**N****OTICE OF AMENDED REGULATION**

**August 26, 2025**

**BOARD OF GOVERNORS**

Division of Universities

University of North Florida

**REGULATION TITLE:**

Conflicts of Interest

**REGULATION NO.:**

4.0170R

**SUMMARY:**

The amendments to the regulation are necessary to reflect new a process for Conflicts of Interest consideration and approvals, requires preparation and inclusion of management plans prior to approval requests, and provides for institutional setting of deadlines for new and annual disclosures.

**MEETING DATE:**

September 25, 2025

**FULL TEXT:**

The full text of the regulation being proposed is attached.

**AUTHORITY:**

Florida Constitution, Article IX, Section 7(c)

 Florida Statutes 1012.977

**UNIVERSITY OFFICIAL INITIATING THE PROPOSED REVISED REGULATION:**

Robyn Blank, JD, CCEP, Associate Vice President, Chief Compliance and Ethics Officer

**INDIVIDUAL TO BE CONTACTED REGARDING THE PROPOSED REVISED REGULATION:**

Stephanie Howell, Paralegal, Office of the General Counsel, showell@unf.edu, phone (904)620-2828; fax (904)620-1044; Building 1, Room 2100, 1 UNF Drive, Jacksonville, FL 32224.

***Any comments regarding the amendment of the regulation must be sent in writing to the contact person on or before September 8, 2025, to receive full consideration.***

** Regulation**

**Regulation Number**: 4.0170R

**Effective Date**: 02/01/06 **Revised Date**: pending

**Subject: Conflicts of Interest**

**Responsible Division/Department**: Administration & Finance/Human Resources

**Check what type of Regulation this is:**

New Regulation

⌧Major Revision of Existing Regulation

☐Minor/Technical Revision of Existing Regulation

☐Reaffirmation of Existing Regulation

☐Repeal of Existing Regulation

# OBJECTIVE & PURPOSE

The purpose of this Regulation is to inform University employees of their disclosure and reporting obligations as they pertain to actual and potential Conflicts of Interest that may arise during their employment.

This Regulation is intended to complement applicable collective bargaining agreements; however, to the extent this Regulation conflicts with the terms of an applicable collective bargaining agreement, that agreement’s terms will control, so long as the agreement also complies with Florida law such as [Florida Statute § 1012.977](http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=1000-1099/1012/Sections/1012.977.html).

# STATEMENT OF REGULATION

**A. Overview**

1) University of North Florida employees must observe the highest standards of ethics consistent with the Code of Ethics for Public Officers and Employees of the State of Florida (Chapter 112, Part III, Florida Statutes), the advisory opinions rendered with respect thereto, Board of Governors and University regulations, rules, and policies, and the laws of Florida.

2) The duties and responsibilities of an employee's University position are considered the primary employment and generally require the employee’s full time and attention. However, this Regulation is not intended to discourage an employee from engaging in outside activity so long as they are in compliance with this regulation. Outside activity should not interfere with an employee’s performance of their primary job duties. Employees earning annual leave must record annual leave for approved non-University activities that are scheduled to take place during the employee’s normal working hours.

3) The University recognizes the valuable contributions made by individuals who are not full-time UNF employees, such as OPS employees who work less than 30 hours each week and adjuncts. While such individuals are expected to uphold the University’s high ethical standards set forth in this Regulation, to the extent such an individual believes they should be given an exception from a provision of this Regulation because UNF is not their primary employer, such an exception must be approved in writing following the submission of a Conflict of Interest Disclosure form described below.

4) Conflicts of Interest and Conflicts of Commitment are prohibited. Employees are responsible for avoiding and resolving such conflicts, working in conjunction with their supervisors and other University officials. If an employee has concerns as to what may constitute a Conflict of Interest or Commitment, they should consult with their supervisor.

**B.** **Definitions**

1) “Employee” is defined for purposes of this regulation as any person employed by UNF.

2) “Conflicts of Interest” is defined as:

(a) any conflict between the private interests of the employee and the public interests of the University, the Board of Trustees, or the State of Florida, such that an independent observer may reasonably question whether the employee’s actions or decisions are partially or wholly influenced by considerations other than the best interest of the University;

(b) any activity, either alone or in conjunction with another entity, which competes with the University’s teaching, research, and service mission;

(c) any violation of the University’s [Amorous or Sexual Relationship Policy 1.0070P](https://www.unf.edu/president/policies_regulations/01-General/1_0070P.aspx); or

(d) any violation of the University’s [Employment of Relatives Regulation 4.0050R](https://www.unf.edu/president/policies_regulations/04-HumanResources/4_0050R.aspx);

3) “Conflict of Commitment” is any activity which interferes with the full performance of the employee’s professional or institutional responsibilities or obligations.

