

The University of Iowa
Conflicts of Interest in the Workplace and eCOI Disclosure System
~ Frequently Asked Questions (FAQs) ~

INTRODUCTION

The following FAQs pertain to **Conflicts of Interest in the Workplace** ([OM II-18.5](#)) and the **eCOI online disclosure system** (<http://ecoi.uiowa.edu>). For information about other forms of conflicts of interest and related policies and procedures, please see the "[Conflict of Commitment and Interest Policies at The University of Iowa.](#)"

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DEFINITIONS – CONFLICTS OF INTEREST IN THE WORKPLACE

What is a Conflict of Interest in the Workplace? Conflicts of interest in the workplace involve situations in which UI employees have financial interests and/or other personal considerations with a non-university entity that may compromise, or have the appearance of compromising, their professional judgment in performing their University duties (e.g., teaching, business decision-making).

How is a Conflict of Interest in the Workplace (COI-W) different than a Conflict of Interest in Employment (COI-E)? The COI-Workplace policy pertains to a range of “University duties,” whereas the Conflict of Interest in Employment policy safeguards one specific university duty: supervision of employees. The COI-Employment policy is designed to ensure that a current or former relationship outside the work setting (e.g., familial, romantic, intense personal, or significant business relationship) does not interfere with a supervisor’s decisions or recommendations related to the employment status of another UI employee (e.g., hiring, salary, working conditions, working responsibilities, evaluation, promotion, termination). Because of the importance of safeguarding the supervisory relationship, COI-Employment disclosures are reviewed by University Human Resources and the Office of the Provost, with support from the Committee on the Conflict of Interest in Employment appointed by the Faculty Senate and Staff Council. For more information, see: <http://www.uiowa.edu/~our/opmanual/iii/08.htm> .

How does the “Conflict of Interest in the Workplace” interact with other “conflict of interest” policies? Given the breadth of activities conducted within the University enterprise, several unique policies ensure the integrity of other aspects of the enterprise (e.g., health care, research, purchasing). Various policies and procedures address key concerns of their respective domains (for more information, please see the “[Conflict of Commitment and Interest Policies at The University of Iowa](#)” webpage). It is important to note that one outside interest (e.g., financial investment in a company that is interested in doing business with one’s unit) may require review and management by several offices overseeing the various policies.

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eCOI ONLINE DISCLOSURE SYSTEM

What is the eCOI online disclosure system? The eCOI online disclosure system provides a common portal for UI employees to fulfill the disclosure requirements of the following UI policies:

- Policy on [Conflicts of Interest in Research](#),
- Policy on [Conflicts of Interest in the Workplace](#),
- Policy on [Conflicts of Commitment](#),
- [UI Health Care Conflicts of Interest Policy](#), and
- [Accreditation requirements for Continuing Medical Education](#).

Who is required to complete an “Annual Disclosure of Outside Professional Activities and Interests”? While all UI employees are required to disclose any potential or actual conflicts of interest in the workplace as they arise, the following UI employees are required by policy to complete an “Annual Disclosure of Outside Professional Activities and Interests”:

- 1) All UI researchers who are identified as “key personnel” on a UI routing form submitted to Sponsored Programs or an IRB application.
- 2) All UI Health Care employees with 50% or greater appointments, including faculty, P&S and SEIU staff, and Merit Exempt employees.
- 3) Faculty and Staff members with 50% or greater appointments in the following categories:
 - a. Regular Faculty (tenure-track, tenured, clinical-track, research-track),
 - b. P&S compensated at Pay Levels 7 and above (see ePersonnel File in [UI Employee Self Service](#) for Pay Level), and
 - c. Executive Classifications (e.g., President, Provost, Vice Presidents), and
 - d. Administrators with Faculty Appointments (e.g., Deans, Associate Provosts, Directors).

Do I have to complete an “Annual Disclosure of Outside Professional Activities and Interests” if I have nothing to disclose? Yes, if you are required by policy to complete an Annual Disclosure, you must log into the system, indicate you have nothing to disclose, and certify that you agree to abide by the relevant conflicts of interest policies. In fact, the vast majority of UI employees have no relevant outside activities and interests to disclose, so completing the Annual Disclosure and Annual Certification will take less than five minutes. Employees with activities and interests to disclose will be asked to complete a “Disclosure” so that the interest/activity can be reviewed and managed, if appropriate.

OUTSIDE PROFESSIONAL ACTIVITIES (OPA)

Do I need to disclose “outside professional activities” in which I engaged as part of my UI position? The answer is “it depends,” based on your role at the UI and the policies governing that position. The eCOI system recognizes your employee status upon log in and will present you with the set of questions required per your position. The eCOI form will instruct you about which “outside professional activities” you are required to disclose and which you are not.

