

**Carnegie Mellon University**  
**Guidelines for the Research Community**  
**Disclosure of Outside Activities**

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## **INTRODUCTION**

As a research university, Carnegie Mellon University (CMU or University) must conduct itself in accordance with the highest ethical and scientific standards. CMU also must maintain policies and processes that facilitate compliance with sponsor policy governing outside activities (OAs). This document is divided into three main sections:

- Introduction
- Outside Activity Disclosure Requirements for Investigators
- General

Additional information is available on the [Office of Research Integrity and Compliance \(ORIC\)](#) website.

This Guidelines document is a companion to the separate [Guidelines for the Research Community on Compliance with Conflict of Interest in Research Requirements](#). Each Guidelines document outlines different disclosure requirements for financial interests or activities that Investigators (as defined later in this document) may have. Taken together, the documents explain the range of financial interests and activities that Investigators must disclose within CMU's SPARCS disclosure system. Investigators may find it helpful to refer to the [quick reference chart of disclosure requirements](#) on ORIC's COI website.

## **Purpose**

This Guidelines document defines OAs and establishes compliance procedures and disclosure requirements that apply to the CMU research community.

Every CMU Investigator must be familiar with, and abide by, the procedures and requirements set out in this document. CMU Investigators (as specifically defined later in this document) include any person – regardless of title or position – who is responsible for the design, conduct, or reporting of research or research proposed for funding. Investigators includes all faculty, staff, and students specifically named in sponsored research funding applications, proposals, or budgets, including in any proposal or budget submitted in SPARCS, and all key personnel who are identified in a progress report or other report submitted by CMU to a funder.

## **Overview**

The University's principal missions are the education of students and the generation and dissemination of knowledge. In pursuit of these missions, or as a natural outgrowth of such activities, faculty, staff, and students often become involved in outside professional activities.

This Guidelines document establishes institutional standards and requirements for disclosure of outside activities to CMU through the University's electronic system (SPARCS). This Guidelines document complements and functions in tandem with other University policies, including CMU's policies on [Conflict of Interest and Commitment](#) and [Consulting by Faculty](#). Investigators should review those policies and the

procedural requirements in this document to fulfill their disclosure obligations to the University and to research sponsors.

While extramural professional activities are generally encouraged and may benefit CMU by furthering professional development, fostering beneficial collaborations, and advancing CMU's educational and research enterprise, it is important that such activities do not interfere with an individual's primary commitment to CMU: to teach, to conduct research, and to meet obligations to students, colleagues, and the University. It is also important that OAs (as specifically defined later in this document) are properly disclosed to CMU in accordance with the requirements set forth in this document and all research sponsor policies.

This document is not intended to unduly restrict involvement in outside activities so long as such activities comply with applicable CMU policies and any unit requirements, appropriate disclosures are made as set out in this document, and relevant responsibilities to sponsors are met.

## **OUTSIDE ACTIVITY DISCLOSURE REQUIREMENTS FOR INVESTIGATORS**

### **Definitions and Guidance for Disclosure of Outside Activities**

An "*Outside Activity*" (OA) is any paid or unpaid activity undertaken by an Investigator for any external entity or person (e.g., not for CMU). Such activities relate to or rely on the Investigator's professional, scientific, research, or academic expertise. Disclosure is required for all OAs that appear to be related to or rely on an Investigator's professional, scientific, research, or academic expertise, unless otherwise exempted by this document.

"*Investigator*" means the Project Director (PD), Principal Investigator (PI), Co-Investigator or any other person, regardless of title or position, who is responsible for the design, conduct or reporting of sponsored research, including research that is funded or proposed for funding. This includes all faculty, staff, and students specifically named in sponsored research funding applications, proposals, or budgets, including in any proposal or budget submitted in SPARCS, and all key personnel who are identified in a progress report or other report submitted by CMU to a funder. If an individual's role changes during the course of a project or after a proposal has been submitted such that they would then be considered an Investigator, they become subject to the compliance procedures and disclosure requirements set out in this document at that time.

CMU uses an electronic system (SPARCS) to collect and store OA disclosures. This process is described in the Disclosure Process and Review section below.

The OAs that CMU Investigators must disclose to CMU through SPARCS include, but are not limited to, the following activities, whether or not they occur during an Investigator's CMU appointment period (where applicable):

- Consulting
- Academic, professional, scientific, or institutional appointments and positions outside of CMU, whether or not remuneration is received, whether full-time, part-time, or voluntary (adjunct, visiting, honorary, or other), including (for example) any form of employment or similar service

engagement, research oversight, teaching courses, student advisory activities, and visiting scholar or fellowship positions

- Any activities undertaken for foreign (i.e., non-U.S.) entities or governments, including (for example) grant review or advisory services for foreign entities, or lab work for foreign entities
- Participation in a foreign talent recruitment program
- Activity associated with travel paid or reimbursed by or on behalf of a foreign entity including academic and healthcare institutions, governments, companies, or non-profits<sup>1</sup>
- Advisory role for an external entity, including (for example) on a scientific or medical advisory board, a data and safety monitoring board, or advisory role to a government or public agency (e.g., Systems Engineering and Technical Assistance (SETA) service, or Advisory & Assistance Services (A&AS))
- Service, position, or role involving a fiduciary responsibility to an external entity, including as a member of the governing board (e.g., Board of Directors), as a corporate officer, as a trustee, or any other executive or management position
- Leadership role in a professional society
- Any research activities undertaken at or on behalf of an outside entity (e.g., for a non-CMU entity) or research activity that is outside of the Investigator's CMU appointment, including serving as a principal investigator on research not sourced through CMU
- Editor of journals or other publications
- Expert witness service
- Grant reviewer, unless for a U.S. government agency or U.S. non-profit organization
- Receipt of prizes or honoraria

Investigators also must disclose to CMU, through SPARCS, gifts or in-kind contributions from external entities or persons made directly to, or delivered directly to, the Investigator in support of the Investigator's professional, scientific, research, or academic activity. In-kind contributions mean non-cash contributions, i.e., property, goods, or services.

