

Additional COI and EPAP information for Admin Forum

External Professional Activities for Pay

- Examples of paid external activities that need prior approval:
 - Private consulting
 - Expert witness
 - Private practice (legal, clinical, etc.)
 - Ownership or management position in a company or other entity
- Examples of paid external activities that do not need prior approval:
 - Editing articles for academic journals or similar texts
 - Refereeing research grant proposals or reports
 - Membership on a professional board in return solely for a sitting fee
 - Writing of books or creation of other artistic works
- University resources or facilities should not be used while performing paid external activities without prior authorization. Additionally, the individual should not make any use of the University's name for any purpose other than professional identification.
- External professional activities for pay should not be undertaken if the paid activities create a conflict of commitment or conflict of interest with respect to that individual's professional responsibilities to the University.

Policy on use of Textbooks

- [University Policy 204, Textbook and Educational Material Adoption](#), describes what approvals are needed for someone to assign their own textbook to their students.
- An exception to the policy allows departments to develop their own policy for textbook approval for "Departmental Courses". If more than one section is being offered, the Department can select the textbook, or authorize each instructor to make the selection.
- If there is a potential monetary conflict of interest:
 - The instructor is required to notify the chairperson of the potential COI
 - An appropriate departmental committee must review the potential COI, and determine whether or not to approve use of the text and how to manage the potential monetary conflict of interest

Comparison of UNC-Charlotte Policy with Federal COI Regulations

| Topic | 1995 NSF Regulations | 2011 PHS Final Rule | UNC-Charlotte Policy |
|--|--|--|--|
| Significant Financial Interest (SFI) defined | Compensation ≥ \$10,000. Ownership interests ≥ 5% for non-publicly traded entities. | Compensation ≥ \$5,000. Ownership interests > 0% for non-publicly traded entities Income from patents/copyrights. Compensation ≥ \$5,000. | FULL disclosure - all compensated (any dollar amount) <u>and</u> uncompensated relationships with any entity. |
| Which SFIs Need to Be Disclosed to University? | Only those SFI an Investigator deems related to NSF funded research. | ALL SFI related to Investigator's institutional responsibilities. | Investigator reports ANY financial interest related to their institutional responsibilities. |
| Types of SFI <u>excluded</u> | Mutual funds and trusts | Mutual funds and trusts- Investigator cannot directly control investment decisions | Mutual funds and trusts- Investigator cannot directly control investment decisions |
| Travel* | Travel reimbursement is not mentioned explicitly in the regulations, but is not excluded from the SFI definition | Disclose to Institution any reimbursed or sponsored travel, ≥ \$5,000, related to Institutional duties. <i>Exclusions listed below.</i> | New regulation will only apply to PHS funded investigators. |

**Comparison of UNC-Charlotte Policy with Federal COI Regulations –
continued**

| Topic | 1995 NSF Regulations | 2011 PHS Final Rule | UNC-Charlotte Policy |
|--|---|---|---|
| <p>Authorship* Including Textbooks</p> | <p>Paid authorship is not mentioned explicitly in the regulations, but is not excluded from the SFI definition.</p> | <p>Disclose to Institution any paid authorship activity, including textbooks, and resulting income.</p> | <p>New regulation will only apply to PHS funded investigators.</p> |
| <p>Public Accessibility*</p> | <p>No requirement</p> | <p>FCOIs held by personnel listed on a public Web site OR written response to any requestor within 5 business days. [Name, research role, entity, nature of SFI, dollar range.]</p> | <p>New regulation will only apply to PHS funded investigators.</p> |
| <p>FCOI training</p> | <p>No requirement</p> | <p>Investigator must complete training prior to engaging in research and every four years thereafter.</p> | <p>All individuals must complete COI training & every four years thereafter.</p> |

***Travel, Authorship, and Public Accessibility Requirements: At UNC-Charlotte these requirements will apply ONLY to investigators with PHS funding.**