



CONFLICT OF INTEREST OVERSIGHT AT UM: WHAT YOU NEED TO KNOW

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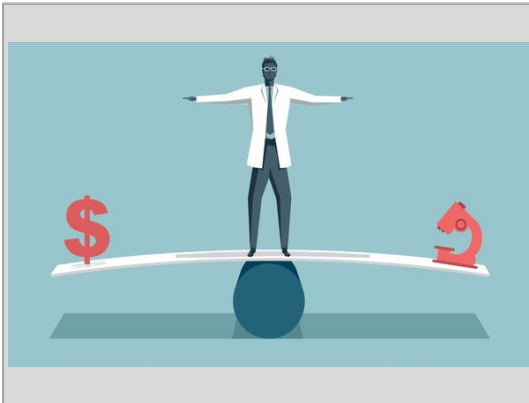
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UNIVERSITY
OF MIAMI

Conflicts of Interest

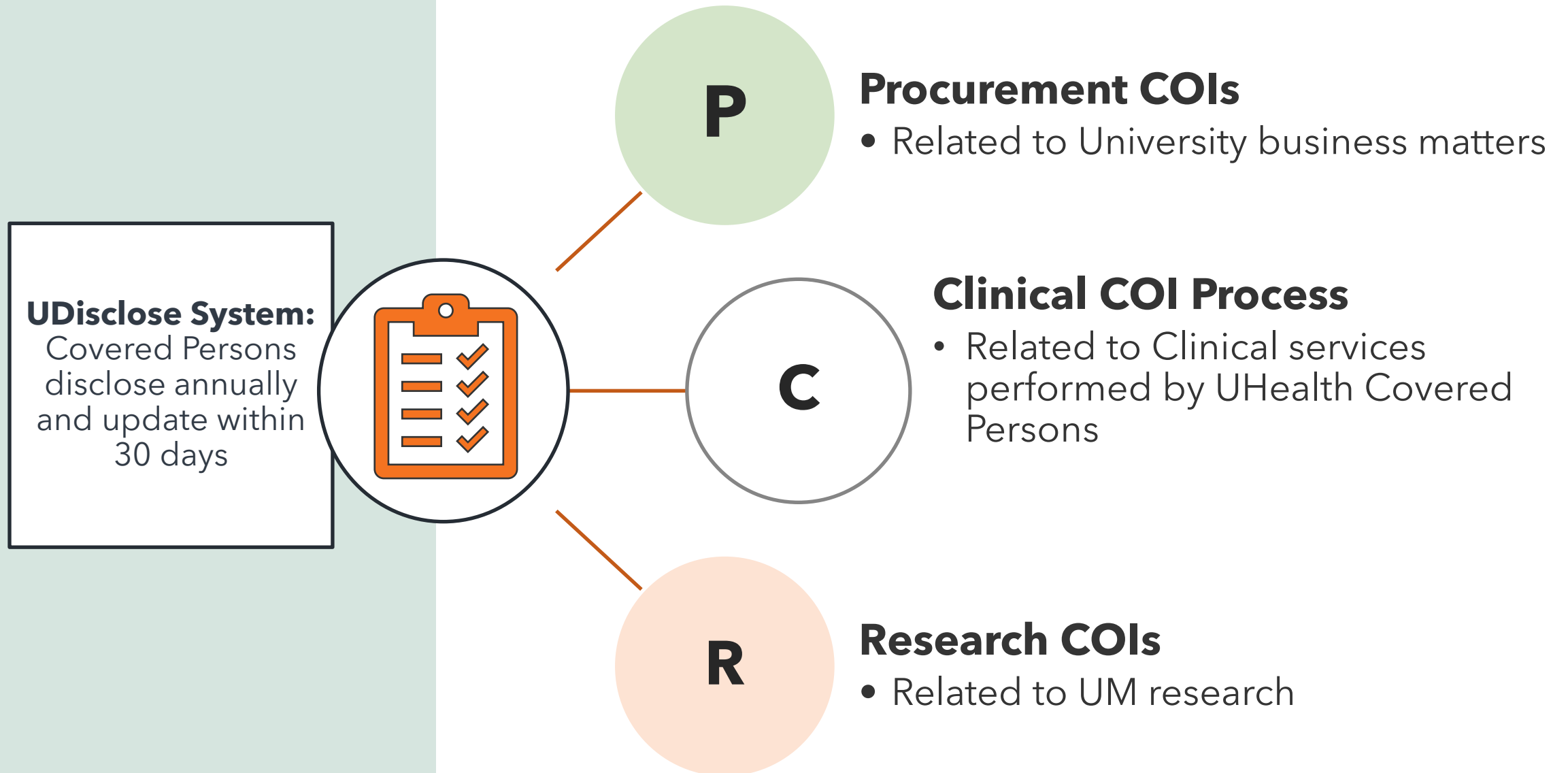
A conflict arises when the interests of a Covered Person, or those of the University at large, influences, affects or is affected by the University's educational, clinical care, and Scholarly Activities.



