

**STAFF**

**Conflict of Interest Policy Training**

**FSU**

# Welcome to CAMS!

**CAMS** is the Conflict Administration Management System at FSU. It serves as the home for disclosure of financial interests and Outside Activities for faculty and staff of the University.

This presentation will assist you in your understanding of what you may need to disclose concerning Outside Activities or employment.



# What is a Conflict of Interest?

- ▶ A “Conflict of Interest” (COI) means a situation in which regard for a private interest tends to lead to disregard of a University duty or interest. Sometimes, conflicts of interest arise when an FSU staff member has a second job, or goes into business for themselves, or when an FSU staff member’s relative has business or financial interests that create conflicts or the appearance of conflicts.
- ▶ FSU staff members are public employees subject to the Florida Code of Ethics and are required to comply with [FSU Policy 4-OP-C-7-J2 General, Outside Employment](#).

## As public employees, FSU Staff must:

- Disclose any existing outside employment upon hire
- Seek prior approval before assuming any new outside employment
- Disclose business or financial interests of certain relatives that may create conflicts or the appearance of conflicts

# Examples of Conflicts of Interest

The following situations may give rise to conflicts of interest related to Outside Employment:

- ▶ Being employed by an 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
- ▶ Voting for or promoting your own business in your role as an FSU employee
- ▶ Having a conflict of commitment, i.e., engaging in Outside Activity that has the potential to hinder your ability to carry out your University employment commitments, by occurrence or duration.

# Conduct to be Avoided

As public employees subject to the Florida Code of Ethics you must:

Refrain from using FSU resources, equipment, or your public position for private gain or for the 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 vote or other official action

# What does FSU require concerning COI?

The keys to avoiding illegal or unethical conflicts of interest are:

- ▶ Disclosure of proposed activity
- ▶ Timeliness of the disclosure
- ▶ Completeness of the disclosure
- ▶ Transparency in the COI analysis and management processes
- ▶ Adherence to any conditions imposed for approval
- ▶ Annual redisclosure in CAMS

**NOTE:** FSU policy does not prohibit Outside Activity, ownership in businesses, external appointments, volunteerism, or opportunities to serve in leadership roles or on organizational boards.

# Examples of Reportable Outside Activities

- ▶ Having an employment or contractual relationship with an agency or business entity outside of your employment with FSU
- ▶ Serving on a board or committee, paid or unpaid
- ▶ Having a leadership or managerial position in another business or entity
- ▶ Holding an appointment with another institution
- ▶ Possessing intellectual property rights that generate income to you
- ▶ Receiving reimbursement for travel from an entity other than FSU

# Key aspects of disclosure requirements

- ▶ You are required to update your outside activity disclosure prior to undertaking a new outside employment opportunity or personal business venture.
- ▶ You are required to update your outside activity disclosure if there is any material change to the circumstances of your employment or business.
- ▶ Outside employment with a state agency may require additional scrutiny, or coordination with COI policies at the agency.
- ▶ Dual appointments at FSU are not considered outside activity.

Please familiarize yourself with [FSU Policy 4-OP-C-7-J2](#), Outside Employment.

**NOTE:** If you are employed by a joint college, you may have disclosure obligations with both entities. Please contact the Compliance Office at your home institution to assist with coordination, if needed.



# Who must disclose?

All FSU Staff must submit a disclosure:

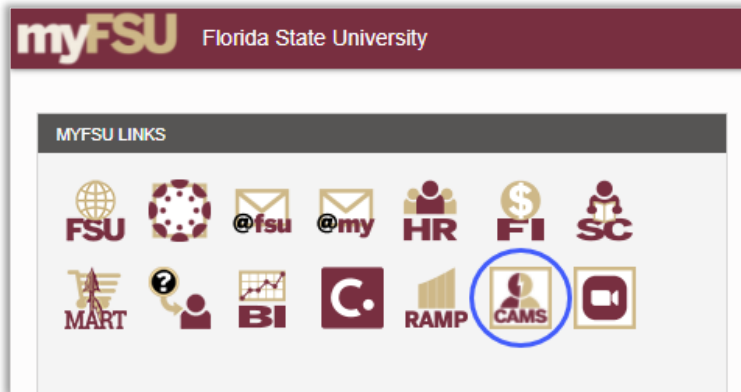
- ▶ Staff always includes
  - Executive Service
  - A&P
  - USPS employees
- ▶ Staff may also include
  - Adjunct Faculty
  - Graduate Students with paid teaching or research assistantships

**NOTE:** If you are a Procurement employee or have other FSU obligations (e.g., serve on an FSU Board or are involved in research activity), you may have additional disclosure obligations.

