

SECTION: HUMAN RESOURCES

AREA: EMPLOYEE RELATIONS

SUBJECT: CONFLICT OF INTEREST FOR ACADEMIC STAFF MEMBERS

Purpose

The University of Arkansas for Medical Sciences (UAMS) is committed to protecting the scholarly record and the university mission (research, teaching, service and patient care) in an ethical environment. The following policy establishes a faculty peer review system that will enable management of potential conflicts of interest among all faculty colleagues.

Scope

This policy applies to all UAMS faculty and academic staff members.

Policy

Full time academic staff members must demonstrate primary professional loyalty to UAMS and devote themselves to teaching, caring for patients, interacting with students, carrying out research and scholarly work, serving on appropriate campus committees, performing administrative duties, and other required functions. Academic Staff Member for purposes of this policy shall be defined as all UAMS faculty, an individual who is the principal investigator on a research project, or any person who is involved with the design, conduct and reporting of research. When other activities interfere with these basic duties, Academic Staff Members must disclose these relationships based on this policy (See Appendix A for a summary).

Conflicts of Interest: A conflict of interest is defined as a divergence of interests away from professional obligations to the Institution. COI is also defined as a divergence of interests toward external sponsors of research or other activities toward an individual's private or personal interests. Under these conditions, an unbiased observer would reasonably conclude the individual's professional actions or deeds were determined by personal considerations of gain, financial or otherwise and were not in the best interest of the Institution and sponsor.

A conflict of interest exists when an individual has an outside interest that affects or provides an incentive to affect the individual's conduct of his or her UAMS activities. Conflicts of interest can arise naturally from an individual's engagement with the world outside of UAMS, and the mere existence of a conflict of interest does not necessarily imply wrongdoing. When conflicts of interest do arise, however, they must be recognized, disclosed and either eliminated or appropriately managed.

Conflicts of Commitment: The term conflict of commitment relates specifically to significant distraction of an individual Academic Staff Member's attention or effort from obligations to the academic appointment (teaching, research, other services, and/or patient care) because of "outside" activities. Professional service activities on the part of College of Medicine faculty, such as patient care and professional consultation, are subject to special constraints as defined in the MCPG By-Laws. Part-time faculty may not be subject to conflict of commitment guidelines due to the nature of their appointments; however they are subject to conflict of commitment requirements, especially if they participate in sponsored activities. These instances should be discussed with individual chairs and/or division heads. The following list represents conflicts of commitment:

1. **Absence:** Commitments that involve frequent or prolonged absence from the University on non-University business.
2. **Substantial Outside Commitments:** Commitments that engage a substantial portion of the time an Academic Staff Member is expected to spend in University-related activities and which thereby reduce the amount or quality of participation in the clinical, instructional, scholarly or administrative work of the University. Situations where an Academic Staff Member, while serving in a position at the University makes a substantial contribution to the non-educational services offered by another entity that interferes with UAMS duties.
3. **Multiple Teaching Appointments:** Situations where an Academic Staff Member, while serving in a position at the University, is concurrently engaged to teach a course or otherwise make a substantial contribution to the instruction or educational services offered by another entity. Instructional activities performed in the course of normal faculty scholarly leave, which are routinely subject to disclosure and approval processes, are not meant to be covered by this example.
4. **Limitations on Performance of Duties:** Situations where an Academic Staff Member, as part of an arrangement with an entity unaffiliated with the University, agrees to any limitations on his/her performance of teaching or other instructional duties, or non-teaching duties for the University (e.g., through agreements containing exclusive provider, non-competition or right of first refusal clauses).
5. **External Executive or Managerial Appointments:** Situations where an Academic Staff Member is asked to assume Executive Positions with outside organizations that might seriously divert the individual's attention from University duties, or create other conflicts of loyalty.

