

# Dual Roles

## A guide for separating UofL & external roles

UofL faculty, staff, and affiliated researchers with roles, activities, and interests external to UofL are responsible for abiding by all UofL policies, procedures, and guidelines that ensure an appropriate separation between institutional and external roles.

### Tips for staying in Compliance with UofL Conflict of Interest Requirements

1. **Complete your Attestation & Disclosure Form** at least annually and/or within 30 days of a change to your disclosure(s). *This form is required annually, regardless of if you have items to disclose or changes to your last annual ADF.*  
Visit <http://louisville.edu/conflictinterest> for tip sheets and infographics on what to disclose.
2. **You cannot wear two hats at the same time.** Your activities are either in your role as a UofL employee and/or researcher or in your role at the external entity. Specified contracts between UofL and the entity will dictate many those roles for projects, but you must be aware of other scenarios that could skew the lines.  
Examples:
  - Information regarding intellectual property (IP). Is that UofL IP? Is that the entity's IP? Ensure appropriate non-disclosure agreements are in place before discussing any unlicensed IP. More information on IP is available at: <https://louisville.edu/research/technologytransfer/policy-procedures>
  - Be wary of using UofL resources in your external activities.  
Visit <http://louisville.edu/conflictinterest> for a specific infographic on University Resources.
3. **You cannot have roles on both sides of the transactions**, which includes spouses, dependent children and any other person that you are legally responsible.  
Example: You cannot serve as the representative for the external entity in negotiations or transactions with UofL.
4. **Know the responsibilities related to funding.** Certain funding agencies require that the small business prime awardees request an exception at the time of proposal for any individual at the small business\* that plans to serve as the PI on a sub award from that entity. This is the requirement of the Prime to obtain this approval prior to proposal. *\*This includes equity holding "only existing on paper."*
5. **Provide an appropriate disclosure statement** for all manuscript submissions and presentations that are in any way related to your external interests/relationships.
6. **Reach out if you have questions.** It is best to send an email to [COI@louisville.edu](mailto:COI@louisville.edu), either with the question and all details, or set up a time to have a discussion, if you prefer.

Further details on these and additional requirements are prescribed in each individual's management plan. The management plans are created to manage the real or perceived conflict of interest and are needed for related research or affiliated contracts to move forward. Information on the COI and Management Processes are available at <http://louisville.edu/conflictinterest>.

*Last updated 1/10/19.*

*This guidance document is available at <http://louisville.edu/conflictinterest>. Please ensure you have the current version.*