

Conflicts of Interest or Commitment Training

Categories and Examples of Potential Conflicts of Interest

Activities that may involve conflicts of interest or commitment fall into four general categories that differentiate interests, activities and relationships according to potential for adverse impact.



Category I: Activities That Are Allowable but Must Be Disclosed:



Category II: Relationships that may be allowed but need administrative review and analysis.



Category III: Relationships presenting such serious problems that they are generally presumed to be inappropriate and require the implementation of an appropriate management plan.



Category IV: Relationships that are not permitted.

Examples of Scenarios that Create Conflicts of Interest

The following are examples of situations that create some degree of conflicts of interest. Some of these conflicts can be managed with an appropriate management plan while others are impermissible under UNCP regulations.

These relationships and activities should be disclosed in annual conflict of interest disclosures and project specific disclosures when applicable.

- Receiving consulting fees from a company while performing clinical research on the company's technology.
- Owning stock in a company while performing research sponsored by the company.
- Conducting federally-funded research that could affect the financial interests of a company in which the investigator has a personal financial interest.
- Involving students or post-doctoral students and trainees in work that could directly benefit a company in which the faculty member supervising the students has a personal financial interest.

Cont.

- Giving a company preferential access to results of UNCP-conducted research while providing personal consulting services to that company.
- Participating in institutional purchasing decisions about products made by a company in which you hold stock.
- Receiving licensing milestone payments for licensed technology while performing clinical research on that licensed technology.
- Holding a clinical appointment while having an executive position at a for-profit biomedical company.
- Serving on the Board of Directors of a company while participating in clinical research on the company's technology.
- Serving on the Board of Directors for a company while receiving sponsored research from that company.
- Accepting a gift from a vendor.
- Being involved in the decision to hire a company in which your spouse is an employee to provide services to UNCP

Category I: Activities That Are Allowable but Must Be Disclosed:

Note: The examples provided are representative, but not all-inclusive examples of activities in each of the four categories.

Category I: Relationships that are generally allowed because they do not compromise the objectivity of research results, the integrity of faculty-student interaction, decision-making, or other interests of the University, a sponsor, or the public.

These relationships are generally minimal in their personal financial impact, and otherwise do not represent a potential source of unreasonable bias. If these relationships involve the receipt of compensation or reimbursement, they must be reported at least annually so long as they continue to exist and may be subject to investigation and further oversight by appropriate University personnel.

- Receipt of royalties or other payments for scholarly works, other writings, or for inventions,
- Receipt of compensation in the form of honoraria or reimbursement in connection with service to professional associations, service on review panels, presentation of scholarly works, and/or participation in accreditation reviews.

Category II: Relationships that may be allowed but need administrative review and analysis.

Category II: Relationships that may be allowed following administrative review and analysis. Such relationships may necessitate supervisory procedures be put in place to prevent bias or inappropriate activities and to ensure academic standards and institutional integrity.

- Requirement that students purchase a textbook or related instructional materials written or copyrighted and produces compensation for the faculty, staff or immediate family member.
- Receipt of compensation or gratuities from any individual or entity doing business with the University.
Note that no University employee may seek or receive any gift, reward, or promise of reward for recommending, influencing, or attempting to influence the award of a contract by his or her employer. (See N.C.G.S. 14-234 and N.C.G.S 138A).
- Service on the board of directors or scientific advisory board of an enterprise that provides financial support for University research when faculty, staff or immediate family member, may benefit from such financial support.
- An equity or ownership interest in a publicly or non-publicly-traded entity or enterprise held by a faculty, staff or immediate family member that does business with the University or is related to their university employment responsibilities.
- Receipt of financial support for University research under conditions that require research results to be held confidential, withheld from publication, or inordinately delayed in publication.
- Research conducted by faculty or students under any form of sponsorship must maintain the University's open teaching and research philosophy and must adhere to a policy that prohibits secrecy in research, unless approved by the UNC President.

Category III: Activities That Are Generally Not Allowable or Permitted Unless an Approved Conflict of Interest Management Plan is in Place

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- University research that involves the use of a technology owned by, or contractually obligated to (by license or an option to license, or otherwise) the individual, or to an enterprise or entity, in which the individual or a member of his or her immediate family has a consulting relationship, holds an equity or ownership interest, or holds an executive position.
- Receipt of grant or contract funding for University research from an enterprise or entity in which the individual or a member of his or her immediate family has an equity or ownership interest.
- Assignments of students, post-doctoral fellows, or other trainees to University research projects sponsored by an enterprise or entity in which the individual or a member of his or her immediate family has an equity or ownership interest.

Category IV: Relationships that are not permitted.

Category IV: Activities that are Not Allowable under Any Circumstances

- Referrals of University business to an external enterprise in which a faculty or staff member or a member of his or her immediate family has a financial interest.
- Negotiating or administering a contract on behalf of the University from which a faculty or staff member derives a direct benefit from the contract.
- Soliciting or receiving a gift, favor, reward or service, or promise of an award in exchange for recommending, influencing, or attempting to influence the award of a contract by the University.
- Associating a faculty or staff member's own name with the University in such a way as to profit financially by trading on the reputation or goodwill of the University.
- Unauthorized use by faculty or staff of privileged information acquired in connection with one's University responsibilities.
- Signing agreements that assign University patent and other intellectual property rights to third parties without prior University approval.
- Any activity otherwise prohibited by law or University policy

Thank You!!



Additional Resources:



[UNCP COI Policy](#)



[OSRP Compliance Page](#)



[COI Video](#)

For More Information & Assistance

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