Outside employment is governed by University of Arkansas Board of Trustees Policy 450.1. That policy establishes that outside employment "shall not interfere in any substantial way with the employee's University duties nor conflict with his/her University assignments." The policy further recognizes that full-time faculty and non-classified administrative staff members "are obligated to devote their working time and efforts primarily to University activities". Outside employment requires prior written approval by the department head and/or dean.

Activities Related to Students/Trainees: Academic Staff Members may not assign students, post -doctoral fellows, or other trainees to University projects sponsored by any Business if the Academic Staff Member or a Family Member has a Significant Financial Interest in or is an officer or director for such Business. Academic Staff Members also may not assign students or trainees or permit students or trainees to participate in any consulting relationship of the Academic Staff Member which constitutes a Significant Financial Interest for the Academic Staff Member or a Family Member.

Deans and department chairs have the responsibility for protecting the interests of students, fellows, and trainees who may be directly or indirectly involved in a conflict situation based upon their institutional role and relationship with a faculty or staff Academic Staff Member who has a financial interest in which the student is involved, in accordance with this Policy.

Activities Related to Academic Staff Members and Immediate Family Members: An Academic Staff Member may not participate in the hiring process or any employment - related decisions pertaining to a Family Member. Likewise, an Academic Staff Member may not be in a position to supervise a Family Member as an employee of the University or otherwise review or participate in reviewing a Family Member's work as an employee of the University.

Research and Healthcare Activities: An Academic Staff Member may not review, approve or administratively control contracts, grants, clinical trials, or other business relationships when such contract, grant, clinical trial, or other business relationship pertains to Sponsored Research involving the University and a Business in which the Academic Staff Member or a Family Member has any financial interest or when the Academic Staff Member or Family Member is an employee of the Business and directly involved with activities pertaining to the Sponsored Research. Accordingly, each Academic Staff Member either participating in or otherwise involved in patient care or any University research activities is responsible for learning and complying with the specific policies and procedures pertaining to their work or area of research, including the special policies and procedures for Sponsored Research which is part of this policy.

Conflicts of Interest in Sponsored Research and the provision of patient care involve situations in which financial, professional, or other personal considerations may compromise, or have the appearance of compromising, an individual's judgment in the provision of patient care or the conduct or reporting of Sponsored Research. The bias which may result from such conflicts may impact not only on the collection, analysis and interpretation of data, but also on the hiring of staff, procurement of materials, clinical referrals, sharing of results, choice of protocol, the use of statistical methods, the use of human participants or otherwise influencing the provision of patient care or the course of a Sponsored Research project.

DEFINITIONS:

Academic Staff Member: All UAMS faculty, an individual who is the principal investigator on a research project, or any person who is involved with the design, conduct and reporting of research.

Technology: Any tangible or intangible invention, in the patent sense, whether or not reduced to practice and any research results, whether or not patentable or copyrightable, including:

- (i) any process, method, product, compound, drug, device, biological or biogenic material,
- (ii) any diagnostic, therapeutic, medical, or surgical procedure, or any computer program or software, integrated circuit design, database, technical drawing, or other technical creation whether intended for commercial use or not.

Technology Transfer: Technology transfer refers to the commercialization of ideas, concepts, and inventions through publication, patenting and licensing, and the formation of business entities.

Immediate Family: Family or Family Member: Spouse, children, stepchildren, parents, siblings, and domestic partners (individuals not related by blood, not legally married, but currently in a committed relationship and residing in a common household sharing joint responsibility for the household).

Responsible Administrator: With respect to the disclosure and management provisions of this policy, the term “Responsible Administrator” for an Academic Staff Member refers, in the first instance, to the Vice Chancellor for Academic Affairs and Research Administration (VCAA).

Business Relationships: In general, when Academic Staff Members or their immediate family members are involved in Business ventures as owner, operator, or a major investor or as an Executive Officer.

Gifts: Are defined in the UAMS gift policy and include anything of monetary value from meals and travel to promotional items such as pens, coffee mugs and note pads.

