



TITLE Annual Disclosure of Financial Conflicts of Interest (Code of Conduct Addendum, Part 5 of 5)			IDENTIFICATION NUMBER A01-160
ORGANIZATION(S) University of Kentucky / UK HealthCare	SITES AFFECTED ☒ Enterprise ☐ Chandler ☐ Good Samaritan ☐ Golisano Children's at UK ☐ Ambulatory	CATEGORY ☒ Enterprise ☐ Nursing ☐ Department ☐ Guideline ☐ Protocol	REPLACES:
REVIEW CYCLE ☐ 1 year ☒ 3 years REVIEW DATES: 8/12/2015; 10/1/2018; 10/21/2019; 2/24/2020; 3/6/2023; 2/16/2026			EFFECTIVE DATE: 3/15/2026

POLICY STATEMENT

The University of Kentucky along with UK HealthCare has an obligation to the public to conduct its activities transparently and with integrity. Both entities are committed to avoiding financial conflicts of interest that may compromise or appear to compromise the integrity and objectivity of patient care, research, and the safety of human research subjects. Because the University encourages its members to engage in outside activities and relationships that enhance its missions, real or perceived conflicts of interest may arise. Full disclosure of any possible conflicts is the key to identifying and managing financial conflicts.

PURPOSE

The purpose of this policy is to outline the procedure for full disclosure of financial conflicts of interest by UK HealthCare Members.

SCOPE

The policy applies to all UK Healthcare Members.

DEFINITIONS

UK HealthCare Members

"UK HealthCare Members" is defined as University of Kentucky Trustees, UK HealthCare employees, trainees, students, volunteers and representatives acting on behalf of the University involved in healthcare delivery and to all faculty, staff and trainees in the academic programs of the University of Kentucky Colleges of Medicine, Dentistry, Nursing, Pharmacy, Health Sciences and Public Health whether or not those individuals engage in clinical care.

PROCEDURES

Annual Reporting

UK HealthCare faculty and designated staff must complete annual financial disclosures.

1. All UK HealthCare faculty and staff as identified by the Conflict Committee must complete a disclosure specific to UK HealthCare. This disclosure is completed annually or as requested and includes:
 - a) All outside employment and consulting agreements;
 - b) All professional income from sources other than the University¹;
 - c) Relationships with vendors, including but not limited to research support, vendor boards, and advisory boards;
 - d) Participation in vendor sponsored or supported educational or informational programs; and
 - e) All other relationships with vendors, including but not limited to vendor sponsored or reimbursed travel.

Annual disclosures are made through the UK HealthCare Corporate Compliance Office. Information reported will be treated as personal information contained in the faculty Standard Personnel File or the staff human resources file, to the extent permitted by law. Compliance with this policy shall be considered an official University need for access to reported information by department heads and other University officials, and is shared in coordination with other administrative areas that collect conflict of interest information.

2. For UK HealthCare Members who accept extramural funding of any kind, a financial interests disclosure is required as outlined in [UK AR 7:2 \(Financial Conflicts of Interest in Research\)](#).
3. Changes to financial disclosures must be updated within 30 days of the change.
4. If a financial conflict is determined, a management plan will be requested by an institutional official.
5. The Management Plan will be reviewed by the Research Conflict of Interest Committee (RCOIC) or by the UK HealthCare Conflict of Interest Committee, or both. After reviewing the management plan, the committees have several options:
 - a) Accept the management plan as submitted
 - b) Amend the plan to decrease the chance for conflict
 - c) Require changes to eliminate the conflict. Examples of required changes include but are not limited to:
 - (i) Removal from participation in the research project
 - (ii) Divestiture of the financial interest
 - (iii) Termination of relationship that creates the conflict

Questions

Any questions regarding this policy should be directed to the Office of Corporate Compliance.

¹ Exclusions include income from the Lexington VA, and income associated with participation in an NIH study section. See [AR 3:9 \(Consulting and Other Overload Employment Outside the University\)](#); [UK AR 7:2 \(Financial Conflicts of Interest in Research\)](#).

REFERENCES

Additional information, definitions, and authorization procedures are outlined in policies and administrative regulation below:

1. [A01-005, Code of Ethics \(Code of Conduct Addendum, Part 1 of 5\)](#)
2. [A01-030, Conflicts of Interest \(Code of Conduct Addendum, Part 2 of 5\)](#)
3. [A01-105, Industry Representatives and Service Providers \(Code of Conduct Addendum, Part 3 of 5\)](#)
4. [A01-155, UK HealthCare Members Interactions with Industry Representatives and Service Providers 7 \(Code of Conduct Addendum, Part 4 of 5\)](#)
5. [AR 3:9 \(Consulting and Other Overload Employment Outside the University\)](#)
6. [UK AR 7:2 \(Financial Conflicts of Interest in Research\)](#)

APPROVAL

NAME AND CREDENTIALS: Noelle True	NAME AND CREDENTIALS: Brett Short
TITLE: Assistant Chief Compliance Officer	TITLE: Chief Compliance Officer