

Conflict of Interest

From University of Nebraska Medical Center

Human Resources	Safety/Security	Research Compliance	Compliance	Privacy/Information Security	Business Operations	Intellectual Property
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Compliance Program | Compliance Hotline | Investigations by Third Parties | Research Integrity | Export Control | Code of Conduct | Use of Human Anatomical Material | Clinical Trial Fee Billing Procedures | Contracts | **Conflict of Interest** | Red Flag Identity Theft Prevention Program | Principles of Financial Stewardship | Human Tissue Use and Transfer | International Research Policy | Health Care Vendor Interactions | Internal Audit

Policy No.: 8010

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Reviewed Date: 05/20/2013

Conflict of Interest Policy

Basis for Policy

Statutes, regulations, University policies and accreditation standards related to conflict of interest identification and management are:

1. "Responsibility of Applicants for Promoting Objectivity in Research for which Public Health Service Funding is Sought and Responsible Prospective Contractors" regulations at 42 CFR Part 50 and 45 CFR Part 94
2. "Financial Disclosure by Clinical Investigators" Food & Drug Administration regulations at 21 CFR Part 54
3. Nebraska Conflict of Interest Statute at Neb. Rev. Stat. §49-1493 et. seq.
4. Bylaws of the Board of Regents of the University of Nebraska Sections 3.10, 3.45 and 3.8
5. Board of Regents Conflict of Interest Policy, RP-3.2.8
6. Board of Regents Patent & Technology Policy, RP-4.4.2
7. UNMC Human Research Protections Policy #3.12, "Identification and Management of Potential Financial Conflicts of Interest of Research Personnel"
8. UNMC Policy No. 1049, Outside Employment
9. UNMC "Interactions between College of Medicine Faculty, Staff & Trainees and Health Care Vendors" policy

Policy

Potential conflicts of interest arise in a variety of circumstances in the academic health sciences center environment when an individual's private financial interests either conflict with or create the appearance of conflicting with UNMC's public interests. This policy applies to potential conflict of interest arising in any UNMC activity, including but not limited to research, teaching, patient care, outreach to underserved populations and the associated business activities in support of them. Covered Persons shall disclose all financial interests related to their University of Nebraska responsibilities so that an analysis of potential conflict of interest may be conducted. When a conflict of interest is identified, the conflict will either be

managed or eliminated to reduce the appearance of bias and maintain responsible stewardship of public resources. This policy shall be publicly posted in the UNMC Policies and Procedures manual on the UNMC internet site.

Definitions

Covered Person under Regents Policy 3.2.8 shall mean:

1. University administrative officers and employees, specifically including any University employees with delegated signature, purchasing or contracting authority on behalf of the university;
2. University employees and faculty engaged in outside employment or other activities specified in this policy (tech transfer/use of University facilities or equipment) that may create a Conflict of Interest; and
3. Sponsored research investigators who participate in sponsored research; and non-sponsored research investigators participating in human subjects or animal subjects research.

Investigator under PHS regulations shall mean the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct or reporting of research which may include graduate students, post-docs, residents, collaborators or consultants. **Conflict of Interest (COI)** under Regents Policy 3.2.8 shall mean situations when a Covered Person's direct or indirect personal financial interest, (whether or not the value is readily ascertainable) may compromise, or have the appearance of compromising, the Covered Person's professional judgment or behavior in carrying out his or her obligations to the University of Nebraska. This includes indirect personal financial interests of a Covered Person that may be obtained through third parties such as a Covered Person's immediate family, business relationships, fiduciary relationships, or investments.

Equity includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

Financial Conflict of Interest (FCOI) under PHS regulations means a Significant Financial Interest that the COI Officer or COI committee reasonably determines could directly and significantly affect the design, conduct or reporting of research.

Immediate Family under Regents Policy 3.2.8 shall mean an individual who is a spouse, child, brother, sister, grandchild, or grandparent, by blood, marriage, or adoption of the Covered Person.

Institutional Conflict of Interest (ICOI) may occur when the University or a Covered Person in a senior administrative position has a financial interest in a commercial entity that itself has an interest in a University research project, including potential conflicts with equity/ownership interests or royalty arrangements.

Institutional Responsibilities means professional responsibilities on behalf of the University of Nebraska which may include activities such as professional service including patient care, teaching, research & research consultation, outreach, administrative, institutional committee membership including service on panels such as the Institutional Review Board or Data and Safety Monitoring Boards, and other duties as specified in the Covered Person's job description and/or employment agreement.

Remuneration includes salary and any payment for services not otherwise identified as salary including but not limited to consulting fees, honoraria, and paid authorship.

Senior/Key Personnel means the Project Director (PD)/Principal Investigator (PI) and any other person identified as senior/key personnel in the UNMC grant application, progress report, or any other report submitted to the PHS by UNMC.

Significant Financial Interest means a financial interest of the Investigator or his/her Immediate Family Member that reasonably appears to be related to the Investigator's Institutional Responsibilities, and:

1. If with a publicly traded entity, the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of the disclosure, when aggregated, exceeds \$5,000;
2. If with a non-publicly traded entity, the value of any remuneration received exceeds \$5,000 or when a research Investigator or Immediate Family holds any equity interest;
3. Intellectual property rights and interests upon receipt of income related to such rights and interests, excluding income paid by the University of Nebraska.;
4. For PHS-funded research investigators, includes reimbursed or sponsored travel, excluding travel that is reimbursed or sponsored by a Federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with an Institution of higher education.

Conflict of Interest Management Roles and Responsibilities

COI Officer

The UNMC Conflict of Interest Officer shall be responsible for implementing the UNMC COI management program. The COI management program shall also include review and approval of the "Application for Authorization to Engage in Outside Professional Activity" forms as delegated by the Chancellor with associated management of conflict of commitment under Regents Policy 3.8. and UNMC Policy 1049, Outside Employment. The COI Officer shall:

1. Ensure UNMC policy meets Board of Regents policy and state and federal regulatory requirements;
2. Implement annual disclosure requirements for Covered Persons and monitor to ensure compliance. The UNMC electronic Annual Disclosure of Financial Interest form is incorporated into this policy by reference. The Annual Disclosure of Interest and Application for Authorization to Engage in Outside Professional Activity forms are located at: <https://unmc.coi-smart.com> .
3. Coordinate identified conflict of interest matters with Sponsored Programs Administration, UNeMED, the Institutional Review Board (IRB), the Institutional Animal Care and Use (IACUC) committee, the Associate Vice Chancellor, Business and Finance (for business COI), and the Continuing Medical and Nursing Education offices as relevant. Whenever a potential COI involving activities with another University of Nebraska campus or university affiliated entity is disclosed or identified, notify the other campus or university affiliated entity COI contact and collaboratively review and manage the potential COI.
4. **COI Education.** Provide COI education to covered persons at time of hire, and every four years thereafter, and immediate re-education when there are policy changes or when investigators fail to comply with the COI policy. For investigators conducting Public Health Service (PHS) sponsored research, education shall be completed prior to the expenditure of any PHS funds.
5. When Covered Persons have significant financial interests related to their institutional responsibilities, present information to the COI committee for potential COI management plan creation.
6. **Report FCOI to PHS.** When the COI committee has implemented a COI management plan for PHS-funded research, update the PHS e-Commons with the FCOI report provided by the COI committee. Provide initial, annual and revised FCOI reports, if applicable for both UNMC and its subrecipients. Revised FCOI reports shall be submitted within 60 days of identification for new Investigators added to a grant, or newly identified FCOIs for existing investigators. The FCOI report shall contain the following elements:
 1. The role and principal duties of the conflicted Investigator in the research project;
 2. Conditions of the management plan;

3. How the management plan is designed to safeguard objectivity in the research project;
 4. Confirmation of the Investigator's agreement to the management plan;
 5. How the management plan will be monitored to ensure Investigator compliance; and
 6. Other information as needed.
7. **Conduct retrospective review.** If UNMC identifies a significant financial interest that was not disclosed by a research Investigator in a timely manner, or was not reviewed by UNMC, the COI officer shall, within sixty (60) days: review the significant financial interest and determine whether it is related to PHS-funded research. The COI committee shall determine whether a financial conflict of interest exists, and, if so, implement an interim COI management plan. Within 120 days, the COI committee shall complete a documented retrospective review of the research Investigator's activities and the PHS-funded research project to determine whether any PHS-funded research conducted during the period of non-compliance was biased in the design, conduct or reporting of such research. The documented review shall contain all of the elements required by the PHS regulations.
 8. **Reporting Bias & Mitigation Report.** If bias is found with the design, conduct or reporting of PHS-funded research, the COI Officer shall notify the PHS awarding component promptly and submit a Mitigation Report containing the retrospective review information and a description of the impact of the bias on the research project and UNMC's plan of actions taken to eliminate or mitigate the effect of the bias.
 9. If the research is clinical research whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment, the COI committee shall require the Investigator to disclose the FCOI in each public presentation of the results of the research, and request an addendum to previously published presentations, in addition to any applicable disclosure listed below in Disclosure of Financial Interest.
 10. **Public Disclosure.** Disclose Financial Conflicts of Interest (FCOI) of senior/key personnel involved in Public Health Service funded research only as determined by the COI Committee in response to public requests within five (5) business days of the request as required by PHS regulations. These requests shall be coordinated with the University of Nebraska Records Management Officer.
 11. **Board of Regents Annual Report.** Submit the annual Conflict of Interest and Outside Activities report to the University of Nebraska Director of Internal Audit and Advisory Services for review by the Board of Regents Audit Committee.

