

## University of Illinois at Chicago (UIC) 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. How does the policy define immediate family?
4. My position has been reclassified from Academic Professional to Civil Service; am I required to complete the RNAU?
5. Why do part-time academic staff members have to disclose?
6. How often does an academic staff member have to complete a RNAU?

#### **RNAU: PROCEDURES**

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

#### **RNAU: EMPLOYEE DISCLOSURE QUESTIONS**

13. Why am I asked to identify whether I am a physician?
14. I was asked to add an activity, appointment or affiliation. What is an activity, appointment or affiliation?
15. Under "Adding information about a non-University activity," I was asked to provide an "Entity Description." What is an entity?
16. My start-up company is located in University incubator space (EnterpriseWorks or Incubator Laboratory Facility). Should it be considered a non-University activity?
17. 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?
18. Do I need to have approval for non-University activities, appointments and affiliations?
19. Do I need to request approval for all non-University income-producing activities?
20. How do I complete a retrospective disclosure?
21. I requested approval for all non-University activities last year. Do I still need to report the number of days spent on prior activities, appointments and affiliations?
22. Do I have to report my non-University income-producing activities if there is a net loss?
23. Does the amount of money received for a non-University incoming-producing activity need to be reported?
24. How should time spent on non-University activities, appointments and affiliations be calculated?
25. If I am a part-time employee, how much time should I report for my non-University activities, appointments and affiliations?
26. If I am an adjunct academic staff member at the University, how should I report time spent on my primary employment?

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

## **RNUA: ADMINISTRATIVE REVIEW**

45. Who is the unit executive officer?
46. Can the unit executive officer delegate the responsibility for reviewing and approving disclosures?
47. What are the guidelines for the unit executive officer to determine potential conflicts of commitment?
48. What are the guidelines for the unit executive officer to determine potential conflicts of interest?
49. What are the approval options for the unit executive officer?
50. How does the UEO deny an activity, appointment and affiliation?
51. Does the unit executive officer need to include a statement explaining why the activity, appointment and affiliation is not approved and must be revised?
52. If activities, appointments and affiliations are not approved by the unit executive officer, what should be communicated to the academic staff member?
53. Can a denial be appealed?
54. How should the unit executive officer review previously undisclosed activities, appointments and affiliations that are reported retrospectively?
55. An academic staff member previously completed the RNUA for the current academic year under a different unit. The RNUA is approved and complete, but because of a change in appointment or a new payment, the employee shows up as not submitted in the folder for the new unit or unit administering the payment. Does the employee need to complete a new RNUA?

## STATEMENT OF ECONOMIC INTERESTS

56. I just received a "Statement of Economic Interests" in the mail. Where do I find information that will help me complete 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, affiliation and interest. The RNUA is a process by which academic staff members disclose and obtain prior approval for non-University activities, affiliations and appointments including review panels, other commitments or travel, whether compensated or not.
- Illinois state law, federal regulations, and the University's statutes and policies require faculty and other academic staff members to report activities, appointments and affiliations. Most non-University activities, appointments and affiliations 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, appointments and affiliations, but to assist academic staff members in disclosing them. Non-University professional activities, affiliations and appointments of faculty and academic staff often enhance professional skills and serve the public, and such activities, appointments and affiliations are appropriate unless they give rise to a conflict of commitment or interest. However, there are some activities, appointments and affiliations that might present conflicts with University duties and those activities, appointments and affiliations 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 "specialized," "research," "adjunct," "visiting," or "clinical"), instructor and lecturer. All covered persons are referred to herein as "academic staff members."
- 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.

### 3. 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.

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

- 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 UI Vice President for Academic Affairs website: [https://www.vpaa.uillinois.edu/rnua/civil\\_service/](https://www.vpaa.uillinois.edu/rnua/civil_service/)

### **5. 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, appointments and affiliations. Even part-time employees may have non-University activities, appointments and affiliations that are in conflict or appear to be in conflict with their University responsibilities.

### **6. How often does an academic staff member have to complete a RNUA?**

The state law and the [Policy on Conflicts of Commitment and Interest](#) require an annual disclosure. Additionally, academic staff members should complete an RNUA:

- upon the start date of a new hire or within 30 days of the start of a new hire University appointment;
- when transferring to a different unit within the University;
- when requesting approval from the UEO for a new non-University activity, appointment or affiliation;
- when a change in non-University activity, appointment or affiliation occurs; and
- when required by granting agency.

Advance approval of all external income-producing activities is required.

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

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

Please refer to the step by step instructions on the [RNUA Employee Instructions](#).

