**SOP for Managing Nepotism and Research Related COIs**

ECU Policy POL06.05.02 defines the types of employee interpersonal relationships that by their very existence create an inherent conflict of interest that affects, could potentially affect, or as the appearance of affecting an employee's ability to be objectively supervised or evaluated.

This SOP provides steps necessary to ensure that concerns of nepotism or interpersonal relationships are properly vetted and managed when related persons or persons involved in amorous relationships engage in research related activities.

**Research Related Conflict of Interest Management Mechanism**

At proposal:

1. The Principal Investigator must disclose the relationship to the University in AIR through the COI disclosure process.

2. The Principal Investigator must provide rationale and justification to the Conflicts of Interest Officer (COIO) for the selection of key project personnel with whom he or she may have an amorous or familial relationship and how that individual's qualifications are uniquely necessary to support execution of the project.

3. A Mitigation Memo must be developed by the investigators that includes the following information:
   a. Title and sponsor of the project
   b. Names of each investigator on the project with a brief description of the role each investigator will have on the project
   c. The name and department of an independent investigator or the department chair who will:
      1) Oversee administrative and financial matters involving the investigators (performance on the project, approval of travel, approval of expense reports, effort reporting) and will be signed by all parties
      2) Provide independent review to ensure the integrity of the research data

4. Identify an alternative reporting structure to eliminate any real or perceived conflict related to salary, working conditions, work responsibilities, evaluation and promotion

5. Once the Mitigation Memo is signed by all parties, it must be forwarded to the COIO, or a designee of the COIC, for review.

At funding/Notice of Award:

a. The COIO, or the COIO's designee, must be contacted before any funding can be disbursed.

b. Conflicted investigators must update project specific disclosures in AIR through the self-
initiated disclosure if any changes have occurred since proposal submission.

c. A proposed Management Plan will be drafted for review by ORIC and the immediate supervisor(s) and/or department chairs of conflicted individuals.

d. The final version of the Management Plan will be signed by conflicted individuals, independent investigator and/or department chair, and the Chair of the COIC.

In accordance with applicable UNC and ECU Policies, the conflicted parties shall:

a. Continue to disclose their personal relationship in annual conflict of interest disclosures.

b. Ensure the scope of work for each investigator on the sponsored research project is not duplicative.

c. Comply with provisions of the Management Plan that are subject to review.

d. Ensure reimbursement from the project is approved by an independent person of equal or higher rank than the PI. This includes approving time and effort certifications, travel, and other sponsor related expenditures on funded research.