Healthcare Industry: The healthcare industry includes the development, manufacture, supply and delivery of healthcare products or services. Entities in healthcare industry include, but are not limited to, pharmaceutical and medical devices, medical supply, patient transportation and ambulance services, hospitals, laboratories, medical imaging, and physician and nursing services.

CONFLICT OF INTEREST GUIDANCE WHEN HUMANS ARE INVOLVED IN THE RESEARCH

Conflicts of Interest in Human Subject Research:

In addition, if the Conflict of Interest Committee (COIC) determines a conflict exists between the university and the company sponsoring the research, these conflicts and their respective management plans shall be disclosed in the informed consent documents as follows*:

If any investigator listed in the IRB form has a “significant financial interest,” a disclosure statement, such as the following, must be included in the consent form:

The Research staff may make money if the study goes well. There are no plans to share this with people who take part in this study. Please ask the research staff if you have any questions.

If not significant, use the following language:

The Sponsor of this study will give the research doctor [*insert other personnel as appropriate*] or UAMS [*add other sites as appropriate*] money to cover the costs of doing this study. Please ask the research staff if you have any questions.

If the Institution has a “significant financial interest,” a disclosure statement, such as the following, must be included in the consent form:

UAMS may make money if the study goes well. There are no plans to share this with people who take part in this study. Please ask the research staff if you have any questions.

If the PI has received either an “unrestricted research grant” or a “gift” from an outside entity to fund research initiatives, a disclosure statement, such as the following, must be included in the consent form:

(Insert Name of Funder) has given the *(Insert Department or PI Name, whichever is applicable)* money that will help pay for this study and may include money for research staff salaries. Also, this money will cover the costs of *(Insert other uses for the funding, if applicable)*.

*Please note that all revised consent forms are subject to IRB review and approval.

DISCLOSURE AND REVIEW PROCEDURES

Disclosure: Outside activities or Significant Financial Interests relating to the professional roles for which Academic Staff Members are employed by UAMS as well as all contracts with (includes employment), Board service for, and financial interest in entities in healthcare industries or entities that contract with, or are otherwise engaged in business with or seek to do business with UAMS, must be disclosed annually to the

Responsible Administrator by all UAMS faculty (Full and Part-time), using Conflict of Interest disclosure forms (Appendix B).

Federal Grants: At the time of submission of a proposal for any federal grant, the principal investigator of that grant shall provide a verification of currency of disclosure of Significant Financial Interests for all Academic Staff Members involved in the proposed work, and in the event of an award shall be responsible for assisting in developing an assurance of management of conflicts of interest. If federally funded research is to be carried out in part by subgrantees, contractors, or collaborators, the principal investigator is responsible for securing the compliance by such other investigators with this UAMS policy or for providing from the external entities assurances that will enable UAMS to comply with its institutional responsibilities to the funding agency. Prior to expenditure of any funds from a federal award, the Office of Research and Sponsored Programs shall report to the awarding agency the existence of any conflicting interest with respect to the research proposed (but not the nature of the interest or other details) and assure that the interest has been managed, reduced, or eliminated. For any conflicting interest identified subsequent to the initial report under the award, a report shall be made and the conflict managed, reduced, or eliminated within sixty days.

Maintenance of Records: All financial disclosures and records of actions taken by UAMS with respect to each conflicting interest shall be maintained for at least three years from the date of the submission of the final expenditure report for any federally funded project. Such information shall be provided to the funding agency upon appropriately authorized request.

Conflict of Interest Committee: The Conflict of Interest Committee (COIC) shall be appointed by the Vice Chancellor for Academic Affairs and shall be a standing committee of UAMS. The Committee shall include one lay person appointed by the Vice Chancellor for Academic Affairs. The Chair shall be appointed by the Vice Chancellor for Academic Affairs, and the Committee shall meet regularly in order to act in a timely fashion. The Conflict of Interest Committee shall review disclosures for possible conflict and shall advise appropriate officials on the management of the situations using the COIC standard operating procedures. The Committee shall also publish and periodically revise concrete guidelines to assist faculty and administrators.

