

## Policy for the Disclosure of External Activity By Faculty and Other Research Grant and Contract Eligible Employees

**Unit:** [Office for Research & Economic Development](#)

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### Purpose

The Office for Research and Economic Development (ORED) must certify on behalf of the University of Alabama (UA) that it has taken all reasonable steps to ensure that all research grants and contracts submitted on behalf of all faculty and other employees to external funding agencies are submitted after full disclosure and consideration of potential matters relating to Conflict of Interest (COI) and Conflict of Commitment (COC). External Activities of employees have the potential to serve as sources of potential COI and COC and must be disclosed in order for ORED to provide the required certification well before the research grant or contract is submitted.

The University of Alabama has numerous and varied central and decentralized mechanisms in place across campus to disclose potential COI and COC. The overall purpose of this policy is to standardize a university-wide process for the disclosure, review and approval of an external activity of an employee eligible to submit research grants and contracts through ORED. This policy and procedure will supersede and replace all existing forms and mechanisms currently in place in colleges and schools to disclose external activities or request external supplemental compensation.

### Policy

1. All research grant or contract eligible employees covered by this policy must disclose any proposed External Activity at least two weeks in advance throughout the entire fiscal year (October 1 through September 30).
2. All research grant or contract eligible employees covered by this policy must use the electronic form titled [The UA Notice of Intent for External Activity By Faculty and Other Research Grant and Contract Eligible Employees](#).
3. A separate Notice of Intent must be completed for each proposed External Activity.
4. All research grant or contract eligible employees covered by this policy must have prior approval from their Department Head and Dean or Dean's designee. For those employees who do not report to a department or dean, approval is required by the Director of the unit. The "approvers" have the responsibility to thoroughly review and approve each disclosure.
5. For employees requesting employment with any other institution of higher education, approval is also required by the Provost as required by the Faculty Handbook.
6. An employee cannot engage in any External Activity prior to disclosing and receiving approval in advance. Willfully disregarding the requirement to receive prior approval is considered a violation of this Policy. Violation of this Policy could warrant a range of disciplinary actions as detailed in the Employee Handbook or the Faculty Handbook.
7. Employees must also complete the UA Policy on Conflict of Interest/Financial Disclosure in Research and Other Sponsored Programs prompted through Cayuse at the time a specific grant or contract is submitted to ORED.
8. Faculty must complete the Notice of Intent for any External Activity by October 1 of each new fiscal year if the existing External Activity will extend into the next fiscal year.

## Definitions

**A Research Grant or Contract Eligible Employee:** Includes all faculty, as well as any other employees who are either currently listed or may be listed as “key personnel” on a research grant or contract submitted to an external funding agency by ORED on behalf of the UA. The employee may be, but is not limited to, all faculty, as well as other research staff, staff, post-doctoral fellows, graduate students, and/or undergraduate students. All faculty includes all full-time faculty having either a 9-month or 12-month appointment. All faculty also includes grant or contract active part-time and adjunct faculty who are either currently listed or may be listed as “key personnel” on a research grant or contract submitted to an external funding agency by ORED on behalf of the UA.

**Conflict of Interest:** Addressed in Board Rule 106.2. All university employees must acknowledge and appropriately manage conflicts of interest. “University community members should be loyal to our missions and institutions, appropriately objective and impartial in exercising their duties and discretion, and follow applicable ethical standards. University community members must not use public offices or resources for private or other improper gain, or otherwise act under an improper conflict-of-interest related to their duties.”

**Conflict of Commitment:** Any activity that interferes with the Primary Responsibilities or Secondary Responsibilities of the employee of The University of Alabama.

**External Activity:** Any activity other than Primary Responsibilities or Secondary Responsibilities that an employee may engage in that, (1) is based upon professional knowledge, experience and abilities of the employee that relate to their UA employment, and (2) is performed for any public or private entity other than UA. When completing the external activity the employee may or may not receive compensation. External Activities most often include, but are not limited to, appointments and consulting for any public or private entity other than UA. For faculty, External Activities include those activities occurring (1) during the appointment period of faculty (9-month or 12-month), (2) during the allotted “supplemental compensation days” as defined by the Faculty Handbook, and (3) during the time the faculty is not under academic-year appointment (e.g., summer months).

**Supplemental Compensation (also known as Compensation):** Any payment, deferred payment, equity, or deferred equity, or in-kind incentives provided in exchange for the expectation that the employee will perform work or services for the benefit of the external payer. Compensation does not include standard Honoraria.

**Honoraria:** Any payments given for professional or voluntary services that are rendered nominally without charge or invoice, and any payment in recognition of these services typically forbids a price to be set.

**Primary Responsibilities:** Teaching, research, service, administrative duties, and other appropriate duties officially assigned by The University of Alabama to the employee.

**Secondary Responsibilities:** Well-recognized professional activities or affiliations traditionally undertaken by employees outside of immediate UA employment context but where the employee legally and professionally represents UA. Secondary Responsibilities may or may not entail the receipt of honoraria, remuneration, or the reimbursement of expenses. Some examples of Secondary Responsibilities include, but are not limited to, the following: Membership in and service to professional associations and learned societies; Membership on professional or scientific review or advisory panels; Presentation of lectures, papers, concerts, or exhibits; Participation in seminars and conferences; Reviewing or editing scholarly publications and books; Service to national or international associations, foundations, or on governing boards closely aligned with or related to faculty work; Work or service required to maintain credentials or board certifications related to the University faculty position, etc. Secondary Responsibilities are not considered External Activities, and employees engaging in Secondary Responsibilities do not have to complete the Notice of Intent for External Activity By Faculty and Other Research Grant and Contract Eligible Employees. However, employees are encouraged to do so if there are unique questions about the proposed External Activity.

## Scope

This policy applies to all faculty and any other research grant or contract eligible employees as defined by this policy.

## References

- [Frequently Asked Questions](#)
- [Code of Alabama Title 36 – Public Officers and Employees. Chapter 25 – Code of Ethics for Public Officials, Employees, etc.](#)
- [Board Rule 106.2 Risk – Ethics – Compliance – Code of Conduct](#)
- [The UA Code of Ethical Conduct](#)
- [The UA Policy on Conflict of Interest/Financial Disclosure in Research and Other Sponsored Programs](#)
- [The University of Alabama Employee Handbook](#)
- [The University of Alabama Faculty Handbook](#)
- [Board Rule 509: Patent Policy](#)
- [The UA Policy for Faculty and Staff Participation in Companies Commercializing University Technology](#)

## Office for Research & Economic Development

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