

# COI Risk Manager User Guide

Office of Research Integrity and Compliance

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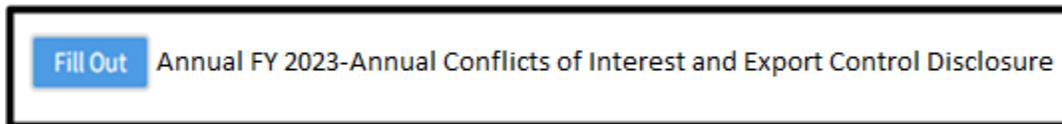
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## COI Risk Manager Overview:

This tutorial is for COI Risk Manager, ECU's electronic system for conflicts of interest and commitment and export control disclosure.

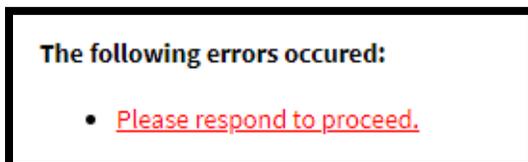
Access COI Risk Manager by going to <https://ecu.ospreycompliancesuite.com/coiriskmanager> or selecting COI Risk Manager in PiratePort. We recommend using Chrome, Firefox, or Microsoft Edge for this application from a laptop or desktop computer; the website is not yet optimized for mobile use.

After logging in, you will see a list of disclosure that are available to complete. Select the "Fill Out" button beside the appropriate disclosure and answer all questions. Hover text and hyperlinks are embedded in the disclosure to provide definitions, examples, and links to regulations.



You may save your progress at any time by selecting the "Save and complete later" button. When you are ready to submit, select "Save and Submit" and agree to the text in the attestation. Remember, to be in compliance you must complete disclosures on your own behalf.

If you inadvertently miss responding to a question, a notification link will appear at the top of the disclosure. Clicking this link takes you directly to the question for completion.



Upon disclosure submission, you can view additional disclosures to complete on the "Home" page or you can view submitted disclosures by selecting the arrow beside "Show Disclosure History."

If you have any questions or concerns about conflicts of interest, please contact our office at (252) 744-4140, (252) 744-1971 or email us at [oric@ecu.edu](mailto:oric@ecu.edu). If you have questions or concerns about export controls, call (252) 744-2395 or email us at [ecuexportcontrols@ecu.edu](mailto:ecuexportcontrols@ecu.edu).

## Annual COI and Export Control Disclosure:

This tutorial will introduce you to the “Annual Conflicts of Interest and Export Control Disclosure.” All EHRA employees at ECU are required to complete this disclosure every fiscal year per University of North Carolina System policy. Disclosures are submitted in the COI Risk Manager system between July 1<sup>st</sup> and April 30<sup>th</sup> and must be updated within 30 days of obtaining a new financial interest.

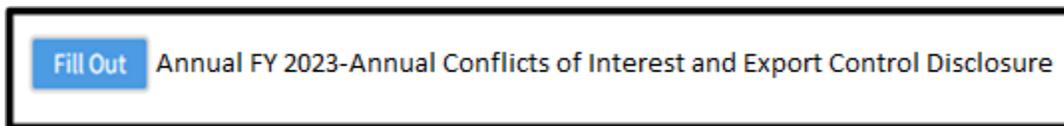
The Annual Conflicts of Interest and Export Control Disclosure covers:

- Receiving income or honoraria for consulting or speaking engagements,
- Ownership or equity interests,
- Board memberships,
- Self-authorship,
- Intellectual property, and
- Positions or collaborations outside of the U.S.

To submit this disclosure:

First, log in to COI Risk Manager by going to <https://ecu.ospreycompliancesuite.com/coiriskmanager> or by selecting COI Risk Manager in PiratePort.

Next, select the “Fill Out” button beside the Annual Conflicts of Interest and Export Control Disclosure.



Answer all questions and certify that you have completed this disclosure on your own behalf.

Our office will review your disclosure and contact you if further actions are required.

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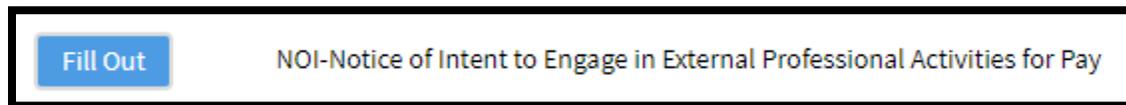
## Notice of Intent to Engage in External Professional Activities for Pay:

This tutorial will inform you about policies regarding the University’s External Professional Activities for Pay and direct you to the “Notice of Intent to Engage in External Professional Activities for Pay” in COI Risk Manager. This policy covers EHRA employees who are seeking to engage in work related to their University duties but are being paid by an entity external to the University.

