

Outside Activity Disclosure Training

Conflict of Interest, CAMS Usage, & More!



Training Overview

- Identifying and Understanding Conflicts of Interest and Commitment
- Disclosure Requirements, Process, Procedures, and Tools
- Navigating FSU's Conflicts Administration Management System (CAMS)
- Conflicts Management and Mitigation
- Additional Resources



Compliance Paradigm

- FSU Faculty, Staff, and officers are public officials subject to the Florida Code of Ethics (FCOE), containing laws prohibiting Conflicts of Interest (COI) which are incorporated into FSU policies.
- In addition, FSU Researchers, Faculty, and certain others have additional transparency requirements arising from federal regulations, collective bargaining agreements, statutes located outside of the FCOE, and FSU policies—designed to mitigate conflicts whenever possible.

Note: FSU policies do not prohibit lawful and approved Outside Activity including ownership in a business, external appointments, volunteerism, or opportunities to serve in leadership roles or on boards.

What is a Conflicts of Interest?

- **Conflict of Interest (COI):**

- A COI is any situation in which regard for a private interest tends to lead to disregard of a University duty or interest. s. 112.312(8), F.S.
- In the case of Researchers this includes situations in which an individual's financial, professional, or personal interests outside of the University (or those of their spouse or child) affects, or has the potential to compromise the individual's professional judgment or objectivity. 42 CFR 50.601-607
- COIs can arise when an FSU staff/faculty member has a second job, or goes into business for themselves, or when an FSU member's relative has business or financial interests that create conflicts or the appearance of conflicts.
- COIs, once identified can often be mitigated and managed through transparency and compliance mechanisms.

What is a Conflicts of Commitment?

- **Conflicts of Commitment (COC)**

- A COC is an Outside Activity (OA) that has the potential to interfere with an individual's time commitment to the University terms of employment.
- COCs can occur when an employee's professional time or effort is devoted to OA adversely affecting their capacity to satisfy their obligations to the University.
- For example, when an employee attempts to balance their University responsibilities with OA such as consulting or volunteering, they may be left with inadequate time to fulfill their University responsibilities.
- The COI and COC disclosure process is designed to protect the independence and impartiality of public officers and public employees.

Examples of Possible Conflicts of Interest & Commitment

- Being employed by a for-profit or nonprofit entity that does business with FSU
- Contracting with FSU through a business you own or control, or one that is owned or controlled by your spouse or child
- In your private capacity selling realty, goods, or services to FSU—either personally or through business entities that you own/control, are employed by, or wherein you serve as a compensated or uncompensated member of the Board of Directors
- Engaging in Outside Activity that has the potential to hinder your ability to carry out your University employment commitments, by occurrence or duration

FSU's COI and COC disclosure process is designed to protect the independence and impartiality of public employees and officials by identifying and prospectively mitigating conflicts before they arise!

Conduct to be Avoided

Absent an exemption or express authorization all FSU officials and employees must:

- ▶ Refrain from using FSU resources, equipment, information or your public position for private gain or for the disproportionate benefit of others connected to you in a private capacity
- ▶ Refrain from using your FSU position to select, promote, or advance your own business (or that of a relative)
- ▶ Refrain from soliciting or accepting anything of value from anyone given to influence your official public actions

NOTE: FSU officials that file financial disclosure (Form 1) annually with the Florida Commission on Ethics have additional gifts, honoraria, and expenditure restrictions applicable to them. For guidance on issues involving gifts, honoraria, or expenditures please inquire with the Office of Compliance and Ethics.

Institutional Responsibilities



Preserve the public's trust in the University, while also promoting entrepreneurship amongst its officials and employees



Identify, disclose, review, and manage COIs and COCs

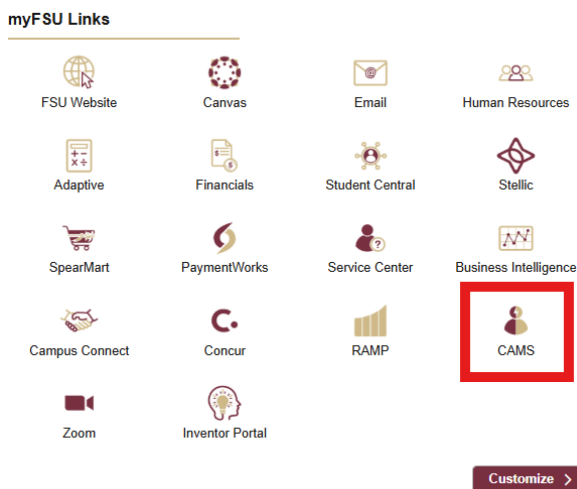


Provide guidance and support to the University community regarding COI policies, processes and procedures

Where to Disclose Outside Activity?

