



## Research Integrity Office Conflicts of Interest Guidance

Questions? Email: [COI@uncw.edu](mailto:COI@uncw.edu)

### Categories of Conflicts and Examples

Activities that may involve conflicts of interest or commitment can be categorized into four general groups based on the potential for adverse impact on the University's interests. Category I includes those activities that, while conflicts in the technical sense, are allowable because they are not likely to compromise the employee's objectivity. Category II includes those activities that may be allowable with administrative approval and oversight. Category III includes those activities that are presumed to be inappropriate and require management. Category IV includes activities that are not allowable under any circumstances. Provided below are illustrative, but not all inclusive, examples of activities in each of the four categories.

#### Category I: Activities that are generally allowable upon disclosure

1. Receiving royalties for published scholarly works and other writing or for licensure of inventions pursuant to the Patent and Invention Policy and the Copyright Ownership and Use Policy.
2. Receiving external professional activity for pay, in the form of honoraria or expense reimbursement, for secondary university employment responsibilities, such as service to professional associations, service on review panels, presentation of scholarly works, and participation in accreditation reviews.

#### Category II: Activities that may be allowable following disclosure and, where necessary, the implementation of an approved management plan

##### 1. External Activities

- a. Serving on the board of directors or scientific advisory board of an enterprise that provides financial support for University research and the employee or a member of the employee's immediate family or household may receive such financial support.
- b. Serving in an executive position in a for-profit or not-for-profit business which conducts research or other activities in an area related to the employee's University duties.

##### 2. Financial Interests

- a. Requiring students to purchase the textbook or related instructional materials of the employee or members of the employee's immediate family or household, which produces compensation for the employee or member of the employee's immediate family or household.
- b. Receiving compensation or gratuities from any individual or entity doing business with the University.
- c. Having a financial interest in a for-profit business which conducts research or other activities in an area related to the employee's University duties.
- d. Having a financial interest in a business that competes with services provided by the University.
- e. Covered Employee or a member of his/her immediate family or household having a Financial Interest in a publicly or non-publicly traded entity or enterprise. *(Note: Income from investment vehicles, such as mutual funds or retirement accounts, are generally not considered a "financial interest" when the covered employee or family member does not directly control the investment decisions. Also, when the institution and covered employee*

*have an agreement to share in royalties from intellectual property rights, it is not considered a "financial interest.")*

- f. Accepting support for University research under conditions that require research results to be held confidential, or unpublished, or inordinately delayed in publication. Research conducted by faculty or students under any form of sponsorship must maintain the University's open teaching and research philosophy and must adhere to a policy that prohibits secrecy in research. Such conditions on publication must be in compliance with UNCG Policy Manual 500.1 and 500.2, and with University Patent and Invention Policy and the Copyright Ownership and Use Policy.

**Category III: Activities that are presumptively not allowable, unless an approved conflict of interest management plan is in place**

1. Participating in University research involving a technology owned by or contractually obligated to (by license or option to license, or otherwise) a business or entity in which the employee or a member of the employee's immediate family or household, has a Financial Interest, or with which the employee member or a member of the employee's immediate family or household holds an executive position or a consulting relationship.
2. Participating in University research which is funded by grant or contract from a business in which the employee or a member of the employee's immediate family has a Financial Interest.
3. Assigning students, postdoctoral fellows or other trainees to University research projects sponsored by a business in which the employee or a member of the employee's immediate family or household has a Financial Interest.
4. Accepting support for University research under conditions that require research results to be held confidential, or unpublished, or inordinately delayed in publication.

**Category IV: Activities that are not allowable under any circumstances**

1. A Covered Employee making referrals of University business to an external enterprise in which the individual or a member of the Covered Employee's immediate family or household has a financial interest.
2. A Covered Employee associating his or her own name with the University in such a way as to profit financially by trading on the reputation or goodwill of the University.
3. A Covered Employee making unauthorized use of privileged information acquired in connection with one's University responsibilities.
4. A Covered Employee signing agreements that assign University patent and other intellectual property rights to third parties without prior University approval.
5. Any activity otherwise prohibited by law or University policy.

***If you have any questions, please contact Lee Prete at 910-962-7774 or email [COI@uncw.edu](mailto:COI@uncw.edu).***

***For additional information, a link to the AIR system, and COI resources, please visit the UNCW COI website: <https://uncw.edu/sparc/integrity/COI.html>.***