

# Types of Conflicts (COI) The Disclosure Conundrum

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# COI+ Working Group

## Purpose

Identify and educate community about different types of disclosures and processes related to Conflict of Interest across campus

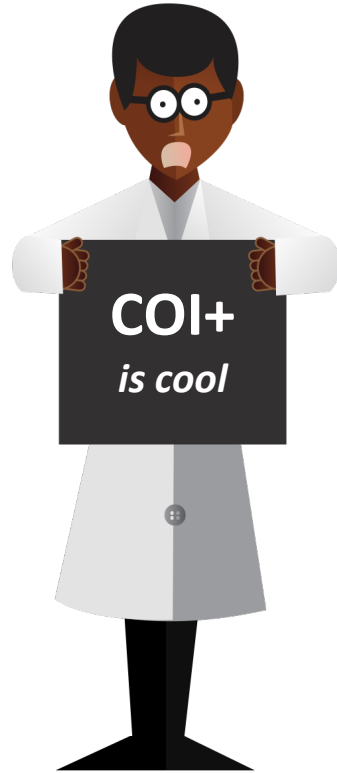
## Members

Human Resources (2)

Ethics and  
Compliance Office (2)

General Counsel  
Office (1)

DOR/RIO (2)



## Goals

1. **Create a central website** with all the types of disclosures listed with links to additional information
2. **Simplify compliance** through more accessible information and processes
3. **Reduce the confusion** around the types of disclosures
  - When required
  - Who must disclose

# COI Requirements

## Who Needs to be Aware of COI Requirements?

Employees Required to Make COI Disclosures

All Employees

Full-Time,  
Benefits-Eligible  
Faculty and Staff

Employees Involved in  
Purchasing Decisions

Employees Who Have or  
Are Considering:

1. Outside employment
2. Consulting
3. A start up company

Investigators/  
Researchers

Employees with  
International  
Collaborators/Donors

# Types of Disclosures

If this describes you:

**All Employees**

You are required to:

Follow State Laws and University policies regarding:

- Ethics
- Conflict of Interest
- Conflict of Commitment

For more information, see:

- [Board of Regents Policy 57.08 – Conflicts of Interest](#)
- [SAM 02.A.09 – Conflicts of Interest](#)
- [SAM 02.A.29 – Ethical Conduct of Employees](#)

# Types of Disclosures

If this describes you:

**Full-Time,  
Benefits-Eligible Faculty  
and Staff**

You are required to:

Complete Annual Disclosure of  
Related-Party Interests for the  
previous calendar year

Disclosure form is located in AccessUH. Go to P.A.S.S. and click on Training.

For more information, see:

- [SAM 03.A.17 – Disclosure of Related-Party Interests](#)

# Types of Disclosures

If this describes you:

**Employees Involved in Purchasing Decisions**

You are required to:

- Complete Annual Disclosure of Related-Party Interests
- Comply with procurement conflict of interest statutes, including necessary disclosures
- Comply with all UHS purchasing procedures

For more information, see:

- [SAM 03.A.17 – Disclosure of Related-Party Interests](#)
- [Conflict of Interest and Procurement Training](#)
- [UHS Purchasing Guidelines & Procedures](#)

# Types of Disclosures

If this describes you:

## Employees Who Have or Are Considering:

1. Outside employment
2. Consulting
3. A start up company

You are required to:

- Complete the UH Outside Consulting and Paid Professional Service Form, and get approval *prior to* starting the work
- Annually complete Disclosure of Related-Party Interests for the previous calendar year in P.A.S.S.

For more information, see:

- [Board of Regent Policy 57.02 – Consulting and Paid Professional Service](#)
- [SAM 02.A.08 – Consulting and Paid Professional Service](#)
- [Consulting and Paid Professional Service Application](#)

# Types of Disclosures

If this describes you:

**Investigators/  
Researchers**

You are required to:

- Comply with University policies regarding research and sponsored projects, including conflict of interest
- Make disclosures as per University policies
- Comply with all requirements of any sponsoring agency

For more information, see:

- [Policy on Conflict of Interest in Research](#)
- [Integrated Compliance Oversight Network \(ICON\) portal](#)



# Types of Disclosures

If this describes you:

**Employees with  
International  
Collaborators/Donors**

You are required to:

- Comply with Export Control Laws and Federal Disclosure Requirements Foreign Reporting
- Comply with all requirements of any sponsoring agency
- Notify University and comply with University policy

For more information, see:

- [UH International Research website](#)
- [Disclosing International Relationships and Activities](#)
- [Export Control Information](#)

## Compliance & Ethics

[UH System Policies](#)

[UHS Compliance & Ethics Program](#)

[University Compliance Resources](#)

[UHS Code of Ethics](#)

[Hotline - Fraud & Non-Compliance Reporting](#)

[Clery Act Compliance](#)

[Conflicts of Interest and Related Disclosures](#)

## Conflicts of Interest and Related Disclosures

All employees of the University of Houston System have an obligation to adhere to the highest ethical standards of conduct reflected by state law, and university policy. This obligation encompasses a wide range of areas, including recognizing and disclosing potential conflicts of interest and conflicts of commitment, as well as disclosures related to procurement, export control laws, international relationships and technology transfer.

The University seeks to assist employees in adhering to these standards through providing information regarding the requirements for all employees, as well as specific groups of employees.

### If this describes you:

*More than one may apply*

*You are required to:*

All Employees

- Follow State Laws and University policies regarding;
  - Ethics
  - Conflict of Interest
  - Conflict of Commitment

[Board of Regents Policy 57.08 – Conflicts of Interest](#)

[SAM 02.A.09 – Conflicts of Interest](#)

[SAM 02.A.29 – Ethical Conduct of Employees](#)

# COI Disclosures



## Important

Disclosure in one COI category doesn't mean disclosure(s) in others is not required. Review all types to ensure proper disclosure to each appropriate office.

Compliance landing page for

Conflicts of Interest and Related Disclosures:

<https://uhsystem.edu/compliance-ethics/conflicts-of-interest/index.php>