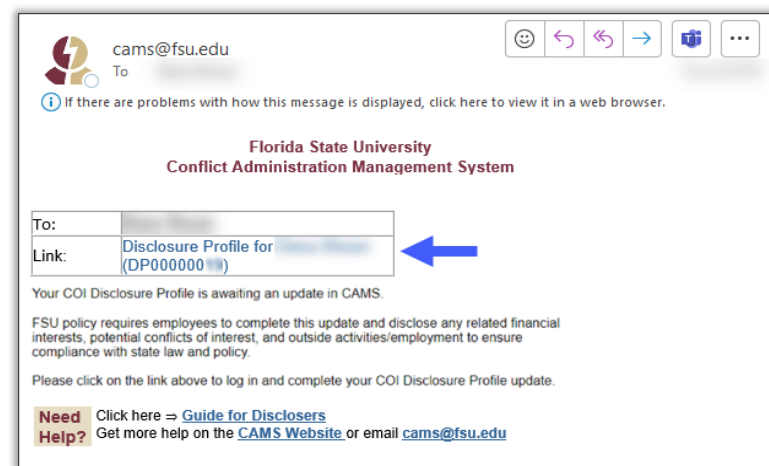
All FSU employees must disclose in CAMS

- ▶ CAMS is accessible 24/7 via the **myFSU** portal



- ▶ CAMS can also be accessed at <https://cams.fsu.edu/>

- ▶ Direct links are also included in CAMS email notifications



- ▶ Additional CAMS information and resources are located on the Office of Compliance and Ethics' website

When to Disclose Outside Activity (OA)

- **Pre-Approval Requests:** OA (including any secondary employment by any employer other than the University) should be reported and approved through a Pre-Approval Request (PAR) submitted via CAMS prior to engaging in the OA or employment. Questions regarding the disclosure of OA via CAMS should be directed to the Office of Compliance and Ethics.
- **Material Changes to a Reportable Outside Activity:** If substantive facts change regarding a previously disclosed OA, employees should resubmit a PAR prospectively disclosing the changes to the OA.
- **Annual Update to CAMS Disclosure Profile:** At least annually, unless reporting a material change, or as requested by the University, employees must disclose facts concerning their reportable OA existing at that time, even if attesting to no change from previous disclosures. Depending on your position, the University will annually send you a CAMS update request wherein you can access your CAMS profile directly from the link provided in the email outreach.

Note: Failure to receive such an email notice does not relieve an employee of the obligation to make a timely annual disclosure.

What Must be Disclosed?

Examples of Reportable Outside Activity (ROA):

- ▶ Compensated work, external to FSU, that is related to your institutional expertise (for example a non-FSU teaching appointment)
- ▶ When you (or your spouse or child) possess a management role (such as service as a director or officer of a nonprofit or for-profit company) or a material ownership interest (in excess of 5%) in a company that does business with FSU
- ▶ Royalties from a non-FSU entity that exceed \$5,000 in a year
- ▶ Ownership interests (of any value) in a business related to your institutional expertise (such as a consulting business)
- ▶ Intellectual property that generates income received by you

NOTE: Art. 19 of the UFF-CBA defines “institutional expertise” to mean a faculty member’s specialization in teaching, research, clinical, or creative activity at the University. Art. 7 of the FSU-BOT GAU CBA contains information concerning the disclosure requirements of graduate assistants.

What Must be Disclosed?

