**LINKS FOR FEDERAL, USF and USF HEALTH POLICIES CONCERNING CONFLICTS OF INTEREST, CONFLICTS OF COMMITMENT, OUTSIDE ACTIVITIES, AND REPORTING**

**NIH policy on grant confidentiality:** The sharing (or using) of information in grant proposals by reviewers is specifically prohibited. It is not only unethical, but also may jeopardize intellectual property (IP), amounting to IP theft. The NIH policy on the confidentiality of grant proposals is here: https://grants.nih.gov/grants/guide/notice-files/NOT-OD-14-073.html

**NIH Other Support policy:** The NIH requires reporting of all "Other Support" by all grant applicants and recipients. This "includes *all* resources made available to a researcher in support of and/or related to *all* of their research endeavors, regardless of whether or not they have monetary value and regardless of whether they are based at the institution the researcher identifies for the current grant"
(see https://grants.nih.gov/grants/guide/notice-files/NOT-OD-19-114.html )

**IP Theft** by the above (and other) activities is the subject of this report:
http://ipcommission.org/report/IP_Commission_Report_Update_2017.pdf

**USF Regulation 10.107:  Ethical Obligations: Conflicts of Interest, Outside Employment, Employment of Relatives, and Public Office**: This Regulation establishes the University overarching philosophy that USF employees will adhere to the highest ethical standards in all official acts in the performance of their duties for USF.

**USF System Policy 0-027: Florida Code of Ethics for Public Officers and Employees; Compliance and Disclosure**: This is the University's Policy which, among other things, governs outside activity reporting obligations of all USF employees, the solicitation or acceptance of gifts, and prohibitions on certain business, employment, or contractual relationships employees may have with persons or entities outside of USF.  This policy defines outside activity and compensation. This policy requires all employees to annually submit a Florida Code of Ethics disclosure in eDisclose, but there is a specific provision for USF Health Faculty to meet their outside activity reporting obligation through reporting in the ROAD system
( https://hsccf.hsc.usf.edu/ROAD/auth.cfc?method=renderLogin).

**USF Conflicts of Interest regarding research projects**:
http://regulationspolicies.usf.edu/policies-and-procedures/pdfs/policy-0-309.pdf

**USF Yearly Report of Outside Activity (eDisclosure):** https://www.usf.edu/compliance-ethics/resources/edisclose.aspx

**Outside Activity Guide:**  https://www.usf.edu/compliance-ethics/documents/nutshell-outside-activity-20181012.pdf

**USF Regulation 9.019 Limiting Conflicts of Interest in Interactions with the Pharmaceutical, Medical Device, and Biotechnology Industries**: This Regulation is specific to the Morsani College of Medicine and is supplemental to USF Regulation 10.107 and 0-027. It provides guidance for appropriate interactions with industry with respect to clinical research and other activities, including some limited exceptions.

**Florida Code of Ethics (FCOE):** Certain business, employment, and contractual relationships are prohibited under the FCOE, which applies to all USF employees.  As we expand our entrepreneurial activities, it is important to consider these prohibitions. https://www.usf.edu/compliance-ethics/documents/nutshell-busemplcontracttelationships-20181012.pdf.  Such relationships must be disclosed in eDisclose.  Below are step-by-step guides on how to complete an FCOE disclosure in eDisclose:

- Video version: http://cmsfs.forest.usf.edu/human-resources/onlinetrng/edisclose/disclose-fcoe.htm
- Print version: https://www.usf.edu/compliance-ethics/documents/fcoe-step-by-step-guide-20150427.pdf