



ROAMWyo

Research Organization
Administration and Management

Outside Interest SOP:

**Annual Disclosure Campaign
and Update Management**

University of Wyoming
Research & Economic Development Division (REDD)
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Title: Outside Interest SOP: Annual Disclosure Campaign and Update Management	Process Owner: Research & Economic Development Division	Approved By: Carrie Hesco, Director of Research Security and COI
Date Approved: 6/16/2023	Effective Date: 8/1/2023	Date of next review: 7/30/2024

Purpose: This purpose of this document is to identify the stakeholders involved, define their roles, define terms related to the management of disclosures within ROAMWyo, and provide an overview of the entire process of the Conflict of Interest Annual Disclosure campaign and subsequent updates.

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Scope: This SOP applies to all University of Wyoming faculty and staff who are required to disclose any outside interests and University of Wyoming designated officials who are responsible for conducting reviews of those disclosures.

Responsibility: All stakeholders are responsible for understanding and completing their roles

COI Disclose – is each University of Wyoming employee to submit a disclosure and is responsible for disclosing all relevant outside interests and relationships as defined in University of Wyoming’s Conflict of Interest Policy.

Conflict of Interest and Commitment Committee – Committee appointed by the Vice President for Research and Economic Development that assists with and reviews complex conflict matters as outlined in the policy. The Committee consists of one administrator from the Office of Research and Economic Development; one representative from the Office of the General Counsel; two senior faculty members appointed by the Faculty Senate Executive Committee, and one staff employee appointed by the Staff Senate Executive Committee.

Reviewers – Director of Research Security and COI, Supervisors, and the COI Review Committee.

Director, Research Security and COI - is responsible for administering the COI annual campaign and conducting the review from initial submission to potential conflict resolution (management plans) and sign-off.

Definitions:

Terms	Definitions
Annual Disclosure	All Employees are required to complete an annual disclosure form regarding any Employee identified potential, perceived, or actual conflicts of interest or commitment, including all foreign affiliations and collaborations as outlined in this document, through the University’s electronic research administration software system (Cayuse). If the Employee determines there is no potential, perceived, or actual conflicts of interest, the Employee shall indicate annually through the University’s electronic research administration software system (Cayuse). The disclosure will be routed as appropriate, and any conflicts will be managed by a conflict management plan, when appropriate.
Conflict of Commitment	A conflict of commitment exists when an Employee renders professional service or engages in an external activity that is not part of his/her duties to the university that interferes with the Employee’s ability to perform their obligations to the university. <i>Examples:</i> 1. Teaching at another university during On-Duty periods in an academic year, or otherwise representing yourself as a faculty member of another university when you are a full-time faculty member at UW. 2. Participating in private business or other activities to the detriment of your university education, research, scholarship, or service responsibilities.



	3. Conducting research or novel scientific investigation as a private consultant to outside entities, which should be conducted more appropriately as research sponsored through the University.
Conflict of Interest	A conflict of interest exists when an Employee has an interest that affects or provides an incentive to affect the Employee’s conduct of her or his university activities.
Conflict of Interest and Commitment Committee	A Committee appointed by the Vice President for Research and Economic Development that assists with and reviews complex conflict matters as outlined in the Conflict of Interest and Commitment policy. The Committee consists of one administrator from the Research and Economic Development Division; one representative from the Office of the General Counsel; two senior faculty members appointed by the Faculty Senate Executive Committee, and one staff employee appointed by the Staff Senate Executive Committee.
Reviewers of COIs	Director of Research Security & COI; Conflict of Interest and Commitment Committee; Deans, Departments Heads and/or Supervisors.
Employee (Disclose)	For the limited purpose of the University of Wyoming’s Conflict of Interest and Commitment Policy, Employee shall mean any individual who is employed by the University, whether full or part-time, and includes but is not limited to staff, faculty (including tenured, tenure-track, non-tenure track, in-residence, visiting, and emeritus faculty if performing a function for the University), administration, postdoctoral fellows, and student employees.
Non-Financial Conflict of Interest in Research	Conflicts with respect to matters with non-financial implications, such as decisions about the use of university equipment and facilities and the negotiation of research agreements and license agreements. Conflicts may also exist with respect to the particular conduct of research, the care of patients, the protection of human research subjects, and the treatment of students and faculty colleagues. Other potential non-financial COI that must be disclosed include any Foreign Affiliations.
Significant Financial Interest of an Employee	Significant financial interest means anything of monetary value in excess of \$5,000 owned or payable to an Employee, including: A) Salary, royalties, commissions, consulting fees or honoraria and/or any other form of compensation for services which is directly or indirectly paid or payable to the Employee while on-duty by an entity other than the university or an affiliate or instrumentality of the university. B) Equity interests such as stocks and stock options and other ownership interests which: <ul style="list-style-type: none"> • Represent more than five percent ownership interest in any single entity; and • Do not comprise widely held, publicly available, diversified investment funds over which the Employee does not and has no ability to exercise control; and