Conflicts are situation-dependent, and *not* a judgment of character.

Situations in which University personnel use their positions for purposes of obtaining private gain for themselves or others, such as those with whom they have family, business, or other ties.

Disclosure Review at UM





UM'S COI POLICY AND DISCLOSURE REQUIREMENTS

Lory A. Hayes, PhD, CHRC

Director, Disclosures & Scholarly Activities Management

UM'S COMPREHENSIVE POLICY

Articulates that all Covered Persons, must

- Complete annual training (1st page of the disclosure form), and
- Disclose interests to UM on an annual basis, including:
 - Outside interests (including non-compensated business and fiduciary responsibilities, consulting, gifts, royalties, travel, etc.)
 - Financial interests of spouse and dependent children related to UM responsibilities
 - Non-UM Scholarly Activities (e.g., teaching & research)
 - Non-UM “C”-suite positions and fiduciary responsibilities
 - Financial interests in entities that do, or propose to do business with UM
 - Receipt of non-UM, “Other Support,” and
 - Foreign affiliations/income/support
- Separate UHealth and Scholarly Activities sections
- ✓ [Disclosure and Research COI policy in PolicyStat](#)



UDisclose Disclosure Profile



	Dashboard	COI	Grants	Agreements	IRB	IACUC	Animal Operations	
	Disclosures	Requests	Certifications	Plans	Triggering Events	Reports	Meetings	Help Center

COI > Disclosures > Disclosure Profile for Institutional COI

Action Required

Disclosure profile last completed:
10/27/2025

Request Pre-Approval

☒ Submit and Finish

Assign Proxy

Disclosure Profile for Institutional COI

Instruction Center	
Action Required	Reason
Review disclosure information in the disclosure profile. When all disclosure information is current and accurate, click on the Submit and Finish button.	Discloser manually updated the disclosure profile
Note: <u>If you don't execute this activity, your profile will not be submitted and your profile will remain in an action required state.</u>	

Edit Disclosure Profile

Management Plan	Status	Last Accepted Date	Plan Monitors
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There are no items to display

Disclosures		Training	History				
Entity	Foreign Entity?	Publicly Traded?	Relation to Discloser	Disclosure Types	Total Value	Total Time Commitment (Days)	Last Modified
view Travel	No	No	Self	Sponsored or Reimbursed Travel	\$5,000.00	3	10/27/2025
view UM Intellectual Property	No	No	Self	Royalties, Innovations or Intellectual Property Rights	\$0.00	1	10/27/2025

<https://UDisclose.miami.edu>

Entity Disclosures

U Disclose

Hello, Institutional COI ▾

Validate Compare

Instructions and
Policies

Entity Disclosure
Information

Institutional
Responsibilities

Foreign Engagement
& Influence

Complete Disclosure
Profile

Editing: DP00021538

<https://UDisclose.miami.edu>

Entity Disclosure Information

1. * Can you answer yes to any of the following questions in the past 12 months?

