

[START myDisclosures](#)  
**FREQUENTLY ASKED QUESTIONS**

**REPORT OF NON-UNIVERSITY ACTIVITIES (RNAU)**

**RNAU: POLICY QUESTIONS**

1. What is the Report of non-University Activities (RNAU) and why is the Report of Non-University Activities (RNAU) important?
2. Who must complete an RNAU disclosure?
3. My position has been reclassified from Academic Professional to Civil Service; am I required to complete the RNAU form?
4. Why do part-time academic staff members have to disclose?
5. How often does an academic staff member have to complete a form?

**RNAU: PROCEDURES**

6. How do I make a disclosure?
7. Who approves the individual's RNAU form?
8. Who reviews and approves the unit executive officer's RNAU form?
9. Which disclosures will be routed for a second level of review?
10. Can I submit scanned or digital versions of my disclosure?
11. How long will disclosures be retained?

**RNAU: EMPLOYEE DISCLOSURE QUESTIONS**

12. Why am I asked to identify whether I am a physician?
13. I was asked to add an activity. What is an activity?
14. Under "Adding information about a non-University activity," I was asked to provide an "Entity Description." What is an entity?
15. My start-up company is located in University incubator space (EnterpriseWorks or Incubator Laboratory Facility). Should it be considered a non-University activity?
16. Under "Level of Financial Interest," I was asked to select a description for my entity. What if I don't know whether it is public or private?
17. Do I need to have approval for non-University activities?
18. How do I complete a retrospective disclosure?
19. I requested approval for all non-University activities last year. Do I still need to report the number of days spent on prior activities?
20. Do I have to report my non-University income-producing activities if there is a net loss?
21. Does the amount of money received for a non-University incoming-producing activity need to be reported?
22. How should time spent on non-University income-producing activities be calculated?
23. If I am a part-time employee, how much time should I report for my non-University income-producing activities?
24. If I am an adjunct academic staff member at the University, how should I report time spent on my primary employment?

25. If I am a locum at the University, how should I report time spent on my a non-University activity (primary employment)?
26. When reporting time spent on non-University income-producing activities, do I have to include travel time?
27. Does the ownership of rental property or farm income need to be reported?
28. Am I required to report a non-University consulting activity?
29. Am I required to report income-producing activity that is not directly connected to my research or to companies in which I have an interest?
30. Must non-University income-producing activities performed during evenings and weekends be reported?
31. Are retired faculty and staff who work for the University required to disclose?
32. I have less than a 12-month appointment. Do I have to report my activities outside my contract period (i.e. summer)?
33. Do new staff members have to disclose activities performed before their University of Illinois employment?
34. Does time spent working for other University of Illinois units on a contractual basis need to be reported?
35. Do staff members who are out of the country, on a leave of absence, on sabbatical, or on sick leave need to complete a disclosure?
36. What are examples of allowable income-producing activities?
37. What are examples of potential or actual conflicts of commitment or interest?
38. Do I need to attach a statement to explain my activities?
39. I have more than one non-University income-producing activity; how can I list multiple activities?
40. I have less than a 75% appointment; do I need to submit a disclosure?
41. Where do I find information about my University appointment?
42. What is a fiduciary?
43. How does the policy define immediate family?

## **RNUA: ADMINISTRATIVE REVIEW**

44. Who is the unit executive officer?
45. Can the unit executive officer delegate the responsibility for reviewing and approving disclosures?
46. What are the guidelines for the unit executive officer to determine potential conflicts of commitment?
47. What are the guidelines for the unit executive officer to determine potential conflicts of interest?
48. What are the approval options for the unit executive officer?
49. How does the UEO deny an activity?
50. Does the unit executive officer need to include a statement explaining why the activity is not approved and must be revised?
51. If activities are not approved by the unit executive officer, what should be communicated to the academic staff member?
52. Can a denial be appealed?
53. How should the unit executive officer review previously undisclosed activities that are reported retrospectively?

## **STATEMENT OF ECONOMIC INTERESTS**

54. I just received a "Statement of Economic Interests" in the mail. Where do I find information that will help me fill out this form?