If you are planning to engage in an external professional activity for pay, you will want to make sure that you complete the necessary “Notice of Intent to Engage in an External Professional Activity for Pay” or “NOI” **at least ten calendar days before** the engagement begins. Once submitted, your supervisor, or whoever is designated as the NOI approver for your department, will have ten calendar days to review the request. Please note that if this is an ongoing engagement—you have an adjunct appointment at another institution every year, for example—you will need to resubmit your notice of intent form annually.

Keep in mind that once the request has been approved, you should update your Annual COI Disclosure and then you may begin your external professional activity for pay engagement.

The “Notice of Intent” and “Annual Conflicts of Interest and Export Control Disclosure” can both be found in the COI Risk Manager system. After logging in, you will see the list of disclosures that are available to complete. Select the “Fill Out” button beside the appropriate disclosure and answer all questions. Hover text and hyperlinks are embedded in the NOI to provide definitions, examples, and links to regulations.



If you have any questions or concerns about conflicts of interest, please contact our office at (252) 744-4140, (252) 744-1971 or email us at [oric@ecu.edu](mailto:oric@ecu.edu). If you have questions or concerns about export controls, call (252) 744-2395 or email us at [ecuexportcontrols@ecu.edu](mailto:ecuexportcontrols@ecu.edu).

## Notice of Intent Reviewer Instructions:

This tutorial is for individuals who serve as the Notice of Intent to Engage in External Professional Activities for Pay (NOI) reviewer. As a reviewer, it is your responsibility to approve or disapprove any NOI request that you receive from individuals within your department.

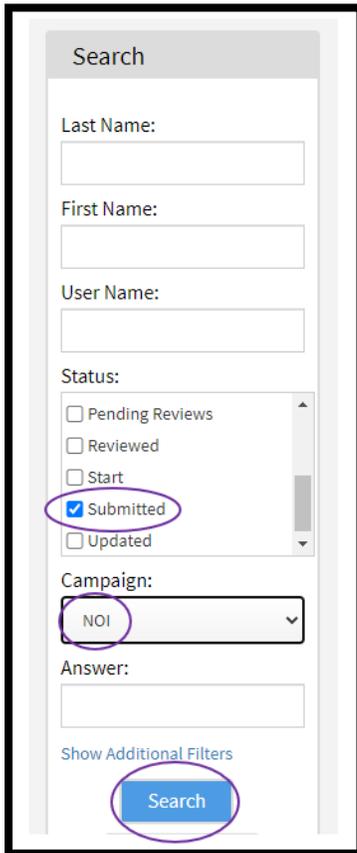
When an employee has submitted their NOI, you will receive an automatic notification from the COI Risk Manager system. Approving the NOI is a simple, straightforward process.

To approve this NOI:

- Go to <https://ecu.ospreycompliancesuite.com/coiriskmanager>.
- Log in to COI Risk Manager and select "Review Disclosures" on the left-hand menu.



- Under the "Search" area, filter for "Status: Submitted" and "Campaign: NOI". Then click the "Search" button. You will see any NOIs awaiting your approval in COI Risk Manager.

A screenshot of the Search filter area in the COI Risk Manager system. The "Search" section contains several input fields: "Last Name:", "First Name:", and "User Name:". Below these is a "Status:" section with a list of checkboxes: "Pending Reviews", "Reviewed", "Start", "Submitted" (which is checked and circled in purple), and "Updated". Below the status section is a "Campaign:" dropdown menu with "NOI" selected and circled in purple. There is also an "Answer:" input field. At the bottom of the search area, there is a "Show Additional Filters" link and a blue "Search" button, both circled in purple.

- Click the small icon that looks like a piece of paper to review the NOI.



- When you have read the NOI and you intend to approve it, click the “Actions” button, and then select “Mark as Reviewed.” A notification box will appear confirming that you intend to approve this action. Click “OK” in this notification to approve the NOI. You will want to notify the NOI requestor via email of your approval.