Covered Persons

1. **Annual Disclosure of Financial Interest.** Individuals covered under this COI policy shall complete a UNMC Annual Disclosure of Financial Interest Questionnaire through the UNMC electronic e-Disclosure system annually. Covered Persons shall receive an e-mail notification from the Compliance Department to complete the form. The UNMC Disclosure of Financial Interest form contains all elements required under Board of Regents policy and federal regulations (including PHS regulations) and is incorporated into this policy by reference. The e-Disclosure system may be accessed through the Research Support System (RSS) website at: <https://unmc.coi-smart.com> . Individuals shall disclose all financial interests related to their University of Nebraska (institutional) responsibilities.
2. **Research Investigators** shall review and update their Annual Disclosure of Financial Interest when sponsored grants and contracts are submitted, including PHS-funded research. Investigators shall update their Annual Disclosure of Financial Interest form within thirty (30) days of discovering or acquiring a Significant Financial Interest and on an annual basis thereafter during the period of the award.
3. **Education.** Covered Persons shall complete education on Board of Regents COI policy, UNMC COI policy, and PHS COI regulations, and their disclosure responsibilities prior to initially completing the Annual UNMC Disclosure of Financial Interest, and every four (4) years thereafter. Covered Persons shall not spend any PHS research funds until education has been completed.

4. **Disclosure of Financial Interest.** Covered Persons who are research Investigators shall disclose the nature of all financial interests related to their research (e.g. consulting advisory board, intellectual property) in all publications and presentations and to all UNMC personnel involved in the research project, including students. In human subjects research, Investigators shall disclose their financial interests related to the research in the informed consent, as required by UNMC HRPP Policy 3.01.
5. **Appeal Rights.** Covered Persons may appeal adverse decisions made under this policy to the Vice Chancellor for Academic Affairs. The appeal shall be in writing and contain a description of the adverse decision, justification for why the decision should be changed, and the change desired. The appeal request shall be submitted to the COI Officer. The VCAA shall respond in writing to the Covered Person with his/her decision within thirty (30) days of receipt. The VCAA's decision is final.

COI Committee.

The UNMC COI Committee composition and operating procedures are contained in Appendix A. The COI Officer shall be a member of the COI committee and shall provide administrative support for the committee. The COI committee shall:

1. Provide oversight over the UNMC COI program, advise the COI officer, and provide guidance on UNMC COI policy matters.
2. Review Significant Financial Interests. Review Disclosures of Financial Interest in the amount of \$5,000 and above for research Investigators and determine if these Significant Financial Interests are related to the research, and, if so related, whether the Significant Financial Interest constitutes a Financial Conflict of Interest. A Significant Financial Interest is a Financial Conflict of Interest if it could directly and significantly affect the design, conduct, or reporting of research, including PHS-funded research.
3. Create COI Management Plans for Financial Conflicts of Interest.
4. Conduct retrospective reviews of newly identified Significant Financial Interests as described in Conduct Retrospective Review above.
5. Review COI Policy violations and recommend sanctions, if appropriate, to the Vice Chancellor Academic Affairs and to the appropriate UNMC administrator responsible for supervision of the individual(s) violating the policy.

Sponsored Programs Administration

Sponsored Programs Administration shall:

1. Notify all research Investigators submitting sponsored grant/contract proposals to review their Annual Disclosure of Financial Interest form and update the information as needed. Sponsored Programs Administration shall verify review has been completed for all applications.
2. Coordinate with the COI Officer when Investigators disclose significant financial interests related to the sponsored project to determine if a COI management plan is required.

Subrecipients. Include provisions in PHS-funded subrecipient agreements that:

1. the subrecipient certifies that its FCOI policy complies with PHS regulations or in the alternative that the subrecipient will follow the UNMC COI policy; and
2. the subrecipient shall report identified FCOIs for its Investigators in a timely manner so UNMC can report identified FCOIs to the PHS in the time frames in Report FCOI to PHS and Conduct retrospective review above.

Associate Vice Chancellor, Business and Finance

The Associate Vice Chancellor of Business and Finance shall manage business conflict of interest by reviewing all Annual Disclosure of Financial Interest questionnaires completed by Covered Persons with contract signature authority under Executive Memorandum 13 and 14; Covered Persons with purchasing authority; Covered Persons who identify family member(s) with a financial interest with the University of Nebraska; and any other potential business-related financial interest identified by the COI Officer through the annual COI disclosure process or by any other person at UNMC. Business COI management plans shall be created to minimize the appearance of bias in decision-making and ensure state and federal regulations and University of Nebraska business-related policies are followed. Business COI management plans shall be reported through the UNMC COI committee and reported on the Annual COI report to the Board of Regents Audit committee.

Institutional Review Board (IRB)

The IRB shall require all Covered Persons listed on the IRB application who have a financial interest to update their Annual Disclosure of Financial Interest form pursuant to UNMC HRPP Policy #3.12. The IRB shall review and approve proposed COI management plans as described in HRPP Policy #3.12.

UNeMED

The President of UNeMED or designee shall coordinate with the COI officer on UNeMED activities where it appears that a Covered Person's or UNMC's financial interest may be a potential individual or institutional conflict of interest, including intellectual property interests and equity interests involving technology transfer companies.

Continuing Education Offices

UNMC is accredited by the Accreditation Council for Continuing Medical Education (ACCME). The Continuing Medical Education (CME) office shall review disclosures of financial interest for UNMC employees who are serving as course directors, faculty or peer reviewers for UNMC CME courses, as required by the ACCME Standards for Commercial Support.

Institutional Conflict of Interest Management

In order to avoid real or perceived favoritism in relationships with research sponsors, each/every potential Institutional COI shall be reported. Any Covered Person who has knowledge of potential Institutional COI shall report the information to the COI Officer. Potential Institutional COI may be identified through the Annual Disclosure of Financial Interest questionnaire for senior administrative personnel. The COI Officer shall convene a group of senior UNMC officials appointed by the Chancellor to review the disclosure and propose a management plan for Chancellor approval if appropriate. It is important to note that PHS COI regulations do not cover institutional conflict of interest.

Records Retention

All Disclosure of Financial Interest information, COI management plans and all Public Health Service-funded Financial Conflict of Interest-related records shall be retained for the fiscal year in which the grant or contract is closed plus seven (7) years as required by Board of Regents Records Retention Schedule 170-8, "Sponsored Projects (Grants)". No destruction of records shall take place if there is a Preservation Hold in effect, or if any litigation, claim, negotiation, audit or other actions involving the records have been started before the expiration of the retention period. The records must be retained until completion of the action and resolution of all issues which arise from it, or the seven year retention period, whichever is later, as required under 45 CFR 74.53 and 92.42.

Public Accessibility of PHS-funded Senior/Key Personnel FCOI

Upon request, the COI Officer shall make available to the public information concerning identified FCOIs held by Senior/Key personnel receiving PHS research funding as required by PHS regulations. Information shall be provided in writing within five (5) business days of the request. The COI officer shall coordinate these public requests with the University of Nebraska Records Management Officer. All other financial interest disclosure information and conflict of interest determinations shall remain confidential and may be withheld from the public as permitted under Neb. Rev. Stat. 84-712.05, "Records which may be withheld from the public; enumerated."

Sanctions

Covered Persons who violate this policy may receive corrective action under UNMC Policy No. 1098, Corrective and Disciplinary Action Policy. The COI Committee may also recommend other corrective action such as additional training, or for serious violations, recommend that research funding be withheld or recommend other appropriate sanctions to maintain the integrity of the research. The Vice Chancellor of Academic Affairs shall review and approve all proposed sanctions. The sanctions shall be coordinated with the respective Dean, Director or Vice Chancellor for enforcement.

Policy 8010 Appendix A

Conflict of Interest Committee (COIC) Governance

COI Committee Composition. The COI Committee shall have at least 16 members representing the following areas: </P>

College of Medicine	Vice Chancellor for Business & Finance
College of Dentistry	Vice Chancellor for Research
College of Pharmacy	Compliance/Conflict of Interest Officer
College of Nursing	Sponsored Programs Administration
College of Public Health	Institutional Review Board
Eppley Cancer Institute	Associate General Counsel for Healthcare
Munroe Meyer Institute	Center for Continuing Medical Education
Vice Chancellor for Academic Affairs	Community Member

Membership Term. COI Committee members shall serve for a term of three years, which may be automatically renewed upon mutual agreement of the member and the Chancellor or his/her designee. New members shall be nominated by the department/unit and approved by the Vice Chancellor of Academic Affairs or his/her designee. The Chancellor or his/her designee shall appoint a faculty chair of the COI Committee. The Vice Chancellor of Academic Affairs or his/her designee shall select the community member. The Chancellor or his designee can appoint additional voting and non-voting members.

Quorum. A quorum is required for meetings to be conducted. More than half of the membership present will constitute a quorum.

Voting. All committee members are eligible to vote. No regular motion shall pass unless a majority of the COI Committee members present vote in favor of the motion.

COIC Member Conflicts. If a COIC member has a conflict of interest with a specific matter being discussed, the member shall declare that he/she has a potential conflict and shall not vote on the matter. Such conflicts may arise when:

1. the member is participating in the research under review;
2. the member has a financial relationship with a research sponsor under review; or
3. the member has a personal relationship or conflict with the individual under review that could potentially cause the member to be perceived as less than objective in his/her review.

Committee Review by Telephone/Electronically. While face-to-face meetings will normally be held, committee review of potential conflicts may be conducted by telephone or electronically at the discretion of the COI Committee chair.

Meeting Minutes. The COI Coordinator chair shall prepare meeting minutes and present them for approval at the next scheduled COI Committee meeting.

