

PENN STATE COLLEGE OF MEDICINE AND HERSHEY MEDICAL CENTER ADMINISTRATIVE GUIDELINES:
MANAGING CONFLICTS OF COMMITMENT, OUTSIDE BUSINESS INTERESTS, AND NON-PSU TEACHING ACTIVITIES

Purpose: To consolidate guidance found in the following policies and SOP:

- AC80 – Faculty Outside Professional Activities and Conflict of Commitment
- Penn State College of Medicine (COM) Standards of Practice Regarding Conflicts of Interest
- Milton S. Hershey Medical Center (HMC) Industry Relations Policy

The criteria outlined in the policies and SOP listed above will be utilized to review faculty activities and approval will be considered on a case by case basis.

Applicability:

- All Penn State-employed faculty (36- or 48- week appointment) must adhere to the policies and SOP listed above. This does **not** include volunteer/adjunct faculty (clinical assistant, associate, or full professors); however, Penn State Health physicians involved in research and/or holding a College of Medicine research faculty appointment must adhere to the COM Standards of Practice Regarding Conflicts of Interest.

The Following Activities are examples of Scholarly Activities. Scholarly Activities are not Outside Professional Activities as defined by PSU Policy AC80 and do not require disclosure or prior approval:

- Peer review of articles and grant proposals;
- Presentations and workshops at professional meetings or other similar gatherings;
- Leadership positions in professional societies;
- Preparation of scholarly publications;
- Unpaid (i.e. neither cash nor In-Kind compensation) scholarly collaboration with an institution of higher education for which there is no agreement or required time commitment;
- Editorial services for educational or professional organizations;
- Service on advisory committees or evaluation panels for governmental funding agencies, nonprofit foundations, or educational organizations;
- Serving on, but not chairing, master's or doctoral thesis committees at another university;
- Service with accreditation agencies;
- Creative performances and exhibitions.

The Following Activities do not Require Pre-approval by the Department Chair or Dean, but may Require Annual Disclosure:

- Giving a seminar or short course at another institution (<1 week);
- Conducting short course offerings not for academic credit, including professional education courses for licensing;
- Outside Teaching that takes place outside the Appointment Period should be disclosed within 30 days of accepting the Outside Teaching role or prior to starting that activity, whichever is earlier;
- Serving on a board of directors outside of the University;
- For non-clinicians only: Expert witness testimony (HMC-employed physicians should reference the PSH Fact Expert Witness Policy for additional guidance).

The Following Activities **Require** Written Prior Approval by the Department Chair (or Dean, if faculty member is a Department Chair or Institute Director):

- Exceeding the monthly or annual time limits for outside business activities;
- Teaching for credit at another institution of higher education during the appointment period;
- Chairing a graduate or doctoral committee at another institution of higher education;
- Holding a foreign or domestic position or professional appointment, including honorary, adjunct, and visiting positions or appointments, at another university (this includes titled academic, professional, or institutional appointments whether full-time, part-time, or voluntary) whether or not remuneration is received, other than those solely for the purpose of teaching a course outside of the Appointment Period;
- Starting a company;
- Becoming an employee of or assuming an executive or management position for a third party entity (e.g., as President, Chief Scientific Officer, etc.) including serving on advisory board positions that have fiduciary responsibilities on behalf of the third-party entity.
- Involving undergraduate or graduate students, or University staff, in Outside Professional Activities;
- Outside Professional Activities that involve the conveyance of intellectual property rights to another entity;
- Compensated (money or In-Kind) Research from all foreign and domestic entities that is not subject to approval by the Office for Sponsored Programs;
- Participation in programs sponsored by foreign governments, instrumentalities, or entities, including foreign government-sponsored talent recruitment programs;
- Running or having fiduciary responsibility for a Research endeavor at another entity (e.g., a lab, institute, program);
- Research at other entities for which there is a required time commitment or an agreement/contract between the faculty member and the other entity;
- Global health trips for clinical purposes.

The Following Activities **are Prohibited**:

- Holding a tenure-line appointment or holding tenure at another institution of higher education;
- Private consulting involving presentations that are either not the work of the speaker or marketing/promotional in nature.

Approval for activities will be collected via the [PSU Outside Professional Activities Request Form](#).

Additionally, any contracts, grants, or agreements related to a foreign appointment and/or employment with a foreign institution **may require institutional review by contacting** research-security-orp@psu.edu.

RELEVANT POLICIES AND DESCRIPTIONS:

AC80 Faculty Outside Professional Activities and Conflict of Commitment (Formerly HR80)

<https://policy.psu.edu/policies/ac80>

This policy defines *Outside Professional Activities* as entrepreneurial or professional services, paid or unpaid, that are in the general area of expertise for which the faculty member is employed by the University but are beyond the scope of the individual's University employment responsibilities.

COM Standards of Practice Regarding Disclosure of Conflict of Interest

<https://pennstatehealth.ellucid.com/documents/view/3924>

These standards incorporate the requirements of Penn State University policies regarding Conflict of Interest, (including RP06) for implementation at the College of Medicine.

Milton S. Hershey Medical Center (HMC) Industry Relations Policy

<https://pennstatehealth.ellucid.com/documents/view/808>

This policy establishes guidelines for interactions with Industry representatives. This policy is intended to cover interactions that involve marketing of products or services, on-site training, and/or education. It applies to all health care professionals, including faculty, staff, administration, residents, students and trainees at HMC.