Special Circumstances: Arkansas state law provides certain exemptions from prohibitions on activities of state employees that encourage facilitation of commercialization of university-generated technology or discovery. Business Incubators: Faculty or staff of state supported institutions of higher education may participate in business incubators within the state. This exemption includes companies in which faculty or staff may have an ownership interest. These exemptions from the state ethics law do not necessarily exempt an individual from any restrictions imposed by UAMS policy. In particular, UAMS policy requires full disclosure through the mechanism outlined in this document and review of the management plan for such business by the COIC.

University Intellectual Property: State Law also provides that it is not a conflict of interest, or a breach of ethical standards for an institution of higher learning to contract with a person or firm in which an employee or former employee has a financial interest if such contract, subcontract or proposal involves patents, copyrights, or other proprietary information in which the institution and the employee have rights or interests. There are restrictions on such activities: the contract or agreement must be approved by the University of Arkansas Board of Trustees in an open meeting.

Campus Committees: All campus committees must be mindful of potential conflicts of interest and must incorporate disclosure of potential conflicts of interest of committee members at the start of each committee meeting.

Physician Preference Purchasing: Any physician wishing to purchase under the physician preference procedure must disclose any contract with or financial interest in the entity selling, manufacturing or otherwise involved in producing the item to be purchased.

ADMINISTRATIVE ACTIONS, PENALTIES, AND APPEALS

Notification of Federal Agencies: If the failure of the investigator to comply with this conflict of interest policy has biased the design, conducting, or reporting of federally funded research, UAMS shall promptly notify the awarding agency of the corrective action taken or to be taken.

Administrative Sanctions: Failure to disclose conflicts of interest in an appropriate and timely manner or failure to comply with procedures to resolve conflicts of interest as recommended by the Conflict of Interest Committee shall result in administrative sanctions determined by the Vice Chancellor for Academic Affairs with advice from the appropriate Dean or other administrative officials and the Conflict of Interest Committee. Additional administrative action may include oral admonishment, written reprimand, reassignment, disqualification from submitting proposals for research support to Federal Agencies or other sponsors, demotion, suspension, or separation.

Appeal: Appeal of any determination by a Responsible Administrator may be made to the next higher level or to the Conflict of Interest Committee. Appeal of sanctions determined as above may be made to the Chancellor, in accordance with the UAMS Grievance Procedure. The decision made by the Chancellor will be final and binding and shall not be subject to further appeal.

Reporting: The UAMS Office of Research and Sponsored Programs shall report identified financial conflicts of interest to the funding agency prior to releasing the award to Grants Accounting for establishing an account.

SIGNATURE: _____ **DATE:** _____

Appendix A

List of activities to monitor for conflicts of interest when conducting university duties.

Category	Activities
I Regular scholarly/creative activities	These activities ordinarily do not require disclosure: <ol style="list-style-type: none">1. Receive royalties for scholarly work2. Hold memberships and/or offices in professional organizations3. Professional review or advisory panels4. Presentations, papers, conferences, exhibits5. Reviewing for scholarly publications6. Service to accreditation bodies
II Performing Sponsored Research	These activities (A-D) require disclosure and management: <p>A) Perform research on new technologies, and;</p> <ol style="list-style-type: none">1. the PI develops the technology, or2. the PI or a family member receives royalties from the technology <p>B) Perform research at the university that serves the needs of a private or public entity. (Excludes industry sponsored clinical trials unless the PI owns the technology).</p>
Executive Positions in Companies	<p>C) Serve in an executive position or on the board of a directors of a company and;</p> <ol style="list-style-type: none">1. the company does work related to what you do for the university, or2. the company does work related to what the university does, or3. company has or seeks a contractual arrangement with the university, or4. the PI receives research support from the same company, or5. the PI accepts a significant financial interest in the same company.
Investing in Companies	<p>D) Have any contractual or financial interest in a company and;</p> <ol style="list-style-type: none">1. in the healthcare industries2. the company has or seeks contractual relationships with the university at the same time, or3. you or a family member hold and executive or board position with the company, or4. the company competes with the university for the same services, or5. the company is a start up company