Additional Information

- Contact the Compliance Officer (<mailto:tscrogin@unmc.edu>)
- Contact the Associate Vice Chancellor for Business and Finance (<mailto:dthomas@unmc.edu>)
- Conflict of Interest Procedures
- Appendix 1 - Disclosure of Potential Business Conflict of Interest (<http://webmedia.unmc.edu/policy/8010-1.doc>)
- Research Conflict of Interest Procedures
- UNMC Policy No. 1049, Outside Employment
- Application for Permission to Engage in Professional Activity Outside the University (<https://net.unmc.edu/rss/>)
- Disclosure of Potential Conflict of Interest Form (<http://webmedia.unmc.edu/policy/COIForm.doc>)
- <https://unmc.coi-smart.com>

This page maintained by dkp (<mailto:dpanowic@unmc.edu>).

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Announcements

Managing the risks associated with potential conflicts of interest begins with establishing a culture of transparency. This disclosure process is designed to serve as a tool for identifying situations that could create potential conflicts of interest, documenting them, and when necessary, establishing plans to manage the risk.

Your disclosure questions are based on your professional responsibilities at UNMC. Click on the link below to view your profile which includes your name and other identifying information. Your role(s) have been pre-assigned and are indicated with a checkmark. You can add additional roles as you may find appropriate, however you cannot eliminate any preassigned roles. Once you have reviewed your profile you will need to choose the appropriate button to save your profile.

After you have reviewed your profile, click the link below to access your questionnaire(s). There are two types of questionnaires:

The **Annual Disclosure of Financial Interest Questionnaire** which must be filled out annually and updated any time there is a change to your financial interests.

The **Application for Authorization to Engage in Outside Professional Activity** which is a transactional questionnaire that must be filled out prior to engaging in an outside activity.

Should you have any questions or concerns regarding your Profile information or require assistance in completing the questionnaires, please contact the Compliance Office at 402-559-3784 or email sara.ward@unmc.edu.

2016 Annual Disclosure of Financial Interest Questionnaire

Introduction

Financial and other interests that may create the appearance of conflict of interest must be disclosed under Federal and State regulations and University of Nebraska Board of Regents policy:

1. Federal Public Health Service (NIH, FDA, CDC, IHS, HRSA, AHRQ, ATSDR, SAMHSA) Regulations require research investigators to disclose financial interests related to their institutional responsibilities.
2. The University of Nebraska Board of Regents Policy 3.2.8 requires that potential conflicts of interest must be disclosed when *any* University faculty or employee has a direct or indirect financial interest that may compromise or have the appearance of compromising their professional judgment or behavior in carrying out their obligations to the University of Nebraska.

The following Annual Disclosure of Financial Interest Questionnaire is designed to meet the above requirements. This Questionnaire shall be completed annually. Research investigators will review and update this Questionnaire when they submit sponsored grants or contracts.

You should report all interests with the goal of full disclosure (if in doubt, disclose).

If you require assistance as you fill out the Questionnaire, please contact the UNMC Compliance Office at 402-559-3784 or e-mail sara.ward@unmc.edu

Questionnaire: 2016 Annual Disclosure of Financial Interest Questionnaire

1. Contact Information

Select the category(ies) that describe the nature of your University of Nebraska responsibilities and Practice Plan responsibilities:

University of Nebraska includes UNCA, UNMC, UNO, UNL, UNK, UNeHealth and university technology transfer corporations including University Technology Development Corporation (UTDC), UNeMed, NUTech Ventures, PKITDC, and the Nebraska Innovation Campus Development Corporation. The University of Nebraska does not include the NU Foundation.

Group 1

Mark all that apply:

- Senior Management (Chancellor, Vice Chancellor, Assistant/Associate Vice Chancellor, Dean, Associate Dean)
- Faculty
- Childrens Specialty Physicians
- University Dental Associates
- UNMC Physicians
- Medical Staff Committee member, Medical Director
- Researcher (anyone involved in conduct, oversight or administration of research in any way)
- Department and Unit Administrators
- Purchasing Department Buyers
- Contract Signature Authority (see Executive Memorandum 13 & 14 signature tables)
- Institutional Review Board (IRB), Conflict of Interest Committee, Scientific Review Committee, IACUC
- Continuing Professional Education for UNMC (presenter, author/editor/moderator/peer reviewer)
- Other

Group 2

Please indicate your position title:

Answer goes here

Definitions:

Practice Plan:

Practice Plans include UNMC Physicians, Children's Specialty Physicians and the University Dental Associates

Univeristy of Nebraska responsibilities:

Professional responsibilities on behalf of the University of Nebraska which may include activities such as clinical, teaching, research, administrative or service, including Institutional committee memberships, and service on

panels such as Institutional Review Boards, Scientific Review Committees, Institutional Animal Care and Use Committees, or Internal Data and Safety Monitoring Boards; and other duties as specified in your job description/employment agreement.

University of Nebraska responsibilities:

Professional responsibilities on behalf of the University of Nebraska which may include activities such as clinical, teaching, research, administrative or service, including Institutional committee memberships, and service on panels such as Institutional Review Boards, Scientific Review Committees, Institutional Animal Care and Use Committees, or Internal Data and Safety Monitoring Boards; and other duties as specified in your job description/employment agreement.

2. Compensation For Services From An Outside Source

(There may be multiple disclosures for this question)

Have you or an immediate family member received compensation or anything of monetary value (remuneration) whether or not the value is readily ascertainable, from an outside source (profit or non-profit including the NU Foundation) other than an institution of higher education, academic medical center or governmental agency within the last twelve months for services including but not limited to speaking, consulting, advisory services, teaching or training engagements, authorship, honoraria, or other services that relate to your University responsibilities and/or Practice Plan responsibilities?

If you or an immediate family member are involved in more than one activity with one or more entities, you will be prompted to click the green check at the end of this section to complete another disclosure for this question.

Group 1

Please indicate Yes or No.

- Yes
- No

Group 2

Person with the Relationship

- Self
- Immediate Family Member
- Immediate Family Member who is also affiliated with the University of Nebraska and/or Practice Plan

Group 3

Specify relationship

Select from 'Immediate Family Member' List

Group 4

If Immediate Family Member is affiliated with the University of Nebraska and/or Practice Plan, provide their full name and the campus and/or practice plan they are affiliated with.

Answer goes here

Group 5

Name of the Entity/Outside Source compensation/remuneration received from:

Group 6

Nature of the Activity (select one):

If you are involved in more than one type of activity with this same entity, you will be prompted to click the green check at the end of this section to complete another disclosure for this question.

- Consulting
- Advisory Board
- Data Safety Monitoring Board
- Employee
- Paid Authorship (including test books, journal editor, book chapters)
- Scientific Review Committee
- Speakers Bureau
- Speaking/Teaching
- Training/Education
- Investment Company Advisor
- Other

Group 7

Frequency, Period and/or Term: (example monthly for two years)

Group 8

Financial Interest (Amount/Value of Compensation/Remuneration):

- Less than \$5,000
- \$5,000 - \$9,999
- \$10,000 - \$19,999
- \$20,000 - \$49,999
- \$50,000 - \$100,000
- Greater than \$100,000

Group 9

Additional Information. If none, type 'none'.

Answer goes here

Group 10

Do you participate in any University of Nebraska research sponsored by this entity

- Yes
- No

Group 11

Do you receive any Public Health Service (NIH,FDA,etc.) funding for this research

- Yes
- No

Group 12

Have you been reimbursed travel expenses or had travel paid directly by this entity

- Yes
- No

Group 13

Purpose of Trip

Answer goes here

Group 14

Destination

Answer goes here

Group 15

Duration

Answer goes here

Group 16

Amount (estimate range if exact dollar amount not known)

Answer goes here

Group 17

Please specify the consulting responsibilities:

Answer goes here

Definitions:

immediate family member:

Immediate family includes spouse, child, parent, brother, sister, grandchild, or grandparent, by blood, marriage, or adoption, guardian or ward.

University responsibilities:

University Responsibilities include your professional responsibilities on behalf of the University of Nebraska which may include activities such as clinical, teaching, research, administrative or service, including institutional committee memberships and service on panels such as Institutional Review Boards, Scientific Review Committees, Institutional Animal Care and Use Committees, or internal Data and Safety Monitoring Boards; and other duties as specified in your job description/employment agreement. University of Nebraska includes UNCA, UNMC, UNO, UNL, UNK, and University technology transfer corporations including UTDC, UNeMed, NUTECH Ventures, PKITDC, and the Nebraska Innovation Campus Development Corporation. The University of Nebraska does not include the NU Foundation.

University of Nebraska:

University of Nebraska includes UNCA, UNMC, UNO, UNL, UNK, and university technology transfer corporations including University Technology Development Corporation (UTDC), UNeMed, NUTech Ventures, PKITDC, and the Nebraska Innovation Campus Development Corporation. The University of Nebraska does not include the NU Foundation

Practice Plan responsibilities:

Practice Plans include UNMC Physicians, Children's Specialty Physicians and the University Dental Associates

Practice Plan:

Practice Plans include UNMC Physicians, Children's Specialty Physicians and the University Dental Associates

Public Health Service:

Agencies within the Public Health Service include the following Agency for Healthcare Research and Quality

(AHRQ) Agency for Toxic Substances and Disease Registry (ATSDR) Centers for Disease Control and Prevention (CDC) Food and Drug Administration (FDA) Health Resources and Services Administration (HRSA) Indian Health Service (IHS) National Institutes of Health (NIH) Substance Abuse and Mental Health Services Administration (SAMHSA)

3. Equity or Ownership Interests

(There may be multiple disclosures for this question)

Do you or an immediate family member have any stock, stock options, other equity or ownership interests in a publicly traded or non-publicly traded entity engaged in an activity related to your University Responsibilities (including any sponsored research) and/or Practice Plan responsibilities?