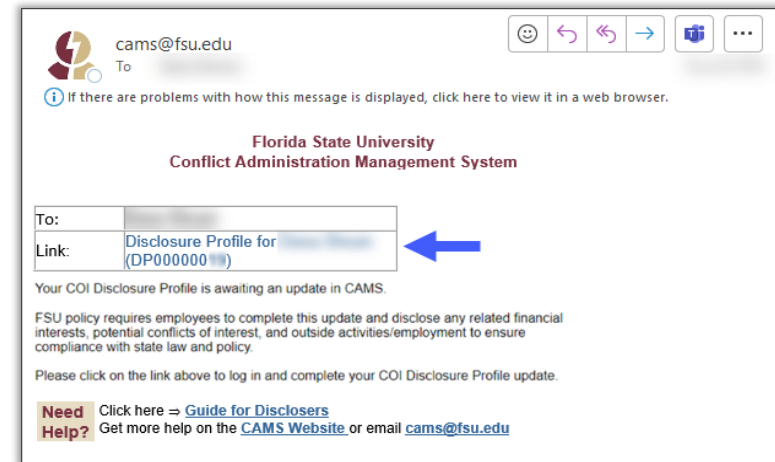
# Where do Staff disclose?

All Staff must disclose in CAMS

- ▶ CAMS is accessible via the **myFSU** portal



- ▶ Direct links are also included in CAMS email notifications



# What does FSU require concerning COI?

In addition to your own Outside Activities, interests held by a Staff member's relatives must also be disclosed.

- Includes ownership or control of a business (partner, officer, director, proprietor)
- Relatives include spouses and children

**NOTE:** CAMS will prompt you to indicate whether the relationship with the outside entity is yours or that of your relative.

# When do Staff need to disclose?

## Part 1: Initial Disclosures in CAMS

- A disclosure must be on file in CAMS, which describes certain holdings and activities. The initial disclosures must be approved by the department reviewer and final approver.

## Part 2: Pre-Approval in CAMS

- For any activity for which FSU policy requires approval prior to undertaking, Staff must use the Pre-Approval feature in CAMS. You should use this feature to disclose any new Outside Activity.

## Part 3: Updates to Disclosures or Outside Activity

- Includes number of hours dedicated to the activity, change in employee's ownership, or nature of the interest, which must be updated in CAMS.
- Do NOT wait until annual disclosure time to make these updates.

## Part 4: Annually

- If you have no new Outside Activity to disclose between annual disclosure cycles, the annual disclosure is sufficient. You must complete a disclosure annually, even if acknowledging no change.
- CAMS will notify you automatically when it is time to submit your annual disclosure.

# Categories for Disclosure in CAMS

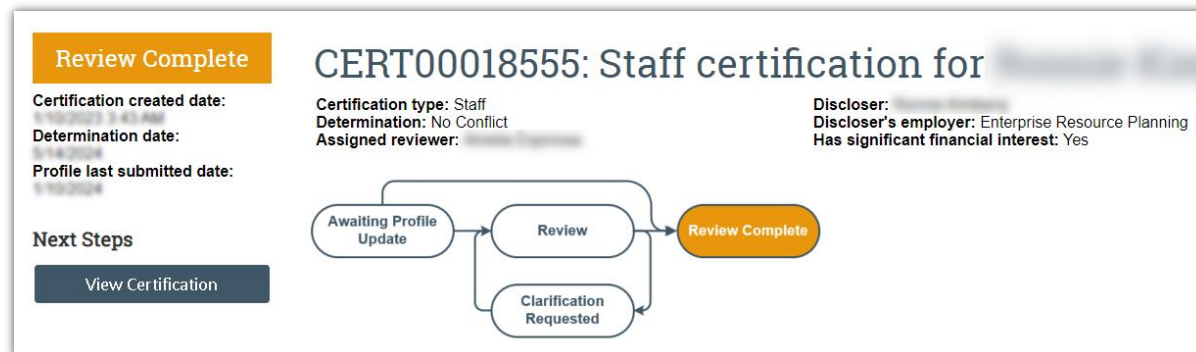
Disclosure Type	Description
<b>Equity</b>	Stock, stock options, or ownership interest
<b>Consulting or Other Professional Services</b>	Giving expert advice to people or entities working in a specific field on a short-term basis (expert witness services, research, product design, etc.)
<b>Editorial Services</b>	Journal services, scientific editor services
<b>Intellectual Property Rights</b>	IP rights or royalty income paid directly to you
<b>Divestiture and Cash Pay-out</b>	Sale of equity
<b>Sponsored Travel</b>	Payments or reimbursements for work-related travel other than from FSU, a governmental agency, or research sponsor
<b>Board Service</b>	Service on the Board of Directors of a nonprofit or for-profit entity external to FSU or an FSU DSO
<b>Outside Employment</b>	Any employment external to FSU (initial disclosures should reflect outside employment forms already on file)
<b>Other Appointments</b>	Compensated or uncompensated (e.g., appointments, fellowships, courtesy positions)
<b>Honoraria</b>	Payment of an honorarium that exceeds \$5,000 or honoraria from a single entity that totals more than \$10,000 in a calendar year

