Baylor University Creating Pre-Approval Requests



### Agenda

- 1. Pre-Approval Overview
- 2. Creating a Pre-Approval Request
- 3. Questions



## Pre-Approval Overview



### Overview

In the 2024 academic year, Baylor's policy and processes around disclosing and managing outside activities and interests are changing.

#### **Key Drivers for Change**

Disclosing in two systems is burdensome for our faculty

Review of activities did not systematically include supervisors or other individuals with knowledge of the disclosure's impact

Appropriate disclosures help Baylor manage its business across missions

#### Approach

Summer 2022: Assessed Baylor's Approach to Managing Outside Activity and Financial Interests

**2022 Academic Year:** Formed faculty and administrator working groups to recommend policy and process changes

**2023 Academic Year:** Implementing changes based on working group recommendations



# BUPP-800 Outside Activities and Interests

A faculty and staff work group made significant changes to this policy, including:

- Named a broader membership to the Outside Activities and Interests Committee to increase faculty and staff representation
- Increased disclosure reporting and pre-approval thresholds from \$250 to \$5,000
- Established an assumption that faculty are allotted one day per week to spend on outside activities
- Defined activities that do and do not require pre-approval
- Outlined an appeals process if the Outside Activities and Interests Committee does not approve the activity or interest
- Provided clearer definitions
- Established supervisory review of all disclosures



CARA is an electronic solution that allows disclosers and reviewers to easily report and review Outside Activities and Interests.

What is CARA?

Each discloser has 1 disclosure profile to maintain for all Outside Activities and Interests.

Reviewers will receive email notifications when an action that requires their attention is needed.



### Pre-Approval at Baylor

- Baylor acknowledges that employee participation in outside activities is often appropriate and even beneficial to the University.
- Baylor may approve involvement in outside activities if the activities do not unreasonably interfere with the duties and responsibilities of the employee.
- In these circumstances, the employee is expected to submit a request to participate in outside activities to the appropriate unit leadership for approval.
- Requests for pre-approval should be submitted no less than five business days prior to the proposed outside activity or interest commencing.
  - \*Please refer to BUPP-800 Outside Activities and Interests for policy details.



### Pre-Approval Requests

- Requests are required for outside activities and interests from which you expect to earn more than \$5,000 or that will exceed more than one day per week on average.
- Activities that do not require pre-approval include:
  - Performing a grant review (if under \$5,000 from single entity)
  - Participation in a professional society
  - Reviewing a book, journal article, or other scholarly publication

\*Please refer to BUPP-800 Outside Activities and Interests for a complete list.



### Example Pre-Approval Requests

The activities listed below always require pre-approval:\*

- Teaching or conducting research at another institution
- Activities involving a foreign entity
- Directing a program or lab outside of Baylor
- Running for public office
- Serving as an expert witness
- Taking a role at a start-up company

\*Please refer to BUPP-800 Outside Activities and Interests for a complete list.



### **Pre-Approval Overview**

Faculty and Staff submit Pre-Approval Request

Chairs or Supervisors Provide Context to Internal Audit and Research Compliance

Internal Audit or Research Approve or Send to OAIC  Faculty and Staff members will complete the Pre-Approval Request in CARA.

The department chair or supervisor will review the Pre-Approval Request and provide context to Internal Audit or Research Compliance.

Internal Audit or Research Compliance will either approve the request or send the request to the Outside Activities and Interests Committee.



## Creating a Pre-Approval Request



### Creating a Pre-Approval Request

Log in to CARA at cara-coi.baylor.edu and navigate to the **COI** tab and **Disclosures** subtab. From your disclosure workspace, select **Request Pre-Approval**.

CARA STAGE				
Dashboard	Agreements COI Grants			
Disclosures Requests	Certifications Plans Triggering Events Reports Meetings Help Center			
COI > Disclosures > Disclosure Profile	for	Help		
No Action Required	Disclosure Profile for			
Disclosure profile last completed:	Instruction Center			
5/22/2023	Action Required         Reason           No actions need to be taken at this time         Discloser's disclosure profile is up-to-date and requires no action			
Request Pre-Approval	Edit Disclosure Profile			
	Disclosures Pre-Approval Requests Training History			
	You have not disclosed any interests. Reference the Instruction Center to take the appropriate steps of completing a disclosure update.			



### Request Pre-Approval

Complete the required fields. Create a new pre-approval request if you have more than one activity to request, or if there is more than one entity involved.

