

Consulting at UConn Health

Before accepting any compensation for an outside activity, ask yourself four questions:

- 1. Am I being paid personally?*
- 2. Am I affiliated with a company?*
- 3. Could this create a conflict of interest or commitment?*
- 4. Have I obtained all required approvals before starting?*

If the answer to any of these questions is uncertain, consult the appropriate University office before proceeding.

Top 10 Things to Know

1. Consulting Requires Prior Approval

Key Message: If you will be personally compensated for work outside your university role, approval must be obtained before the activity begins.

Talking Points:

- Consulting approval is required when payment is made directly to you as an individual.
- Approval must occur before any work is performed.
- Requests are submitted through the Faculty Consulting Office.
- Failure to obtain approval in advance may result in compliance concerns.
- The approval process protects both the faculty member and the institution.

2. Your Primary Professional Obligation Is to UConn Health - Consulting Must Not Interfere with Your University Responsibilities

Key Message: Full-time faculty are expected to devote their primary professional efforts to their University responsibilities. Regardless of when consulting occurs, it cannot impair your ability to fulfill your UConn role.

Talking Points:

- Teaching, clinical care, research, and service responsibilities come first.
- Consulting should never create scheduling conflicts with teaching, patient care, or research obligations.
- Outside activities cannot diminish performance in your University role and should be managed carefully.
- Faculty are expected to maintain their institutional commitments at all times, and remain accountable for all assigned responsibilities.
- Workload expectations remain unchanged because of consulting activities.

3. Not All External Activities Are "Consulting"

Key Message: Activities performed as part of your University duties may not require consulting approval.

Talking Points:

- The critical distinction is how the activity is being conducted and where payment goes.
- If work is performed as part of your UConn role and payment is directed to a University account (e.g., AEA), consulting approval generally does not apply.
- Reimbursed expenses, or those paid on your behalf, must be reported within 30 days, see [Necessary Expenses](#)
- Faculty should consult their department leadership when uncertain.
- When in doubt, ask before accepting an engagement.

4. Multiple Levels of Review May Be Required

Key Message: Consulting activities often require institutional review and approval.

Talking Points:

- Approvals may involve Department Chairs, Deans, and other University offices.
- Reviews help identify conflicts of interest or commitment.
- The review process ensures compliance with state and University requirements.
- Early planning helps avoid delays.

5. State Resources Cannot Be Used for Outside Consulting

Key Message: State resources are for University business only.

Talking Points:

- Do not use UConn Health facilities, equipment, or staff support for outside work.
- You may not access your departmental accounts to support any aspect of consulting, including travel.
- Confidential patient, research, and institutional information must remain protected.
- Separation between University resources and outside activities is essential.

6. Outside Clinical Practice Is Prohibited for Full-Time Faculty

Key Message: Full-time physician faculty may not engage in outside clinical practice.

Talking Points:

- Clinical work for part-time employees must occur within approved University structures.
- Even when opportunities appear unrelated to UConn Health, they may still pose compliance concerns.
- Questions involving clinical activities should be reviewed before commitments are made.
- Faculty should seek guidance if opportunities involve patient care responsibilities.

7. Financial Interests Must Be Disclosed

Key Message: Financial relationships with outside entities including **faculty affiliated companies** may create conflicts of interest that require disclosure.

Talking Points:

- Annual and event-specific disclosures may be required.
- Ownership interests, stock, consulting compensation, and other financial relationships may require review.
- Disclosure does not necessarily prohibit an activity.
- Transparency allows appropriate conflict management plans to be developed.

8. Interactions With Industry Are Closely Regulated

Key Message: Faculty must comply with state ethics requirements governing vendor and industry relationships.

Talking Points:

- Personal gifts from vendors are prohibited.
- Certain meals, travel, and honoraria may be restricted.
- Decisions regarding purchasing, research, and clinical activities must remain free of financial influence.
- Faculty should consult compliance resources whenever questions arise.

9. Non-Compliance Can Have Significant Consequences

Key Message: Violations can result in state, institutional, and professional penalties.

Talking Points:

- State ethics violations can lead to civil penalties.
- Institutional consequences may include disciplinary action.
- Non-compliance can affect research funding, professional standing, and clinical privileges.
- Consulting policies are designed to protect faculty, patients, and the institution.

10. Compliance Framework & Oversight Mechanics

Area	Governing Body / Mechanism	Key Action Required
Consulting Pre-Approval	UConn Faculty Consulting Office (FCO)	Payment to faculty as an individual (e.g., personal bank account). Advance formal request submission via InfoEd. Approval required before faculty can engage in activity. https://consulting.uconn.edu/forms/
Paid work completed as part of job duties	Department/Chair Approval	Payment goes to the Department in Faculty's name (e.g., AEA). Typical approvals obtained in advance of activity. Contact your department for approval process.
Necessary Expenses	Office of University Compliance / Connecticut Office of State Ethics (OSE)	Expenses (e.g., meals, non-luxury transport, hotel) reimbursed or paid on your behalf when undertaking a non-compensated activity in your capacity as a faculty member must be reported to the state. Reported within 30 days of receiving compensation or repayment. https://www.oseapps.ct.gov/NewLobbyist/NecessaryExpenses/NEHome.aspx
Faculty Affiliated Companies	Office of University Compliance	A faculty affiliated company (FAC) [or other legal entity] is a for profit or not for profit business where a UConn Health faculty or member of their immediate family: 1. Is a director, officer, owner, or limited or general partner; or 2. Is a beneficiary of a trust OR holder of stock constituting five per cent or more of the total outstanding stock of any Class. FACs must be reported/disclosed yearly, even if no compensation or no activity is occurring (e.g., dormant company). https://ovpr.uconn.edu/services/rics/compliance-faculty-affiliated-companies/
Financial Conflict of Interest	Office of University Compliance / Research Integrity	Annual disclosure + research/clinical specific COI management plans; new conflicts must be reported within 30 days.
State Ethics Oversight	Connecticut Office of State Ethics (OSE)	Adherence to C.G.S. Ch. 10; advisory opinions for novel cases
Post-State Employment	C.G.S. § 1-84b ("Revolving Door" Laws)	1-year cooling-off period on negotiating/representing before UConn Health or joining vendors with contracts $\geq$ \$50k

Bottom Line:

Again, before accepting any compensation for an outside activity, ask yourself four questions:

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Resources for Faculty:

[Faculty Affiliated Companies / External Entities](#)

[Faculty Consulting Office](#)

- Consulting approvals and procedures
- [Faculty Consulting Forms](#)

[Guide to State Code of Ethics](#)

- Ethics guidance and reporting requirements

[Office of University Compliance](#)

- Conflict of interest and ethics guidance

Department Chair/Dean's Office

- Contact with questions regarding departmental approvals and University responsibilities