

CONFLICTS OF INTEREST DISCLOSURES QUICK REFERENCE GUIDE

Conflicts of Interest and Commitment, applies to:

- Faculty (9-month, 12-month, and part-time), including adjunct faculty members.
- EHRA staff members regardless of employment status (e.g. temporary hires)
- Research personnel involved in the design, conduct, or reporting of a funded research project, contract, sub-contract, or other agreement.
- Individuals responsible for the design, conduct, or reporting of a Public Health Service (PHS) funded research project are also required to disclose sponsored travel and paid authorships.

Disclosures must include the Significant Financial Interests of family members (i.e., spouse, siblings and dependent children).

SUBCONTRACTS AND NON-UNIVERSITY EMPLOYEES

Individuals responsible for the design, conduct, or reporting of a PHS funded research project may include non-university personnel, such as subcontractor employees, collaborators, or consultants. If the subrecipient's home institution does not have a PHS compliant COI policy, then that subrecipient must agree to be subject to the ECU COI policy.

Note: Phase I Small Business Innovation Research (SBIR) or Phase I Small Business Technology Transfer Research (STTR) grants are excluded from the PHS COI regulations. Phases II & III are not.

WHAT TO REPORT

- **Publicly Traded Companies**
 - Ownership of stock, options, etc. from any entity during the preceding 12 months, for you and your family members that appears to be related to your institutional responsibilities.
 - Note that investments in which you do not directly control investment decisions, such as mutual funds or retirement accounts, do not need to be disclosed.
- **Privately Held or Nonprofit Companies**
 - Any ownership or equity interest from any entity whose stock is not publicly traded, by you and your family members that appears to be related to your institutional responsibilities.
- **Intellectual Property Rights**
 - Intellectual Property (IP) in which you or your family members have an existing or proposed licensing interest.
 - IP rights held (or in negotiation) for a pending or issued patent in which you or your family members are listed as inventors. **IP held by ECU is excluded.**

- **External Roles**
 - Paid or unpaid positions of influence, by you or your family members, with an entity in which the interests of the entity appear related to your institutional responsibilities.
- **Student Involvement (PIs only)**
 - Situations in which an activity could create a potential conflict of interest or commitment with respect to a faculty member's mentorship responsibility.
- **Sponsored Travel (PHS only)**
 - Any reimbursed or sponsored travel whose aggregate value paid or reimbursed by any single entity meets or exceeds \$5,000 in the prior twelve months, except travel that is reimbursed or sponsored by a Federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.
- **Authorship**
 - Paid authorship from any entity over the past 12 months.
- **External Professional Activities for Pay**
 - Any secondary employment that is related to your professional responsibilities at the university. Examples would include: private consulting, serving on a board of directors, speaking engagement, etc. These disclosures go to the departmental supervisor for review and approval. All activities should be disclosed in the annual review process.

When should you disclose?

- Annually (April 30th deadline)
- At the time of research project proposal
- At each new increment of research project funding
- Within thirty (30) days of discovering or acquiring any financial interests for which disclosure is required
- External Professional Activities for Pay (EPAP) should be disclosed in the COI Risk Manager system at least 10 days prior to that activity and included in the annual COI disclosure process.

How do you submit your disclosure?

All disclosures should be made using the COI Risk Manager online system at <https://ecu.ospreycompliancesuite.com/coiriskmanager>

- **Annual disclosures:** required from all EHRA faculty/staff and should be made through the "Annual Conflicts of Interest and Export Control Disclosure" link in COI Risk Manager. Reminders for annual COI reporting will be sent via email prior to the April 30th deadline. (Note: all annual disclosures must be submitted via COI Risk Manager.)
- **EPAP and Required PHS Related Disclosures** should be made through the appropriate links in COI Risk Manager. These disclosures are self-initiated.
- EPAP disclosures must be made no less than 10 days prior to engaging in the outside activity.

- **Project specific disclosures:** A separate COI disclosure is required for each research project. A unique link will be sent via email for each person on each project once the proposal is submitted to ORA. A COI disclosure must be received from all listed personnel before the proposal will be sent to the funding agency/sponsor.