### **8. Who approves the academic staff member's RNUA disclosure?**

- 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 to the disclosure.
- The [START myDisclosures](#) application will identify those disclosures that meet thresholds and requirements for the RNUA Terms and Conditions, which the academic staff member acknowledges in the certification. Those activities, appointments and affiliations will require the UEO either:
  - Forward the disclosure for further review along with a department management plan to the second level reviewer (typically dean, vice chancellor); or
  - Approve the activity with a comment or attached statement to explain that the activity does not present conflicts of commitment or interest.
- If the UEO requires the academic staff member to revise the disclosure, the RNUA 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.

**9. Who reviews and approves the unit executive officer's RNUA disclosure?**

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

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

- The [START myDisclosures](#) application will identify those disclosures that meet thresholds and requirements for the RNUA Terms and Conditions, which the academic staff member acknowledges in the certification. Those activities, appointments and affiliations will require the UEO either:
  - Forward the disclosure for further review along with a department management plan to the second level reviewer (typically dean, vice chancellor); or
  - Approve the activity with a comment or attached statement to explain that the activity does not present conflicts of commitment or interest.
- Disclosures of a real or potential conflict will be identified and a management plan will be proposed by the UEO. The disclosure and management plan will be routed by the application to a second level of review.

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

No. If you are unable to utilize the electronic system, please contact the [COI Office](#) for your campus and request assistance.

**12. 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**

**13. 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 are compared with your University disclosure.

**14. I was asked to add an activity, appointment or affiliation. What is an activity, appointment or affiliation?**

An activity, appointment or affiliation must be reported when you engage with an entity outside the University whether paid or not, wish to receive any affiliation or appointment, or plan to have an external fiduciary responsibility. A non-University activity, appointment or affiliation may be associated with a foreign or domestic:

- company or other organization;
- non-profit organization;
- University or educational institution other than the University in the UI System, whether public, private, for-profit or non-profit;
- farmland;

- rental property;
- self-employment or freelance work;
- time commitment that interferes with University responsibilities.

**15. 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, appointment or affiliation; 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 have an appointment or affiliation with another University (domestic or foreign); or you are teaching, lecturing, or presenting at another University (domestic or foreign), 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.
- If you are an expert witness, provide the name of the law firm or consulting practice.

You will have the opportunity to enter multiple entities. Enter each activity, appointment and affiliation separately. Be as specific as possible and do not list or describe the entity as:

- Various
- Consulting
- Multiple

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

Yes.

**17. 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.

**18. Do I need to have approval for non-University activities, appointments and affiliations?**

Yes. Academic staff members must obtain prior approval from their unit executive officer to engage in non-University activities (regardless of net revenue), appointments and affiliations (whether you receive compensation or not) and all other external activities that may present a conflict of commitment with their University responsibilities.

If your activities, appointments and affiliations, 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.

**19. Do I need to request approval for all non-University income-producing activities?**

Yes. See [COCI Policy Section VII. A. Academic Staff Member Responsibilities.](#)

**20. 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, appointments and affiliations. If you have engaged in non-University activities, appointments or affiliations but did not report and obtain approval prospectively for activities, appointments or affiliations, then these previously unreported activities, appointments and affiliations must be reported retrospectively. Reporting of retrospective activities, appointments and affiliations must be done as promptly as possible.

To report activities, appointments and affiliations retrospectively in the [START myDisclosures](#) application, you must disclose your activities, appointments and affiliations for the previous reporting period on the current RNUA disclosure. Provide a full compilation of all non-University activities, appointments and affiliations. Clearly identify that you are reporting an activity, appointment and affiliation that occurred retrospectively. Include time period during which the activity, appointment and affiliation 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, appointments and affiliations were not disclosed in advance. The additional explanation should also indicate whether you propose to continue the activities, appointments and affiliations or whether the activities, appointments and affiliations have ended. Your disclosure will be routed to your UEO for approval.

Failure to seek prior approval for non-University activities, appointments and affiliations, as per the University Policy (see [Section VIII. Violations](#)), may result in sanctions. Severity of sanctions depends on the extent of the violations of the Policy. Failure to make a disclosure may be interpreted as making a false report to the University.

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

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

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

Yes.

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

The exact amount of income is not required as part of your disclosure. The RNUA asks that you identify which dollar range describes your financial interest: \$0-4,999; \$5,000-24,999; or \$25,000 and over. Unit executive officers may require more detailed information separately if needed to assess the potential, actual or apparent conflicts presented by a non-University income-producing activity.

**24. How should time spent on non-University activities, appointments and affiliations be calculated?**

All time should be reported in terms of the number of days devoted to non-University activities, appointments or affiliations.

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 days per week by your appointment period at the University.

**25. If I am a part-time employee, how much time should I report for my non-University activities, appointments and affiliations?**

As a part-time employee, you should disclose your non-University activities, appointments and affiliations, and answer questions about your interests.

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 days per week by your appointment period at the University.

