

Conflicts of Interest

What to Disclose – Business Transactions

Disclosure Requirements for Involvement in Business Transactions

How & When to Disclose

The Attestation and Disclosure Form (ADF) is the means to disclose external activities related to an individual's institutional role(s). The ADF is available at <http://iris.louisville.edu>. Instructions for completing the form are available <http://louisville.edu/conflictinterest>. The ADF must be completed at least annually, or within 30 days of any change to your disclosure(s).

What to Disclose

External interests that are **related** to an employee's institutional role(s) (and activities) must be reported on the ADF. This includes, off campus, non-University commitments, such as company ownership, additional employment, or consulting activities for external entities.

The following external interests of an employee (or immediate family member) must be disclosed on the ADF for the past 12 months and the anticipated upcoming 12 months:

- Serving in a management and / or operational role (president, officer, director, etc.), regardless of whether compensation is received for a for-profit (public or private) or not-for-profit entity.
- Receiving compensation from any public entity and/or the value of any equity interest (excluding purchase of mutual funds) in the entity, when aggregated, exceeds \$5,000.
- Receiving any compensation from any private entity.
- Holding any ownership interest (e.g., stock, stock option, or other ownership interest).
- Aggregated gifts amounting to greater than \$25 per year from an outside organization that provides good, services, and/or funds to the university or associated organization (ULAA, ULF, ULRF). Examples include: Free meals, discounted items, gift cards, free tickets to entertainment events, software, or other tangible items. Please note that single gift items over \$25 value, must be politely refused (per policy*).

What is Exempt from Disclosure

- Ownership of Mutual Funds, of any amount.
- Salary, royalties, or other compensation paid by the University or associated organization (ULAA, ULF, ULRF), if the individual is currently employed or otherwise appointed by the University or associated organization.

**Please see the Vendor Gifts/Meals Tip Sheet for specifications on policy allowances related to gifts and meals.*

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External Interests to Disclose	Annual Threshold	Excluded from Disclosure
Serving in a fiduciary role for an entity (officer/director/etc) <i>Includes for-profit & not-for-profit entities</i>	\$0	Holding a membership-only relationship in a not-for-profit entity (professional societies, community groups, etc)
Receiving compensation from any publicly traded entity and/or the value of any equity interest in the public entity	≥\$5,000	Ownership of Mutual Funds, of any amount.
Receiving compensation from any non-publicly traded entity (Private Entity)	\$0	Salary, royalties, or other remuneration paid by the University or associated organization (ULAA, ULF, ULRF), if the individual is currently employed or otherwise appointed by the University or associated organization.
Holding equity interest in any non-publicly traded entity (e.g., stock, stock option, or other ownership interest)	\$0	---
Spouse or Dependent Child holding equity interest in any non-publicly traded entity (e.g., stock, stock option, or other ownership interest)	\$0	---
Sponsored or reimbursed travel from a single external entity	≥\$5,000	---
Aggregated Gift(s) (anything of value) from an external entity that provides good, services, and/or funds to the university or associated organization (ULAA, ULF, ULRF) (e.g., meals, tickets, etc.) Single gift items over \$25 value cannot be accepted.	≥\$25	Discounts received through the employee benefits programs. Items related to direct sponsor provided travel should be disclosed on the travel form.

Additional information on COI's, including FAQ's, policies, and disclosing requirements is available on the COI Program website or contact us directly.