



Research Integrity Office
Conflicts of Interest
FAQs for Required COI Training
Questions? Email: COI@uncw.edu

Some of these FAQs were adapted from NIH FAQs found at: http://grants.nih.gov/grants/policy/coi/coi_faqs.htm

1. How is “covered employee” defined in UNCW’s Conflict of Interest or Commitment policy?

The UNCW COI policy defines “covered employee” as:

- any full time or part time EHRA faculty or non-faculty professional employee, including employees who are on leave (if the leave is funded at least partially from university sources)
- Any EHRA or SHRA employee who is applying for or are listed as investigators on externally funded projects
- Any SHRA employee serving in an interim EHRA role or teaching a course
- And other employees listed as principal investigators or senior/key personnel on grants submitted to any Public Health Service agency.

2. I only have to submit an annual conflict of interest disclosure, right?

Possibly. All faculty and EHRA non-faculty employees are required to submit annual conflict of interest disclosures. You might also be required to submit a project-specific conflict of interest disclosure if you are submitting a proposal for or listed as key personnel on a proposal for an externally-funded project. The project-specific disclosure is *in addition to* your required annual disclosure. If you are seeking funding from a PHS agency, you might be required to submit additional disclosures for paid authorship and/or paid travel.

Additionally, you are required to file a *Notice of Intent to Engage in an External Professional Activity for Pay* (EPAP) if you are hired for certain activities that relate to your professional expertise and experience, such as consulting work or being hired as an expert witness.

3. What is PHS?

PHS means the Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority involved may be delegated. Some of the agencies under the PHS include the Administration on Aging, the Centers for Disease Control and Prevention (CDC), the Food and Drug Administration (FDA), the National Institute of Health (NIH), and the Substance Abuse and Mental Health Services Administration (SAMHSA).

4. I am a post-doctoral fellow receiving funding from the NIH. Does this requirement apply to me?

Yes. If you are a principal investigator on NIH-funded research you are required to submit a project-specific conflict of interest disclosure form.

5. What is a “Conflict of Interest?”

A Conflict of Interest (COI) refers to situations in which financial or other personal considerations, circumstances, or relationships may compromise, involve the potential for compromising, or have the appearance of compromising a covered employee’s objectivity in fulfilling his or her university employment responsibilities, including research, service and teaching activities and administrative duties.

6. What is a “financial interest?”

Financial interests include:

- Payment for services to the covered employee not otherwise included within university salary, such as consulting fees, honoraria, and paid authorships.
- Equity or other ownership interest in a publicly or non-publicly traded entities such as stocks, stock options, or other ownership interests.
- Intellectual property rights and interests upon receipt of income related to such rights and interests, held by the covered employee or members of his or her immediate family.

7. Do I need to disclose financial interests that I acquired or discovered after I already filed my annual or project-specific disclosure?

Covered employees have an ongoing obligation to disclose interests throughout the year. Specifically, if the covered employee is conducting research funded by a PHS agency, the employee must update applicable disclosures within thirty (30) days of acquiring or discovering (e.g., through purchase, marriage, or inheritance) a new interest.

8. What about payments to or assets held by my family members? Must these financial interests be disclosed?

Yes, if the payments or assets are in companies whose operations are related or potentially related to the covered employee’s university responsibilities, including administrative, research, supervisory, instructional, operational or financial responsibilities.

9. Do I need to disclose salary paid to me by my institution?

No. Salary, royalties, or other remuneration paid through your employing or appointing institution are not included.

10. If I have equity interest or stock options in a company, do I need to disclose them?

Possibly. A covered employee must disclose any equity interest or stock options in companies whose operations are related or potentially related to the covered employee’s university responsibilities, including administrative, research, supervisory, instructional, operational or financial responsibilities.

11. Am I required to disclose interests in mutual funds or retirement accounts?

No, provided the covered employee or a member of his or her immediate family do not directly control the investment decisions.

12. What does “immediate family member” mean?

A covered employee’s immediate family member or household includes that employee’s spouse, life-mate, child(ren), parent(s), sibling(s), grandparent(s), and persons living in the employee’s home who have a close personal relationship to the employee.

13. Is a covered employee required to disclose remuneration received from an outside entity for services performed (e.g., data analysis) when the payment is made directly to the employee’s institution?

No. Since the payment for services is paid to the institution, disclosure is not required. However, if payment for services is paid directly to the covered employee, the remuneration must be disclosed no matter if the covered employee turns the money over to the institution or if the money will be used to support the covered employee’s future research activities.

14. Do I need to disclose the occurrence of any reimbursed or sponsored travel related to my institutional responsibilities?

Yes, you must disclose anything you received of monetary value from a person or business that is related or potentially related to your responsibilities at the university.

If you receive funding from one of the Public Health Service agencies, the disclosure requirement also applies to the investigator’s spouse and dependent children. However, for PHS-funded research the disclosure requirement does not apply to travel that is reimbursed or sponsored by the following:

- a federal, state, or local government agency,
- an Institution of higher education as defined at 20 U.S.C. 1001(a),
- an academic teaching hospital,
- a medical center, or
- a research institute that is affiliated with an Institution of higher education.

15. Is income from all non-profit institutions excluded from the definition of financial interest?

No.

16. Does UNCW require conflict of interest training for researchers?

Yes. Researchers, including subrecipient investigator(s), must complete training prior to engaging in research and at least every four years.

17. What are the responsibilities of the institution for subrecipients (e.g., subcontractors or consortium members)?

The institution is responsible for ensuring any subrecipient’s compliance with applicable regulations and reporting identified financial conflicts of interests for subrecipient investigators.

Questions?

Email: COI@uncw.edu

Visit: <https://uncw.edu/sparc/integrity/COI.html>