## REPORT OF NON-UNIVERSITY ACTIVITIES: POLICY QUESTIONS

### 1. What is the Report of Non-University Activities (RNUA) and why is the Report of Non-University Activities (RNUA) important?

- The RNUA is an important means of managing real or perceived conflicts of commitment and interest. The RNUA is a process by which academic staff members disclose and obtain prior approval for non-University income-producing activities.
- Illinois state law and the University's Statutes and General Rules require faculty and other academic staff members to report certain categories of activities. Most non-University activities are compatible with, and often beneficial to, the University duties of academic staff members.
- The reporting process and the University's [Policy on Conflicts of Commitment and Interest](#) ("Policy") are not meant to discourage external activities, but to assist academic staff members in disclosing them. Non-University income-producing professional activities of faculty and academic staff often enhance professional skills and serve the public, and such activities are appropriate unless they give rise to a conflict of commitment or interest. However, there are some activities that might present conflicts with University duties and those activities must be carefully reviewed and monitored.
- [START myDisclosures](#) is an online application that allows users to enter, submit, route, review, and retain RNUA disclosures.

### 2. Who must complete an RNUA disclosure?

- The Policy applies to all paid academic staff members, whether part time or full time employees of the University. The academic staff includes academic professionals, postdoctoral associates, and the faculty ranks of professor, associate professor, assistant professor (and all of the foregoing whose appointments contain such terms as "research," "adjunct," "visiting," or "clinical"), instructor, and lecturer. All covered persons are referred to herein as "academic staff members."
- For the purpose of this Policy, civil service staff, students, and medical residents (unless also employed as academic staff members) are not considered academic staff and therefore are not required to complete an RNUA disclosure.
- Although civil service staff, students, and medical residents are not covered by this policy, they are not exempted from making disclosures as required by federal or state laws and regulations, or from making situation-specific disclosures as described in Section III.D.3 of the University [Policy on Conflicts of Commitment and Interest](#).

### 3. My position has been reclassified from Academic Professional to Civil Service; am I required to complete the RNUA form?

- No. If your position at the University has been reclassified from Academic Professional to Civil Service, then you are not required to make an RNUA disclosure. Civil Service employees are covered by a different policy and are not required to complete an RNUA disclosure.
- Civil Service employees should refer to the Conflict of Interest Policy for Civil Service Staff. See Rule 16.01; [https://nessie.uihr.uillinois.edu/cf/policies/index.cfm?Item\\_id=390](https://nessie.uihr.uillinois.edu/cf/policies/index.cfm?Item_id=390)
- Additional guidance and resources for Civil Service employee conflict of commitment and interest disclosure and management is available on the Vice President for Academic Affairs website: [https://www.vpaa.uillinois.edu/rnua/civil\\_service/](https://www.vpaa.uillinois.edu/rnua/civil_service/)

### 4. Why do part-time academic staff members have to disclose?

Although the state law requires full-time staff members to disclose, the [Policy on Conflicts of Commitment and Interest](#) also requires part-time staff members to disclose non-University activities. Even part-time employees may have non-University activities that are in conflict or appear to be in conflict with their University responsibilities.

#### **5. How often does an academic staff member have to complete a form?**

The state law and the *Policy on Conflicts of Commitment and Interest* require an annual disclosure. The disclosure must be updated throughout the year if changes in activity occur. It is the responsibility of the unit executive officer to review all disclosures submitted by faculty and academic staff members. These are then routed by START myDisclosures to the next level of review (often the college office), and forwarded by the online system to the appropriate campus/UA office if necessary. Advance approval of all external income-producing activities is required.

### **REPORT OF NON-UNIVERSITY ACTIVITIES: PROCEDURES**

#### **6. How do I make a disclosure?**

Please refer to the step by step instructions on the [START myDisclosures Users' Guide](#).