B CARA STAGE	Hello, 🗾 👻		
Creating New: Pre-Approval Request I. Requestor:  . * Request name/title:  . * Type of request:  Name Name	t Go to forma menu 🕐 Help	Editing: PAR00000035 Request Information Activity Consulting Activity and other Professional Services Information	∢Gs is forms menu 🔒 Print 👻 🕑 Help
Consider Academic Appointment Consulting Activity and other Professional Services Scientific Advisory Board Foreign Talent Program Participation Foreign Travel Start-Up Company Clear	Description         Academic and/or research appointments at an entity other than the institution (e.g. adjunct faculty)         Provision of professional expertise to an outside entity in a consulting or other professional services capacity         Provision of scientific expertise to outside entity (e.g., pharmaceucical or device manufacturer)         Participation in a talent program sponsored by a foreign government or organization         Travel outside of the U.S. for non-recreational purposes         Taking a role at a start-up company	Information       1. Entity: @         Submit Request       1. Entity: @         or       If you cannot find the entity in the above list, enter the details here: @         State Government [] @       2. * Describe the proposed activity: @         [] [] UII provide consulting work to the Texas state government regarding water pathways.	
	Save Continue	3. Start date: • •27/2023 • 4. End date: • 11/29/2023 • 5. Provide the estimated time that will be spent on this activity (days): • 10	

### Request Routes for Review

Once your request is complete, it will route for review and determination.

				Hello,
				Switch User
Dashboard	Agreements COI Grants			
Disclosures Requests	Certifications Plans Triggering Events Report	s Meetings Help Center		
COI > Disclosures > Disclosure Profile for	r y > Consulting for State Government			😮 Help
Under Review	PAR00000035: Consulting for S	State Covernment		
	Request type: Consulting Activity and other Professional Services	Discloser:		
8/7/2023 3:27 PM A Date submitted: C	ssigned reviewer: urrent review stage: Supervisor Review stage: 1 of 2	Discloser's employer: Vocal Studie	es	
Next Steps				
View Pre-Approval Request         Add Comment         Copy Request	Pre-Submission Review Review Complete Clarification Requested			
L copy request				
	History Review Information			
	Filter by 😧 Activity 💌 Enter text to search	Add Filter X Clear All		۵.
_	Activity	Author	<ul> <li>Activity Date</li> </ul>	
(	Pre-Approval Request Submitted		8/7/2023 3:45 PM	



### What to Expect



Your supervisor will review the request and will make recommendations to either Internal Audit or to Research Compliance.



Internal Audit or Research Compliance will review the request in five business days and determine if it needs to be reviewed by the Outside Activity and Interest Committee (OAIC).



If not, your request will be approved or denied.



If so, you may be asked to provide additional information to the OAIC.



### Notification of Decision

#### When the review is complete you will receive an email notification.

From: cara@baylor.edu <cara@baylor.edu>

Sent: Thursday, August 3, 2023 10:03 AM

To: cara@baylor.edu;

April\_Swindell@baylor.edu; Wallace, Amanda <amanda r\_wallace@baylor.edu>;

chris\_mullaney@baylor.edu

Subject: Your Pre-Approval Request has been Approved

To:	
Link:	Sitting on a Board (PAR0000031)
Determination:	Approved
Reviewer:	Amanda Wallace

A determination has been made on the above pre-approval request. Follow the link included in this email to log in and access additional details of the request. If you do not have additional questions or concerns regarding the determination, there is no system action required at this time.

From: cara@baylor.edu <cara@baylor.edu>

Sent: Monday, July 31, 2023 5:54 PM

To:

April\_Swindell@baylor.edu; Wallace, Amanda <amanda\_r\_wallace@baylor.edu>;

chris\_mullaney@baylor.edu

Subject: Your Pre-Approval Request has been Disapproved

To:	
Link:	Test (PAR00000019)
Determination:	Disapproved
Reviewer:	Amanda Wallace

A determination has been made on the above pre-approval request. Follow the link included in this email to log in and access additional details of the request. If you do not have additional questions or concerns regarding the determination, there is no system action required at this time.



### Making an Appeal

If your pre-approval request is denied, you may submit an appeal.

- 1. Gather additional documentation regarding your request.
- 2. Contact Internal Audit to request an appeal.
- 3. Provide additional documentation or answers to specific questions to the Outside Activities and Interests Committee (OAIC).
- 4. The OAIC will consider your appeal and send it to either the Provost or to Human Resources.
- 5. The Provost's or Human Resources' decision is final.



## Questions?

Thank you!

