

Outside Activities and Conflicts Policy

Frequently Asked Questions

Questions About When Pre-Approval is Required

Q: I want to do outside work. Do I need pre-approval?

A: All employees must obtain pre-approval before engaging in Outside Activities as defined by the [Outside Activities and Conflicts](#) policy. This includes any activity, paid or unpaid, that is related or similar to the employee's university responsibilities and is performed outside the university (excluding professional service). For examples of Outside Activities, see the Definitions section of the policy.

Employees do not need prior approval from their unit to engage in professional service within the U.S. However, employees do need prior approval from their unit to engage in professional service involving a foreign government agency or a foreign government institution *when those activities involve a contract with the agency or institution*. For examples of what constitutes professional service, see the Definitions section of the policy and [this list](#).

Q. How do I know if an activity is related to or similar to my university responsibilities?

A: If it would be possible for you to use university resources in the activity, make university decisions that would affect your outside interests, or if the activity may otherwise influence your university duties, this activity is likely related to or similar to your university responsibilities. In addition, if an activity involves your expertise as a researcher, or overlaps with your university research program, then the activity is likely related to your university responsibilities.

Q: Do I need pre-approval for professional service involving a foreign entity?

A: Usually not, provided that the relationship is not an [Outside Activity](#) as defined by the policy. However, employees do need prior approval from their unit to engage in professional service involving a foreign government agency or a foreign government institution *when those activities involve a contract with the agency or institution*. For any professional service, if you are required to submit an annual Disclosure Form in the eCOI application, you must disclose personal compensation (e.g., honoraria) and personally reimbursed or sponsored travel received for the professional service on your Disclosure Form.

Q: Do I need pre-approval for personally reimbursed or sponsored travel to perform a professional service?

A: No, personally reimbursed or sponsored travel to perform a professional service does not require pre-approval with an Outside Activity Approval Form. However, if you are required to submit an annual Disclosure Form in the eCOI application, you must disclose the personally reimbursed or sponsored travel on your Disclosure Form. Please note that the Ohio Ethics Law or the OSUWMC Vendor Interaction Policy may prohibit the reimbursement of some travel expenses. See the [Ethics Guide](#) for more information.

Q: I have a personal consulting LLC. Do I need to obtain pre-approval for each client?

A: No, you do not need to obtain pre-approval for each client. However, you must submit an Outside Activity Approval Form to obtain pre-approval for the personal consulting LLC itself, providing a general description of the anticipated work. If you are required to submit an annual Disclosure Form in the eCOI application, you should disclose both the LLC and any clients of the LLC that may be related to your institutional responsibilities (e.g., research sponsors, vendors, etc.) as separate outside activities.

Q: Are employees permitted to engage in Outside Activities when on leave? Do they need to obtain pre-approval from their unit by submitting an Outside Activity Approval Form?

A: In general, employees should consult with their unit to determine if Outside Activities are permitted while on leave, and if so, whether an Outside Activity Approval Form is required. Employees are often permitted to engage in Outside Activities when on leave, depending on the type of leave, as described below.

- Faculty Professional Leave (FPL):
 - Faculty on Faculty Professional Leave are permitted to engage in Outside Activities which clearly enhance the purposes of the leave, and are required to submit an Outside Activity Approval Form to obtain approval from their unit prior to engaging in those activities. Faculty members who have already obtained pre-approval for the Outside Activity on their FPL Application do not need to submit an Outside Activity Approval Form.
- Unpaid leave:
 - Employees on unpaid leave should consult with their unit to determine whether they are permitted to engage in Outside Activities while on leave. If the employee's unit determines that they are permitted to engage in Outside Activities while on leave, an Outside Activity Approval Form may be required.
- Special Assignment:
 - Faculty on Special Assignment are permitted to engage in Outside Activities and are required to submit an Outside Activity Approval Form to obtain approval from their unit prior to engaging in those activities.
- FMLA:
 - Employees that are on full-time FMLA are not permitted to engage in Outside Activities while on leave. Employees using FMLA intermittently are permitted to engage in Outside Activities and are required to submit an Outside Activity Approval Form to obtain approval from their unit prior to engaging in those activities.

Q: Do faculty members need pre-approval for Outside Activities occurring during off-duty periods?

A: Yes. Outside Activities during off-duty periods are not subject to time limitations; however, the Outside Activities are still subject to approval and disclosure requirements in the policy to ensure that there is not a conflict of interest.

