set forth in the policy.
Unit	<ol style="list-style-type: none"> <li>1. Identify employees who are required to complete an eCOI disclosure.</li> </ol>



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Position or Office	Responsibilities
	<ol style="list-style-type: none"> <li>Review Outside Activities Approval Form and determine, in consultation with conflict administrators as needed, whether to approve, deny, or obtain required Conflict Approval Committee (CAC) approval of the outside activity.</li> <li>Review eCOI disclosures with SFIs or personally reimbursed or sponsored travel related to university responsibilities as set forth in the policy.</li> <li>Recommend CAC faculty or staff voting representatives to OUCI.</li> </ol>
Vice president and chief compliance officer	Appoint a conflict administrator in OUCI.
Vice president for research or designee	<ol style="list-style-type: none"> <li>Provide FCOI reports to outside funding agencies as required by federal regulations or the terms of sponsored research agreements.</li> <li>Appoint a conflict administrator in ORC.</li> </ol>

### Resources

#### Governance Documents

- 42 C.F.R. 50, Subpart F-Promoting Objectivity in Research, [ecfr.gov/current/title-42/part-50](https://www.ecfr.gov/current/title-42/part-50)
- 45 C.F.R., Part 94-Responsible Prospective Contractors, [ecfr.gov/current/title-45/part-94](https://www.ecfr.gov/current/title-45/part-94)
- Creating Helpful Incentives to Produce Semiconductors and Science Act of 2022, [congress.gov/bill/117th-congress/house-bill/4346](https://www.congress.gov/bill/117th-congress/house-bill/4346)
- Code of Student Conduct, [trustees.osu.edu/bylaws-and-rules/code](https://trustees.osu.edu/bylaws-and-rules/code)
- Corrective Action and Involuntary Termination policy, [hr.osu.edu/policy/policy815.pdf](https://hr.osu.edu/policy/policy815.pdf)
- Faculty Rule 3335-5-01, [trustees.osu.edu/bylaws-and-rules/3335-5](https://trustees.osu.edu/bylaws-and-rules/3335-5)
- Faculty Rule 3335-5-07, [trustees.osu.edu/bylaws-and-rules/3335-5](https://trustees.osu.edu/bylaws-and-rules/3335-5)
- Faculty Rule 3335-13-07, [trustees.osu.edu/university-faculty-rules/3335-13](https://trustees.osu.edu/university-faculty-rules/3335-13)
- Financial Conflict of Interest Standard Operating Procedures, [go.osu.edu/fcoiinresearchsop](https://go.osu.edu/fcoiinresearchsop)
- Foreign Talent Programs Standard Operating Procedures, [research.osu.edu/research-responsibilities-and-compliance/conflict-interest/foreign-talent-programs](https://research.osu.edu/research-responsibilities-and-compliance/conflict-interest/foreign-talent-programs)
- Intellectual Property policy, [go.osu.edu/intellectual-property-policy](https://go.osu.edu/intellectual-property-policy)
- Ohio Ethics Law, Ohio Revised Code Chapter 102, [codes.ohio.gov/ohio-revised-code/chapter-102](https://codes.ohio.gov/ohio-revised-code/chapter-102)
- Ohio Ethics Law, Ohio Revised Code §2921.42, [codes.ohio.gov/ohio-revised-code/section-2921.42](https://codes.ohio.gov/ohio-revised-code/section-2921.42)
- Ohio Ethics Law, Ohio Revised Code §2921.43, [codes.ohio.gov/ohio-revised-code/section-2921.43](https://codes.ohio.gov/ohio-revised-code/section-2921.43)
- Review of Research by The Convened IRB, [go.osu.edu/hrpppolicy12](https://go.osu.edu/hrpppolicy12)
- Wexner Medical Center Vendor Interaction Policy, [wexnermedical.osu.edu/about-us/employee-onesource](https://wexnermedical.osu.edu/about-us/employee-onesource)

#### Additional Guidance

- College of Medicine Faculty Outside Activities Guidance, [onesource.osumc.edu/sites/forms/Pages/COM%20Faculty%20Affairs%20Forms.aspx](https://onesource.osumc.edu/sites/forms/Pages/COM%20Faculty%20Affairs%20Forms.aspx)
- Common Scenarios for eCOI, [go.osu.edu/commondisclosurescenarios](https://go.osu.edu/commondisclosurescenarios)
- eCOI: What Not to Disclose, [go.osu.edu/whatnottodisclose](https://go.osu.edu/whatnottodisclose)
- Guide to the Ohio Ethics Law and Outside Activities, [go.osu.edu/ethicsguide](https://go.osu.edu/ethicsguide)
- Outside Activities Approval Form, [go.osu.edu/coi](https://go.osu.edu/coi)
- The Ohio Ethics Law for Public Universities & Colleges, [ethics.ohio.gov/education/factsheets/PublicUniversitiesandColleges.pdf](https://ethics.ohio.gov/education/factsheets/PublicUniversitiesandColleges.pdf)

### Contacts

Subject	Office	Telephone	E-mail/URL
COC questions regarding faculty	Office of Academic Affairs	614-292-5881	<a href="mailto:oaas@osu.edu">oaas.osu.edu</a>
COC questions regarding staff	Office of University Compliance and Integrity	614-292-3251	<a href="mailto:Compliance-integrity@osu.edu">Compliance-integrity@osu.edu</a> <a href="https://Compliance.osu.edu">Compliance.osu.edu</a>



Applies to: Faculty, staff, student researchers, student employees, graduate associates, applicants

Subject	Office	Telephone	E-mail/URL
COI questions	Office of University Compliance and Integrity	614-292-3251	<a href="mailto:Compliance-integrity@osu.edu">Compliance-integrity@osu.edu</a> <a href="http://Compliance.osu.edu">Compliance.osu.edu</a>
FCOI in Research questions	Office of Research Compliance	614-292-9258	<a href="mailto:conflictinfo@osu.edu">conflictinfo@osu.edu</a> <a href="http://orc.osu.edu">orc.osu.edu</a>
International engagement questions	Office of Secure Research	614-688-0725	<a href="mailto:secureresearch@osu.edu">secureresearch@osu.edu</a> <a href="http://go.osu.edu/international-engagements">go.osu.edu/international-engagements</a>
Legal issues	Office of Legal Affairs	614-292-0611	<a href="http://legal.osu.edu">legal.osu.edu</a>

### History

Issued:	09/01/2022	This policy replaces the Faculty Financial Conflict of Interest policy, Faculty Conflict of Commitment policy, Faculty Paid External Consulting policy, and Conflict of Interest and Work Outside the University policy, which are being retired as standalone policies.
Revised:	12/22/2022	Minor revision
Revised:	01/02/2024	Minor revision