

Carnegie Mellon University
Outside Activities and Significant Financial Interest Disclosure Guide

Introduction

You must report outside activities and significant financial interests to Carnegie Mellon University (“CMU”) in the SPARCS disclosure system.

An “*Outside Activity*” (“OA”) is any paid or unpaid activity undertaken by an Investigator¹ 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. Please refer to CMU’s [Guidelines for the Research Community on Disclosure of Outside Activities](#) (“OA Guidelines”) for additional information about the definition of “outside activity”, related terms, and disclosure requirements.

A “*Significant Financial Interest*” (“SFI”) is a financial interest consisting of one or more interests of the Investigator (and those of the Investigator’s spouse/domestic partner and dependent children) as defined in the University’s [Guidelines for the Research Community on Conflicts of Interest in Research](#) (“FCOI Guidelines”), that reasonably appear to be related to the Investigator’s Institutional Responsibilities.² Please refer to the FCOI Guidelines for additional information about the definition of “significant financial interest,” related terms, and disclosure requirements.

In general, OAs and SFIs may fall into the categories outlined in this chart. Within each category, there are specific activities and interests to disclose and others that do not require disclosure. Use this chart as guidance to determine which OAs and SFIs must be disclosed in the SPARCS system. This chart is a companion document to the separate OA Guidelines and FCOI Guidelines documents, and you should review those documents in parallel with this chart.

When in doubt about whether disclosure is required, you should err on the side of disclosure. All questions regarding OAs and SFIs, or the SPARCS disclosure system may be directed to coi-compliance@andrew.cmu.edu.

¹ “*Investigator*” means the Project Director (“PD”), Principal Investigator (“PI”), Co-Investigator or any other person, regardless of title or position, who is responsible for 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. Additional requirements for who must disclose can be found in the FCOI Guidelines and OA Guidelines.

² “*Institutional Responsibilities*” include professional activities on behalf of CMU or associated with an Investigator’s CMU appointment or position, such as teaching, research, scholarship, professional practice, service (e.g., on CMU committees) and administrative activities or responsibilities for CMU.

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Category	Disclose in SPARCS as an OA or SFI ³	Exceptions
Activities and Relationships (Paid and Unpaid)	<p>Appointments and Employment</p> <ul style="list-style-type: none"> • Academic, professional, scientific, or institutional appointments (including while on leave from CMU) and positions at an external entity, whether full-time, part-time, or voluntary (e.g., adjunct, visiting, honorary, or other) • Any form of employment (including part-time), research oversight, teaching courses or lecturing (in degree or non-degree programs), student advisory activities, fellowship positions, or visiting scholar outside of CMU at an external entity (e.g., teaching a course, role at a start-up company, lab work) <p>Advisory and Service</p> <ul style="list-style-type: none"> • Consulting for a non-CMU entity • Services for start-up companies, early stage companies, or small businesses • Clinical services to an external entity • Advisory role outside of CMU for a domestic entity (e.g., scientific, technical, or medical advisory board; data and safety monitoring board; or advisory role to a government or public agency, including Systems Engineering and Technical Assistance Service or Advisory & Assistance Services) 	<p>Appointments and Employment</p> <ul style="list-style-type: none"> • Teaching unrelated to your professional, scientific, academic, or research expertise (e.g., teaching ski lessons) • Other paid work that is unrelated to your professional, scientific, academic, or research expertise (e.g., jury duty) • CMU salary <p>Advisory and Service</p> <ul style="list-style-type: none"> • <u>Income</u> from service on an advisory committee or review panel where sponsored by a U.S. government agency, U.S. institution of higher education, U.S. academic teaching hospital, U.S. medical center, or U.S. research institute affiliated with a U.S. institution of higher education [Note: The activity itself may still be disclosable as an outside activity consistent with the OA Guidelines.] • Service unrelated to your professional, scientific, academic, or research expertise (e.g., participating on a committee as a parent for a child’s school)

³ Disclose regardless of whether the activity or interest occurs during your CMU appointment period (where applicable).

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	<ul style="list-style-type: none"> • Service, position, or role involving a fiduciary responsibility to a non-CMU 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 • Service on government or industry review boards or panels, or special commissions or committees • Service to an accreditation agency or accreditation committee • Expert witness or legal consultant service <p>Research, Editorial, and Writing</p> <ul style="list-style-type: none"> • Research or laboratory work at or on behalf of an outside entity or research activity that is outside your CMU appointment • Editor of journals or other publications • Providing commissioned papers or reports • Preparing scholarly publications on behalf of a non-CMU entity • Grant reviewer (except for a U.S. government agency or U.S. non-profit entity) <p>Leadership Roles</p> <ul style="list-style-type: none"> • Leadership role in a professional society • Starting a company 	<ul style="list-style-type: none"> • Serving as an executor or trustee for personal, family, or a healthcare trust or estate • Serving as a member of a home owner’s association or condo board • Serving as an external member of a thesis or dissertation committee for a U.S. academic institution <p>Research, Editorial, and Writing</p> <ul style="list-style-type: none"> • Peer reviewer for books or journal articles • Grant reviewer for a U.S. government agency or U.S. non-profit entity <p>Membership Roles</p> <ul style="list-style-type: none"> • Membership on an educational institution alumni board • Membership in a U.S. academic or U.S. professional society