#### **7. Who approves the individual's RNUA form?**

- The unit executive officer (UEO) of the unit in which an academic staff member holds his/her primary appointment is responsible for evaluating all potential conflict situations reported in the disclosure (or otherwise known) before acting to approve or request revisions of the activities.
- If the UEO requires the academic staff member to revise the disclosure, the form will be returned to the academic staff member for changes. The academic staff member will receive an email notification.
- A facilitator can review, set the status of the review, or return the disclosure to the academic staff member for changes.
- In cases of secondary/joint appointments greater than 0%, the unit executive officer of the secondary unit must also review the disclosure. START myDisclosures will route the disclosure to the secondary UEO after the home department UEO completes her/his review.
- The UEO may determine that a disclosure requires a second level of review. The second level of review follows the reporting line of the staff member's primary unit (dean, vice chancellor, etc.).

#### **8. Who reviews and approves the unit executive officer's RNUA form?**

The academic officer next in the administrative reporting line (dean, provost, vice chancellor, etc.) reviews and approves the unit executive officer's form.

#### **9. Which disclosures will be routed for a second level of review?**

- Disclosures of a real or potential conflict will be identified by the UEO and routed by the system to a second level of review.
- The unit executive officer's own disclosure will automatically be routed to the second level of review.

#### **10. Can I submit scanned or digital versions of my disclosure?**

Please make every effort to submit your RNUA disclosure through the START myDisclosures system. This supports the University's obligation for transparency and accountability of this process. If you are

unable to utilize the electronic system, please contact the [COI Office](#) for your campus and request assistance.

#### **11. How long will disclosures be retained?**

In compliance with University policy on [Records Disposal Authorization](#), electronic RNUA disclosures along with any attachments will be retained as an official record for at least six years from the year of submission.

## **REPORT OF NON-UNIVERSITY ACTIVITIES (RNUA): EMPLOYEE DISCLOSURE QUESTIONS**

#### **12. Why am I asked to identify whether I am a physician?**

If you are a practicing physician, any payments to you by organizations in the private sector are disclosed to the Centers for Medicare and Medicaid Services (CMS) and included in the Open Payments database. At the end of your disclosure, you will be asked to affirm that your disclosed activities and financial interests are consistent with the information in the CMS database. This is intended to protect your reputation and that of the University in the event that the CMS data is compared with your University disclosure.

#### **13. I was asked to add an activity. What is an activity?**

An activity is work in which you engage outside the University for income, or an external fiduciary responsibility. A non-University activity may be associated with:

- a company or other organization;
- a non-profit organization;
- another University or educational institution, whether public, private, for-profit or non-profit;
- Farmland;
- rental property;
- self-employment or freelance work.

#### **14. Under “Adding information about a non-University activity,” I was asked to provide an “Entity Description.” What is an entity?**

An entity is the company or organization with which you conduct your non-University activity; or in which you have a financial interest; OR the circumstances surrounding your non-University activity (e.g. freelance/not registered as a business). Here are some examples.

- If you are disclosing individual consulting activity with an established company, list the name of that company (e.g. Pfizer, Caterpillar).
- If you have a financial interest in a start-up company, list the name of that company.
- If you are teaching at another University, public, private or non-profit, list the name of the University.
- If you have a fiduciary role (e.g. Treasurer, CEO, CFO) for an organization, list the name of that organization.
- If you have formed a company to conduct non-University consulting, list the name of your consulting company.
- If you are conducting freelance work, list “freelance.”
- If you farm or manage rental property, list “farming,” “rental property,” or the name of your farming corporation or property rental firm.

You will have the opportunity to enter multiple entities. Enter each activity separately.

Be as specific as possible and avoid descriptions such as:

- Various
- Consulting
- Multiple

**15. My start-up company is located in University incubator space (EnterpriseWorks or Incubator Laboratory Facility). Should it be considered a non-University activity?**

Yes.

**16. Under “Level of Financial Interest,” I was asked to select a description for my entity. What if I don’t know whether it is public or private?**

If you don’t know, then select “Privately held or start-up company.” You will answer a follow-up question which will inform your Unit Executive Officer if you have any equity in the entity.

**17. Do I need to have approval for non-University activities?**

Yes. Academic staff members must obtain prior approval from their unit executive officer to engage in non-University income-producing activities (regardless of net revenue) and all other external activities that may present a conflict of commitment with their University responsibilities.

If your activities or interests change during the year, you must update your disclosure and seek approval from the unit executive officer prior to engaging in the non-University activities.

