

Understanding Conflict of Interest and Conflict of Commitment



OFFICE OF THE
VICE CHANCELLOR
FOR RESEARCH

Conflict of
Interest

Understanding COI, FCOI, and COC

This Quick Reference Card outlines Conflict of Interest and Conflict of Commitment. It further provides instructions on the Conflict of Interest Annual Disclosure. Anyone who is involved in the design, conduct, or reporting of research must follow the annual disclosure process in AIR.

Conflict of Interest (COI)

A **Conflict of Interest** occurs when **personal, financial, or professional interests** may “compromise, involve the potential for compromising, or **have the appearance of compromising**” your ability to fulfill **your University responsibilities objectively**.

- Includes both **financial** and **non-financial** interests that are reasonably related to your research or other institutional responsibilities.

Financial Conflict of Interest (FCOI):

- A specific type of COI, which occurs when a **Significant Financial Interest** could directly and significantly affect the **design, conduct, or reporting** of research.

What you do:

- Anyone involved in the **design, conduct, or reporting** of research should follow the Annual Disclosure process outlined on the following pages.

Governing Policy:

- [UNC-Chapel Hill Policy on Individual Conflict of Interest in Research](#)

Conflict of Commitment (COC)

While Conflicts of Commitment are handled separately, they are closely related to Conflicts of Interest. A **Conflict of Commitment** arises when your **external activities**, whether paid or unpaid, may **interfere with your primary University responsibilities and schedule**, such as teaching, research, or service.

Some examples of COC:

- Engaging in **consulting or advisory work**
- Operating a private business
- Serving in an external leadership or board role

What you do:

- **Faculty and EHRA non-faculty employees** report external professional activities through the External Professional Activities for Pay (**EPAP**) form in AIR
- **SHRA employees** report secondary employment through **Human Resources**

Governing Policy:

- [UNC-Chapel Hill Policy on Individual Conflicts of Interest and Commitment](#)

Navigating Conflict of Interest Processes at UNC

What does Individual COI Policy Cover?

The [UNC-Chapel Hill Policy on Individual Conflict of Interest in Research](#) requires that anyone who is involved in the design, conduct, or reporting of research disclose any relevant interests - financial or non-financial, domestic or foreign - that are reasonably related to their institutional responsibilities and could influence their research.

This includes:

- Interests reasonably related to your University responsibilities;
- Interests that could affect the design, conduct or reporting of research;
- Interests held by immediate family members*

***Immediate Family:** COI Investigator's spouse, dependent children, or any person cohabitating with the investigator, sharing mutual responsibility for each other's welfare and financial obligations. In certain circumstances as dictated by specific federal funding agencies or other sponsors, immediate family may have a broader definition.

Who must disclose?

You must disclose if you are involved in the **design, conduct or reporting** of:

- Sponsored research projects
- Human subjects research reviewed by the Institutional Review Board (IRB)

Examples Include:

- Principal Investigators (PIs)
- External PIs
- Independent contractors (investigators)
- Co-investigators and subrecipients
- Study coordinators
- Collaborators or consultants involved in research decisions
- Students, trainees, and research staff in oversight roles
- UNC Faculty

The Principal Investigator (PI) is responsible for identifying all participants who are involved in the design, conduct, or reporting on a project or protocol, and ensuring their disclosures are complete.

When must you disclose?

- Annually
- Within 30 calendar days of a change in your interests
- If prompted by the COI Office

What must you disclose?

Financial Interests: Financial benefits and other reportable interests received or held by discloser or their immediate family members, including but not limited to:

Salary or other payments for services

e.g., consulting fees, honoraria, or remuneration for holding a position in a company

Income from

seminars, lectures, service, or speaking/teaching engagements sponsored by for-profit, non-profit, foreign, or individual entities

Equity Interests

(e.g., stocks, stock options, or bonds) that are directly controlled by the discloser or their immediate family members. "Direct control" means the owner of the securities has investment power, which includes the power to buy, sell, or direct the purchase or sale of the securities.

Serving in

an external executive, board, consulting, volunteer, or advisory position, whether paid or unpaid

Ownership of

a business regardless of the business's profitability

Intellectual Property

(e.g., inventions, patents, and copyrights) and license-related payments from such rights that are paid through any entity

Travel

that is paid or reimbursed by a non-University entity and related to a discloser's institutional responsibilities

Gifts

to the University that benefits a discloser's research

What should you NOT disclose?

- Salary, reimbursement, or remuneration originating from the University
- Income from seminars, lectures, or teaching/speaking engagements sponsored by a federal, state, or local government agency; an institution of higher education/affiliated research institute; or an academic teaching hospital/medical center in the U.S.
- Income from service on advisory committees or review panels for a federal, state, or local government agency; an institution of higher education/affiliated research institute; or an academic teaching hospital/medical center in the U.S.
- Mutual funds or other investment vehicles over which the discloser has no direct control over the selection of holdings.
- Travel that was paid for by the University or by a project processed through the Office of Sponsored Programs.

Who can I contact if I have questions?

- Email: coi@unc.edu
- Phone: 919-843-9953

Where can I get more information?

- [University of North Carolina at Chapel Hill Policy on Individual Conflict of Interest in Research](#)
- [Conflict of Interest \(COI\) | UNC Research](#)
- [FCOI Training Module | UNC Research](#)
- [FCOI Training | NIH Grants & Funding](#)
- [42 CFR Part 50 Subpart F - Promoting Objectivity in Research | eCFR](#)
- [300.2.2 - Conflicts of Interest and Commitment Affecting Faculty and Non-Faculty EHRA Employees | UNC Policy Manual](#)