Examples of Reportable Outside Activity (ROA):

- ▶ Requiring FSU course materials that you authored and for which you expect to receive payment or royalties exceeding \$500 in a calendar year
- ▶ Payment of an honoraria from a single entity that exceeds \$5,000 or that total more than \$10,000 in a calendar year
- ▶ Being a candidate for public office or holding public office external to FSU
- ▶ Uncompensated or compensated external work that uses University resources (such as FSU equipment, staff, students, or other public resources)

NOTE: Depending on one's position transparency requirements within FSU policies, CBAs, and Florida law provide greater detail regarding what does and does not constitute ROA.

What Does NOT Need to be Disclosed?

Examples of Activities that Do NOT Need to be Disclosed:

- ▶ Uncompensated services not related to your institutional expertise (such as volunteer work or any other form of work for which you receive no payment or promise of payment and which does not otherwise interfere with your FSU responsibilities)
- ▶ Academic or research collaboration that does not involve compensation in exchange for services or an appointment position
- ▶ Ownership interests in intangible personal property (such as stocks, mutual funds, pensions, etc.) that are managed by a third party
- ▶ Royalties from FSU and Intellectual Property that does not generate income
- ▶ Sponsored or reimbursed travel provided by FSU or a U.S. governmental agency or research center
- ▶ Working as an external member of the thesis or dissertation committee or as part of a Promotion & Tenure review

NOTE: Article 19 and Appendix K of the UFF-CBA contains additional examples of activities that need not be disclosed. Article 7 of the FSU-BOT GAU CBA provides details concerning the reporting of outside activities by graduate assistants.

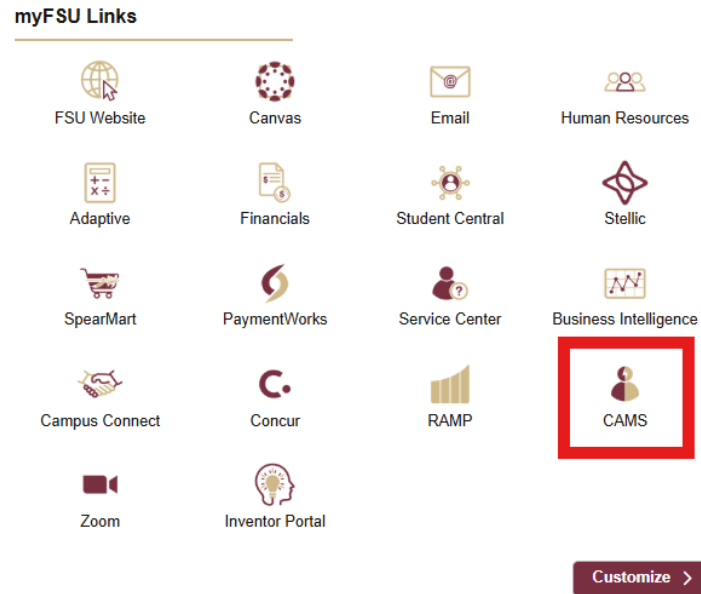
Conflicts Management & Mitigation

- ▶ In most cases where a COI or COC is identified, the Office of Compliance & Ethics (OCE) and others will work with you and your College to *reduce, manage, or eliminate* the issue!
- ▶ Examples of reduction, management, and elimination strategies include:
 - Assessment and application of a statutory exemption
 - Reduction of proposed hours (in cases involving a COC)
 - Adjustment of reporting or supervisory lines
 - Use of a Management Plan
- ▶ In rare cases it may not be possible to sufficiently eliminate the COI or COC. In those matters, a request for Outside Activity may be denied or a request for an ethics opinion must be sought from the Commission on Ethics