**Please note that by clicking “OK” the NOI will be marked as “Reviewed” meaning that you have approved this NOI. This approval cannot be reversed.**

External Professional Activities for Pay (EPAPs) are to be undertaken only if they do not:

1. Create a conflict of commitment by interfering with the obligation of the individual to carry out all primary University duties in a timely and effective manner.
2. Create a conflict of interest with respect to the individual's status as an employee of the University.
3. Involve any inappropriate use or exploitation of University resources.
4. Make any use of the name of ECU or any constituent institution within the UNC system for any purpose other than professional identification.
5. Claim, explicitly or implicitly, any University responsibility for the conduct or outcome of the External Professional Activity for Pay.

Additionally, External Professional Activities for Pay should generally be limited to no more than the equivalent of 20 percent (20%) of the full-time EHRA faculty or EHRA non-faculty employee’s contracted time during the appointment.

Please contact the employee who submitted the Notice of Intent to Engage in an External Professional Activity for Pay if you require additional details about this request.

Should you need further assistance, please call the Office of Research Integrity and Compliance at (252) 744-4140 or (252) 744-1971 or email us at [oric@ecu.edu](mailto:oric@ecu.edu).

## Project Specific Disclosure:

This tutorial will introduce you to the “Project Specific Conflicts of Interest Disclosure”. This disclosure is for faculty, staff, and graduate students who will be working on research, or an activity funded by an external sponsor.

If you serve as the Principal Investigator (PI) on a project that is being submitted to an external sponsor, you are required to complete a Project Specific Conflicts of Interest Disclosure at the time of proposal submission. It is the PI’s responsibility to make sure that any ECU personnel paid on the grant, excluding undergraduate students complete a Project Specific Conflicts of Interest Disclosure at the time of proposal submission. The PI MUST complete a Project Specific COI Disclosure regardless of receiving compensation. Please keep in mind that if there are any changes to your financial interests, an updated project specific disclosure will be required.

The Project Specific COI Disclosure is available through COI Risk Manager. Once you log in to the system, you should see a link for it on your home page. Select the “Fill Out” button beside the disclosure and answer all questions. Hover text and hyperlinks are embedded in the disclosure to provide definitions, examples, and links to regulations.



External subrecipients and contractors should follow this link: <https://rede.ecu.edu/oric/fcoi-guidance/> and complete the steps as appropriate.

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## Updating a Disclosure:

This tutorial will explain how to edit disclosure that have been previously submitted in the COI Risk Manager system.

Reasons to update a disclosure:

- Disclose a new financial interest or relationship
- Disclose a change in the type of the financial interest or relationship
- Eliminate a previous financial interest or relationship
- Make a correction or add clarifying information

### **Updating Your “Annual Conflicts of Interest and Export Control Disclosure”**

The “Annual Conflicts of Interest and Export Control Disclosure” must be updated within 30 days of obtaining a new financial interest.

- Select the “Annual Conflicts of Interest and Export Control Disclosure” under the “Show Disclosures Available to Update” tab.



SHOW DISCLOSURES AVAILABLE TO UPDATE

- Edit your responses to the questions.
- Select “Save and Submit” and agree to the text in the attestation.

### **Updating Your “Notice of Intent to Engage in an External Professional Activity for Pay”**

The “Notice of Intent to Engage in an External Professional Activity for Pay” must be updated to include additional external professional paid activities you plan to be involved in during the fiscal year.

- Select the “Notice of Intent to Engage in External Professional Activities for Pay” under the “Show Disclosures Available to Update” tab.



SHOW DISCLOSURES AVAILABLE TO UPDATE

- Within the form, click on the “Update” button and select “Add Row” to include information for your additional activity in the data grid.

Entity's name	Entity's address	Country of contracting entity
Eastern Compliance, LLC	101 Ivy Ln., Greenville, NC	US

- Add a new row for each additional activity.
- Select "Save" within the data grid window. This disclosure will provide a snapshot of all of the external professional activities for pay that you are involved in over the fiscal year.
- To submit your Notice of Intent select "Save and Submit" and agree to the text in the attestation.

### Updating Your "Project Specific Conflicts of Interest Disclosure"

The "Project Specific Conflicts of Interest Disclosure" must be updated at the time of award if there have been any changes in your financial interests. This disclosure also needs to be updated within 30 days of obtaining a new reportable financial interest during the period of the award.

- Select the "Project Specific Conflict of Interest Disclosure" under the "Show Disclosures Available to Update" tab.



- Edit your responses to the questions.
- Select "Save and Submit" and agree to the text in the attestation.

### Viewing Disclosures You Have Submitted

Select "Show Disclosure History" to view submitted disclosures.

