TO: All Faculty and EHRA Professional Employees

FROM: Marilyn Sheerer, Provost and Vice Chancellor for Academic Affairs

SUBJECT: UNCW Policy 03.230, Conflict of Interest or Commitment Conflict of Interest Reporting – Action Required

DATE: October 17, 2019

Faculty, EHRA professional employees, and SHRA employees serving in interim EHRA roles may recall that annual disclosure of potential conflicts of interest (COI) and/or commitment is a requirement of UNC and UNCW policy. You are required to submit annual disclosures at the beginning of each academic year, and submit updates at any time during the year that changes in status occur. Please be reminded that annual disclosure remains a condition of employment for all faculty, EHRA employees and SHRA employees serving in interim EHRA roles.

The deadline to submit your annual COI disclosure report this year is Thursday, October 31, 2019. More information about annual COI disclosures can be found below. You can access the COI online submission system, “AIR” (Activities, Interests, Relationships) here.

Many faculty and EHRA professional employees also use this time of year to submit Notices of External Professional Activities for Pay (a.k.a. EPAPs) for approval to their supervisors. However, please note that subject employees are required to submit Notices of EPAPs throughout the year, at least ten (10) days prior to engaging in an externally paid activity. EPAPs are also filed through the online AIR system. More information about EPAPs can be found below.

Please note: The information provided on annual disclosures and EPAPs must be accurate and may have a direct bearing on the individual's employment status with the university and/or external funding.

Please review UNCW Policy 03.230 Conflict of Interest or Commitment for detailed information about these requirements. You can also find resources and guidance on the Research Integrity Office Conflict of Interest website and in the UNC Policy.

Additional Background Information

UNC policy requires all faculty members and EHRA professional employees (permanent or temporary, full-time or part-time, active or on leave with partial pay) to disclose potential conflicts of interest and/or commitment AND to notify the university when they plan to engage in external activities for pay (e.g., consulting), as well as updating this information during the year as personal and professional circumstances change.

There are two conflict of interest requirements stemming from UNC and UNCW policy:
1. **Annual Conflict of Interest Disclosure.** The disclosure report must be completed annually AND updated every time circumstances change causing a real or perceived conflict of interest. The purpose of the disclosure report is to identify activities that may require additional oversight and review. Activities reported should not necessarily be interpreted as prohibited; they may be permissible following their report, review, and approval.

2. **External Professional Activities for Pay.** Both [UNC](https://www.unc.edu) and [UNCW policies](https://www.unw.edu) on Conflict of Interest and Commitment include requirements for reporting *Notices of External Professional Activities for Pay (EPAPs)*.

   EPAPs are paid activities that may relate to your professional knowledge or expertise but are outside the scope of your primary university employment responsibilities (assigned teaching, scholarship, research, institutional service, administrative duties and other assigned employment duties).

   Employees subject to this requirement who wish to engage in EPAPs during their contract period must complete the *Notice of Intent to Engage in External Professional Activities for Pay* form not less than ten (10) calendar days before the date the proposed activity for pay is to begin. Approval of an EPAP can only extend to the end of the relevant fiscal or academic year in which it was begun. If an approved activity continues in the succeeding year, a new EPAP must be filed.

Resources and guidance on conflicts of interest and EPAPs can be found on the [UNCW Research Integrity Office Conflict of Interest website](https://www.research.integrity.uncw.edu).

Two additional requirements came into effect in October 2015 due to changes in the uniform regulations on sponsored programs (2 CFR Part 200):

1. **Conflict of Interest Disclosure for Externally Funded Projects or Programs.** Please note that the annual reporting requirement described above is in addition to project-specific conflict of interest disclosure reports for externally funded projects or programs. The funded project or program does not necessarily have to involve research to be subject to this requirement.

2. **Conflict of Interest Training.** Investigators involved in funded projects or programs must complete a brief, online conflict of interest training every four years.

You can find more information about the different types of COI disclosures by:

- Visiting the [Research Integrity Office Conflict of Interest website](https://www.research.integrity.uncw.edu).
- Reviewing the [UNCW Policy 03.230, Conflict of Interest or Commitment, Revised 8/28/18](https://www.research.integrity.uncw.edu/policies)

Questions should be directed to Leanne Prete, Research Integrity Office director at [COI@uncw.edu](mailto:COI@uncw.edu) or 962-7774. Dr. Stuart Borrett, Associate Provost for Research and Innovation, serves as the appointed COI Institutional Official (email: [borretts@uncw.edu](mailto:borretts@uncw.edu)).

Thank you in advance for your compliance with these requirements.

cc: Stuart Borrett, Associate Provost for Research and Innovation
Elizabeth Grimes, Associate Vice Chancellor of Human Resources
John Scherer, General Counsel
Leanne Prete, Research Integrity Office Director