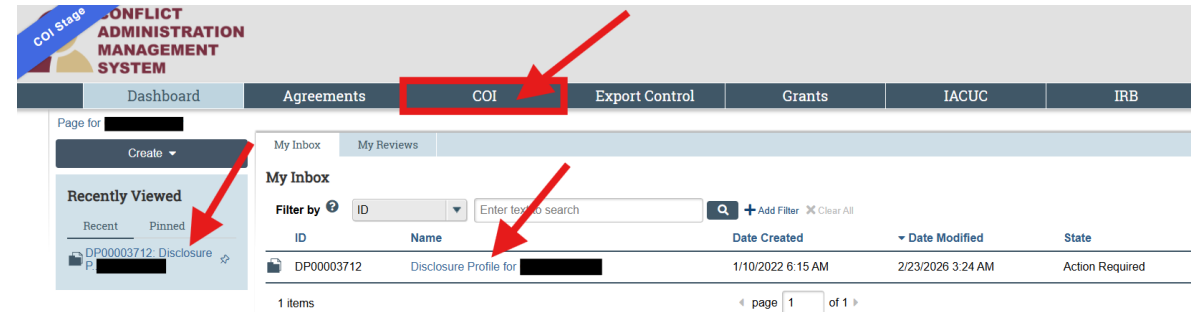
The OCE works with RISE, Procurement, Contracts, HR, the Office of the General Counsel and others to actively identify and mitigate COIs/COCs to facilitate entrepreneurialism in full compliance with FSU policies, Florida law, and federal regulations whenever possible!

Navigating & Updating your Disclosure Profile in CAMS

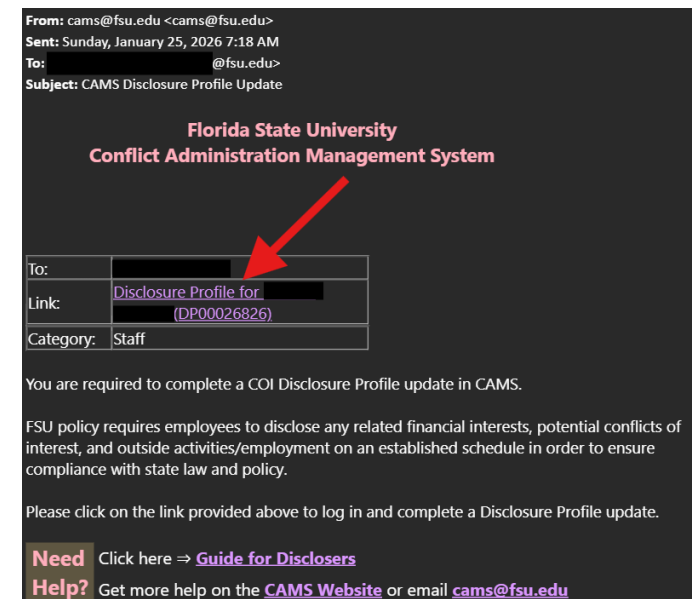
1. Log into your my.FSU.edu portal and click the CAMS icon under your myFSU links:



2. Click one of the Disclosure Profile links OR the COI tab at the top of the page:



Your Disclosure Profile can also be accessed via the link sent in a CAMS email notification:



3. Carefully read the **Instruction Center** messages, then click the 'Edit Disclosure Profile' button.

COI > Disclosures > Disclosure Profile for [REDACTED]

Action Required

Disclosure profile last completed: 1/21/2022

Request Pre-Approval

☒ Complete Disclosure Profile Update

Disclosure Profile for [REDACTED]

Instruction Center

Action Required	Reason
Review disclosure information in the disclosure profile. When all disclosure information is current and accurate, click on the garnet " Complete Disclosure Profile Update " to submit.	Discloser manually updated the disclosure profile
Click the Edit Disclosure Profile button below, then go to the Instructions and Policies page to review your CAMS training and education materials. Make sure you Check the Box for Training Attestation to certify that you have reviewed the PDF training documents. You will not be able to complete a profile update if your training has not been accepted!	Discloser's training is out of date
To Submit your profile update, click the garnet " Complete Disclosure Profile Update " button. DO NOT CLICK FINISH!! This will only save and exit you out of your profile, not update it.	
Review disclosure information in the disclosure profile. When all disclosure information is current and accurate, click on the garnet " Complete Disclosure Profile Update " button to submit.	A disclosure profile associated with the discloser requires renewal

Edit Disclosure Profile

Disclosures Training History

You have not disclosed any interests. Reference the Instruction Center to take the appropriate steps of completing a disclosure update.

Download and review the **training PDF(s)** on the **Instruction and Policies** page and ensure you **click the training attestation box** before continuing with your profile update.

>>>Be sure to review and attest to your training PDF (check the box) document(s) within your Disclosure Profile.