	<ul style="list-style-type: none"> • Are not held in a blind trust where the Employee has no knowledge of trust assets. <p>C) Intellectual property rights, such as patents and copyrights and royalties from those rights.</p> <p>It does NOT include the following types of financial interest:</p> <ol style="list-style-type: none"> 1. Salary, royalties, or other remuneration paid by the University to the Employee if the Employee is currently employed or otherwise appointed by the University, including intellectual property rights assigned to the University and agreement to share in royalties related to such rights; 2. Income from investment vehicles, such as mutual funds and retirement accounts, as long as the Employee does not directly control the investment decision made in these vehicles; 3. Income from seminars, lectures, or teaching engagements sponsored by a US Federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or 4. Income from service on advisory committees or review panels for a US Federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education. If required by a federal funding agency, significant financial interests of a spouse, dependent children or dependent relative may also have to be disclosed.
<p>Foreign Affiliations and Collaborations</p>	<p>A. All financial interests, whether On-duty or not, (including but not limited to travel, salary, awards, honoraria, talent programs, and grants) received from or relationships with a foreign institution of higher education, a foreign research institute, a foreign academic teaching hospital or medical center, the government of another country (which includes local, provincial, or equivalent governments of another country), or private foreign entity must be disclosed.</p> <p>B. All participation on foreign review panels (grant review panels, journal peer review etc.) must be disclosed.</p> <p>C. Formal affiliations or titles (even unpaid) with foreign entities, including companies or universities must be disclosed.</p> <p>D. Participation in foreign talent recruitment programs (paid or unpaid) must be disclosed. In general, such programs include any foreign-state-sponsored attempt to acquire U.S. scientific-funded research or technology through government-run or funded recruitment programs that target scientists, engineers, academics, researchers, and entrepreneurs of all nationalities working or educated in the U.S. These recruitment programs are often part of</p>



	<p>broader whole-of-government strategies to reduce costs associated with basic research while focusing investment on military development or dominance in emerging technology sectors.</p> <p>E. Other support and foreign components must be disclosed when required as outlined in NIH NOT-OD-19-114.</p>
Manage	Taking action to address a conflict by reducing, managing through a management plan, or eliminating the conflict.
Management Plan	Management plans are required when conflicts of interest and commitment are identified. The content of management plans may vary depending on the nature of the conflict of interest or conflict of commitment and the level of conflict management required. However, all management plans are required to be in writing and must describe the conflict; specify the actions to be taken to manage, reduce, or eliminate the conflict; and define the effective period of the plan.
Relationship	<p>Includes the following:</p> <p>A. Family, defined as the legal spouse, domestic partner, dependent children, and dependent relatives of the Employee. The term “family” shall also include the legal spouses of any of the individuals named above.</p> <p>B. Business partners and corporate professional associates.</p>

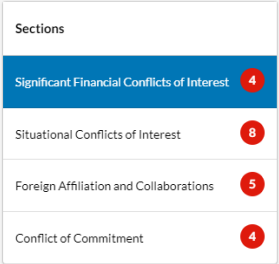
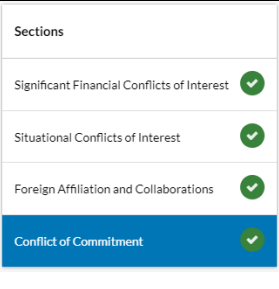
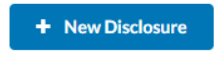





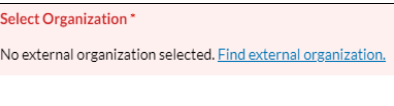

Related Policies and SOPs:

- University of Wyoming Conflict of Interest Policy
- New External Organization Review


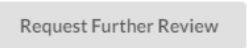



OVERVIEW OF OUTSIDE INTERESTS

Icons Legend – The system relies on the icons below to indicate that an action has been taken, or needs to be taken, or an action has been completed, or indicates an error.

	<p>Table of Contents in a COI Annual Disclosure form- each page is section of the form. This icon shows red circles with numbers, which indicates that a section is incomplete and the number of incomplete fields in that section.</p>
	<p>Table of Contents in a COI Annual Disclosure form, showing that all sections of the Disclosure form have been successfully completed, indicated with green checkmarks. All sections must be completed to proceed with form submission.</p>
	<p>Select this button used to start a new disclosure form.</p>
	<p>This icon provides helpful tips and is displayed at the top of each field in every section. Hover over the question mark to reveal the tips (explanations).</p>
	<p>This icon indicates that a section is incomplete and is displayed in each section at the beginning of each field.</p>
	<p>This button appears if a discloser has previously completed a disclosure, and that relationship auto-populates into the same field. This will not be applicable in the first year of the Outside Interests module because it has not been previously used. Use this button if the relationship that is pre-populated still exists and remains unchanged.</p>
	<p>This button is used to add a new relationship to a section's field. Once selected, a few more questions will appear on the form section, asking for details about the relationship.</p>
	<p>Icon indicating that a new external organization has been requested by the discloser and is under review by the Research and Economic Development Office.</p>
	<p>When adding a relationship, use the hyperlink "Find external organization" to select from a pre-existing approved list of organizations already in the system.</p>
	<p>This button appears if an organization is not found in the system. Select this button to add a new organization, for the REDD System Administrator to review and formally add to the system.</p>