# What does NOT need to be disclosed?

<b>Nature of Interest</b>	<b>Do <u>NOT</u> Disclose</b>
<b>Unpaid services not related to your expertise or FSU work</b>	Volunteer work with organizations, or any other work for which you receive no payment or promise of payment, as long as the time spent on the work does not interfere with your FSU obligations and does not utilize FSU resources
<b>Equity Interests</b>	Interests in any entity through personal retirement accounts, mutual funds (403b, IRA, etc.), or other funds that are managed by a third party with discretion
<b>Intellectual property rights and interests</b>	Royalties received from FSU, or unlicensed intellectual property that does not generate income
<b>Sponsored or reimbursed travel</b>	Travel administered through FSU funds, and travel reimbursed or sponsored by a U.S. federal, state, or local government agency, a U.S. institution of higher education, a U.S. academic teaching hospital, medical center, or a research institute that is affiliated with a U.S. institution of higher education

# Who can view my disclosures in CAMS?

- ▶ Disclosures can be reviewed for certification by:
  - Level 1 Reviewer (usually the Chair or appropriate equivalent)
  - Level 2 Reviewer (usually the Dean or appropriate equivalent)
  - Final Approver (usually the Vice President or their designee)
  - Administrators in the FSU Office of Compliance and Ethics
  - Conflict of Interest Committee, when applicable



**NOTE:** Documents related to COI disclosures are public records that are subject to disclosure pursuant to [Chapter 119, Florida Statutes](#).

# What happens if a COI is identified?

- ▶ If a COI is identified, we will work with you and your College to *reduce, manage, or eliminate* it. However, it is not always possible to completely eliminate a COI or appearance of COI. In those cases, it may not be appropriate to approve an outside activity request.

## **Examples of Reduction, Management, and Elimination strategies include:**

- Reduction of proposed hours (in cases of conflict of commitment)
  - Assessment of whether a statutory exception is present
  - Minimization of employee's involvement in work that is related to the area of conflict
  - Reduced role in project
  - Adjustment of reporting or supervisory lines
  - Use of competitive solicitation process for procurements
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- ▶ A faculty member may request review of an initial decision on a COI matter in accordance with the UFF-FSU Collective Bargaining Agreement.
  - ▶ Any employee may seek an advisory opinion from the Florida Commission on Ethics on Code of Ethics-related issues.



# What is considered noncompliance relative to COI?

- ▶ Noncompliance includes failure to disclose, inaccurate disclosure, untimely disclosure, or incomplete disclosure.
- ▶ Instances of non-compliance are reviewed, and disciplinary action taken if needed, in accordance with applicable University policies and procedures.
- ▶ Actions that violate the Conflict of Interest and Outside Activity Policy may also violate University policies prohibiting false statements. In egregious circumstances, misrepresentations or omissions can constitute fraud or subject employees to criminal penalties.

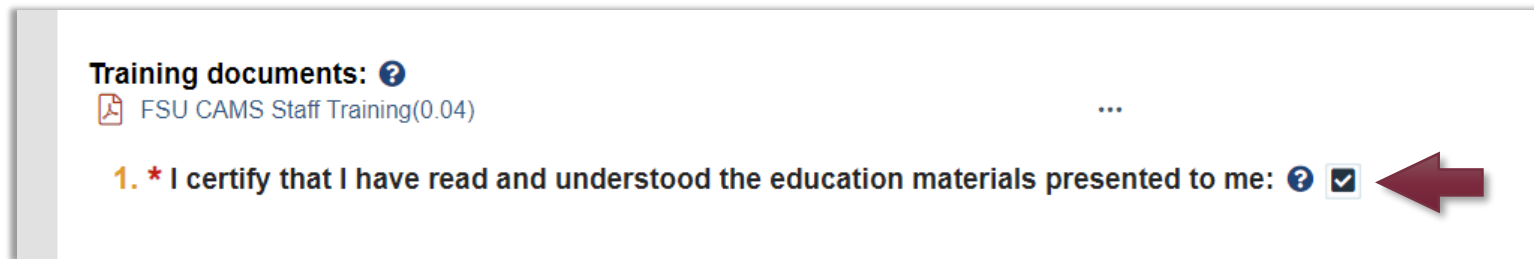
## Instances of noncompliance:

- Failure to disclose information as required
- Failure to submit an updated disclosure within 30 days of an event requiring disclosure
- Submission of an incomplete, erroneous, or misleading initial, updated or annual disclosure
- Agreement or undertaking of a new Outside Activity prior to receipt of required approval
- Failure to comply with COI management plan strategies established by the University

# Your Training is Complete!

After you have completed your review of this training presentation, you may save a copy for your future reference and close the file.

On the *Instructions and Policies* page of the CAMS disclosure SmartForm, **check the box** beside the certification.



The screenshot shows a section titled "Training documents:" with a help icon. Below it is a document icon and the text "FSU CAMS Staff Training(0.04)". To the right of the document name are three dots. Below this is a numbered list item: "1. \* I certify that I have read and understood the education materials presented to me:". To the right of the text is a help icon and a checked checkbox. A red arrow points to the checked checkbox.

Your training will need to be renewed once a year when you complete your annual disclosure profile update.

# Contact

For questions about non-research COI disclosures and outside activity:



*Office of Compliance and Ethics*  
[compliance@fsu.edu](mailto:compliance@fsu.edu)

For questions about CAMS:



*CAMS Helpdesk*  
[cams@fsu.edu](mailto:cams@fsu.edu)