Financial interests in mutual funds or retirement accounts where investment decisions are not under your direct control are excluded.

If you or an IMMEDIATE FAMILY MEMBER are involved in more than one equity or ownership interest, you will be prompted to click the green check at the end of this section to complete another disclosure for this question.

Group 1

Please indicate Yes or No

- Yes
- No

Group 2

Person with the Relationship:

- Self
- Immediate Family Member
- Immediate Family Member who is also affiliated with the University of Nebraska and/or Practice Plan

Group 3

Specify Relationship:

Select from 'Immediate Family Member' List

Group 4

If Immediate Family Member is affiliated with the University of Nebraska and/or the Practice Plan, provide their full name and the campus and/or practice plan they are affiliated with

Answer goes here

Group 5

Name of the Entity where equity or ownership interest exists:

Group 6

Nature of the Financial Interest (select one):

- Stock/Stock Options/Warrants
- Owner/Partner/Manager/Membership Interest or other Company Ownership current or pending
- Royalties
- Other

Group 7

For equity/ownership interest marked above, indicate value of the financial interest:

- Less than \$5,000
- \$5,000 - \$9,999
- \$10,000 - \$19,999
- \$20,000 - \$49,999
- \$50,000 - \$100,000
- Greater than \$100,000

Group 8

If non-public traded entity, indicate % of equity interest. Otherwise, type 'n/a'.

Group 9

Additional Information. If none, type 'none'.

Group 10

Do you participate in any University of Nebraska research sponsored by this entity

- Yes
- No

Group 11

Do you receive any Public Health Service (NIH,FDA,etc.) funding for this research

- Yes
- No

Group 12

Have you been reimbursed travel expenses or had travel paid directly by this entity

- Yes
- No

Group 13

Purpose of Trip

Answer goes here

Group 14

Destination

Answer goes here

Group 15

Duration

Answer goes here

Group 16

Amount (estimate range if exact dollar amount not known)

Answer goes here

Definitions:

University Responsibilities:

Professional responsibilities on behalf of the University of Nebraska which may include activities such as clinical, teaching, research, administrative or service, including institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards, IACUC and other duties as specified in your job description/employment agreement. University of Nebraska includes UNMC, UNO, UNL, UNK, UNCA, and University Technology Development Corporation including UNeMed. It does not include the NU Foundation.

immediate family member:

Immediate family includes spouse, child, parent, brother, sister, grandchild, or grandparent, by blood, marriage, or adoption, guardian or ward.

Practice Plan:

Practice Plans include UNMC Physicians, Children's Specialty Physicians and the University Dental Associates

University of Nebraska:

University of Nebraska includes UNCA, UNMC, UNO, UNL, UNK, and university technology transfer corporations including University Technology Development Corporation (UTDC), UNeMed, NUTech Ventures, PKITDC, and the Nebraska Innovation Campus Development Corporation. The University of Nebraska does not include the NU Foundation

Public Health Service:

Agencies within the Public Health Service include the following Agency for Healthcare Research and Quality (AHRQ) Agency for Toxic Substances and Disease Registry (ATSDR) Centers for Disease Control and Prevention (CDC) Food and Drug Administration (FDA) Health Resources and Services Administration (HRSA) Indian Health Service (IHS) National Institutes of Health (NIH) Substance Abuse and Mental Health Services Administration (SAMHSA)

4. Fiduciary Role

(There may be multiple disclosures for this question)

In the last 12 months have you or an immediate family member had a fiduciary role (board member, director, owner, partner, manager) in a for profit or non-profit entity?

If you or an IMMEDIATE FAMILY MEMBER have more fiduciary roles with other entities, you will be prompted to click the green check at the end of this section to complete another disclosure for this question.

Group 1

Please indicate Yes or No

- Yes
- No

Group 2

Person with the Relationship:

- Self
- Immediate family member
- Immediate Family Member who is also affiliated with the University of Nebraska and/or Practice Plan

Group 3

Specify Relationship:

Select from 'Immediate Family Member' List

Group 4

If Immediate Family Member is affiliated with the University of Nebraska and/or Practice Plan, provide their full name and the campus and/or practice plan they are affiliated with.

Answer goes here

Group 5

Name of the Entity where holding this fiduciary role:

Group 6

Nature of the Financial Interest/Relationship Outside Company: Mark all that apply.

- Owner/Partner
- Board Member/Director
- Officer/Manager/Employee

Group 7

Is this entity related in any way to your University responsibilities (including sponsored research) and/or Practice Plan responsibilities

- Yes
- No

Group 8

Specify if University of Nebraska and/or Practice Plan and describe in detail:

Group 9

Are you paid

- Yes
- No

Group 10

If so, how much

- Less than \$5,000
- \$5,000 - \$9,999
- \$10,000 - \$19,999

\$20,000 - \$49,999
\$50,000 - \$100,000
Greater than \$100,000

Group 11

Do you participate in any University of Nebraska research sponsored by this entity

- Yes
- No

Group 12

Do you receive any Public Health Service (NIH,FDA,etc.) funding for this research

- Yes
- No

Group 13

Have you been reimbursed travel expenses or had travel paid directly by this entity

- Yes
- No

Group 14

Purpose of Trip

Answer goes here

Group 15

Destination

Answer goes here

Group 16

Duration

Answer goes here

Group 17

Amount (estimate range if exact dollar amount not known)

Answer goes here

Definitions:

immediate family member:

Immediate family includes spouse, child, parent, brother, sister, grandchild, or grandparent, by blood, marriage, or adoption.

Public Health Service:

Agencies within the Public Health Service include the following Agency for Healthcare Research and Quality (AHRQ) Agency for Toxic Substances and Disease Registry (ATSDR) Centers for Disease Control and Prevention (CDC) Food and Drug Administration (FDA) Health Resources and Services Administration (HRSA) Indian Health Service (IHS) National Institutes of Health (NIH) Substance Abuse and Mental Health Services Administration (SAMHSA)

5. Intellectual Property

(There may be multiple disclosures for this question)

Do you or an immediate family member receive remuneration for any Intellectual Property rights (i.e. patentable inventions, copyrights, royalties, mask works) held outside the University related to your University responsibilities?

Royalties/Licenses paid by the University to a current employee are excluded.

If you or an IMMEDIATE FAMILY MEMBER have more than one intellectual property interest, you will be prompted to click the green check at the end of this section to complete another disclosure for this question.

Group 1

Please indicate Yes or No

- Yes
- No

Group 2

Person with the Relationship:

- Self
- Immediate family member
- Immediate Family Member who is also affiliated with the University of Nebraska and/or Practice Plan

Group 3

Specify Relationship:

Select from 'Immediate Family Member' List

Group 4

If Immediate Family Member is affiliated with the University of Nebraska and/or Practice Plan, provide their full name and the campus and/or practice plan they are affiliated with.

Answer goes here

Group 5

Name of Entity with Intellectual Property Financial Interest:

Select from 'Sponsors' List

Group 6

Describe financial interest in detail:

Answer goes here

Group 7

Value of Intellectual Property Financial Interest

- Less than \$5,000
- \$5,000 - \$9,999
- \$10,000 - \$19,999
- \$20,000 - \$49,999
- \$50,000 - \$100,000
- Greater than \$100,000

Group 8

Do you participate in any University of Nebraska research sponsored by this entity

- Yes
- No

Group 9

Do you receive any Public Health Service (NIH,FDA,etc.) funding for this research

- Yes
- No

Group 10

Have you been reimbursed travel expenses or had travel paid directly by this entity

-
- Yes
 - No

Group 11

Purpose of Trip

Answer goes here

Group 12

Destination

Answer goes here

Group 13

Duration

Answer goes here

Group 14

Amount (estimate range if exact dollar amount not known)

Answer goes here

Group 15

Are you conducting any human subjects research involving Intellectual Property rights that you or an immediate family member hold (either University or external) regardless of whether you or your immediate family member receive income from the Intellectual Property

- Yes
- No

Group 16

Explain in detail including the short title of the protocol and the IRB number if assigned:

Answer goes here

Definitions:

Intellectual Property:

"Intellectual Property" shall include, but is not limited to patentable inventions, mask works, tangible research property, trademarks, and copyrightable works, including software.

immediate family member:

Immediate family includes spouse, child, parent, brother, sister, grandchild, or grandparent, by blood, marriage, or adoption, guardian or ward.

University:

University of Nebraska includes UNCA, UNMC, UNO, UNL, UNK, and University technology transfer corporations including UTDC, UNeMed, NUTECH Ventures, PKITDC, and the Nebraska Innovation Campus Development Corporation. The University of Nebraska does not include the NU Foundation.

Public Health Service:

Agencies within the Public Health Service include the following Agency for Healthcare Research and Quality (AHRQ) Agency for Toxic Substances and Disease Registry (ATSDR) Centers for Disease Control and Prevention (CDC) Food and Drug Administration (FDA) Health Resources and Services Administration (HRSA) Indian Health Service (IHS) National Institutes of Health (NIH) Substance Abuse and Mental Health Services Administration (SAMHSA)

6. Gifts and/or Loans from an Outside Source

(There may be multiple disclosures for this question)

Have you or an immediate family member received **any** gifts, gratuity, favors, personal loans or anything of value not already disclosed above from an outside source, or taken advantage of an opportunity or knowledge of confidential information in the last 12 months related to your University Responsibilities or Practice Plan responsibilities?

If you or an IMMEDIATE FAMILY MEMBER have more than one interest in this category, you will be prompted to click the green check at the end of this section to complete another disclosure for this question.