Q: Does using biographical information, including my Ohio State position, in my expert witness testimony require pre-approval?

A: No, as long as you use a disclaimer indicating that you do not represent the university.

Questions About the Pre-Approval Process

Q: Where do I submit an Outside Activities Approval Form?

A: You can submit an Outside Activities Approval Form in eCOI, Ohio State's electronic Conflict of Interest application, at <https://go.osu.edu/coi>.

Q: How do I submit an Outside Activities Approval Form?

A: To submit an Outside Activities Approval Form, follow the steps below.

- Log in to the electronic conflict of interest (eCOI) application (<https://go.osu.edu/coi>) using your Ohio State credentials.
- On the eCOI homepage, click the "Outside Activity Approval" button to navigate to the Outside Activity Approval section of eCOI.
- Alternatively, you may click the "Approval Forms" tab from the menu bar, then select "My Approval Forms" from the drop down.

- Click the “Create an Approval Form” button to begin a new Outside Activities Approval Form.
- Additional information is available by clicking the “Instructions” tab from the menu bar.
- For technical assistance accessing or submitting the Outside Activities Approval Form, contact the [ORIS Help Desk](#)

Q: What information is needed to submit an Outside Activities Approval Form?

A: In addition to basic information about the name of the outside organization, your involvement, and the start and end dates of the activity, you may also need to attach any proposed contracts, letters of engagement, consulting agreements, an [IP addendum](#), or other documentation related to the proposed Outside Activity.

Q: I made a mistake on my Outside Activities Approval Form. Can I edit this?

A: Once submitted, your Outside Activities Approval Form will automatically route to your unit for approval. To edit the Form, you will need to contact the unit approver and request that they send the Form back to you for modifications. You can see who your Outside Activities Approval Form has routed to for review by navigating to the “My Approval Forms” page of the eCOI application.

Your approver can select the option “The Outside Activity Approval Form is incomplete, inaccurate, or needs to be modified.” When the approver selects this option, your Form will be returned to your “My Approval Forms” page, where you can select “Modify and Submit.”

Q: How often do I need to submit an Outside Activities Approval Form?

A: You should submit an Approval Form for each new Outside Activity. In order to submit an Approval Form, you must select a start date and an end date for the Activity. If you wish to continue conducting an Outside Activity after the designated end date has passed, you should submit a new Approval Form for that engagement.

For start-ups or other Outside Activities without a discrete end date, you may select an anticipated end date or consult with your unit approver to determine the appropriate end date to use for the Activity.

Q: Do I need to submit an Outside Activities Approval Form for activities that have already been approved by my unit for FY2022?

A: No, you are not required to submit until July 1, 2023 for previously approved, ongoing activities, unless directed otherwise by your unit.

Q: I have been involved in a start-up since 2019. Should I list the start date as my outside activity from 2019?

A: No, the Outside Activities Approval Form is for pre-approval only – use the current date as the start date.

Q: Who will review and sign my Outside Activities Approval Form?

A: Your unit will review your form and may elevate it to the Conflict Approval Committee for further review if the Outside Activity meets certain criteria under the policy. You can see who has reviewed and/or signed your form in the “History” section of your Outside Activity Approval Form.

Q: What will my unit do with my Outside Activities Approval Form?

A: Your unit will either approve, deny, void, send the Form back to you for modification/more information, or elevate the Outside Activity Approval Form to the CAC for review. You will receive an email notifying you when your unit takes any action regarding your Outside Activity Approval Form.

Q: How can I check on the status of my Outside Activities Approval Form?

A: All status updates will be listed in the “History” section of your Outside Activity Approval Form.

Q: Will I be notified when my Outside Activities Approval Form has been reviewed?

A: Yes. The eCOI application will send you email notifications when your Outside Activities Approval Form has been approved, denied, voided, sent back for modifications, or elevated to the CAC. After CAC review, you will also be notified by email of the committee's decision.

Q: My unit denied my Outside Activities Approval Form. Can I appeal this decision?

A: Yes, you may submit a written appeal to the chair of the Conflict Approval Committee (CAC). The CAC chair, in consultation with the CAC, will review the appeal and decide whether to issue an advisory opinion to the unit. Appeals to the CAC chair can be submitted to compliance-integrity@osu.edu.

Q: My unit elevated my Outside Activities Approval Form to the Conflict Approval Committee. What does this mean? Is there anything I need to do?