- Do you have any financial interests, obligatory interests, and/or outside activities to report?
- Do you receive any royalties or hold rights to any Innovations or Intellectual Property?
- Are you an IND/IDE holder, irrespective of whether it is utilized for your UM Institutional Responsibilities?
- Do you receive other support from any non-UM entity for research and/or scholarship regardless of whether it is related to UM research or scholarship?
- Have you received any gifts from the entity, organization, or individual?
- Do you or a close family member have a financial interest in a company that is a current or potential supplier to the university?
- Do you hold equity in an entity receiving venture capital funding?



☒ Yes ☐ No [Clear](#)

2. Entity disclosures:

+ Add

	Entity	Foreign Entity?	Publicly Traded?	Relation to Discloser	Disclosure Types	Total Value	Total Time Commitment (Days)	Last Modified
	Travel	No	No	Self	Sponsored or Reimbursed Travel	\$5,000.00	3	10/27/2025
	UM Intellectual Property	No	No	Self	Royalties, Innovations or Intellectual Property Rights	\$0.00	1	10/27/2025

Foreign Engagements Disclosures

UDisclose

Validate Compare

Instructions and Policies

Entity Disclosure Information

Institutional Responsibilities

Foreign Engagement & Influence

Complete Disclosure Profile

Hello, Institutional COI ▾

Editing: DP00021538

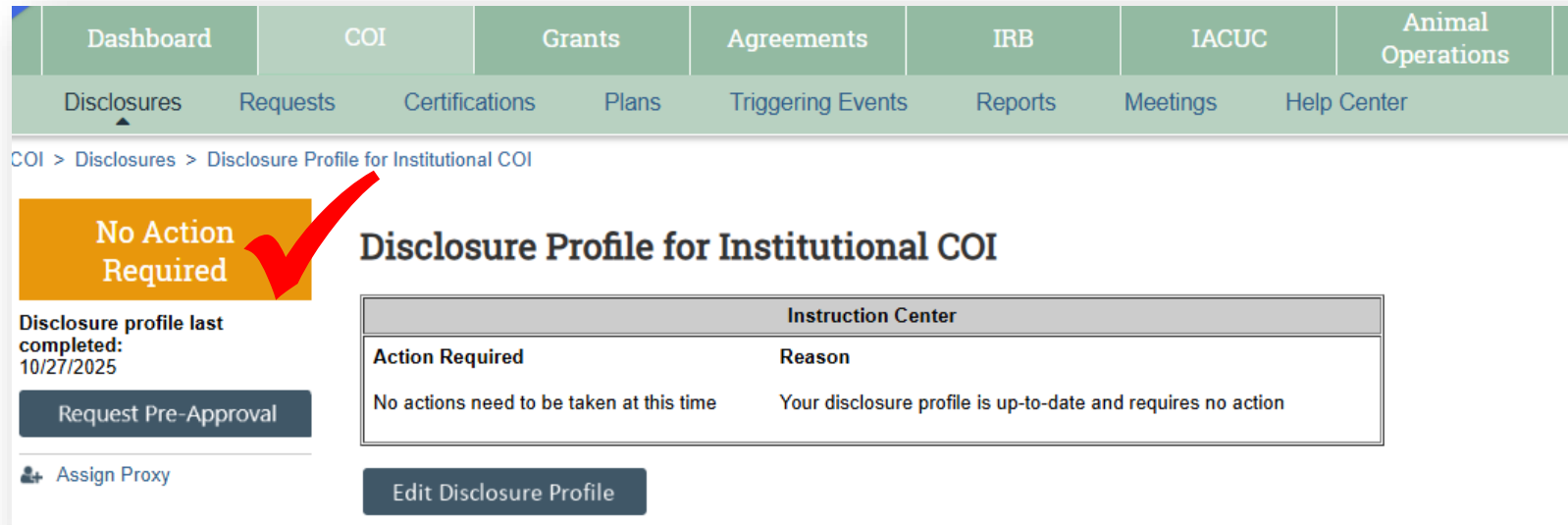
Foreign Engagement & Influence

- * Foreign Affiliation:** In the past 12 months, have you held, or do you currently hold, a professional affiliation with a Foreign Source? ("Professional affiliations" include, but are not limited to, extra-institutional titles and affiliations, activities, relationships, professional or academic appointments (paid or unpaid), regardless of the effort (full-time, part-time, or voluntary), including but not limited to, a foreign institution of higher education, a foreign public or private entity or the government of another country.) ?
☐ Yes ☒ No [Clear](#)
- * Foreign Talents:** Are you a member of a Foreign Talents program? ?
☐ Yes ☒ No [Clear](#)
- * Foreign Income:** In the past 12 months, did you receive any income of \$600 or more from a Foreign Source? ("Income" includes, but is not limited to, income received for any publication, presentation or speaking engagement (such as a conference, symposium or presentation). "Income" also includes, but is not limited to, income that is unrelated to your UM institutional responsibilities, as well as income for events that took place within the U.S) ?
☐ Yes ☒ No [Clear](#)
- * Monetary Foreign Support:** In the past 12 months, has a Foreign Source provided you any monetary resources valued at \$600 or more that support your research or scholarship? ("Monetary resources" does not include grants, contracts, or gifts awarded/given to UM. "Research" includes, but is not limited to, consulting on a research study; serving as a Principal Investigator for another institution; and teaching and/or mentoring graduate students. "Scholarship" includes, but is not limited to, publications, presentations, and speaking engagements, such as at a conference or symposium.) ?