Group 1

Please indicate Yes or No

- Yes
- No

Group 2

Person with the relationship:

- Self
- Immediate family member
- Immediate Family Member who is also affiliated with the University of Nebraska and/or Practice Plan

Group 3

Specify Relationship:

Select from 'Immediate Family Member' List

Group 4

If Immediate Family Member is affiliated with the University of Nebraska or the Practice Plan, provide their full name and the campus and/or Practice Plan they are affiliated with.

Answer goes here

Group 5

Name of Outside Source

Select from 'Sponsors' List

Group 6

Nature of the Financial/Relationship with Outside Source (select one):

If you are involved in more than one of the following with this same entity, you will be prompted to click the green check at the end of this section to complete another disclosure for this question.

- Gifts, Gratuity, Favor
- Entertainment
- Knowledge of Confidential Information
- Food/Beverage
- Contributions to Charities or Other Entities including the University of Nebraska or Practice Plan on Your Behalf
- Personal loan(s)
- Other

Group 7

Value:

- Less than \$5,000
- \$5,000 - \$9,999
- \$10,000 - \$19,999
- \$20,000 - \$49,999
- \$50,000 - \$100,000
- Greater than \$100,000

Group 8

Describe in detail including frequency:

Answer goes here

Group 9

Do you participate in any University of Nebraska research sponsored by this entity

- Yes

No

Group 10

Do you receive any Public Health Service (NIH,FDA,etc.) funding for this research

- Yes
- No

Group 11

Have you been reimbursed travel expenses or had travel paid directly by this entity

- Yes
- No

Group 12

Purpose of Trip

Answer goes here

Group 13

Destination

Answer goes here

Group 14

Duration

Answer goes here

Group 15

Amount (estimate range if exact dollar amount not known)

Answer goes here

Definitions:**University Responsibilities:**

Professional responsibilities on behalf of the University of Nebraska which may include activities such as clinical, teaching, research, administrative or service, including institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards, IACUC and other duties as specified in your job description/employment agreement. University of Nebraska includes UNMC, UNO, UNL, UNK, UNCA, and University Technology Development Corporation including UNeMed. It does not include the NU Foundation.

Practice Plan:

Practice Plans include UNMC Physicians, Children's Specialty Physicians and the University Dental Associates

immediate family member:

Immediate family includes spouse, child, parent, brother, sister, grandchild, or grandparent, by blood, marriage, or adoption, guardian or ward.

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Agencies within the Public Health Service include the following Agency for Healthcare Research and Quality (AHRQ) Agency for Toxic Substances and Disease Registry (ATSDR) Centers for Disease Control and Prevention (CDC) Food and Drug Administration (FDA) Health Resources and Services Administration (HRSA) Indian Health Service (IHS) National Institutes of Health (NIH) Substance Abuse and Mental Health Services Administration (SAMHSA)

7. Goods or Services

(There may be multiple disclosures for this question)

Has the University of Nebraska and/or Practice Plan proposed to contract or contracted with you or an immediate family member to purchase or lease goods, services or property, gratuitously provided use of facilities, property or services, or by any action or transaction caused you or an immediate family member to financially benefit over the past 12 months?

Payment for University and/or Practice Plan Responsibilities and University tuition and fees for education are excluded.

Group 1

Please indicate Yes or No

- Yes
- No

Group 2

Person with the Relationship

- Self
- Immediate family member
- Immediate Family Member who is also affiliated with the University of Nebraska and/or Practice Plan

Group 3

Specify Relationship:

Select from 'Immediate Family Member' List

Group 4

If Immediate Family Member is affiliated with the University of Nebraska and/or the Practice Plan, provide their full name and the campus and/or practice plan they are affiliated with

Answer goes here

Group 5

Describe in detail including the name of the entity if there is one:

Answer goes here

Group 6

Value:

- Less than \$5,000
- \$5,000 - \$9,999
- \$10,000 - \$19,999
- \$20,000 - \$49,999
- \$50,000 - \$100,000
- Greater than \$100,000

Group 7

Do you participate in any University of Nebraska research sponsored by this entity

- Yes
- No

Group 8

Do you receive any Public Health Service(NIH,FDA,etc.) funding for this research

- Yes
- No

Group 9

Have you been reimbursed travel expenses or had travel paid directly by this entity

- Yes
- No

Group 10

Purpose of Trip

Answer goes here

Group 11

Destination

Answer goes here

Group 12

Duration

Answer goes here

Group 13

Amount (estimate range if exact dollar amount not known)

Answer goes here

Definitions:

University of Nebraska:

University of Nebraska includes UNCA, UNMC, UNO, UNL, UNK, and University technology transfer corporations including UTDC, UNeMed, NUTECH Ventures, PKITDC, and the Nebraska Innovation Campus Development Corporation. The University of Nebraska does not include the NU Foundation.

Practice Plan:

Practice Plans include UNMC Physicians, Children's Specialty Physicians and the University Dental Associates

immediate family member:

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Public Health Service:

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8. Financial or Non-Financial Interests

(There may be multiple disclosures for this question)

In addition to what is disclosed above, do you or an immediate family member have or intend to obtain any financial or non-financial interests or benefits (preferential treatment, promotion, non-salaried appointment) which may create the appearance of a conflict of interest with your University Responsibilities and/or Practice Plan Responsibilities?

Group 1

Please indicate Yes or No

- Yes
- No

Group 2

Person with the Relationship:

- Self
- Immediate family member
- Immediate Family Member who is also affiliated with the University of Nebraska and/or Practice Plan

Group 3

Specify Relationship:

Select from 'Immediate Family Member' List

Group 4

If Immediate Family Member is affiliated with the University of Nebraska and/or Practice Plan, provide their full name and the campus and/or practice plan they are affiliated with.

Answer goes here

Group 5

Describe in detail:

Answer goes here

Group 6

If there is a financial value, please specify value:

- Less than \$5,000
- \$5,000 - \$9,999
- \$10,000 - \$19,999
- \$20,000 - \$49,999
- \$50,000 - \$100,000
- Greater than \$100,000

Group 7

Do you participate in any University of Nebraska research sponsored by this entity

- Yes
- No

Group 8

Do you receive any Public Health Service (NIH,FDA,etc.) funding for this research

- Yes
- No

Group 9

Have you been reimbursed travel expenses or had travel paid directly by this entity

- Yes
- No

Group 10

Purpose of Trip

Answer goes here

Group 11

Destination

Answer goes here

Group 12

Duration

Answer goes here

Group 13

Amount (estimate range if exact dollar amount not known)

Answer goes here

Definitions:

University Responsibilities:

Professional responsibilities on behalf of the University of Nebraska which may include activities such as clinical, teaching, research, administrative or service, including institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards, IACUC and other duties as specified in your job description/employment agreement. University of Nebraska includes UNMC, UNO, UNL, UNK, UNCA, and University Technology Development Corporation including UNeMed. It does not include the NU Foundation.

Practice Plan:

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immediate family member:

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9. Other Activity

Has the Practice Plan offered employment to any of your immediate family members?

Group 1

Please indicate Yes or No or select N/A if you are not a member of a Practice Plan

- Yes
- No
- N/A

Group 2

Person with the Relationship

Select from 'Immediate Family Member' List

Group 3

Provide the name of the Practice Plan and the person's name, title and position.

Answer goes here

Group 4

Additional Information. If none, type 'none'.

Answer goes here

Definitions:

Practice Plan:

Practice Plans include UNMC Physicians, Children's Specialty Physicians and the University Dental Associates

immediate family members:

Immediate family includes spouse, child, parent, brother, sister, grandchild, or grandparent, by blood, marriage, or adoption, guardian or ward.

10. Research Activity

(There may be multiple disclosures for this question)

Are you involved in research?

Group 1

- Yes
- No

Group 2

Is any of the research funded by Public Health Service Agencies within the Public Health Service include the following Agency for Healthcare Research and Quality (AHRQ) Agency for Toxic Substances and Disease Registry (ATSDR) Centers for Disease Control and Prevention (CDC) Food and Drug Administration (FDA) Health Resources and Services Administration (HRSA) Indian Health Service (IHS) National Institutes of Health (NIH) Substance Abuse and Mental Health Services Administration (SAMHSA)

- Yes
- No

Group 3

Within the last 12 months, have you been reimbursed travel expenses or had travel paid directly by an outside entity (profit or non-profit, excluding an institution of higher education, academic medical center or governmental agency) related to any of your University Responsibilities

If more than one entity or outside source has paid or reimbursed travel expenses for one or more trip(s) related to your University Responsibilities you must report each trip separately. After answering the following questions click the green '' sign to add each additional disclosure.

- Yes
- No

Group 4

Name of the Entity/Outside Source that paid or reimbursed travel expense

Select from 'Sponsors' List

Group 5

Purpose of Trip

Answer goes here

Group 6

Destination

Answer goes here

Group 7

Duration

Answer goes here

Group 8

Amount (estimate range if exact dollar amount not known)

Answer goes here

Group 9

Is the travel related to the PHS funded research

Travel may be related if the purpose/subject matter of the travel is the same or similar to the subject matter of the PHS funded research.

- Yes
- No

Group 10

Provide an explanation why the travel is or is not related to the research.

Answer goes here

Definitions:**University Responsibilities:**

Professional responsibilities on behalf of the University of Nebraska which may include activities such as clinical, teaching, research, administrative or service, including institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards, IACUC and other duties as specified in your job description/employment agreement. University of Nebraska includes UNMC, UNO, UNL, UNK, UNCA, and University Technology Development Corporation including UNeMed. It does not include the NU Foundation.

11. Certification of Review

I certify that the information contained in this disclosure is accurate and complete.