If there is uncertainty or ambiguity about whether an OA must be disclosed, Investigators should resolve any doubt in favor of disclosure or request guidance from ORIC.

The OAs that CMU Investigators need not disclose to CMU through SPARCS include the following:

- Activities unrelated to an Investigator's professional, academic, scientific, or research expertise, for example:
  - Teaching that is unrelated to the Investigator's professional, scientific, academic, or research expertise, e.g., teaching ski lessons
  - Service unrelated to the Investigator's professional, scientific, academic, or research expertise, e.g., participating on a committee as a parent for a child's school
  - Owning rental property
  - Other paid work that is unrelated to an Investigator's professional, scientific, academic, or research expertise, e.g., jury duty.
- Membership in a U.S. academic or U.S. professional society

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<sup>1</sup> The Software Engineering Institute (SEI) has separate travel disclosure requirements and processes that apply to everyone whose primary department is the SEI.

- Attendance at scientific or educational conferences while representing CMU
- Providing presentations or trainings for U.S. professional societies or U.S. academic institutions
- Reviewing proposals for a U.S. federal or state government agency or a U.S. non-profit organization
- Reviewing books or journal articles
- Serving as an external member of a thesis or dissertation committee for a U.S. academic institution

ORIC may on a case-by-case basis request disclosure of additional types of OAs to comply with the requirements of specific sponsors.

ORIC may request documentation related to OAs, such as copies of employment agreements.

OAs excluded from disclosure above may still require disclosure and approval under other CMU policies, for example, if the time commitment associated with the OAs exceeds the requirements outlined in CMU's Consulting by Faculty Policy.

### **Disclosure Process and Review**

CMU uses an electronic system (SPARCS) to collect and store OA disclosures. Specific instructions on how to use SPARCS to meet disclosure requirements are available on the [SPARCS website](#). Information is available on the ORIC website to assist Investigators in completing their SPARCS disclosures.

Investigators must disclose an up-to-date listing of the Investigator's OAs in SPARCS: i) no later than the time of application for research funding; ii) annually (even if only to acknowledge no change to previous disclosures); iii) within thirty (30) days for a newly acquired OA; iv) when time commitments in an OA undergo a significant change; and v) upon ORIC's request.

ORIC will review the OAs disclosures and may contact the Investigator for additional information. At any time, and at CMU's discretion, information from OA disclosures may be shared with the relevant department head, dean, or research, finance, or business staff, Office of the Vice President for Research (OVPR), Office of General Counsel, and/or their designees. Beyond this, access to information in disclosures will be limited to those with a need to know and will be shared in accordance with applicable law, sponsor policy, or CMU policies.

Each CMU unit (e.g., college, school, department, or institute) may maintain additional, separate local OA disclosure and review processes and procedures, including processes on how to determine whether an OA constitutes a conflict of commitment or a violation of the University's consulting policy. The procedures and requirements of this document do not supersede or reduce local processes and procedures that CMU Investigators are otherwise required to comply with as part of their unit. However, compliance with local disclosure requirements is **not** a substitute for the disclosures set out in this document.

In all cases, Investigators must comply with requirements of the [Conflict of Interest and Commitment](#), [Compliance with Financial Conflict of Interest Requirements in Research](#), [Code of Business Ethics and](#)

[Conduct](#), and [Consulting by Faculty](#) policies, as well as any unit-level policies, to keep their units regularly informed in adequate detail as to all outside professional activities.

### **Training**

Training about OA disclosure obligations is built into the online module in SPARCS. SPARCS may prompt Investigators to participate in training about this document and sponsor requirements related to OA disclosures.

### **Reporting to Sponsors**

OVPR will comply with sponsor requirements to disclose Investigator OAs and may review Investigator OAs disclosures to ensure that required information is included in relevant submissions to sponsors, e.g., in proposals and progress reports. Investigators will cooperate with CMU to fulfill all reporting requirements to research sponsors.

### **GENERAL**

#### **Compliance**

In the event there is a violation of the compliance procedures and disclosure requirements set out in this document, an Investigator may be subject to sanctions set forth in the relevant disciplinary policy. The relevant disciplinary policies include the Appointment and Tenure Policy (for a faculty member); the Disciplinary Guidelines in the staff handbook (for a staff member); and the applicable provisions of the student handbook - The Word (for a student).

#### **Record Keeping**

Records related to disclosures of OAs and CMU's reviews and response to such disclosures will be maintained for a period of at least three years after disclosure, or for such other time required by applicable law.

#### **References**

[CMU ORIC COI website](#)