Academic staff whose appointments are less than 50% are not required to request or report time committed to non-University activities, appointments or affiliations but you must still disclose these on the RNUA.

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

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](#).

Academic staff whose appointments are less than 50% are not required to request or report time committed to non-University activities. Academic staff with less than 50% appointments are still required to report non-University activities, appointments and affiliations.

**27. 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?**

You should disclose your primary employment as an outside activity and answer questions about your interests, but as an academic staff member whose appointment is less than 50%, you are not required to request or report time for your primary employment. Academic staff with less than 50% appointments are still required to report non-University activities, appointments and affiliations.

**28. When reporting time spent on non-University activities, appointments and affiliations do I have to include travel time?**

Yes.

Time spent on travel for activities, appointments and affiliations must be accounted for in number of days. Even if you are using your vacation time or business leave, you must report the time spent in the number of days for travel and the days to conduct the activities, appointment or affiliation.

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 in your typical workday 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 outside entity, 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 outside entity, time spent in meals paid for or reimbursed by the outside entity, or time spent in any other activities that were paid for or reimbursed by the outside entity.

Travel logs must be signed and dated by your Unit Executive Officer upon completion of your travel and return to the University. The completed and approved 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](#).

**29. 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.

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

Yes.

**31. Am I required to report activities, appointments and affiliations that are not directly connected to my research or to companies in which I have an interest?**

Yes.

**32. Must non-University activities, appointments or affiliations performed during evenings and weekends be reported?**

Yes. All non-University activities, appointments or affiliations should be reported even if activities occur during the evening, weekends, holidays, vacation time or non-appointed periods (summer for 9 or 10-month appointments).

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

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

**34. I have less than a 12-month appointment. Do I have to report my activities, appointments or affiliations 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 must be reported when responding to the disclosure questions.

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

No. They need only report their activities, appointments and affiliations as of the date of employment with the University.

**36. 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* activities, appointments and affiliations.

**37. Do staff members who are on an unpaid leave of absence, on unpaid sabbatical, or on medical 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 temporary release 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.

Temporary release from reporting non-University activities is not allowable if the absent academic staff member applies for a federal grant or contract while on unpaid leave. The academic staff member must also submit the sponsor specific questionnaire to disclose any significant financial interests and comply with any agency-specific disclosure requirements.

**38. What are examples of allowable activities, appointments and affiliations?**

The University requires academic staff members to submit a complete report of all non-University activities, appointments and affiliations (whether compensated or not). Most are considered allowable pending review and approval from the Unit Executive Officer. The University policy fully recognizes that most are consistent with, and often beneficial to, an academic staff member's University roles.

RNUA Guidance includes a list of activities, appointments and affiliations that must be report. The list is not all-inclusive and is only intended to provide guidance.

**RNUA Guidance:** <https://go.uic.edu/coiRNUAGuidance>

**39. 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](#). The list is not all-inclusive and is intended to provide guidance. All examples are assumed to include both for-profit and not-for-profit entities (including domestic and foreign).

- Accepting or holding foreign appointments or affiliations, including having a position with a foreign talent or recruitment program, or being supported by foreign awards, grants, or gifts while conducting federally funded research at the University.
- 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 activities, appointments or affiliations 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 including domestic and foreign, 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, 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
  - Coaching
  - Providing or directing professional entertainment services.

**40. Do I need to attach a statement to explain my activities, appointments and affiliations?**

You are not required to submit an additional explanation unless you are reporting an activity, appointment and affiliation retrospectively when approval was not requested in advance. You may also submit an additional explanation if you need additional space to explain your activities, appointments and affiliations 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).

**41. I have more than one non-University activity, appointment or affiliation; how can I list multiple activities, appointments and affiliations?**

Follow the instructions in [START myDisclosures](#) to add additional activities, appointments and affiliations to your disclosure. For additional guidance, see the step by step [Employee Instructions](#).

**42. 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.

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

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

**44. What is a fiduciary?**

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

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

**45. 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.

**46. 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.

**47. 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 commitments or excessive use of time such that they diminish the academic staff member’s commitment or service to the University.
- Accepts or holds foreign appointments or affiliations, including having a position with a foreign talent or recruitment program, or being supported by foreign awards, grants, or gifts while applying for or actively participating on federally funded research at the University.
- Is a faculty member that teaches outside the University, unless assigned or approved by the department.

**48. 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 written 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.

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

The [START myDisclosures](#) review process groups disclosures ready for review into two categories:

- Disclosure with no activities reported
- Disclosures with **no activities**, but includes only **comments or attachments**
- 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 Records folder. Reviewers can use the filter function to list employees who have no activities reported. The reviewer can click on the name of the academic staff member. 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, appointments or affiliations that were not reported but should have been, when known.

