



**Conflict of Interest, Conflict of Commitment and Outside Activities Policy
Disclosure Self-Assessment Worksheet**

Purpose: This worksheet is intended to help any University of Oregon employee determine whether or not an outside interest or activity requires disclosure and approval, in accordance with the UO’s Conflict of Interest, Conflict of Commitment and Outside Activities [Policy](#) (“COI-COC policy”). The COI-COC policy supports both UO employee’s and the University’s compliance with state ethics laws, which promote good stewardship of public resources. For outside activities that do require disclosure and approval, approval should be obtained before the employee engages in the activity.

Completion of this document can help employees comply with the policy. When employees complete the worksheet and have nothing to disclose, they may retain the document to demonstrate careful consideration of the policy’s applicability to their outside interests and activities. When employees have something to disclose, or are unsure about whether something should be disclosed, they may complete the worksheet and submit it as their disclosure. Instructions for the disclosure are provided below.

NOTE: Compliance with state ethics laws is an individual responsibility. Compliance with UO’s COI-COC policy can help, but does not guarantee, compliance with state law.

This worksheet is specifically related to the UO’s COI-COC policy and is completely separate from requirements related to Financial Conflict of Interest in Research (FCOIR) regulations and the UO’s FCOIR policy, which require sponsored researchers to disclose all Significant Financial Interests (SFIs). SFI declarations must be made through the UO’s Electronic Compliance Proposal System ([EPCS](#)).

Instructions: Complete this worksheet by answering **all** of the questions to help you determine whether or not you have an outside interest that requires, or may require, disclosure or approval. It is possible to answer “yes” to more than one question, which means you may have more than one interest or activity to disclose. If you confidently answer “no” to all questions, the policy does not require you to submit a disclosure. When in doubt about whether or not an outside interest or activity must be disclosed and approved, employees should contact Research Compliance Services (RCS) to discuss the matter, or err on the side of caution and disclose the interest or activity.

If the worksheet directs you to make a disclosure, email your completed worksheet to Research Compliance Services at coi@uoregon.edu. An RCS staff member will follow up with a determination, additional questions and/or instructions. Do not hesitate to email coi@uoregon.edu with questions while completing this worksheet.

1. Do you or a relativeⁱ of yours, or any business associate of you or your relative, have a financial interest that would or could be impacted by you acting (taking action, making a decision, or making a recommendation) in your capacity as a University employee?

- Yes. The outside interest must be disclosed. Briefly explain below, and proceed to next question.
- No. Proceed to next question.
- Not sure. Briefly explain below, and proceed to next question.

2. Are you a full-time, salaried employee - including those with a [faculty appointment](#) - interested in an outside activity that will require more time than an average of one day in each seven-day week, averaged over a quarter term (i.e. 13 days over 3 months)?

- Yes. The outside activity must be disclosed. Briefly explain below, and proceed to next question.
- No. Proceed to next question.
- Not sure. Briefly explain below, and proceed to next question.

ⁱ Definition of **relative**: (a) the spouse, parent, stepparent, child, sibling, stepsibling, son-in-law or daughter-in-law of the employee or official; (b) the parent, stepparent, child, sibling, stepsibling, son-in-law or daughter-in-law of the spouse of the employee or official; (c) any individual for whom the employee or official has a legal support obligation; (d) any individual for whom the employee or official provides benefits arising from the employee’s public employment or from whom the employee or official receives benefits arising from that individual’s employment.

3. Are you a part-time employee with a [faculty appointment](#) interested in an outside activity that will require more time than an average of one day in each seven-day week, prorated by your UO FTE?

- Yes. The outside activity must be disclosed. Briefly explain below, and proceed to next question.
- No. Proceed to next question.
- Not sure. Briefly explain below, and proceed to next question.

4. Do you have ownership of equity in an entity, including a consulting entity, that carries on activities closely relatedⁱⁱ to your UO duties and/or field of expertise? This **excludes** consulting as an individual or sole proprietor.

- Yes. The outside activity must be disclosed. Briefly explain below, and proceed to next question.
- No. Proceed to next question.
- Not sure. Briefly explain below, and proceed to next question.

5. Do you perform outside activities in exchange for equity in an entity that carries on activities closely related to your UO duties and/or field of expertise? This **excludes** publicly-traded equity unless you have a majority ownership in that entity.

- Yes. The outside activity must be disclosed. Briefly explain below, and proceed to next question.
- No. Proceed to next question.
- Not sure. Briefly explain below, and proceed to next question.

6. Do you perform outside activities closely related to your UO duties and/or field of expertise that involve research and development and/or the creation of technological improvements, inventions, or software?

- Yes. The outside activity must be disclosed. Briefly explain below, and proceed to next question.
- No. Proceed to next question.
- Not sure. Briefly explain below, and proceed to next question.

7. Are you managing or significantly participating in the day-to-day operations of an entity that carries on activity closely related to your UO duties and/or field of expertise?

- Yes. The outside activity must be disclosed. Briefly explain below, and proceed to next question.
- No. Proceed to next question.
- Not sure. Briefly explain below, and proceed to next question.