**18. How do I complete a retrospective disclosure?**

When you are completing the online disclosure, you will be asked to provide information on “My Time Commitment.” This allows you to report the time spent during the past year (retrospective) and the coming year (prospective).

The University [Policy on Conflicts of Commitment and Interest](#) requires that you both prospectively and retrospectively report non-University activities (see [example of activities that require reporting](#)). If you have engaged in non-University activities but did not report and obtain approval prospectively for activities that require disclosure and approval, then these previously unreported activities must be reported retrospectively. Reporting of retrospective activities must be done as promptly as possible.

To report activities retrospectively in the START myDisclosures application, you must disclose your activities for the previous reporting period on the current RNUA disclosure. Provide a full compilation of all non-University activities. Clearly identify that you are reporting an activity that occurred retrospectively. Include time period during which the activity occurred. At the end of your disclosure, on the “Add Additional Information Page,” either provide an explanation in the comments section or upload a document explaining why the activities were not disclosed in advance. The additional explanation should also indicate whether you propose to continue the activities or whether the activities have ended. Your disclosure will be routed to your UEO for approval.

Failure to seek prior approval for non-University activities, as per the University Policy (see [Section IV.E. on Sanctions](#)), may result in sanctions. Severity of sanctions depends on the extent of the violations of the Policy.

**19. I requested approval for all non-University activities last year. Do I still need to report the number of days spent on prior activities?**

Yes. Due to a state law, regardless of whether an activity was disclosed in advance for the previous year, the time spent on the activity still needs to be reported retrospectively.

**20. Do I have to report my non-University income-producing activities if there is a net loss?**

Yes.

**21. Does the amount of money received for a non-University incoming-producing activity need to be reported?**

On the RNUA, you must identify whether the interest reaches the threshold for significance, which University Policy sets as \$5,000 or more.

The exact amount of income is not required as part of your disclosure; unit executive officers may require such information separately if needed to assess the potential, actual, or apparent conflicts presented by a non-University income-producing activity.

Federal regulations may require disclosure of specified ranges of financial interests.

If you are an investigator or key research personnel on a federal award from the Department of Health and Human Services, Public Health Services, or the National Institutes for Health, then you are required to comply with federal financial conflict of interest regulations. In addition to the RNUA, you must complete the disclosure of your significant financial interest which requires specifying the amount for financial interests and travel that are reasonably related to your University responsibilities. Please make sure to complete a “sponsor specific” disclosure. Campus specific resources are available here: <https://www.vpaa.uillinois.edu/cms/One.aspx?portalId=420456&pageId=466286>.

**22. How should time spent on non-University income-producing activities be calculated?**

All time should be reported in terms of the number of days devoted to non-University income-producing activities. An accumulation of eight hours is equal to one day, regardless of time of day or day of week. You should report the aggregate (total) number of days requested.

A [time calculator tool](#) is available to assist you. The tool calculates time to be reported or requested by determining any overlap in appointment percentage and multiplying the appropriate hours per week by your appointment period at the University.

**23. If I am a part-time employee, how much time should I report for my non-University income-producing activities?**

As a part-time employee, you should disclose your non-University income-producing activities and answer questions about your interests. You should only report time spent on your non-University income-producing activities to the extent that it impinges on your University activities.

A [time calculator tool](#) is available to assist you. The tool calculates time to be reported or requested by determining any overlap in appointment percentage and multiplying the appropriate hours per week by your appointment period at the University.

**24. If I am an adjunct staff member at the University, how should I report time spent on my primary employment?**

Please see above. You should disclose your primary employment as an outside activity and answer questions about your interests, but only report the overlap of time between your adjunct employment and your primary employment outside the University. Please use the [time calculator tool](#).

**25. If I am a locum or have a 0% appointment with compensation (e.g., lump sum) at the University, how should I report time spent on my primary employment?**

As a locum or a 0% employee that receives compensation at the University, there is no overlap between your University employment and your primary employment. You should disclose the name of your primary employer and report any financial interests and enter zero (e.g., 0) for your time commitment.

**26. When reporting time spent on non-University income-producing activities, do I have to include travel time?**

Yes.