III

Performing Sponsored Research

These activities are NOT allowed

A) Perform research for a company under a grant and;

1. have a significant financial interest in the company or the company's products, or
2. hold an executive position or board position in a company, or
3. employ a family member
4. accept a grant when the sponsor delays or disallows publication rights
5. use significant university resources for consulting.

Executive Positions in Companies

B) Hold an executive position or board position in a company and;

1. perform research on the company's technology or product, or
2. perform research for the company under a grant, or
3. the company does the same kind of work the faculty member does, or
4. take an action as a University employee that would benefit this company to the detriment of the university

Investing in Companies

C) Have a significant financial interest (or consulting) in a company and;

1. perform research on the company's technology or product, or
2. perform research for the company under a grant, or
3. the company does the same kind of work the faculty member does, or
4. assign students/post-docs/trainees to projects funded by the company, or
5. participate in negotiating contracts for the university, or
6. make referrals of University work to this company

Information

D) Use the University's name or information for personal profit.

E) Use the University's name and presenting without disclosure of SFI in the sponsor

F) Use confidential or privileged University information without authorization from the appropriate University official

G) Transmit or transfer university property for personal gain*

*property, work products, results, materials, records, or nonpublic information

Appendix B

UNIVERSITY OF ARKANSAS FOR MEDICAL SCIENCES
CONFIDENTIAL
CONFLICT OF INTEREST AND COMMITMENT DISCLOSURE

Fiscal Year: _____

NAME: _____
Last, First Social Security Number

ADDRESS: _____
Department Building Room Phone

POSITION: _____
Title Faculty (Yes/No)

Click twice on all that apply. Change the default value to “checked”:

- Annual Update Full-time Employee Part-time Employee
- First Time Form Research Personnel Non-research Personnel
- Ad Hoc report

The following questions address situations that may continue into the above referenced Fiscal Year, but only those situations that, to an outside person could appear to affect objectivity in your professional role at UAMS. For example, it is not necessary to list stock in a bank unless that bank is engaged in business with UAMS or funds research at UAMS, additionally it is not necessary to list a spouse’s unrelated business activities.

1. **Ownership:** Do you or your immediate family members own any interest in any corporation; partnership; trust; joint venture; or other business interest, including land used for income, which represents a legal or equitable interest exceeding \$10,000 or five percent whichever is less (Ownership of intellectual property, e.g., patents, royalties, and copyrights is also included. Ownership of funds and holdings acquired through the UA retirement programs are not included.). No Yes

If patents, list patent number, date of patent and title of patent:

2. **Compensation:** Have you or your immediate family members received or expect to receive salary, anything of value (gifts, favors or gratuities), or economic benefit in return for services rendered in excess of \$10,000, including consulting fees in excess of \$10,000 from any one entity. No Yes

3. **Office:** Do you or immediate family members hold a position or office of director, officer, associate, partner, or proprietor in any outside entity in which you or your family

hold greater than 5% ownership interest or for which you or your family received more than \$10,000 compensation per year. No Yes

4. **Fees and Commissions:** Do you or does a member of your family receive an aggregate of \$10,000 or more in fees or commissions from one or more outside entities. No Yes

5. **Commitment:** Do you have any other relationships, commitments, or activities in which an independent observer could conclude present a conflict of commitment with your UAMS appointment? Such interests may include financial or fiduciary interests or uncompensated activities. (See examples in Policy) No Yes

6. **Employment of UAMS Staff:** Do you have non-university professional or income producing activities involving UAMS students or staff, or do you employ for any outside activities any UAMS students or staff. No Yes

7. **UAMS vendors:** Do you or immediate family members contract with, serve on a board for, or own any financial interest in any entity engaged in business with or seeking to do business with UAMS. No Yes

8. **Healthcare industries:** Do you or immediate family members contract with, serve on a board for, or own any financial interest in any entity in the healthcare industry engaged in business with or seeking to do business with UAMS. No Yes

Complete and sign the remainder of this page. If you have answered "Yes" to any of the questions above, you must complete Disclosure Statement Form B.