Group 1

- As originally submitted
- With changes made

Group 2

Enter Today's Date Below:

Answer goes here

- 3.4.5 **Outside Employment.** Staff members employed on a part-time basis by the University, such as practicing lawyers or physicians, may engage in outside employment or activities unless it is expressly stipulated to the contrary in the conditions of employment.

Staff members employed by the University, other than those covered in the preceding paragraph, shall be encouraged to engage in professional activities outside the University as a means of contributing to the economic growth and development of the state as well as broadening their experience and keeping them abreast of the latest developments in their specialized fields; provided such activities do not interfere with their regular duties at the University, or represent a conflict of interest. Staff members may accept temporary or occasional employment for such professional services when such employment is recommended by the Dean of the college or director of the division involved and approved by the Chancellor or President, or their designees.

Specific approval of the Board is required before any members of the full-time professional staff:

- (a) May be retained to provide professional services outside the University to an individual person, client, company, firm or governmental agency over a time period lasting more than two years.
- (b) May accept professional employment requiring more than an average of two days per month during the period of his or her full-time University employment.

The President shall promulgate such executive policies as shall be necessary for administration and enforcement of this Section 3.4.5 including regulations covering the conduct of outside professional activity performed in University buildings using University equipment or materials that assure there is adequate consideration to the University for such use.

Nothing contained in this Section 3.4.5 shall affect the administration or enforcement of the Medical Service Plan or the Dental Service Plan at the University of Nebraska Medical Center, or any amendments or revisions thereof which have been approved by the Board.

History: Amended, 65 BRUN 142 (16 September 2005)
Amended, 56 BRUN 90 (22 June 1991)

3.8 **Conflict of Interest.** No employee of the University shall engage in any activity that in any way conflicts with duties and responsibilities at the University of Nebraska. The Board of Regents has adopted Regents Policy 3.2.8 and authorized the implementation of related policies and directives to properly avoid, disclose and manage potential conflicts of interest.

History: Amended, 69 BRUN 15 (5 March 2010)
Amended, 47 BRUN 147 (24 July 1982)

3.10 **Ownership and Commercialization of Inventions and Discoveries.** The Board encourages the commercialization of inventions and discoveries arising from research activities of the University, and when appropriate, the pursuit of patents or other intellectual property protection, as a method of bringing recognition and remuneration to the University's inventors and to the University itself. Every invention or discovery by members of the faculty and staff that results from the performance of duties within the scope of their University employment, or from the use of University personnel, property, facilities, or other resources, except where such use is minimal, shall be solely owned by the University provided that the inventor or inventors shall have a share of no less than one-third (1/3) of the net proceeds received by the University resulting from licensing or sale of University owned intellectual property rights associated with such invention or discovery. Further, and unless otherwise explicitly and specifically agreed to in writing, should by operation of law or otherwise it is determined that the inventor or inventors own any rights in the University's inventions and discoveries beyond that described in this section of these *Bylaws*, then it shall be a condition of employment at the University of Nebraska that any such rights shall be assigned to the University. The Board shall adopt a formal Patent and Technology Transfer Policy which shall govern the disclosure of inventions and discoveries resulting from performance of duties by faculty or staff within the scope of their employment, or from the use of University personnel, property, facilities, or resources. The President, or any administrative officers designated by the President, shall have authority to act for the University with respect to inventions or discoveries owned by the University as required by this section and the Board's Patent and Technology Transfer Policy.

History: Amended, 64 BRUN 139 (17 Oct. 2003)
Amended, 59 BRUN 210 (10 Dec. 1994)
Amended, 49 BRUN 300 (16 June 1984)

- e. While located for use as a residence or premises.
- f. Which is an "uninsured motor vehicle".

Reference: BRUN, Minutes, 63, p. 181 (October 19, 2001).
BRUN, Minutes, 65, p. 50 (June 5, 2004).
BRUN, Minutes, 70, p. 36 (September 9, 2011).
BRUN, Minutes, 71, p. 74 (July 18, 2013).

RP-3.2.8 Conflict of Interest and Conflict of Commitment

1. Introduction

University relations with industry, government agencies, individuals, and other enterprises outside the University constitute a complex network of interactions. These interactions have directed attention to potential conflicts of values and interests between these entities and academia. Conflict of Interest is addressed in Section 3.8 of the *Bylaws of the Board of Regents* as follows:

3.8 Conflict of Interest. No employee of the University shall engage in any activity that in any way conflicts with duties and responsibilities at the University of Nebraska. The Board of Regents has adopted Regents Policy 3.2.8 and authorized the implementation of related policies and directives to properly avoid, disclose and manage potential conflicts of interest.

In addition to Section 3.8 of the Bylaws, Nebraska statutes relating to conflict of interest and nepotism apply to all public officials and employees of the University, including the provisions of §49-14,101.01 of the Revised Statutes of Nebraska.³

Furthermore, federal funding agencies require that the University establish safeguards to prevent employees or consultants from using their positions for purposes which are motivated by (or even give appearance of) a drive for private financial gain either for themselves or family members.⁴

Responsibility for assurance of compliance with this policy rests with the President and Chancellor of each campus. The Chancellors shall submit an annual report to the President detailing the compliance policies, procedures and management activities at their campus.

2. University-Wide Conflict of Interest Principles

Campus conflict of interest policies will vary according to the unique roles and needs of each campus. However, each campus policy must ensure that broad University-wide principles are followed, including:

- 1) Prospects of financial gain must not unduly influence faculty and the University with regard to commercially imminent, product oriented research programs versus fulfilling the University's objectives of educating students, advancing basic knowledge and serving Nebraskans through the development and application of knowledge that enables them to develop better lives, stronger communities and genuine economic opportunity.
- 2) The University must avoid situations where the possibilities for personal gain for the Covered Person may be judged to be so significant that it is unreasonable to expect the Covered

³ "A public official or public employee shall not use or authorize the use of his or her public office or any confidential information received through the holding of a public office to obtain financial gain, other than compensation provided by law, for himself or herself, a member of his or her immediate family, or a business with which the individual is associated." and "A public official or public employee shall not use or authorize the use of personnel, resources, property, or funds under his or her official care and control other than in accordance with prescribed constitutional, statutory, and regulatory procedures or use such items, other than compensation provided by law, for personal financial gain. ..."

⁴ Including *Public Health Service, National Institute of Health and National Science Foundation* regulations and guidelines (42 CFR Part 50, Subpart F and 45 CFR Part 94.1), *Department of Education* regulations (34 CFR Part 75.524, 34 CFR Part 75.525 and 34 CFR Part 74.42), and *FDA* regulations (21 CFR Part 54).

Person to exercise the objectivity necessary for public trust in the University and the rigor of its research.

- 3) Research agreements should encourage the free exchange of ideas and the sharing of research results regardless of the sponsoring entity. Some constraints may be required to protect proprietary information or intellectual property.
- 4) To the extent practicable and consistent with applicable law, the University must be appropriately compensated for private, commercial use of the public property under its stewardship.

Underlying these principles is the recognition that the University of Nebraska is a public institution with a mission of serving the people of Nebraska through research, teaching and service.

3. Annual Report

Annually, each campus shall submit a written conflict of interest report to the President which includes at least the following information:

- 1) The number of conflicts disclosed, by appropriate academic unit.
- 2) A summary of the nature of the conflicts.⁵
- 3) The number of conflicts being managed through written plans, by college.
- 4) The number of conflicts eliminated, by college.
- 5) Other material or information related to the management of conflicts of interest at the campus.

4. Personnel Affected by Conflict of Interest and Conflict of Commitment Policy

Covered Person shall mean:

- 1) University administrative officers and employees, specifically including any University employees with delegated signature, purchasing or contracting authority on behalf of the University;
- 2) University employees and faculty engaged in outside employment or other activities specified in this policy (tech transfer/use of University facilities or equipment) that may create a *Conflict of Interest*; and
- 3) Sponsored Research investigators, including University employees, faculty, staff and support personnel (managerial/professional and office/service positions), volunteers, trainees, students, contractors and other persons under the direct control of the University of Nebraska, whether paid by the University of Nebraska or not, who participate in *Sponsored Research* as defined in Section 6 of this policy 3.2.8.⁶

Conflict of Interest shall mean situations when a *Covered Person's* direct or indirect personal financial interests may compromise, or have the appearance of compromising, the *Covered Person's* professional judgment or behavior in carrying out his or her obligations to the University of Nebraska. This includes

⁵ Conflicts may be identified according to basic categories, for example, conflicts arising from ownership of stock, family relationships, potential undue influence, and the like.

⁶ The term *Covered Person* includes the definition of an "Investigator" under NIH guidelines, specifically "the Principal Investigator and any other person who is responsible for the design, conduct, or reporting of research funded by the NIH, or proposed for such funding. The definition includes contractors or collaborators, as well as the Investigator's spouse and dependent children." See *Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought (42 CFR Part 50, Subpart F, grants and 45 CFR Part 94, contracts)*.

indirect personal financial interests of a *Covered Person* that may be obtained through third parties such as a *Covered Person's Immediate Family*, business relationships, fiduciary relationships, or investments.

Immediate family shall mean an individual who is the spouse, child, parent, brother, sister, grandchild, or grandparent, by blood, marriage, or adoption of the *Covered Person*.

5. Individuals and Organizations Responsible for Administration of Conflict of Interest and Conflict of Commitment Policy

At the University of Nebraska, all reporting of potential *Conflicts of Interest* should be undertaken with the goal of full disclosure. The President and Chancellors of each campus shall develop and implement a disclosure process and supporting procedures consistent with the principles set forth in this Policy, covering, at a minimum, sponsored programs administration, institutional review boards, any office of technology transfer, and any other responsible campus administrative officers. The Chancellors shall be responsible for overseeing their campus' reporting process and must designate an administrative officer who will be in charge of developing more specific written procedures for enforcing the policy. Each Chancellor shall submit their campus' processes and procedures to the President for review and approval.