Time spent on travel for income-producing activities must be accounted for in number of days. A "day" is defined as any accumulation of eight hours, regardless of time of day or day of week, including nights and weekends, during the contract period. Even if you are using your vacation time, you must report the time spent in the number of days for travel and the business activities.

It is recommended that you account for travel time by either:

- Calculating the number of hours from the time and day you left your house (or started your travel) for the travel to the time and day you return home from your travel (completed your travel). Divide the total number of hours by 8 to obtain the number of days you must report on your RNUA disclosure.
- If the travel related to your non-University activities intermingles with your personal travel/expenses and you want to differentiate the time you spent on travel related to your non-University activities from personal travel at your own expense (that is not reimbursable by any entity), you must keep a log of travel events and document time spent on any travel sponsored by or reimbursed by the non-University activity, including but not limited to time spent in transit, time spent in meetings, time spent in hotel or lodging paid for or reimbursed by the non-University entity, time spent in meals paid for or reimbursed by the non-University entity, or time spent in any other activities that were paid for or reimbursed by the non-University entity.

Travel logs must be signed and dated by your Unit Executive Officer upon completion of your travel and return to the University. The record must be kept on file by the department. A copy of the travel log must be uploaded as an attachment with your Report of Non-University Activities.

If you had requested sufficient time on the RNUA prior to engaging the non-University activity, then you do not need to upload your travel log until you submit your disclosure of retrospective time in the next academic year. If you did not request sufficient time, then you must update your RNUA disclosure and upload a copy of the travel log with your updated RNUA disclosure.

A template for a travel log is available [here](#).



**27. Does the ownership of rental property or farm income need to be reported?**

Yes. Time spent on these activities should be reported. Ownership of income property and farm income must be considered when assessing potential conflicts of interest and/or conflicts of commitment. Please list "Farming" or "Rental Property" as the Entity.

**28. Am I required to report non-University consulting activity?**

Yes. (See examples in questions 35 and 36)

**29. Am I required to report income-producing activity that is not directly connected to my research or to companies in which I have an interest?**

Yes. (See examples in questions 35 and 36)

**30. Must non-University income-producing activities performed during evenings and weekends be reported?**

Yes. All non-University income-producing activities should be reported even if activities occur during the evening, weekends, or holidays.

**31. Are retired faculty and staff who work for the University required to disclose?**

Retired faculty and staff are required to disclose if they are paid by the University, including travel reimbursements and lump sum payments.

**32. I have less than a 12-month appointment. Do I have to report my activities outside my contract period (i.e. summer)?**

Although staff members with less than a 12-month appointment are not legally obligated to the University year-round, the potential exists for conflicts between non-University activities and their University appointments. As a result, activities outside the contract period should be considered when responding to the disclosure questions.

**33. Do new staff members have to disclose activities performed before their University of Illinois employment?**

No. They need only report their activities as of the date of employment with the University.

**34. Does time spent working for other University of Illinois units on a contractual basis need to be reported?**

No. Payments received through the University of Illinois are not within the scope of the reporting process, which covers only *non-University* income-producing activities.

**35. Do staff members who are out of the country, on a leave of absence, on sabbatical, or on sick leave need to complete a disclosure?**

Not while away. The UEO will use the exemption function in the START myDisclosures application, indicating the reason for the staff member's exemption from the RNUA. The department is responsible for ensuring that the staff member completes and submits his/her RNUA disclosure upon the staff member's return. When the staff member returns from leave and logs in to START myDisclosures, the staff member will see that the UEO has exempted the RNUA. The staff member should follow standard process on START myDisclosures to submit the RNUA upon return to the University.

If the absent academic staff member applies for a federal grant or contract while on leave or out of the country, the academic staff member must disclose any significant financial interests and comply with any agency-specific disclosures. It is recommended that your RNUA be up-to-date.

### **36. What are examples of allowable income-producing activities?**

The following are examples of activities described in the University Policy on Conflicts of Commitment and Interest (see Part III, Section E) that are not generally considered conflicts of interest. They are exempt from reporting requirements, unless they are so extensive in time and effort that they constitute a potential conflict of commitment. Though these activities do not require disclosure, the State Officials and Employees Ethics Act restricts the acceptance of gifts from prohibited sources. For further information, please consult with the [University Ethics Office](#).