DECLARATION:

I, _____, declare that this report of financial and commitment interest and potential conflict of interest and commitment has been examined by me and to the best of my knowledge and belief is a true, correct and complete statement. I have read the Board policy on Conflict of Commitment and Conflict of Interest and I have complied with policies and procedures of the University of Arkansas for Medical Sciences. I have complied with Federal conflict of interest policies and regulations. Also, I understand that UA Board's policy states that failure to file this statement as required or intentionally filing a false statement may result in disciplinary action. Any changes to this statement will be reported prior to proposal submission.

Signature

Date

ACCEPTED: As the responsible administrator for this Academic Staff Member, I hereby declare I have reviewed this information and it is correct to the best of my knowledge.

Chair/Director/Unit Head

Date

FORM B

UNIVERSITY OF UNIVERSITY OF ARKANSAS FOR MEDICAL SCIENCES
CONFIDENTIAL

(ONLY TO BE COMPLETED IF REQUIRED BY ANSWERS TO QUESTIONS IN FORM A)

DISCLOSURE STATEMENT OF SIGNIFICANT FINANCIAL
COMMITMENT INTERESTS

SECTION I - CONFLICT OF INTEREST

In compliance with Federal, Board, and University of Arkansas for Medical Sciences policies, disclosure of relevant significant financial interest is required of all full-time faculty and unclassified staff and all other members of the UAMS community who are responsible for the design, conduct, or reporting of research or educational activities. The disclosure of interests includes those of the UAMS employee, his or her spouse, immediate family members, and other members of the personal household. "Significant Financial Interest" means anything of monetary value including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria), equity interests (e.g., stocks, stock options, or other ownership interests), and intellectual property rights (e.g., patents, copyrights, and royalties from such rights). The term does not include any of the following:

- i. Salary, royalties, or other remuneration from the Medical Center including funds and holdings acquired through the Board retirement programs;
- ii. Income (e.g., salary, fees, or other continuing payments) in an amount of \$10,000 or less per annum from any one business enterprise or entity when aggregated for the employee and members of his/her family.
- iii. Financial interest in any one business enterprise or entity if the value of those interests does not exceed a five percent ownership interest when aggregated for the employee and members of his/her family, except for UAMS vendors and entities in healthcare industry.

A. EMPLOYEE IDENTIFICATION

Name: _____
Last, First MI Social Security Number

B. IDENTIFICATION OF POSSIBLE CONFLICT

Identify the relevant research and educational activities that may be affected by the financial or ownership interest that you, your spouse, immediate family members or other members of your personal household may have. Complete the remainder of this section with this possible conflict in mind.

C. OWNERSHIP INTERESTS

List any corporation, partnership, proprietorship, trust, joint venture, and other business interest, including land used for income in which either you or other members of your household own or have owned within the preceding 12 months a legal or equitable interest exceeding \$10,000 or five percent. If you or members of your household own more than five percent of a business, you must disclose the percentage held. Please insert additional pages if necessary to complete this section.

If you have nothing to report in Section "C," check here _____

Business Name and Address Type of Business Description of Interest Held by Whom Percent of Ownership

Interests

- 1. You _____
Spouse _____
Other* _____
- 2. You _____
Spouse _____
Other* _____
- 3. You _____
Spouse _____
Other* _____
- 4. You _____
Spouse _____
Other* _____

* "Other" refers to immediate family members and other members of your household.

