Process for Outside Employment Approval

- Outside Employment Opportunity Offered
- Work with Department Administration
  - Determine what type of outside employment is being offered, and whether that type of employment is prohibited by UNMC policy (for example: speaker’s bureau participation is prohibited and being paid/reimbursed by an outside vendor to attend a conference where one is not presenting or providing conference services is also prohibited.)
    - Definition of Speaker’s Bureau: Direct marking activities on behalf of health care vendors.
    - A faculty member may not deliver content prepared by industry endorsing a product or service provided by that sponsor that is not his/her own original content.
    - A faculty member may provide unbranded disease awareness presentations sponsored by health care vendors with disclosure to and approval by Department Chairs. It must be the faculty member’s own/original content.
  - Get Department approval for the activity
- Submit Application for Authorization to Engage in Outside Professional Activity via COI Smart.
  - A faculty member can complete this form for up to a 12-month period (for example 1/1/2021-12/31/2021). A new application can be submitted for further paid activities prior to the end of the 12 months to ensure ongoing approval for participation. (Retro dated forms are not accepted.)
    - This should be done prior to engaging in the activity.
      - For approval:
        - Submission to COI Office: The application is sent to the respondent via intercampus mail to circulate for approval/signatures
        - Respondent’s signature
        - Section Chief Signature (if applicable)
        - Chairperson’s Signature
        - Dean/Dean’s Business Office Signature
        - Chief Compliance Officer’s Signature
        - Chancellor’s Signature
- Update Annual Disclosure of Financial Interest via COI Smart.

Helpful Tips:

- Approval required prior to faculty participating in the activities
- Approval takes time
- COI Office is a helpful resource should questions arise
- Open Payments reporting – faculty payments from industry is reported on this site (openpaymentsdata.cms.gov)
  - Activity reported on this site is not a bad thing.
  - What is a bad thing is if activity is reported on this site and the institution does not have record of the activity via the disclosure process.

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