	<p>Submit button for disclosure form routing.</p>
	<p>A reviewer must first select this button to initiate routing to the next reviewer.</p>
<p>My Tasks:</p> <p>Review disclosure and confirm your review (Required)</p>	<p>This is the reviewer’s second step to select the hyperlink shown here to finalize his/her review.</p>
	<p>The third step is when a reviewer must enter a comment into the “Confirm that your review is complete” box prior to routing it to the next reviewer.</p>
<p>My Tasks:</p> <p>Review disclosure and confirm your review (Required)</p> <p>Add Next Reviewer</p>	<p>The reviewer’s final step for initiating routing is to select the hyperlink shown here “Add Next Reviewer” at which time the form will route.</p>



CONFLICT OF INTEREST (COI) ANNUAL DISCLOSURE CAMPAIGN PROCESS

Complete an Annual Disclosure: Disclosee

The Annual Disclosure Campaign begins with the University of Wyoming employee (disclosee) completing an annual disclosure form.

1. Disclosee receives system generated notification to complete an Annual COI Disclosure
 - a. Login to ROAMWyo account (using Single Sign-On credentials)
 - b. Select your **Name** to reveal a drop down menu
 - c. Select option **My Profile**
 - d. Select **COI Disclosures** from the **Table of Contents**
2. Disclosee Completes the Annual COI Disclosure form
 - a. Select + **New Disclosure**
 - b. Select **Start a New Annual Disclosure**
 - c. Select **Next**
 - d. Answer form questions within each **Table of Contents** section: Significant Financial Conflicts of Interests, Situational Conflicts of Interest, Foreign Affiliation and Collaboration, and Conflict of Commitment.

Note: Affirmative answers will reveal a dialogue box for entry of relationship details

- e. **Add New Relationships** as needed (when **Yes** is selected in response to any question)
 - i. Select + **Add New Relationship** to provide details for each relationship
 - ii. Select the hyperlink **Find External Organization** to launch External Org Finder
 - iii. Enter the full organization name in the search bar
 - iv. **Select** organization name
 - v. Select **Save** to return the organization to the form
 - vi. Enter relationship details
 - vii. Continue to answer subsequent form questions

Note: A green check mark will appear in each section of the Table of Contents indicating successful completion.

- f. Select **Next**
- g. Attach relevant documents regarding any of the relationships listed in each section, as applicable.
3. Disclosee Submits the Disclosure for Review
 - a. Select **Submit**
 - b. Select **Proceed** to route the form to the reviewer

Note: After the first disclosure is complete in ROAMWyo, information from the previous disclosure will auto-populate into a new form. If yes is answered to any relationship question, and a relationship appears from your previous annual COI – select “Review and Accept” to confirm that this relationship



still exists since your last annual COI; or select "Delete Relationship" if you no longer have that relationship.

Note: Even if you have successfully completed your annual disclosure form, you may continue to receive automated reminder emails until the Annual Campaign period concludes.

COI Review: Director of Research Security and COI

The COI is automatically approved if the Disclosee has not listed any relationships. Otherwise, the COI is routed to the Director of Research Security and COI to conduct the initial COI Review.

Note: an email notification with the COI resolution will be sent to the Disclosee for his/her records

COI Review: Disclosee's Supervisor

Should the Director of Research Security and COI determine that the relationship does not present a conflict, the disclosure will be routed to the Disclosee's supervisor for review and concurrence.

COI Management Plan

Should the Director of Research Security and COI determine that the relationship does present a conflict that is manageable they will work with the Disclosee and his/her supervisor to create a management plan. Once finalized a copy of the Management Plan shall be attached to the disclosure.

Note: an email notification with the COI resolution will be sent to the Disclosee for his/her records

UPDATING AN ANNUAL DISCLOSURE

University of Wyoming employees are responsible for disclosing new relationships that have occurred outside of the Annual Campaign timeframe, within 30 days of the start of the new relationship.

Disclosees should follow the COI Annual Campaign Process to update their annual disclosure forms. Previous relationships will auto-populate on the new form. Confirm that these relationships still exist and are current.

Note: Disclosees will see a record of their completed COIs in their profiles. There will be a blue button "Modify". DO NOT USE this function to update your annual COI form.

Note: If "yes" is answered to any relationship questions, and a relationship appears from your previous annual disclosure – select "Review and Accept" to confirm that this relationship still exists since your last submitted annual disclosure; or select "Delete Relationship" if this relationship no longer exists.