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	<ul style="list-style-type: none"> • Managing member position (LLC) <p>Conferences, Presentations, and Honoraria</p> <ul style="list-style-type: none"> • Prizes or honoraria • Honorary degree • Speaking compensation, e.g., at a corporate retreat, professional conference, or seminar, including speaking at academic conferences or seminars for other universities in connection with the receipt of an honorarium, monetary prize, or other compensation <p>Activities Related to Academic or Scientific Expertise or Licensed Profession</p> <ul style="list-style-type: none"> • Summer activity related to your academic or scientific expertise • Practicing one’s licensed profession, e.g., attorney <p>Travel</p> <ul style="list-style-type: none"> • Reimbursed or sponsored travel (reimbursed to or paid on behalf of you or your spouse/domestic partner or dependent children) related to your Institutional Responsibilities • Travel required to perform consulting or other professional services for an external entity 	<p>Conferences, Presentations, and Honoraria</p> <ul style="list-style-type: none"> • Attendance at scientific or educational conferences while representing CMU • Providing presentations or trainings for U.S. professional societies or U.S. academic institutions • <u>Income</u> from seminars, lectures, or teaching engagements where sponsored by a U.S. government agency, U.S. institution of higher education, U.S. academic teaching hospital, U.S. medical center, or U.S. research institute affiliated with a U.S. institution of higher education [Note: The activity itself may still be disclosable as an outside activity consistent with the OA Guidelines.] <p>Travel</p> <ul style="list-style-type: none"> • Travel that is sponsored or reimbursed by: i) a U.S. federal, state, local government entity, ii) a U.S. institution of higher education, iii) a U.S. academic teaching hospital, iv) a U.S. medical center, v) a U.S. research institute affiliated with a U.S. institution of higher education, or vi) CMU or a CMU sponsored award <p>Other</p> <ul style="list-style-type: none"> • Social clubs • Religious-based activities

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		<ul style="list-style-type: none"> • Involvement in parent-teacher associations • Charitable activities that do not involve CMU or CMU property • Volunteer or community service activities • Owning rental property • Music and other creative performances and exhibitions if outside your academic or scientific expertise
<p>Other International Engagements</p>	<p>Foreign Talent Program</p> <ul style="list-style-type: none"> • Participation in a foreign government talent recruitment or similar program for a company, university, government or other entity, including in exchange for support in the form of research funding, lab facilities or research staff, or in connection with the receipt of an honorarium, monetary prize or other compensation <p>Advisory and Service</p> <ul style="list-style-type: none"> • Academic recruitment on behalf of a foreign (i.e., non-US) entity • Any consulting or advisory services activities undertaken for a foreign (i.e., non-US) entity or government <p>Research</p> <ul style="list-style-type: none"> • Research support from or research engagement with a foreign (i.e., non-US) entity that is not pursuant to an agreement between CMU and the foreign entity 	<p>Lab Trainee Support</p> <ul style="list-style-type: none"> • Foreign (i.e., non-US) financial support received by trainees in your lab. While these activities are not reported through SPARCS as an OA or SFI, you may still be required to report them as part of the Current & Pending or Other Support documentation submitted to funding agencies <p>Engagements Involving CMU</p> <ul style="list-style-type: none"> • Engagements with foreign entities that are pursuant to an agreement between CMU and the foreign entity. While these activities are not reported through SPARCS as an OA or SFI, you may still be required to report them as part of the Current & Pending or Other Support documentation submitted to funding agencies

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	<ul style="list-style-type: none"> • Any grant review activities undertaken for a foreign (i.e., non-US) entity or government <p>Other</p> <ul style="list-style-type: none"> • Any other activities undertaken for a foreign (i.e., non-US) entity or government <p>Travel</p> <ul style="list-style-type: none"> • Travel paid or reimbursed by or on behalf of a foreign (i.e., non-US) entity, including foreign academic and healthcare institutions, governments, companies, or non-profits, as well as activity associated with such travel • Travel to a foreign university 	
Ownership Interests	<ul style="list-style-type: none"> • Ownership (e.g., stock, stock options, or other ownership interests) in a company • Divestiture, cash pay-outs, or other income related to the sale of equity or other ownership interest in a company • Venture or other capital financing 	<ul style="list-style-type: none"> • Mutual funds, retirement funds, and similar investments where you do not control the investment decisions
Intellectual Property	<ul style="list-style-type: none"> • Royalties, milestones, and option fees paid by a third party 	<ul style="list-style-type: none"> • Any royalties, licensing fees, or other income received from CMU from patents, copyrights, or other intellectual property

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Gifts, Grants, and Contracts	<ul style="list-style-type: none">• Gifts or in-kind contributions from external entities or persons made directly to, or delivered directly to, you in support of your professional, scientific, research, or academic activity	<ul style="list-style-type: none">• Effort (paid or unpaid) on a research or sponsored project managed by CMU (e.g., sponsored research, CMU-funded research)• Grants, gifts, discretionary funds, or other funding received through CMU• Gifts made to CMU