*** Any new Outside Activities require a Pre-Approval Request before being added to your Disclosure Profile. ***

Training documents: ?

FSU CAMS Staff Training(0.05) ...

1. * I certify that I have read and understood the education materials presented to me: ? ☐

4. When you are ready to submit your Profile Update, click the garnet **‘Complete Disclosure Profile Update’** button. **DO NOT CLICK FINISH!** This will only save your progress and log you out.

The screenshot displays the Conflict Administration Management System interface. The top header includes the system logo, the text 'CONFLICT ADMINISTRATION MANAGEMENT SYSTEM', and a user greeting 'Hello, [redacted]'. A navigation bar contains 'Validate' and 'Compare' buttons. The left sidebar lists 'Instructions and Policies', 'Entity Disclosure Information', and 'Complete Disclosure Profile' (highlighted in orange). The main content area shows 'Editing: DP00005798' with links for 'Go to forms menu', 'Print', and 'Help'. Below this is the title 'Complete Disclosure Profile'. A section titled 'The following has occurred:' lists two items: 'Discloser manually updated the disclosure profile' and 'A disclosure profile associated with the discloser requires renewal'. Under 'Next Steps:', step 1 instructs the user to click the 'Complete Disclosure Profile Update' button. A large red arrow points to this button. At the bottom right, there are three buttons: 'Exit', 'Save', and 'Finish'. The 'Finish' button is crossed out with a red circle and slash, indicating it should not be clicked.

CONFLICT ADMINISTRATION MANAGEMENT SYSTEM

Hello, [redacted]

Validate Compare

Instructions and Policies

Entity Disclosure Information

Complete Disclosure Profile

Editing: DP00005798

Go to forms menu Print Help

Complete Disclosure Profile

The following has occurred:

- Discloser manually updated the disclosure profile
- A disclosure profile associated with the discloser requires renewal

Next Steps:

- Click the Complete Disclosure Profile Update button below after all necessary updates have been made to the Disclosure Profile.

Complete Disclosure Profile Update

Exit Save ~~Finish~~

Creating a Pre-Approval Request (PAR)

- Navigate to your **Disclosure Profile** then click the '**Request Pre-Approval**' button to bring your request. The status of your PAR can be tracking via the PAR tab near the bottom of the page.

Dashboard

Agreements

COI

Export Control

Grants

IACUC

IRB

Disclosures

Pre-Approvals

Certifications

Plans

Triggering Events

Reports

Meetings

Help Center

COI > Disclosures > Disclosure Profile for [REDACTED]

Help

Action Required

Disclosure profile last completed: 2/27/2025

Request Pre-Approval

☒ Complete Disclosure Profile Update

Disclosure Profile for [REDACTED]

Instruction Center

Action Required	Reason
Review disclosure information in the disclosure profile. When all disclosure information is current and accurate, click on the garnet "Complete Disclosure Profile Update" to submit.	Discloser manually updated the disclosure profile
Review disclosure information in the disclosure profile. When all disclosure information is current and accurate, click on the garnet "Complete Disclosure Profile Update" button to submit.	A disclosure profile associated with the discloser requires renewal

Edit Disclosure Profile

Disclosures

Pre-Approval Requests

Training

History

Filter by

Name

Enter text to search

+

Add Filter

×

Clear All

Name	Execute Activity	Request Type	Entity	Foreign Entity?	Request Date	Date Modified	Start Date	End Date	Status	Owner	Review Group	Determination	Determination Date
Program Manager		Other Outside Employment or Business	[REDACTED]	No	1/26/2026 9:22 AM	1/26/2026 9:59 AM	1/1/2026	12/31/2026	Under Review	[REDACTED]	Union Administration		

1 items

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Have Additional Questions?

FSU Compliance Specialists Are Here to Help!

➤ **For Questions About COI/COC:**

- Office of Compliance and Ethics compliance@fsu.edu

➤ **For Questions About CAMS Access/Use and Disclosure of Outside Activity:**

- CAMS@fsu.edu
- **Rainey Basinger**, CAMS Specialist

➤ **Research Related COI/COC Questions:**

- Research Integrity, Security, and Ethics research-compliance@fsu.edu