Frequently Asked Questions

Why did the COI policy change?

The U.S. Public Health Service instituted updated regulations for the disclosure of financial interests related to employment responsibilities effective August 24, 2012. As most UNC campuses have Public Health Service funding in their research portfolios, the UNC Policy on Conflict of Interest and Commitment was updated to reflect definitions, thresholds and reporting requirements cited by the federal regulations. UNCGA is subject to the UNC Policy on Conflict of Interest and Commitment.

How has the COI disclosure process changed and why?

The Annual report of Potential Financial Interests or Relationships (COI disclosure form) is filed annually. The report will cover the 12 months preceding the report. Any changes to information provided on the annual COI disclosure form should be reported within 30 days of the change.

What is the difference between a financial interest and an external professional activity for pay (EPAP)?

An External Professional Activity for Pay (EPAP) is a subset of financial interests (see #3 below). Financial Interest is defined as:

1. Equity or other ownership interest (e.g. stock, stock options, or other ownership interest) held by the Covered Employee or his/her immediate family [spouse and/or dependent children] in a publicly or non-publicly-traded entity, if that entity or ownership interest has the potential to affect the performance of responsibilities of the University;

2. Intellectual property rights and interests upon receipt of income related to such rights and interest, help by the Covered Employee or members of his/her immediate family;

3. Payment for services to the Covered Employee not otherwise defined as institutional salary (e.g. consulting fees, honoraria, paid authorship).

How is a Management Plan created?

If an EPA employee has a financial interest in an entity that provides goods or services to UNCGA the management plan would establish certain safeguards to ensure the employee’s decision making regarding the entity was not unduly influenced. Safeguards may include:

1. The employee being prohibited from preparation of bid solicitations, bid review or vendor selection where the entity may be a competitor
2. The employee being prohibited from the review or approval of work product from the entity or approval of payments to the entity.

**If a conflict of interest is disclosed will I lose my job?**

No. The preferred course of action is to minimize the impact of financial interest(s) on the employee’s UNCGA Employment Responsibilities through an appropriate management plan. Divestiture of the financial interest is also a means to minimize the impact of the financial interest on the employee’s UNCGA Employment Responsibilities, although divestiture is not the preferred course of action.

**Are my parents, brothers or sisters considered immediate family?**

No. Only your spouse and/or dependent children are considered immediate family under the UNC Policy.

**Can I own a business?**

Yes. Depending on the type of business you own there are some things to be aware of, including:

1. You may not use UNCGA’s facilities, personnel, equipment, IT resources, confidential information or other resources for the purposes of your outside business.

2. If your business is engaged commercially with UNCGA you must disclose this information on the COI disclosure form and have an approved management plan in place relative to your UNCGA Employment Responsibilities and your role as the business owner.