4) “Financial Interest,” for employees engaged in the design, conduct, or reporting of research, includes anything of value other than that provided directly by the University, pursuant to [Florida Statute § 1012.977](http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=1000-1099/1012/Sections/1012.977.html). For all other employees, it includes anything of value received in connection with an Outside Activity or Potentially Conflicting Undertaking.

5) “Outside Activity” includes anything an employee does for an organization or an individual, other than the University, that is related to the employee’s expertise.

6) “Potentially Conflicting Undertaking” means any activity, compensated or uncompensated, including employment or volunteer service, done for an individual or organization, that does or could potentially cause a conflict of interest or commitment with the university. A potentially conflicting undertaking need not be related to the employee’s expertise or job duties with the university.

7) “Reportable Matter” means any Conflict of Interest, Conflict of Commitment, Financial Interest, Outside Activity, or Potentially Conflicting Undertaking.

**C**. **Disclosure and Reporting Obligations**

1) All Employees must submit a Conflict of Interest Disclosure form:

(a) Annually, even if they indicate that they have no Reportable Matters to disclose, on a schedule set by the University;

(b) Annually for previously disclosed Reportable Matters that continue from a prior disclosure, on a schedule set by the University;

(c) As soon as possible when proposing to engage in a new Reportable Matter; and/or

(d) As soon as possible when there is a significant change in Reportable Matter previously disclosed (nature, extent, funding, etc.).

2) Those employees not hired or physically present during the scheduled annual filing period shall promptly complete and file a new form for each Reportable Matter upon their hire date or arrival to campus.

3) Employees must submit a Conflict of Interest Disclosure and receive a determination that the Reportable Matter does not affect the integrity of the University prior to obtaining the financial interest or engaging in the Reportable Matter.

 **D. Review of Reportable Matters**

1) Employee must complete and submit the Conflict of Interest Disclosure form, currently found in Workday..

2) If approval is contingent upon the execution of a management plan, the employee must attach the executed management plan to the Conflict of Interest Disclosure form when submitting it for approval. If during the review process it is determined that a management plan is needed, the form shall be returned to the employee so that a management plan can be developed, and the form resubmitted with the management plan attached.

3) The Conflict of Interest Disclosure form must be approved by the appropriate vice president or designee and Human Resources. Approval will only be granted if a conflict under this Regulation will not occur. Upon approval or denial, the employee will be notified of the outcome.

4) The University will maintain the approval or denial of the disclosed Reportable Matters in Workday.

**E.** **Use of University Resources**

An employee who wishes to engage in any Reportable Matter making use of facilities, equipment, services, intellectual property, students, or other employees of the University in connection with such outside activity must obtain prior written approval via the Conflict of Interest Disclosure form. Approval for the use of University facilities, equipment, or services may be conditioned upon reimbursement for their use.

**F. Disclaimer Regarding Acting as University Agent**

An employee engaging in a Reportable Matter must take reasonable precautions to ensure that the public, the outside employer, or other recipient of services understands that the employee is engaging in such Reportable Matter as a private citizen and not as an employee, agent, or spokesperson of the University.

**G.** **Appeals**

1) If an employee believes that a request to engage in outside employment or activity has been unduly denied, a written letter of appeal may be sent to the Office of Human Resources outlining the concern, within ten (10) days of the notification of denial.

2) The Office of Human Resources will review the matter in consultation with the divisional Vice-President and/or Office of the Provost, and ten (10) days of receipt of the letter of appeal will notify the employee of the determination.

3) The decision of the Office of the Human Resources shall be final regarding an employee participating in outside employment or activity.

**H. Penalties**

 1) If the employee fails to disclose the Reportable Matter before engaging in it, or if they engage it in despite lack of approval, the Employee may be subject to discipline.

2) An employee who fails to disclose an Outside Activity or Financial Interest as required by [Florida Statute § 1012.977](http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL=1000-1099/1012/Sections/1012.977.html) shall be suspended without pay pending the outcome of an investigation. The investigation shall not exceed 60 days. Upon conclusion of the investigation, the University may terminate the employment of the employee.

*References: Florida Statutes §§ 112.311-112.3261, 1012.977; Approved by the BOT 08/12/21, revised\_\_\_\_\_\_\_\_\_\_\_\_\_\_.*