Also note that University policy and federal regulations require disclosures of significant financial interests on research sponsored by the Health and Human Services (HHS), Public Health Services (PHS), and National Institutes of Health (NIH), as well as funding agencies that have adopted these federal conflict of interest regulations. Activities that may be exempted from disclosure in the RNUA process may require reporting as part of a sponsor-specific disclosure. Please follow campus guidelines on reporting these disclosures if you are an investigator or senior/key personnel on studies sponsored by these funding agencies.

Examples of allowable income-producing activities that generally do not require reporting on the RNUA:

- Preparing, publishing, or presenting scholarly or creative works, including books, articles, and software, even if honoraria, stipends, or royalties may be provided.
- Participating at professional conferences for the purpose of making scholarly presentations, conducting seminars or workshops, even if paid an honorarium.
- Serving as a special reviewer or on a review panel for academic or governmental organizations, even if paid an honorarium.
- Serving as a reviewer or editor for a scholarly journal, even if financial consideration is provided.
- Participating in a clinical practice plan approved by the University of Illinois Board of Trustees.
- Receiving royalties under the University's royalty distribution policies while currently employed or otherwise appointed by the University.
- Earning income from passive investments such as interest or dividends from banks, mutual funds, or stocks and bonds.

### **37. What are examples of potential or actual conflicts of commitment or interest?**

The following activities represent examples of potential or actual conflicts of commitment or interest as described in the University Policy on Conflicts of Commitment and Interest (see Part III, Section F). The list is not inclusive and is intended to provide guidance. All examples are assumed to include both for-profit and not-for-profit entities.

- Using University resources to conduct research that is sponsored by an entity in which the academic staff member or his/her immediate family member has a significant financial interest.
- Serving in an executive or managerial capacity or holding significant financial interests in an entity doing business with the University.
- Serving in an executive or managerial capacity or holding significant financial interests in an entity in one's field of research.

- Serving on the board of directors or a major advisory committee of an entity that sponsors the academic staff member's research or provides gift funds for the use of the academic staff member or his/her department.
- Conducting consulting or other non-University income-producing activities involving University students or other University staff.
- Utilizing University students or employees in the academic staff member's University activities supported by gift funds from an entity in which the academic staff member has a significant financial interest.
- Utilizing University students or employees in the academic staff member's University research sponsored by an entity in which the academic staff member has a significant financial interest.
- Conducting testing or clinical trials of products, devices, or services owned or controlled by an entity in which the academic staff member or a member of his/her immediate family has a significant financial interest.
- Diverting research opportunities from the University to any external entity, (e.g., another academic institution, non-profit organization, federal laboratory, business, or consulting entity in which the staff member or a member of his/her immediate family has a significant financial interest, managerial, or executive role).
- Owning an entity from which the University may seek to procure goods or services.
- Influencing the University's decision to procure goods or services from an entity owned by one's immediate family member.
- Submitting grant proposals or making sub award arrangements involving the purchase of goods or services from an entity in which an academic staff member or a member of his/her immediate family has a significant financial interest.
- While acting in the context of his/her University duties, making professional referrals to an entity in which an academic staff member or a member of his/her immediate family has a significant financial interest.
- Spending more than one day per seven-day-week (as defined in Section III.C.1), averaged over the contract period, on non-University income-producing activities.
- Other examples of activities for which prior approval is required include, but are not limited to:
  - Ownership and/or management of rental property
  - Farming
  - Working at a retail entity
  - Paid coaching
  - Providing or directing paid professional entertainment services.

**38. Do I need to attach a statement to explain my activities?**

You are not required to submit an additional explanation unless you are reporting an activity retrospectively when approval was not requested in advance. You may also submit an additional explanation if you need additional space to explain your activities or if your unit executive officer requests additional explanation. To attach additional information, in START myDisclosures, at the end of your RNUA disclosure, you will have the option to upload documentation in the "Add Additional Information" section. Please submit documents in PDF format (preferred).

**39. I have more than one non-University income-producing activity; how can I list multiple activities?**

Follow the instructions in [START myDisclosures](#) to add additional activities to your disclosure. For additional guidance, see the step by step [User's Guide](#).