D. RECEIPT OF COMPENSATION List all places of employment and other business from which you or any member of your household expect to receive \$10,000 or more in compensation per year.

D.1 YOUR place(s) of employment or other business in the preceding calendar year.

If same as section "A" (current employment), check here _____

If you have nothing to report in Section "D.1," check here _____

Name of Business Address Type of Business

- 1. _____
- 2. _____

D.2 SPOUSE'S place(s) of employment or other business in the preceding calendar year.

If you have nothing to report in Section "D.2," check here _____

Name of Business Address Type of Business

- 1. _____

2. _____

D.3 OTHER HOUSEHOLD MEMBER(S) place(s) of employment or other business in the preceding calendar year.

If you have nothing to report in Section "D.3," check here _____

Name of Business Address Type of Business

1. _____
2. _____
3. _____

E. OFFICER OR DIRECTOR OF AN ORGANIZATION OR BUSINESS

List any organization or business in which you, your spouse, or any other member of your household, hold a position of officer, director, associate, partner, or proprietor for which more than an aggregate of \$10,000 compensation is received per year or more than five percent is owned. Please insert additional pages if necessary to complete this section.

If you have nothing to report in Section "E," check here _____

Name and Address of Business Position Held by Whom

1. _____
2. _____
3. _____
4. _____
5. _____

F. RECEIPT OF FEES AND COMMISSIONS

List each client or customer from which you, your spouse, or any household member receives an aggregate of \$10,000 or more per year which could present a potential conflict of interest with any of your research/educational activities. In the case of partnership, it is your proportionate share of the business or fee that is significant, without regard to expenses of the partnership. An individual who receives a salary as opposed to portions of fees or commissions is generally not required to report under this provision, but may be required to report under Section D. above.

Please insert additional pages if necessary to complete this section.

If you have nothing to report in Section "F," check here _____

Name and Address of Client or _____

Customer _____

Position Held by Whom _____

G. HEALTHCARE INDUSTRIES AND VENDORS

List each UAMS and healthcare entity which you or immediate family member contract with, have a financial interest in, or provide board service.

Please insert additional pages if necessary to complete this section.

If you have nothing to report in Section "G," check here _____

Name and Address of vendor or healthcare entity _____

Nature of interest (by whom) _____

H. IDENTIFICATION

List external activities such as consulting, external employment, public service, holding of office or pro bono, even if not compensated, that represent significant time commitment efforts which may be or appear to be a conflict of time commitment situation. An example would be serving as national president of the Boy Scouts of America which requires your out-of-state presence three days a week. Another example might be that you are an unpaid consultant to a private entity at a significant level of effort.

External Entity Projected level of effort per year Purpose

I. DECLARATION:

I, _____, declare that this statement of significant financial interest and time commitments (including accompanying pages and statements) has been examined by me and to the best of my knowledge and belief is a true, correct and complete statement of all my significant interests and other matters required by law. I have read and agree to abide by Federal and UA Board Conflict of Interest policies and University of Arkansas for Medical Sciences procedures. Also, I understand that Board's policy states that failure to file this statement as required by law or intentionally filing a false statement may result in disciplinary action. Any changes to this statement will be reported when the information becomes known to me.

Signature

Date

Number of additional pages: _____

Return this form to your chair, director or unit head.

J. VERIFICATION:

I have reviewed the (potential) conflicts of interest and/or conflicts of time commitment with the above named individual, and procedures have been implemented to manage the (potential) conflicts. As implemented, these management practices should ensure that none of the above referenced conflicts or potential conflicts will interfere with the performance of the individual's teaching, research, and/or professional service activities.

There is no conflict _____

A potential conflict exists and a plan has been developed to manage it. A copy of the plan is attached.

ACCEPTED: _____
Chair/Director/Unit Head Date

ACCEPTED: _____
Dean Date

ACCEPTED: _____
Vice Chancellor for Academic Affairs (if applicable) Date