

# Conflict of Interest Program

## WHAT WE DO

The Office of Research Integrity and Compliance (ORIC) provides leadership and guidance to the university community regarding conflict of interest reporting and management. We monitor compliance with applicable federal, state, and institutional regulations by developing tools and educational resources to help guide the ECU community through the process of transparency, compliance, and oversight. Specifically, we:

- Work with faculty and staff to mitigate conflicts of interest
- Guide faculty and staff in policies and procedures for EPAPs
- Train faculty and staff on avoiding real or perceived bias in their research that may result from conflicts of interest
- Offer departmental and division support in understanding conflicts of interest and commitment

For more information, visit the ORIC website at <https://rede.ecu.edu/oric/>

## WHEN TO SUBMIT A COI DISCLOSURE

New EHRA employees (faculty and non-faculty must complete COI training and a disclosure within 30 days of beginning employment at ECU.

All EHRA employees (faculty and non-faculty), regardless of employment status (temporary, part-time, etc.), are required to submit a COI disclosure annually.

The annual disclosure period begins on July 1 and ends on April 30.

In addition, there are special circumstances that may require the submission of an update to a disclosure or additional disclosures. These special circumstances are outlined on the next page.

## HOW TO DISCLOSE

Conflicts of interest disclosures and requests to engage in external professional activities for pay are both submitted electronically through a system referred to as AIR. AIR is an acronym for Activities, Interests, and Relationships Management System.

The link to the AIR Management System is <https://ecu.myresearchonline.org/air/>



## STAFF CONTACTS

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## COI PROGRAM POLICIES

Conflicts of Interest, Commitment, and External Professional Activities for Pay (Reg1.15.03)

- Governs general responsibility of EHRA employees for annual submission of COI disclosures
- Governs responsibility of EHRA employees for submission of notices of intent to engage in external professional activities for pay (EPAPs)

Objectivity in Research Under Public Health Service Grants, Cooperative Agreements, or Contracts (Reg10.45.02)

- This regulation focuses on the relationship between your outside interests and research
- Outside interests include significant financial and personal interests held by you, your spouse or domestic partner, or your dependent children
- A project specific disclosure must be submitted at the time of proposal submission and updated whenever the following occur:
  - ⇒ within 30 days of acquiring a new financial interest
  - ⇒ annually even if there is nothing new to report
  - ⇒ for each new sponsored project, including new proposals submitted through the Office of Research Administration (ORA) and continuing awards, and new IRB protocols

External Professional Activities for Pay (EPAP) and Conflict of Commitment Policy

- Notices of intent to engage in external professional activities for pay must be submitted no later than 10 days prior to the planned activity
- EPAPs must be approved in advance by your supervisor
- EPAPs should not create conflicts of commitment with respect to university employment responsibilities
- EPAPs should not create conflicts of interest
- Special rules for Health Sciences Division not contained in regulation