☐ Yes ☒ No [Clear](#)
- * Non-monetary foreign support:** In the past 12 months, has a Foreign Source provided you any non-monetary resources that support your research or scholarship? ("Non-monetary resources" includes, but is not limited to, equipment, materials, or personnel provided to You or made available to You for Your research or scholarship. "Non-monetary resources" do not include resources arranged through UM as Unfunded Agreements (UFAs), such as material transfer agreements and/or data use agreements, library access at another institution generally provided to external users, or resources included in the proposal of a funded sponsored award managed through UM.) ?
☐ Yes ☒ No [Clear](#)

[Exit](#) [Save](#) [Continue →](#)

UDisclose System

Completion of the training & disclosure process shows “No Action Required”



The screenshot displays the UDisclose system interface. At the top, there is a navigation bar with tabs for Dashboard, COI, Grants, Agreements, IRB, IACUC, and Animal Operations. Below this, a secondary bar contains links for Disclosures, Requests, Certifications, Plans, Triggering Events, Reports, Meetings, and Help Center. The main content area shows the path 'COI > Disclosures > Disclosure Profile for Institutional COI'. A prominent orange box with a red checkmark and the text 'No Action Required' is visible. Below this, it states 'Disclosure profile last completed: 10/27/2025' and provides buttons for 'Request Pre-Approval', 'Assign Proxy', and 'Edit Disclosure Profile'. A table titled 'Instruction Center' contains the following information:

Action Required	Reason
No actions need to be taken at this time	Your disclosure profile is up-to-date and requires no action

Access the system at UDisclose.Miami.edu

Resources (require CaneID):

- [UDisclose User Guides & Job Aids \(Box folder\)](#)
- [Discloser Compliance Status Job Aid \(PDF\)](#)
- [Discloser Compliance Status Report \(PowerBI\)](#)

Questions? Call the UDisclose Help Desk 305-243-0877



SUPPLY CHAIN DISCLOSURE REVIEW

Humberto Speziani

Associate Vice President Supply Chain Support Services

“it is always important to consider the appearance of impropriety and unfair business practices”

The University does not purchase goods or services directly or indirectly from its employees or their families, other than those which are specified as a condition of employment. Acquisition from a business in which an employee has an interest is prohibited unless **full disclosure** of all facts is made in writing to the Procurement Office for review and approval. Failure to disclose a conflict and/or use of any University procurement or payment method, including but not limited to PCard, eChecks, eBERF, or purchase orders to bypass this policy may lead to disciplinary action up to and including dismissal.”

