

GUIDANCE DOCUMENT: GE0002 | WHAT TO DISCLOSE

No agency or university can predict or list every outside activity or situation that could cause a potential, real, or perceived conflict, so please use the following, non-exhaustive guide. ***This guide describes well-known situations that cause potential conflicts to help you decide what to disclose and what not to disclose:***

You Should Disclose... if you can (even might) answer "Yes" to any one of these general questions...

Disclosure Question #1: Does your outside activity feel a lot like what you do for UT? Disclose it. The more closely related your outside activity is to what you regularly do for UT, the more likely it needs to be disclosed.

Disclosure Question #2: Will you or your family get anything of monetary value from your outside activity? Disclose it. It is well known that "anything of monetary value" can capture just about any kind of compensation, funding, sponsorship, in-kind support, consulting fees (fee for service), honoraria, intellectual property rights, royalties, real or personal property rights, salary, debt forgiveness, travel, ownership interests (equity, stocks, partnership, etc.), or remuneration. These may also be called "financial interests" or, if you work with PHS standards, "significant financial interests". Keep in mind that these financial interests (especially, gifts, travel, and intellectual property) may also be subject to other University policies.

Disclosure Question #3: Do you or your family own, work, lecture, speak, advise, serve, or make decisions for a company, organization, or government in any way? Disclose it. This could mean you or your family serves as (or is performing in a role similar to) a director, manager, board member, consultant or advisory service provider, other professional service provider, guest lecturer or speaker, joint university appointment position, public

office position (including candidacy for), or holds another type of special relationship, role or affiliation.

Disclosure Question #4: Will your outside activity require any time, energy, or resources of the University in any way? Disclose it and work through it with your supervisor, as this is often the subject of faculty handbooks here and elsewhere. It does not matter if it is paid, unpaid, pro bono, the equipment is not being used, or otherwise because it may interfere or compete with your primary obligation to the University, its mission and its best interests.

Disclosure Question #5: Are you managing family, close friends, or students at UT or anywhere else? Disclose it and work through it with your supervisor. Managing your family member, student, or a person you have a close personal or business relationship may raise questions of favoritism or discrimination in the University employment setting or in University situations involving the acquisition of goods or services. Also, other University policies may be triggered due to favoritism, nepotism, or discrimination in any University employment situation or decision you make concerning a family member, student, or other personal or business contact.

You Should Disclose... if any of these example disclosures are similar to your situation ...

Procurement. Your spouse works for a company that sells a widget that you know the University needs, and your family gets a commission and free trip to the beach if you can help their company make a sale to the University.

Procurement. You approve a contract with a distributor of equipment and your sister is a board member for the distributor.

Procurement. You ask a vendor to collaborate with you to write a better proposal or provide guidance to help them win a bid.

Gifts|Procurement. You accept tickets to a big horse race from a company trying to market and position itself to the University for bidding purposes.

Financial Interests. You have or expect to receive, over a 12-month period, a monetary amount exceeding \$5,000 or an equity interest that exceeds 5% of ownership in a company.

Financial Interests. You use University cameras and video production equipment for your own side-business.

Financial Interests. You wrote a great textbook and require students to purchase it.

Financial Interests. Your spouse sits on the board of a company that pays for your department's research.

Financial Interests. You are paid to consult for a company that performs research in your area of expertise.

Financial Interests. You own stock in a pharmaceutical company and submitted a proposal to receive grant funding from the company.

Financial Interests. You own stock in a medical device company and will be an investigator in their clinical trial.

Outside Commitment. You use a student to perform services for a company that you started.

Outside Commitment. You use a student to perform services for a company that pays you consulting fees.

Outside Commitment. You let a local start-up company use your lab during off-hours without University approval.

Outside Commitment. Most of your time is spent on personal, non-University consulting or advisory committee services.

Financial Interests|Outside Commitment. You take a full-time or part-time faculty job at a neighboring university.

Intellectual Property. You are asked to share and/or license University intellectual property with a company in exchange for a potential management role.

Intellectual Property. You jointly invented a renewable energy solution with a company and did not disclose it to the University.

Foreign Engagements. You are invited to teach virtually and/or hold in-person lectures at a foreign institution or university, paid or unpaid.

Foreign Engagements. You are offered financial support from a foreign university or government for research or other services (e.g., laboratory activities for equipment, space, and/or personnel).

Foreign Engagements. You are a member of a foreign talent program, paid or unpaid, or will become a member.

Visitors. You are asked to provide a tour of your lab to a company representative in exchange for free equipment and/or material.

Travel. You are traveling to a professional conference. Neither you or the University will pay for it.

Travel. You are traveling to perform a consulting service for an external entity. Neither you or the University will pay for it.

Travel | Foreign Engagements. Your foreign sponsor will pay for your travel.

You Should Not Disclose...

- University salaries, University travel, or UTRF royalties.
- Sponsorships by the **United States** government (federal, state, or local) or by United States institutions of higher education (including its teaching hospitals, medical centers and affiliated research institutes) that generate income or reimbursements from seminars, lectures, advisory committees, review panels, teaching, and/or travel. **(Note: All foreign sponsored travel not reported through the University's Concur travel system MUST be disclosed.)**
- Joint faculty appointments with United States federal agencies (e.g. ORNL, Y-12, etc.).
- Equity held in diversified financial holdings that you and your family do not directly control, influence or manage (i.e., mutual funds and retirement accounts).