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I was just elected as president of my professional association. Do I need to disclose that type of “outside professional activity”? Service in one’s professional associations is *typically* considered an expected part of many UI employees’ job responsibilities and/or portfolio. These types of activities do not need to be disclosed on the eCOI disclosure form, *unless* you are a faculty or staff member engaged in research funded by the U.S. Public Health Service (PHS). Conflicts of Interest in Research (COI-R) are monitored per federal regulations and, if your research is funded by the PHS, activities with all non-profit entities related to your University responsibilities, including professional associations, must be disclosed. Please see <http://coi.research.uiowa.edu/> for additional information about COI-Research.

What is meant by a “Business Day” on the Disclosure Report? The Conflict of Commitment policy defines "business day" as “every Monday through Friday during regular business hours and time on any Saturday, Sunday, or evening when a faculty member is scheduled to work, but does not include any University holiday or day that the faculty member takes a vacation day or sick leave.” While this is being used as a general unit of measurement, it is acknowledged that much faculty work is conducted outside of the traditional business day and often outside of the office (e.g., course preparation, writing and other forms of research/scholarship), which is taken into consideration when reviewing faculty members’ outside professional activities.

I gave an invited talk at a professional conference and was paid a small honorarium. Do I need to disclose that as an outside professional activity? The answer is “it depends” based on your role at the UI and the policies governing that position. The eCOI system recognizes your employee status upon log-in and will present you with the set of questions required for your position.

FINANCIAL INTERESTS

The eCOI form asks about “Stock, Stock Options, and Other Ownership Interests” related to my University responsibilities. Do I need to disclose financial investments in a mutual fund portfolio? No, income from investment vehicles, such as mutual funds and retirement accounts, does not need to be disclosed as long as the employee does not directly control the investment decisions made in these vehicles.

The eCOI form asks about “Stock, Stock Options, and Other Ownership Interests” related to my University responsibilities. Do I need to disclose investments that I own that are unrelated to my University position? No, investments that have nothing to do with your University responsibilities do not need to be disclosed. Only those investments that may pose or have the appearance of posing a conflict of interest with the fulfillment of some part of your University responsibilities or same field of expertise as your job at the University as described below.

Why is “Family Member Compensation” asked about? The COI-Workplace policy safeguards against an employee’s outside interests and activities compromising, or having the appearance of compromising, your professional judgment in performing your University duties. If an immediate family member (i.e., spouse/domestic partner, dependent child) could potentially benefit from a [\[Return to Overview\]](#)

decision that you make in your UI role, then it could have the potential to impact your decision-making process, or have the appearance of impacting your process. A Management Plan can address the situation to eliminate the conflict and/or appearance of a conflict.

The eCOI Disclosure Report asks about “Licensing/Royalty Income.” Does that really mean I should disclose royalties related to all of my publications? Some of the royalties don’t even exceed \$100 per year. For purposes of the eCOI Disclosure form, “Licensing/Royalty Income” means any income received from licensing or royalty agreements for inventions and other intellectual property you helped create, whether at the University of Iowa or not.

Royalties from works published in scholarly journals or academic presses can be disclose in aggregate form (e.g., enter “Book royalties” in the “Entity” field rather than the name of each individual academic publishing house) with the exception of the following:

- If a royalty is received from publishing and the publication is used in your curriculum, then the name of the publishing house and publication should be disclosed (see Royalties from Course Materials, OM17.17(3)).
- For UIHC employees, all individual publishing royalties received from any medical publishers (e.g. Springer, Elsevier, Thieme) must be disclosed, regardless of whether or not the book is used in your curriculum.

Why do I have to disclose whether the income was less or in excess of \$5,000? The federal guidelines governing conflicts of interest in research identify greater than \$5,000 as a “significant financial interest.” All employees completing an eCOI Disclosure Report are asked information about the dollar amount of the outside interest. Due to policy requirements, researchers and UI Health Care employees must specify exact dollar amount; all others must only specify whether the amount was \$5,000 or less or greater than \$5,000.

PERSONAL CONSIDERATIONS

What is meant by “Personal Considerations?” What kinds of things should be disclosed? The Conflicts of Interest in the Workplace policy identifies “personal considerations” as situations in which UI employees have other relationships, outside activities, or circumstances that may interfere, or have the appearance of interfering, with the objective performance of their University duties (e.g., teaching, supervising, business decision-making). Examples include enrollment of an immediate family member in a course being taught by the UI employee and/or UI students employed in an outside business owned by the supervisor or faculty member. You will be asked about specific items during the Annual Certification section of the eCOI disclosure form. If you have questions whether something should be disclosed as a “personal consideration”, please consult with your Senior HR Representative, if staff, or your Associate Dean for Faculty, if faculty).

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DISCLOSURE AND REVIEW PROCESS

Who reviews my online disclosure to determine whether a conflict exists and should be managed?