✓ [Supply Chain COI policy in PolicyStat](#)



IT IS THE RESPONSIBILITY OF ALL EMPLOYEES TO AVOID CONFLICTS OF INTEREST WHEN CONDUCTING BUSINESS.

Conflict of Interest: Situations in which University faculty or staff use their positions for purposes of obtaining private gain for themselves or others, such as those with whom they have family, business or other ties.

Indirectly: Defined as occurring when University personnel are considered to have proprietary interests in any supplier of goods or services from which they or any member of their immediate family receive compensation or have financial interest. An investment in a publicly-held company or less than 1% of its outstanding stock will not be regarded as indirect interest.

Gifts: The association between the University's suppliers, vendors, or business partners and University employees should always be on a professional and business like basis. It is always important to consider the appearance of impropriety and unfair business practice.





UHEALTH COMPLIANCE (UHC) CLINICAL COI REVIEW PROCESSES

Rei Thompson

Assoc. Director, Regulatory and Conflicts Compliance

UHealth Compliance



UHC Clinical COI Review Processes

Per policy, **UHealth Covered Persons** (i.e. UMMG faculty, UHealth clinical providers, etc.) must disclose financial interests in, and activities with, entities relating to institutional responsibilities, or with entities that do or propose to do business with UM on an annual basis.

UHC regularly reviews disclosures entered in UDisclose by **UHealth Covered Persons** based on pre-established parameters

UHC investigates any potential COIs based on review of the disclosures in UDisclose, or via allegations received, or identified via auditing/monitoring activities. Based on findings, UHC reports to UHealth Leadership, including any recommended corrective actions.

UHC reviews Pre-Approval Requests (PARs) submitted via UDisclose by **UHealth Covered Persons**



UHC Pre-Approval Request (PAR) Review Process

UHealth clinical providers are permitted to engage in activities and/or relationships with outside entities that do not interfere with their institutional responsibilities and conduct such activities only after receiving approval and disclosing appropriately.

UMMG Faculty and UHealth clinical providers must submit all proposed, fee-for-service consulting agreements as a Pre-Approval Request (PAR) via UDisclose for UHC to review in order to meet policy and regulatory requirements. Department Chair/Division Chief as ultimate approval authority in the review process.

Written contract must outline **specific services**, the **amount of compensation**, and **basis for payment**.

As part of the PAR process, UHC may request ancillary review by stakeholder departments and flag certain relationships to the Purchasing COI and/or Research Committees for further review.





DISCLOSURE REVIEW & RESEARCH COIs

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Director, Disclosures & Scholarly Activities Management

Disclosure Review for Research

The role of Disclosures & Scholarly Activities Management (**DSAM**) and the **Conflict of Interest (COI) Committee** is to determine whether an investigator's relationship with an external entity creates a situation that could introduce bias into a research project conducted at UM or by UM investigators, and, where this occurs, to manage it.

The UM **COI Committee** acts to determine, through a **risk-based, case-by-case review**, whether a COI is created between a research project and an external relationship. If a COI is found, the COI Committee works with the investigator to develop a management plan.

The **Committee's guidelines** help investigators understand how COIs are identified and managed at UM, including the Committee's role, the process for COI determination, and a brief summary of elements that might be included in a typical COI management plan. The Statement has been posted to the OVPRS website (<https://www.research.miami.edu/about/admin-areas/2rise/udisclose/coi-guidelines/index.html>).



COMMENTS, QUESTIONS, OR SUGGESTIONS?

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<https://tinyurl.com/UMiamiResearchCOIs>

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