The procedures for disclosure at each institution must, at a minimum, include the following:

- 1) Annual disclosures by *Covered Persons* who may have potential *Conflicts of Interest*.
- 2) A description of the process for developing, implementing, and overseeing conflict management plans, including a detailed process for managing and/or eliminating potential *Conflicts of Interest*.
- 3) A description of procedures for ensuring coordination among all University organizations with a role in oversight of conflicts.
- 4) A description of the process by which a *Covered Person* may address concerns regarding a *Conflict of Interest* situation or the management thereof.
- 5) A description of how:
 - Disclosures will be reviewed and retained, and the level of activity of each college on the campus will be reported to the President pursuant to paragraph 10 of this policy;
 - Responsible campus officials are to review and manage potential *Conflicts of Interest*;
 - The campus will provide related training and advice about *Conflict of Interest* issues;
 - The campuses will review and validate their program on a regular basis;
 - The campus will make its implementation procedures for this policy available publicly; and
 - The institution will enforce this policy and provide sanctions when necessary.

6. Conflicts of Interest Involving Sponsored Research

Research is basic to the University's teaching and service missions. Good teaching and learning depend upon research. Likewise, through its research, teaching, and service activities, the University's resources can best be brought to bear on public issues requiring objective, systematic study. Research forms an inherent part of departmental and collegiate missions, and brings recognition to the University and its faculty. All forms of research, which are within departmental and collegiate missions, and which maintain the high quality characteristic of the University, are appropriate to the University's open environment. Similarly, University teaching and service activities have potential for commercial use and development.

Sponsored Research means research, training, and instructional projects performed by Covered Persons using any University space, materials, equipment or property that involves funds, materials or other compensation from sources outside the University through a grant or contract that obligates the University to a specified statement of work, sets forth binding financial terms in the form of a budget or up-front payment, or contains terms related to ownership of and rights to use intellectual property developed thereunder. Sponsored Research is a vital endeavor of the University; it allows faculty the means to pursue excellence in their research and scholarly activity, it expands opportunities for graduate and undergraduate student participation in research, it enhances the quality of University research facilities through public and private support, and it helps facilitate the commercialization of research and technology to benefit the University and Nebraska. The University encourages its faculty and staff to engage in both sponsored and non-sponsored research recognizing that compliance with this policy can help assure that appropriate standards of accountability are met and extramural considerations do not hinder the dissemination or commercialization of research.

Each campus shall establish its own Sponsored Research application approval process, including applicable internal or external peer review systems and implementing best practices for approving federally, publicly and privately sponsored research projects. The Chancellor shall be responsible for overseeing the research approval process and must designate an administrative officer who will be in charge of developing more specific written procedures for implementing the policy. The procedures for Sponsored Research approval at each campus must at a minimum include procedures for disclosing, identifying, reviewing, managing and reporting conflicts and potential conflicts that arise with regard to Sponsored Research on their campus pursuant to Article 3 of this policy.

7. Openness of Research and Publication of Results

The traditions of free exchange of ideas and prompt dissemination of knowledge are fundamental to the University's mission and should govern all research, teaching, and service activities conducted by University faculty, staff and students. The University is committed to an open teaching and research environment, which ensures free faculty and student exchange of ideas, thereby contributing to the advancement of knowledge in all disciplines. As far as possible, the acceptance of support external to the University should not create situations which curtail open discussion of the research among colleagues and students.

Industry typically treats the products of its research in a very confidential manner. On occasion, industry expects project participants to maintain the same degree of confidentiality with sponsored research. It is important to note that openness, freedom of discussion, and freedom to publish go to the very core of the University. Nonetheless, there are certain legitimate needs for confidentiality on the part of industry that must be met by Sponsored Research investigators. Data received from an industry sponsor and marked "confidential" may be kept in a confidential status for a stated period of time. Also, it is prudent to recognize the need to maintain the confidential status of the results of the project for a period of time sufficient to determine patentability and filing of patent applications or as agreed upon in an agreement between the sponsor and the University. When appropriate, the University may enter into confidential agreements to protect proprietary information, where this is deemed necessary, either through direct agreement with an industrial sponsor or through an agreement between the sponsor and a University employee.

The campus official responsible for administration of research or other campus official designated by the Chancellor must ensure that all individuals who participate in industry-sponsored research projects are fully informed in writing of the ownership and disposition of inventions and requirements of confidentiality regarding research results and other confidential information provided by the sponsors of such projects.

Research conducted by faculty under industry or other commercial sponsorship must, as far as possible, maintain the University's open teaching, research, and service environment.

The campus official responsible for administration of research or Chancellor's designee must review and approve any new, proposed, or ongoing faculty-industry interactions as these interactions might compromise the University's open teaching and research environment. The appropriate department

chair(s) or director(s), dean(s), and in rare circumstances, the individual designated to perform the complete administrative review as described in Section 1--shall aid in this process and shall seek to resolve all potential problems prior to the approval of such interaction.

The campus official responsible for administration of research or Chancellor's designee shall from time to time provide current information to the department chairs, deans, directors and faculty pertinent information for timely reporting of concerns regarding violation of the *Conflict of Interest* and Conflict of Commitment policy.

Faculty must have the right to disseminate their research results, indeed are obligated to do so. The University discourages individual faculty from agreeing to forego this basic right. Likewise, the University will not unilaterally forego this right on behalf of its faculty, staff and students. However, the University and faculty may accept reasonable delays in submission of new findings for publication or other release of information to enable sponsors or the University to obtain proprietary or patent protection, for example. In special circumstances to be determined by the University, a researcher may waive his or her right to disseminate the results of his or her research and elect to enter an agreement to maintain the confidentiality of proprietary research for specified periods of time.⁷

The campus official responsible for administration of research or Chancellor's designee shall work with faculty engaged in industry-sponsored projects to provide written notification to support personnel and students involved in these projects, describing all contract and grant terms affecting them, including the possibility of delays in publication caused by the need of the sponsor to review manuscripts or any other obligations of confidentiality. Graduate students must not be assigned to thesis research topics which might be affected by confidential agreements. The appropriate campus official or Chancellor's designee may authorize exceptions where appropriate.

8. Outside Employment and Conflicts of Commitment

The University not only permits but expressly encourages faculty to pursue outside professional activities including interactions with industry, with or without compensation, which will enrich a faculty member's academic contributions to the University. Consulting can expose faculty to research problems and perspectives which may enrich faculty teaching, research, extension, and service backgrounds. However, faculty and administration must be sensitive that such interactions could cause *Conflicts of Interest* and must ensure that *Covered Persons* do not make unnecessary or inappropriate commitments of their time or expertise which can adversely affect the University and its mission. A conflict of commitment must be disclosed and managed when it constitutes a *Conflict of Interest* for a *Covered Person*.

The assumption that *Covered Persons* will devote their time and effort to the University in proportion to their appointments--that full-time appointment connotes full-time commitment of time, effort, and expertise to the University--is inherent in University employment. Outside consulting activities, often acceptable in themselves, can interfere with a University employee's paramount obligations to the University by placing significant, competing demands upon the time and energy of a *Covered Person* with the potential for the neglect of instructional, research and other employment obligations. In some circumstances, a *Covered Person's* proposed outside activities may directly conflict with the objective of assignments within the University.

The University, through an outside employment policy enacted by the Board of Regents, seeks to minimize the potential for conflict of commitment by several mechanisms. The time that may be devoted to outside activity is normally limited to two working days per month; greater time commitments require specific approval of the Board of Regents. (For practical reasons, faculty are given considerable freedom in the scheduling of any outside activities.) In addition, the University must examine the application of an employee's expertise to proposed educational, industrial, or other consulting activities to assure that any *Conflict of Interest* and/or conflict of commitment is properly disclosed and managed. Hence, the University requires prior disclosure of proposed consulting, extramural teaching, or other activities to the department chair and the prior approval of the college dean and campus administration. Such disclosure

⁷ An example of such a circumstance would be research performed pursuant to a contract with an agency of the federal government requiring security clearance.

may be made by completing the appropriate campus form for disclosure of outside employment and may require the provision of additional documentation to the chair, dean, or other administrator.

In certain other circumstances, the specific approval of the Board of Regents may be required. The relevant policy of the Board of Regents is set forth in Section 3.4.5 of the *Bylaws of Board of Regents*.

Outside Activity and Employment. As University-industry relationships increase with a growing desire for consultants and other professional activities outside the University, University employees must continue to observe the University policy on outside employment embodied in Section 3.4.5 of the *Bylaws of the Board of Regents*. In addition, University employees must observe the Board of Regents policy on Conflict of Interest stated in Section 3.8 of the *Bylaws of the Board of Regents*. Accordingly, each campus shall develop appropriate forms for employees to disclose 1) potential *Conflicts of Interest*, and 2) outside employment in order for review, documentation, approval and management of *Conflicts of Interest* and outside employment.

Department chairpersons, department heads, deans, and directors have primary responsibility to review the specific nature of each proposed outside professional activity within their respective areas of administrative responsibility and to deny approval to any such activity which would interfere with the normal University duties of the employee involved and to require proper disclosure and management of any *Conflict of Interest*.