Given activities conducted in fulfillment of the University's mission, unique conflict of interest policies govern key areas of the University enterprise. Since UI employees play multiple roles on campus, your disclosure will be reviewed by the respective offices to fulfill federal, state, and institutional requirements. For example, if you are a researcher on campus, your disclosure will be reviewed by the Conflicts of Interest in Research office to ensure that your outside professional activities and interests does not bias your research or compromise, or give the appearance of compromising, your judgment as an investigator. The online eCOI disclosure system provides a consolidated portal for employees to disclose once for use by multiple offices. For more information about related UI conflicts of interest policies and procedures, please see <http://provost.uiowa.edu/conflicts-commitment-and-interest-policies>.

Is the information I disclose kept confidential? The answer to what happens with the information disclosed in your eCOI Disclosure Reports differs based on the policies governing your role at the University. For example, if you are a UI Health Care employee, the UI Health Care Conflict of Interest and Commitment policy requires that information from Disclosure Reports submitted by Health Care employees is published in a publicly accessible online database at <https://wsi.healthcare.uiowa.edu/Marcom/ECOI/>. The information that is published from the Disclosure Report is the Entity Name, the employee's relationship with the entity, and the amount of compensation received (shown in a range). If you are a researcher who has funding under the PHS and you have been determined to have a financial conflict of interest related to that research, federal regulations require that the information about your conflict of interest be publicly accessible. The Conflict of Interest in Research Office will make available to the public upon request information concerning the financial interest. For all disclosures, the information will only be shared on a need-to-know basis and as required by state law.

What is a Management Plan? A Management Plan is an approved written document that details provisions that will be put into place to eliminate any real, potential, and/or perceived conflicts of interest that may arise between fulfillment of one's University responsibilities and one's outside interests and/or activities. Management plan actions may include nothing beyond documentation of disclosure, informing employee about relevant UI policies governing use of University resources or consulting activities, strategies to eliminate the conflictual elements of the activity (e.g., recusal from pertinent decisions, changed reporting structure), and/or in rare cases, prohibition of the activity. Approved Management Plans developed per the Conflicts of Interest in the Workplace policy are kept on file in the college/division and in an employee's personnel file, and reviewed on at least an annual basis.

What if I don't agree with the content of a Management Plan? If an employee wishes to dispute a proposed management plan created under the Conflicts of Interest in the Workplace, the governing procedures for faculty are the Faculty Dispute Procedures ([III-29](#)) and that portion of those procedures dealing with faculty grievances ([III-29.6](#)). Staff and student employees, including graduate assistants, may appeal through Administrative Review ([III-28.2](#)). Disputes related to Management [\[Return to Overview\]](#)

Plans created under other policies can be made per the dispute proceedings listed in the respective policies (e.g., concerns about Research management plans may be made with the Office of the Vice President for Research and Economic Development; for UI Health Care, with the Office of the Vice President for Medical Affairs).

I see that the Annual Disclosure period is February 3 through April 30. What if I have a new outside interest arise in August? Should I wait until the next February to disclose it? The eCOI online disclosure record is available to you to update throughout the year. The interest should be reported as soon as it arises. New employees should be informed of the annual disclosure requirement and complete their initial disclosure using the eCOI online disclosure system shortly after starting employment.

What if an employee does not disclose a situation that poses an actual or potential conflict of interest? There are several reasons why an employee may not disclose an actual or potential conflict of interest (e.g., the situation changed recently, it was not thought to be a conflict). The existence of a conflict of interest is not always clear-cut. University employees are expected to make a reasonable effort to disclose relevant outside activities and interests and, when uncertain, they should consult with the relevant Conflict of Interest office (<http://provost.uiowa.edu/conflicts-commitment-and-interest-policies>). The COI-Workplace policy further states that failure to disclose a conflict and/or comply with required management strategies constitutes a violation of University policy and may also violate state and federal law. Employees may be subject to sanctions for violation of this policy, including disciplinary action up to and including termination of employment.

FOR ADDITIONAL INFORMATION

I still have questions, where can I go for additional information? For further information about the Conflict of Interest in the Workplace policy and/or information about other Conflicts of Interest and Commitment policies and procedures, please see the respective offices listed here:

<http://provost.uiowa.edu/conflicts-commitment-and-interest-policies>

- **Faculty-related Questions:** Diane Finnerty, Office of the Provost, 335-3991 or email: faculty@uiowa.edu. Website: <http://provost.uiowa.edu/conflicts-commitment-and-interest>,
- **Research-related Questions:** Martha Hedberg, 384-4256, Conflict of Interest in Research Office, or email: coi-research@uiowa.edu. Website: <http://coi.research.uiowa.edu/>,
- **UI Health Care Questions:** UI Health Care Conflict of Interest Office at 384-5252 or e-mail: coi@healthcare.uiowa.edu. Website: <http://www.uihealthcare.org/ConflictofInterest/>,
- **Staff and Executive Questions:** Terri Hein, University Human Resources, 335-2374 or email: HR-help@uiowa.edu. Website: <http://provost.uiowa.edu/conflicts-commitment-and-interest-and>
- **Continuing Medical Education Questions:** Division of Continuing Medical Education, 335-8599. Website: <http://www.medicine.uiowa.edu/cme>.

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