ⁱⁱ **Closely related** can describe a wide range of relationships between one's UO duties and outside interests/activities. For example, "closely related" may describe circumstance where the UO duties and outside work are of the same nature; are on the same topics; involve working with the same vendors; involve serving the same populations, including students; involve creating the same or similar products; or may overlap or intersect with UO activities, projects, programs, or services. When in doubt about whether or not the outside interest/activity is or could be considered "closely related" to your UO duties, you should contact RCS to discuss it, or err on the side of caution and disclose the interest and activity.

8. As part of an outside activity or in relation to any financial interest of yours or a relative of yours, do you wish to employ any UO students whom you currently teach, directly supervise, or formally advise?

- Yes. Complete the "**Checklist for Employment of University of Oregon Student Outside of the UO**" (added below; and available through Research Compliance Services) and proceed as directed therein.
- No. Proceed to next question.
- Not sure. Briefly explain below, and proceed to next question.

9. Do you have any other interest, or wish to engage in any other activity in the foreseeable future, that could be considered - or appear to be - a "conflict of interest" or "conflict of commitment" defined as follows?

- Conflict of interest: *Any action, decision, or recommendation by a person acting in their capacity as a University employee that would (for actual conflicts) or could (for potential conflicts) have a private financial impact on the person or their relative, or any business with which either is associated.* [ORS 244.020\(1\) \(13\)](#).
 - Conflict of commitment: *A situation where an individual engages in outside activities, either paid or unpaid, that substantially interfere with the individual's duties to the University of Oregon.*
- Yes. The outside activity must be disclosed. Briefly explain below, and proceed to next question.
 - No. Proceed to next question.
 - Not sure. Briefly explain below, and proceed to next question.

10. Do you anticipate using any University of Oregon supplies, facilities, equipment, employees, records, intellectual property, or any other University resources; or using any non-public information accessed as a UO employee, in your outside activity?

- Yes. Such use is generally not permitted. The outside activity must be disclosed. If you believe the use of UO resources have been authorized as part of your official compensation, the disclosure should explain whether or not, and by whom, permission has been granted. Briefly explain the use here, and proceed to next question.
- No. Proceed to next question.
- Not sure. Briefly explain below, and proceed to next question.

What to disclose. If your response to any question above directs you to disclose, or if you are unsure how to respond to any question above, please provide the additional following information requested below, and submit the entire worksheet to Research Compliance Services by email to coi@uoregon.edu.

- Your name, role/s at the UO (including FTE) and description of your UO duties:

- Your supervisor's name, title, and contact information:

- For any outside interest or activity indicated above, clearly identify the interest or activity (e.g. the name of the outside entity for which you work); briefly explain your relationship to the interest/activity; and describe how it does, could, or may appear to relate to your UO duties:

- For any outside activity identified above, please explain how much time you spend on the outside activity, averaged over a week or quarter term, and duration:

- For any outside interest or activity identified above, please explain whether or not there are any conflict management arrangements in place:

Checklist for Employment of University of Oregon Student Outside of the UO

Complete this form if you are hiring any UO students to do work for you outside of the UO, and you teach, supervise, or advise the student/s at the UO, and proceed as follows:

- If all statements below are true for you, complete the form, share it with the student/s you wish to hire, and retain a copy for your records. **If you affirm all statements below, this record will serve as your approval and you may proceed with hiring the student/s.** You do not need to submit the form to coi@uoregon.edu.
- **If any of the statements below are not true for you, you may be able to hire the student/s, but you must complete and submit this form to coi@uoregon.edu and wait for approval from policy support staff before proceeding with hiring the student/s.** (Note: Those who are hiring any student to do work that is closely related to their UO research or creative work should still complete and submit this form.)

I intend to hire a UO student/s to do work for me outside the UO, and I affirm:

- The student/s decision to work for me is entirely their choice.
- The student/s work for me is completely separate from and will have no bearing on any evaluation or supervision I provide for them in my capacity as a UO employee. In addition, the student/s work for me can have no positive or negative effect on the evaluation of their academic performance or the evaluation of their UO-related work.
- The student/s will not do outside work related to my UO research or creative work.
- I will pay the student/s at least the market rate for their work. I may not expect or receive any discounts as a result of my status at the UO.
- I understand that I am prohibited from accepting any discount or gift from a student (including in the form of labor), in any calendar year, in excess of \$50.
- I understand that I may not use any public resources for, or ask the student/s to use public resources in, the outside work that the student/s will do for me.
- I will share this form with the student/s that work for me.
- I will inform students that they may contact coi@uoregon.edu or consult the UO EthicsPoint website <https://hr.uoregon.edu/ethicspoint-hotline-submit-report> if they have any concerns related to this disclosure.

My name and UO role: _____

My signature: _____

Date: _____

If you were not able to affirm any statement above, submit this form with the information requested below, to coi@uoregon.edu:

Your name, UO email, phone number: _____

Your job at the UO (title and description of what you do): _____

Name/s of the student/s you wish to hire: _____

Description of your relationship to the student/s through your work at the UO: _____

Description of the work you will hire the student/s to do outside the UO: _____