If activities, appointments or affiliations should have been reported, but were not reported, the UEO/assistant should contact the employee by email to request he/she submit a new RNUA.

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, University COI staff, University auditors and University Ethics Office.

When the employee updates his/her RNUA to report an activity, the [START myDisclosures](#) application will alert the executive officer and assistant that a new RNUA has been submitted and requires review.

#### **Review process when no activities are reported, only comments or attachments included with RNUA**

Disclosures of no non-University activities which include only comments or attachments will route

to the executive officer to review and approve or to return to the academic staff member to request the he/she report the non-University activity. The reviewer will see a table with the person's name, the date submitted, a talk bubble icon, and action options with either a green check mark or a red return arrow. Click on the talk bubble icon to view the academic staff member's comments or access the attachments. The reviewer should review these and consider whether there are any activities that require reporting to the University. If there are activities, appointments or affiliations that need to be reported to the University, the reviewer to use the red backward pointing arrow to return the RNUA with a comment to add an activity, appointment or affiliation to the RNUA. If the reviewer has any concerns or questions about the comments or attachments, the RNUA should be returned to the academic staff member with a comment from the reviewer to clarify the comment or attachment. When the reviewer believe he/she has sufficient information and no non-University activities, appointments or affiliations need to be reported, then the reviewer can use the green check mark to complete the review. The reviewer will be asked in a pop-up window to confirm the approval.

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

AY20 (2019-2020), the [START myDisclosures](#) was enhanced to identify activities that reach thresholds that require the academic staff member to follow the University [RNUA terms and conditions](#). When the RNUA requires the terms and conditions, the application will automatically set the RNUA as requiring a second level of review (the reviewer will see the yellow upward pointing arrow, indicating "Forward for Further Review," selected for the activity).

Activities which require RNUA Terms and Conditions must be evaluated by the Unit Executive Officer. The UEO is required to provide comments (or an attachment) to describe the department management plan to monitor the activities; or the UEO may determine to change the review to approved (using the green check mark). When the UEO approves the activities, the next page will ask the UEO to provide a comment (or attachment) to explain why the activities do not present conflicts of commitment or interest.

Guidance on Management Mechanisms for Unit Executive Offices is available at:

<https://uofi.app.box.com/v/rnuamanagement>

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

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



**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 Affair, 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 for secondary appointments and 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 Affair, COI staff, University Auditors, and University Ethics Office.

**50. How does the UEO deny an activity, appointment and affiliation?**

To deny an activity, appointment and affiliation 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 activity, appointment and affiliation 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.

**51. Does the unit executive officer need to include a statement explaining why the activity,**

**appointment and affiliation 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, appointment or affiliation pending the revisions required by the UEO OR explain that one or more activities, appointments or affiliations are not approved.

**52. If activities, appointments and affiliations 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, appointment and affiliation is not approved as submitted and return for revisions the disclosure to the employee, who should revise the disclosure and resubmit.

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

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

**54. How should the unit executive officer review previously undisclosed activities, appointments and affiliations that are reported retrospectively?**

If an academic staff member discloses non-University activities, appointments and affiliations after the activities, appointments and affiliations have occurred or have been accepted, and the staff member did not obtain prior approval for the activities, appointments and affiliations then the UEO must conduct the review of the activities, appointments and affiliations, retrospectively. Please see [COCI Policy Resource, Retrospective Review](#). The academic staff member must upload an explanation as to why the activities, appointments and affiliations were not reported prior to engaging in the non-University activities, appointments and affiliations. The academic staff member's explanation should also indicate whether the activities, appointments and affiliations will continue or whether the activities have ended.

The UEO must assess the retrospective disclosure. The UEO must determine whether the retrospective activities, appointments and affiliations present conflicts of commitment or interest. If activities, appointments and affiliations present conflicts of commitment or interest, then the UEO must provide a comment with a department management plan or attach a department management plan. A second level of review is required.

Sanctions may apply for failure to obtain approval prior to engaging in non-University activities, appointments and affiliations. The UEO should contact the campus Conflict of Interest Officer to discuss the review process when the UEO decides to apply sanctions. Failure to make a disclosure may be interpreted as making a false report to the University.

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

**55. An academic staff member previously completed the RNUA for the current academic year under a different unit. The RNUA is approved and complete, but because of a change in appointment or a new payment, the employee shows up as not submitted in the folder for the new**



**unit or unit administering the payment. Does the employee need to complete a new RNUA?**

If the employee already has an approved RNUA for the current academic year, the new unit may exempt the employee from submitting another RNUA.

Instructions are available at: <https://research.uic.edu/compliance/coi/rnua/rnua-administrators-resources/>

## **STATEMENT OF ECONOMIC INTERESTS**

**56. 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)