**40. I have less than a 75% appointment; do I need to submit a disclosure?**

Yes. You must complete a disclosure regardless of your percentage of paid appointment.

**41. Where do I find information about my University appointment?**

Consult [NESSIE](#) for your notice of appointment

**42. What is a fiduciary?**

A fiduciary has a legal obligation to act in the best interest of an entity or individual.

**43. How does the policy define immediate family?**

The University [Policy on Conflicts of Commitment and Interest](#) defines “immediate family” as one’s spouse or domestic partner, parents, siblings, and children.

**REPORT OF NON-UNIVERSITY ACTIVITIES: ADMINISTRATIVE REVIEW**

**44. Who is the unit executive officer?**

The University [Policy on Conflicts of Commitment and Interest](#) defines the “unit executive officer” (UEO) as the department head/chair, or equivalent officer of other units. For disclosures by unit executive officers, the term refers to the administrators at the next higher level in the normal University reporting lines.

**45. Can the unit executive officer delegate the responsibility for reviewing and approving disclosures?**

No. The University [Policy on Conflicts of Commitment and Interest](#) states the unit executive officer is responsible for reviewing and evaluating disclosures for academic staff in the unit. The START myDisclosures application allows “facilitators” to assist the UEO with review process, but only the UEO has authority to approve the activities.

**46. What are the guidelines for the unit executive officer to determine potential conflicts of commitment?**

The Unit Executive Officer (UEO) may determine that an academic staff member has a conflict of commitment which that requires additional management and monitoring and requires a second level of review if the academic staff member:

- Has external activities deemed by the UEO to involve excessive time commitment such that they diminish the academic staff member’s commitment or service to the University.
- Is a faculty member that teaches outside the University, unless assigned or approved by the department.

**47. What are the guidelines for the unit executive officer to determine potential conflicts of interest?**

The Unit Executive Officer (UEO) may determine that an academic staff member has a conflict of interest that that requires additional management and monitoring and requires a second level of review, if the academic staff member:

- (Applies to faculty only) teaches outside the University, including any form of instruction, whether in the classroom or via distance learning offered by other entities (including for-profit organizations), when the instruction competes with courses offered by the University.

- Undertakes research under circumstances deemed unacceptable by the University that limit dissemination of knowledge (by publication, by presentations in colloquia, workshops, seminars, and the like).
- Serves as an investigator on research agreement(s) with external entity/(-ies) with which the academic staff member has a financial, managerial, or executive relationship.
- Diverts students and/or staff from their primary educational objectives.
- Diverts to external entities or other institutions opportunities for research support that could have been obtained on behalf of the University without prior written approval from the University.
- Uses University resources for non-University activities without permission from the University.
- Influences University research or business decisions in ways that could lead to the academic staff member's direct or indirect personal financial gain or which give improper advantage to third parties.
- Licenses, assigns, or grants use of University intellectual property to an external entity without prior approval from the University.
- Involves University students and/or staff in the academic staff member's external activities.

#### **48. What are the approval options for the unit executive officer?**

START myDisclosures review process groups disclosure ready for review into two categories:

- Disclosures with **no** non-university activities reported \*update starting in AY 2016-17\*
- Disclosures with non-university activities reported

##### **Review process when NO non-university activities are reported:**

Disclosures of no non-University activities are automatically routed to the Completed folder. Reviewers can use the sort function to list employees who listed zero activities. A list of staff members with no non-university activities will display. No additional information is present to review because the staff member indicated on his/her disclosure that he/she has no non-University activities to report. The assistant and UEO should carefully review the list and follow-up with any staff members that have activities that were not reported but should have been, when known.

If activities should have been reported, but were not reported, the UEO/assistant should contact the employee by email.

The staff member may log into his/her account and view the updated status which will not appear as "*Approved [on DATE].*" The approved disclosure will be stored in the system and be available to the employee, the UEO, the Dean, the Provost, and campus COI staff.

##### **Review process when non-university activities are reported:**

There are three possible actions for the unit executive officer (UEO) at the first level of review in reviewing a staff member's disclosure:



**Approve.** When activities were reported but did not require reporting, or when activities disclosed do not present a conflict of commitment or interest. The approved

disclosure will be stored in the system and be available to the employee, the UEO, the Dean, the Provost, the Vice Chancellor for Health Affairs, and campus COI staff.