A: All Outside Activities that meet certain criteria, listed in Section II. E of the [policy](#), must be elevated to the CAC for approval. The CAC may request additional information from you in order to facilitate its review. You will receive an email notification when the CAC review is complete. If the CAC determines that a conflict exists, the CAC will require a conflict management plan (CMP) to manage the conflict whenever possible. You must fulfill the requirements of the CMP to engage in the Outside Activity.

Q: I disagree with the Conflict Approval Committee's decision. Is there any way I can appeal the decision?

A: Within seven days of receiving the CAC's decision, you may reconsideration by submitting a written request to the CAC chair at compliance-integrity@osu.edu. A request for reconsideration must show that the CAC decision was not appropriate or was based on erroneous or incomplete information. You may present relevant new or additional information in the reconsideration request. Reconsideration decisions by the CAC are final.

Q: Does my approved outside activity need to be disclosed on my Disclosure Form in the eCOI application? When?

A: Non-researchers who are required to submit a Disclosure Form will only need to do so annually. You should include the approved activity on your next annual Disclosure Form.

Researchers (see [FCOI SOP](#)) must submit a Disclosure Form annually, and must also update their Disclosure Form within thirty (30) days of acquiring or discovering a new financial interests (e.g., through purchase, marriage, inheritance, or receipt of royalties), engaging in new Outside Activities, or any changes regarding a previously disclosed activity (e.g., the updated value of a previously disclosed equity interest). Update your current Disclosure Form to include the approved activity within this 30 day period.

Q: What if my Outside Activity Approval Form did not route correctly for unit review?

A: The assigned unit approver can reassign the Outside Activity Approval Form if necessary.

Questions for Approvers

Q: How will I know when I need to approve an Outside Activity?

A: You will receive an email notification directing you to the eCOI application. You can also see all pending approval forms in the eCOI application by selecting the “Approval Forms” tab in the menu bar and then selecting “Awaiting My Signature” from the dropdown menu.

Q: I don’t think I am the correct person to approve this Outside Activity- what should I do?

A: If you believe an Outside Activities Form has been assigned to you in error, you can reassign it to the correct person by selecting “Reassign” next to the Outside Activity on the “Awaiting My Signature” page. If you believe that you should not be an approver for any Outside Activity Forms for your unit, please contact compliance-integrity@osu.edu.

Q: When should I elevate an Outside Activity to the CAC for approval?

A: If the Outside Activity meets any of the following criteria, listed in Section II. E of the [policy](#), you should elevate it to the CAC:

The Outside Activity may:

1. Create an FCOI that could affect the design, conduct, or reporting of research
2. Interfere with the employee’s time commitment to the university
3. Compete with coursework or services that are or may be provided by the university
4. Interfere with the employee’s ability to carry out their university responsibilities
5. Improperly influence the employee’s or another individual’s university decisions
6. Create a prohibited interest in a university contract or transaction
7. Involve the use of university resources, name/other identifiers, or employees
8. Involve the use or generation of university-owned intellectual property

You must select at least one of these criteria in order to elevate an Outside Activity Form to the CAC.

For additional guidance on Outside Activities and elevation criteria, we also recommend registering for one of the monthly Outside Activities Policy trainings in BuckeyeLearn here:

<https://go.osu.edu/oactraining>

Q. What if I’m not sure if an activity meets the criteria for CAC approval?

A: For any questions, you can contact a Conflict Administrator here:

<https://compliance.osu.edu/compliance-focus-areas/conflicts-of-interest/contacts.html>.

Or, you can email compliance-integrity@osu.edu.

Q. Will I be notified of the CAC’s decision?

A: You will receive an email notification informing you of the CAC’s decision.

General Policy Questions

Q. Where can I find training for the policy?

A: You can register for Outside Activities Policy training in BuckeyeLearn here:

<https://go.osu.edu/oactraining>

Q: Does the policy apply to seasonal lecturers, adjuncts, etc.?

A: The policy applies to faculty, staff, student researchers, student employees, graduate associates, and applicants. Additionally, all university employees, including seasonal lecturers and adjuncts, are subject to the [Ohio Ethics Law](#). Seasonal lecturers and adjuncts may not be required to obtain pre-approval for Outside Activities, but may still be required to complete a Disclosure Form if they are engaged in research activities or are otherwise identified by their unit as having to complete a Disclosure Form.