

Issuance of Revised APM 025 effective 7-1-24: Guidelines for Faculty appointed at less than 50% effort and Designated Other Academics

January 2023 Issuance of Revisions to Academic Personnel Manual Section 025, Conflict of Commitment and Outside Activities of Faculty Members and Designated Other Academic Appointees (APM - 025) and Section 671, Conflict of Commitment and Outside Activities of Health Sciences Compensation Plan Participants (APM - 671). Effective Date for Implementation July 1, 2024.

Summary of Key Policy Revisions

- APM 025-4 Expansion of the definition of compensation to include *in-kind* contributions:
 - Compensation for outside professional activities includes all types of remuneration (including, but not limited to, stock, stock options, and *in-kind* contributions such as office/laboratory space, equipment, supplies, or employees or students supported by an outside source) that have immediate or potential financial value, excluding customary honoraria, reimbursement for reasonable travel expenses, and per diem expenses
- APM 025.a.2 Policy now includes *Designated Other Academic Appointees* (list of job titles identified in the revised 025 policy – *newly included on our campus are Specialists and Professional Researchers*):
 - Designated Other Academic Appointees who are employed by the University of California should devote their time and energy to research or other defined duties appropriate to their series. This policy requires that Designated Other Academic Appointees comply with federal funding agency laws and policies governing research and grant disclosures if participating in a federally funded research project and if deemed to be key personnel or senior personnel by the Principal Investigator (PI) or funding agency
- APM 025-6 b(2) : Faculty holding appointments at less than 50% effort are responsible for complying with federal funding agency laws and policies governing research and grant disclosures (e.g., conflicts of commitment and affiliations, including, but not limited to, participation in non-U.S. talent recruitment programs and accepting visiting and honorary appointments at outside institutions of higher education and research) if participating in a federally funded research project and if deemed to be key personnel or senior personnel by the PI or funding agency.
- APM 025-6c: Designated Other Academic Appointees are responsible for complying with federal funding agency laws and policies governing research grant disclosures (e.g., conflicts of commitment and affiliations, including, but not limited to, participation in non-U.S. talent recruitment programs and accepting visiting and honorary appointments at outside institutions of higher education and research) if participating in a federally funded research project and if

deemed to be key personnel or senior personnel by the PI or funding agency. For other academic appointees who are covered by a Memorandum of Understanding, reporting requirements are governed by the applicable Memorandum of Understanding.

Implementation Guidelines for APM 025 Faculty less than 50% and Designated Other Academics

- APM /025-4 Expansion of the definition of compensation to include additional *in-kind* contributions. The revised policies state that *in-kind* contributions, such as office/laboratory space, equipment supplies, or employees or students supported by an outside source, constitute compensation for outside professional activities. This is in addition to the receipt of cash and non-cash compensation (stock/options, equity interest) that already require disclosure in OATS. Compensation does not include training awards, prizes, or gifts. Gifts are resources provided where there is no expectation of anything (e.g., time, services, specific research activities, money, etc.) in return. An item or service given with the expectation of an associated time commitment is not a gift and is instead compensation and must be reported as such.
 - This is already required reporting to Office of Sponsored Research when researchers are reporting sources of support to federal funding agencies in grant proposals and progress reports.
 - For COI-SMART disclosures, the PHS regulation for conflicts of interest in research does not specifically define the *in-kind* contributions noted above as a Significant Financial Interest that would need to be reported as a financial conflict of interest related to research. As a result this information may not be captured through existing COI disclosures.
 - Faculty less than 50% (including non-HCOMP recall), Specialists and Researchers, are not required to disclose OPA or request prior approval in the Outside Activity Tracking System (OATS). These populations will disclose directly to OEC. For questions contact COIAC@ucsf.edu
 - Research policies governing disclosure requirements apply to all personnel meeting the definition of an Investigator: *anyone responsible for the design, conduct or reporting of the research regardless of their university job title*. Investigators submitting NIH grant proposals and/or receiving NIH funding support are required to complete COI disclosures in COI SMART. For non-NIH funds, investigators are required to disclose activity within 30 days of receiving a related project by completing form 700U and PI certification (For questions contact COIAC@ucsf.edu or <https://compliance.ucsf.edu/financial-conflict-interest-research>)

- APM 025-6 and 14 Faculty and Designated Other Academic Appointees are responsible for complying with federal funding agency laws and policies governing grant disclosures if participating in a federally funded research project, if deemed to be key personnel or senior personnel by the PI or funding agency, and if deemed required to disclose per funding agency policy, grant terms & conditions, and/or federal law. Reporting requirements for federal funding

agency laws and policies include reporting on conflicts of interest/commitment and affiliations including, but not limited to, participation in non-U.S. talent recruitment programs and acceptance of visiting and honorary appointments at outside institutions of higher education and research.

- While this language has not previously been included in APM policy, these disclosures are currently required under federal funding agency laws and policies governing research and grant disclosures. The inclusion of this language is meant to serve as a reminder of these requirements to Faculty and Designated Other Academic Appointees.
- Disclosure requirement applies to all APM 025 Faculty appointed at 50% effort or less, non-HCOMP Recall Faculty, Faculty on leave, Specialists and Professional Researchers. As noted above, this is not a new requirement.
- Research policies governing disclosure requirements apply to all personnel meeting the definition of an Investigator: *anyone responsible for the design, conduct or reporting of the research regardless of their university job title*. Investigators submitting NIH grant proposals and/or receiving NIH funding support are required to complete COI disclosures in COI SMART. For non-NIH funds, investigators are required to disclose activity within 30 days of receiving a related project by completing form 700U and PI certification (For questions contact COIAC@ucsf.edu or <https://compliance.ucsf.edu/financial-conflict-interest-research>)
- Faculty less than 50% (including non-HCOMP recall), Specialists and Researchers are not required to disclose OPA or request prior approval in the Outside Activity Tracking System (OATS). These populations will disclose directly to OEC if participating in non-U.S. talent recruitment programs and for acceptance of compensated and uncompensated appointments at outside institutions of higher education and research.

Resources:

- For APM 025 policy questions, please contact your department manager or Dean's office:
School: Director / Vice or Associate Dean
Dentistry: [Phillip Babcock](#) / [Sunita Mutha](#)
Medicine: [Amy Friedli](#) / [Christina Mangurian](#)
Nursing: [Catherine Waters](#)
Pharmacy: [Phillip Babcock](#) / [Robin Corelli](#)
- For questions regarding research disclosure requirements contact COIAC@ucsf.edu or <https://compliance.ucsf.edu/financial-conflict-interest-research>