It is impossible to anticipate all questions which may arise in connection with the application of Section 3.4.5 of the *Bylaws* to the varied outside professional activities of employees. However, several general guidelines are set out below to assist in the administration of this policy:

- 1) Section 3.4.5 of the *Bylaws* does not apply to Office and Service staff.
- 2) Section 3.4.5(a) of the *Bylaws* requires Regental approval of outside professional activities where the employees will accept retainer fees or other remuneration on a permanent or yearly basis as a professional consultant. The key consideration in determining whether there will be acceptance of a retainer fee or remuneration on a permanent yearly basis is the nature of the professional business relationship between the employee and his or her client or patient. If this business relationship is one where the employee is obligated at the beginning of the professional relationship with a client or patient to provide professional services over a period of one year or longer, then approval by the Board of Regents is required.
- 3) In addition to obtaining prior approval of the department chair and campus administrator, Section 3.4.5(b) of the *Bylaws* requires Regental approval of outside professional activity requiring more than an average of two days per month during the period of the employee's full-time employment. The Board of Regents has interpreted this language to mean two days per month during the assigned work week. For this reason, Regental approval will only be required when an employee's outside professional activities will prevent the performance of his or her assigned duties at the University more than an average of two days per month during the period of full-time employment.
- 4) Section 3.4.5 of the *Bylaws* requires Regental approval of outside professional activity involving the charging of fees for work performed in University buildings with University equipment and materials. The President and Chancellors are authorized to develop specific policies with regard to the charging of fees for work performed in University buildings with University equipment and materials.
- 5) Section 3.4.5 of the *Bylaws* does not require individual approval of each separate client or patient relationship for professionals such as accountants, engineers, architects, lawyers, psychologists, therapists, etc. It is sufficient that the nature of the outside professional activity be generally described so that appropriate evaluation may be conducted regarding potential interference with University duties, *Conflict of Interest*, and conflict of commitment. So long as

none of the circumstances requiring Regental approval under subparagraphs (a), (b), (c), and (d) of Section 3.4.5 of the *Bylaws* exist, no further information need be provided by the employees, and the professional activity may be approved by the chancellor upon the recommendation of the appropriate dean or director.

- 6) Activities for a professional organization with which an employee is associated do not constitute the type of professional activity coming within the scope of Section 3.4.5 of the *Bylaws* unless a professional service is provided to the organization for which the employees is paid a professional fee which is commensurate with the actual value of the professional service provided.

The foregoing should not be construed to relieve any employee of complying with applicable policies or regulations of the department, college, division, campus, or University with regard to time one is allowed away from regular University duties.

University employees proposing outside employment or a consulting relationship of any nature pursuant to Section 3.4.5 of the *Bylaws* are required to complete the appropriate campus form for disclosure of outside employment.

Furthermore, consistent with the foregoing policy statement regarding conflicts of commitment and the effect such conflicts can have on a faculty member's research programs and the duties faculty members owe the University, University employees proposing outside employment or a consulting relationship with a third party shall disclose to the University any: i) confidentiality or non-disclosure agreements, ii) non-compete agreements or any agreement containing a non-compete clause, iii) assignments of intellectual property rights to the contracting party, and iv) involvement with commercial or educational enterprises where the name of the University may be used for commercial gain to the Chancellor or the Chancellor's designee. Although agreements of this type can be problematic, the University shall endeavor to promptly review such agreements and resolve any potential conflict of commitment to allow the University employee to perform the proposed outside employment or consulting while maintaining the integrity of their research projects and commitments to the University.

9. Conflicts of Interest Involving Technology Transfer

University projects have resulted in the creation of new Nebraska businesses which have transferred research results into products and services and which have contributed to the State's economy. Certain research discoveries lend themselves to commercialization by starting new ventures through the University or through faculty rather than the traditional licensing to existing companies. Moreover, this means of commercializing discoveries may be the best, or in some instances the only, means to transfer such new technology. The University recognizes this as an acceptable method of commercializing discoveries when it is in the best interests of the University, the State, and the inventor and is the most effective means to transfer such technology.

In establishing new companies to commercialize University technology, the University may accept equity positions or combinations of equity and future royalties in return for licensing the technology. This is an acceptable University activity and is an integral part of the technology transfer program. However, in such situations, reasonable limits on the University's involvement with respect to administrative time and the amount of equity taken must be observed. University technology transfer activities shall be governed by Section 3.10 of the *Bylaws* and Section 4.4.2 of the *Policies*. Such oversight will enable the University to be aware of and take steps to prevent or manage potential *Conflicts of Interest* which may arise, involving, among other things, favoritism in future dealings with the same company, discrimination against its competitors, or the use of public funds for private gain. Accordingly, University direction of the company must be limited in time, and the amount of equity taken must be less than controlling. The Board of Regents has separately authorized and delegated authority to the University Technology Development Corporation (UTDC), and nothing in this policy is intended to limit the authority of UTDC as it relates to properly managing or preventing conflicts of interest or otherwise.

Conflict situations also apply to any profit- or nonprofit-affiliated private entities established by the University or one of its employees. Therefore, in the University's relations with all such entities, the *Conflict of Interest* policy must be followed.

Where University technology is transferred in return for an equity position, or royalties, or projects are to be performed in exchange for an equity position, the affected University employees must fully disclose such proposals, and a suitable arrangement that reflects the Regents Policy must be concluded prior to approval of the proposal.

For-profit entities have been formed specifically to fund research and development, such as research and development limited partnerships. Such entities solicit investors from members of the public. There is the possibility that prospective investors may be induced to invest by what appears to be University involvement in the funding entity or by unrealistic expectations of the outcome of the projects. In either event, the name of the University could be unfairly traded upon. Therefore, care must be taken that the investor solicitation is consistent with the potential outcome of the research and the policy on the use of the University's name.

Where appropriate, the University may accept equity in a company as complete or partial payment for transferring University technology to the company for commercialization. Only the Board of Regents may approve acceptance of equity in a company upon the recommendation of the President.

The University may designate individual(s) to hold membership on the board of directors of a company in which the University holds equity.

University faculty, administrators, or other members of the University community holding any such board of directors membership shall oppose or absent themselves, as appropriate, from any funding decisions or other decisions relating to the University which:

- 1) violates or is contrary to any law or University policy or procedure in regard to grants or contracts;
- 2) would constitute a Conflict of Interest with such person's University office of employment; or
- 3) involves improper use of University (public) funds.

When external entities raise funds for University projects through any form of investment offerings, University personnel must scrupulously avoid the endorsement of any such offering or any statement of potential research results. The University's prior written consent must be obtained to use its name in connection with advertising or promotion of any investment offering.

The past history of funding of University research or other projects by any company or firm shall not have any bearing on purchasing decisions made by the University of Nebraska.

10. Institutional Conflicts of Interest

An *Institutional Conflict of Interest* may occur when the University or a *Covered Person* in a senior administrative position has a financial interest in a commercial entity that itself has an interest in a University research project, including potential conflicts with equity/ownership interests or royalty arrangements. Each campus shall develop and establish processes and procedures for review of institutional conflicts involving technology transfer or other commercial activities. This process must at a minimum include:

- 1) Procedures for identifying and overseeing institutional *Conflicts of Interest*;
- 2) Principles and strategies for managing institutional Conflicts of Interest; and
- 3) Principles and strategies for institutional management of equity.

Each Chancellor shall submit their campus' processes and procedures for review of institutional *Conflicts of Interest* to the President for review and approval.

11. Appeal of Administrative Decisions

Each campus shall assure that an appeal mechanism is in place to allow *Covered Persons* to appeal an adverse decision relating to this policy.

Reference: BRUN, Minutes, 58, pp. 11-12, (February 13, 1993).
BRUN, Minutes, 60, p. 20, (March 24, 1995).
BRUN, Minutes, 69, pp. 16-30, (March 5, 2010).

RP-3.2.9 Access to Retirement Accumulations (Repealed)

University of Nebraska Access to Retirement Accumulations, adopted February 28, 1998, BRUN Minutes, 62, p. 16, has been repealed.

Reference: BRUN, Minutes, 62, p. 16 (February 28, 1998).
BRUN, Minutes, 68, pp. 6-8 (January 23, 2009).

RP-3.3 Conditions of Employment

RP-3.3.1 Vacation Accrual: Academic-Administrative Staff

The maximum vacation which may be earned and accrued by members of the Academic-Administrative (all-year) staff, effective April 1, 2007, shall be two hundred eighty (280) hours; provided that any employee who has accumulated more than 280 hours of vacation as of said effective date shall be entitled to retain any such excess vacation over 280 hours for future use. The basis for computation is the accrual of sixteen (16) hours of vacation per monthly pay period.

If an employee's balance of floating holidays is in excess of 32 hours, the employee must first submit floating holiday absences to bring that balance to 32 or less prior to submitting vacation leave.

The service date shall be the basis from which number of years of employment is determined, and this is defined as the month in which current continuous service began in a permanent full-time status. Vacation time is to be credited beginning the month of hire in a permanent, full-time status with the accrual of pro-rata entitlement at the end of that monthly pay period; assuming supervisory approval, vacation time may be taken as it accrues without a specified waiting period.

Reference: BRUN, Minutes, 37, p. 145 (June 29, 1974).
BRUN, Minutes, 66, p. 81 (March 9, 2007).

RP-3.3.2 Vacation Accrual: Managerial-Professional Staff

The President shall designate those members of the all-year managerial-professional staff employed within the Central Administration who shall be allowed vacation benefits allowed to members of the all-year academic-administrative staff.

Subject to guidelines and policies established by the President, the Chancellors shall designate those members of the all-year managerial-professional staff employed within their respective administrative units who shall be allowed vacation benefits equal to the same benefits allowed to members of the all-year academic-administrative staff.

Reference: BRUN, Minutes, 43, p. 46 (May 18, 1979).
See also Bylaws BRUN (1973+), s. 3.4.2.