**Return for Revisions.** This option should be used when activities disclosed are not approved or when the UEO believes other activities exist that require disclosure. The UEO should provide an explanation for returning the disclosure to the employee and state expectations for revision, as well as corrective actions to manage the activities.



**Forward for Further Review.** This option is for activities that are approved but present potential conflicts that require management and monitoring. The UEO should clearly state the requirement for monitoring the activities and conflict management mechanisms in the comment box or attach a statement. By selecting this option, the online application will route the disclosure to the staff member's second level of review (e.g., typically the dean).

**The UEO at the second level of review has the function to either:**




**Approve.** Accept the monitoring and management plan proposed by the first level of review.



**Return for Revisions.** Return the disclosure for revisions to the UEO at the first level of review. The UEO at the second level must provide an explanation for returning the disclosure and state expectations for revision, as well as corrective actions to manage the activities using either the comments or attachment tools in the online application.

Once the disclosure is approved by the second level of review, the approved disclosure will be stored in the system and be available to the employee, the UEO, the Dean, the Provost, the Vice Chancellor for Health Affairs, and campus COI staff.

#### **49. How does the UEO deny an activity?**

To deny an activity, the UEO should select the option to "Return for Revisions" []. The UEO or facilitator must provide an explanation for revision, as well as corrective actions to manage the activities using either the comments or attachment tools in the online application. The disclosure will route back to the staff member. The staff member must revise the disclosure and resubmit the disclosure.

#### **50. Does the unit executive officer need to include a statement explaining why the activity is not approved and must be revised?**

Yes. When the UEO determines that a conflict of commitment or interest exists or returns the disclosure for revisions, s/he **must** either provide an explanation in the comment box or as an attachment that addresses management of the non-University activity, pending the revisions required by the UEO OR explain that one or more activities are not approved.

#### **51. If activities are not approved by the unit executive officer, what should be communicated to the academic staff member?**

The UEO must clearly explain in the comments or an attached document that an activity is not approved as submitted and return for revisions the disclosure to the employee, who should revise the disclosure and resubmit.

**52. Can a denial be appealed?**

Yes. See [COCI Policy Section IV D, Appealing Denials by the UEO](#). Appeals must be addressed to the second level of review outside of the START myDisclosures application, as the software currently does not handle appeals.

**53. How should the unit executive officer review previously undisclosed activities that are reported retrospectively?**

If an academic staff member discloses non-University activities after the activities have occurred and the staff member did not obtain prior approval for the activities, then the UEO must conduct the review of the activities retrospectively. The academic staff member must upload an explanation as to why the activities were not reported prior to engaging in the non-University activities. The academic staff member's explanation should also indicate whether the activities will continue or whether the activities have ended.

The UEO must assess the retrospective disclosure. The UEO must determine whether the retrospective activities present conflicts of commitment or interest. If activities present conflicts of commitment or interest, then the UEO must upload an explanation and a second level of review is required.

Sanctions may apply for failure to obtain approval prior to engaging in non-University activities. The UEO should contact the campus Conflict of Interest Officer to discuss the review process when the UEO decides to apply sanctions.

For disclosures that require retrospective review, it is advisable that the UEO inform the academic staff member that all activities must be disclosed and approved prior to engaging in non-University activities.

## **STATEMENT OF ECONOMIC INTERESTS**

**54. I just received a "Statement of Economic Interests" in the mail. Where do I find information that will help me fill out this form?**

Information about the Statement of Economic Interests process can be found at <http://www.ethics.uillinois.edu/statements/>.

The University official who can assist you with other questions about this form is:

Donna McNeely  
University Ethics Officer  
Human Resources Building, Room 20  
One University Plaza, MS HRB 20  
Springfield, Illinois 62703  
Ethics Help Line: 1-866-758-2146  
Phone: 217-206-6202  
Fax: 217-206-6211  
e-mail: [ethicsofficer@uillinois.edu](mailto:ethicsofficer@uillinois.edu)

