

EAST CAROLINA UNIVERSITY FACULTY MANUAL

PART VIII

Personnel Policies and Procedures for the Faculty of East Carolina University¹

¹For other policies and procedures dealing with faculty appointments, see *ECU Faculty Manual*, Part. X.

PART VIII – PERSONNEL POLICIES AND PROCEDURES FOR THE FACULTY OF EAST CAROLINA UNIVERSITY

SECTION II

Policy of Conflicts of Interest and Commitment and External Activities of Faculty and Other Professional Staff *(Revised 7-19)*

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I. Introduction

Faculty are encouraged to engage in appropriate relationships with public and private agencies outside of the University in their scholarly, teaching and service contributions. In doing so, there is a need for commonly understood principles and corresponding procedures that identify, address, and manage potential conflicts that would detract from or interfere with an employee's dedication of unbiased primary professional loyalty, time, and energy to the University's mission.

All members of the University community are expected to avoid conflicts of interest and conflicts of commitment that have the potential to directly and significantly affect the University's interests or compromise objectivity in carrying out University Employment Responsibilities, including research, service, and teaching activities and administrative duties, or otherwise compromise performance of University responsibilities. All activities that raise the issue of such conflicts must be disclosed, reviewed, and appropriately managed in accordance with the provisions of ECU [REG01.15.03](http://www.ecu.edu/prr/01/15/03) Regulation on Conflicts of Interest, Commitment, and External Professional Activities for Pay. (<http://www.ecu.edu/prr/01/15/03>). [REG01.15.03](http://www.ecu.edu/prr/01/15/03) is based on policies and guidelines adopted by the UNC system Board of Governors, federal and state law, and federal agency sponsor requirements. Any questions regarding these procedures, or the Board of Governors' policies upon which they are based, should be directed to the Conflict of Interest Officer within ECU's Office of Research Compliance.

II. Conflict of Interest

Conflict of Interest (COI) relates to situations in which financial or other personal considerations, circumstances, or relationships may compromise, have the potential to compromise, or have the appearance of compromising an individual's objectivity in fulfilling their university duties or responsibilities, including research, service and teaching activities, and administrative duties.

III. Conflict of Commitment

A Conflict of Commitment (COC) relates to an individual's distribution of time and effort between obligations to University employment and participation in other activities outside of University employment. The latter may include such generally encouraged extensions of professional

expertise as professional consulting (i.e. External Professional Activities for Pay—refer to UNC Policy Manual 300.2.2). Such activities promote professional development and enrich the individual's contributions to the institution, profession, and society; however, a conflict of commitment occurs when their pursuit involves an inordinate investment of time or is conducted at a time that interferes with the employee's fulfillment of University Employment Responsibilities.

IV. Categories and Examples of Potential Conflicts

Activities that may involve financial conflicts of interest can be categorized under four general headings: (1) activities that are allowable and are disclosed; (2) activities requiring disclosure for further administrative review and analysis; (3) activities or relationships that are generally not allowable or permitted unless an approved Conflict of Interest Management Plan is in place; and (4) activities that are not allowable under any circumstances.

A full explanation of each of these categories is provided in regulation ECU [REG01.15.03](#) on Conflicts of Interest, Commitment, and External Professional Activities for Pay.

Faculty have an obligation to become familiar with, and abide by, the provisions of the university's COI/COC Regulation. At a minimum, all are required to receive COI/COC training and complete a disclosure annually. Certain situations or activities may precipitate the need to submit or update a disclosure more frequently. If any question of a COI/COC arises, faculty should discuss the situation with the University's Conflict of Interest Officer and are encouraged to make a formal disclosure to the University.

V. Conflict and Commitment Procedures

The institutional COI Officer reviews the disclosures, categorizes the activity, and when required, works with the faculty member and Conflict of Interest Committee to implement a COI management plan. All questions on allowable activities, potential COIs, disclosures, and management plans should be directed to the University's COI Officer.

VI. Enforcement

Faculty and all employees are under a clear obligation to adhere to the ECU policies and procedures to disclose and to remove or appropriately manage conflicts of interest or commitment. Violations may include, but are not limited to: (a) failure to properly disclose personal or financial interests as required, failure or refusal to respond to requests for additional information, providing incomplete, misleading, or inaccurate information; (b) failure to comply with a prescribed management or monitoring plan; or (c) engaging in an external activity for pay without receiving prior approval. Possible sanctions for such violations can range from administrative intervention to termination of employment in accordance with applicable University policies, including the Faculty Manual (Part IX, Section I, VI). (FS Resolution #10-36, March 2010)

VII. Political Candidacy and Holding Public Office

The Board of Governors has established rules for monitoring and regulating the involvement of University employees in political candidacy and office holding that could interfere with fulltime commitment to University duties. Faculty seeking to hold or are holding public office should refer to UNC Policy Manual, 300.5 for specific policy details.

(FS Resolution #10-36, March 2010, FS Resolution #19-58, June 2019)