

**University of North Carolina at Asheville**  
**Conflict of Interest/Conflict of Commitment (COI/C)**  
**Management Plan - Faculty**

**Faculty Member's Name:** [Faculty Member's Name]

**Email:** [Faculty Member's E-mail]

**Phone:** [Faculty Member's Phone]

**Oversight Manager's Name:** [Oversight Member's Name]

**Email:** [Oversight Member's E-mail]

**Phone:** [Oversight Member's Phone]

**Plan Reviewer's Name:** [Plan Reviewer's Name]

**Email:** [Plan Reviewer's E-mail]

**Phone:** [Plan Reviewer's Phone]

**A. Description**

*[Describe the outside activity, employment, interest, or relationship that creates an actual, potential, or perceived conflict. Include the faculty member's level of involvement and how or where the situation might impact the faculty member's university responsibilities.]*

**B. Safeguards**

**Faculty Member agrees to:** *[use only the paragraphs that apply to the situation]*

1. Disclose the connection to Outside Entity to his/her Supervisor/Oversight Manager and the university.
2. Disclose the connection to Outside Entity to those involved in making decisions to purchase products or services from Outside Entity in which he/she has the opportunity to influence.
3. Refrain from substantive discussion and the decision-making process in his/her university role when services or products are being selected involving or related to Outside Entity.
4. Forward any transactions requiring approval for payments to Outside Entity to Oversight Manager for approval.
5. Enter into an agreement with the University for any use of university facilities, equipment, materials, and/or resources for any activities related to Outside Entity.
6. Refrain from hiring or otherwise engaging (volunteer or otherwise) students or staff whom he/she supervises or advises at the university to perform work for the Outside Entity (or vice versa) without written approval and oversight from the department chair or dean, and delegate supervisory responsibilities to *[an independent university person]*.

7. Refrain from evaluating the performance or making any changes in the employment or academic status of any university staff or students he/she supervises or advises, who also has an interest in Outside Entity.
8. Refrain from engaging in Outside Entity business or other outside activities when expected to perform his/her university responsibilities, and to take approved leave/time-off to engage in outside employment or activities to eliminate a conflict.
9. Refrain from using university equipment, materials, time, and/or resources for the Outside Entity or related activities without an appropriate agreement with the university for such use.
10. Refrain from hiring, supervising, advising or evaluating the performance of any immediate family members or close friends.
11. Remain knowledgeable of all relevant University of North Carolina at Asheville (UNC Asheville) Policies and diligently follow them including but not limited to the University Intellectual Property Policies and Agreements, Financial Conflict of Interest Policy related to research, the Conflict of Interest Policy, the Faculty Consulting Policy and all other relevant university policies and procedures.
12. Disclose to his/her supervisor any and all changes that may affect this Plan and update his/her university disclosure online within 30 days of any material change in relationships or financial interests.

#### **Research-Specific Safeguards**

13. Apply for or pursue research contracts or grants primarily through the university when within the course of Faculty Member's university responsibilities, and not divert potential grant/contract opportunities from the university to the Outside Entity.
14. Refrain from restricting publication or presentation, although publication may be delayed for appropriate purposes for a reasonable period.
15. Disclose relationship to Outside Entity in publications and presentations if the entity supports research being reported or if the publication/presentation is related to the entity's commercial interests or intellectual property.
16. Disclose in writing the relationship (to Outside Entity or family member) to the sponsor as early as possible.
17. Disclose in writing the relationship (to Outside Entity or family member) to all students, fellows, trainees, and other research workers whom he/she supervises and that any concerns may be brought to the Oversight Manager or the Office of Research Integrity.
18. Notify all co-investigators on federal grants of relationship (to Outside Entity or family member).

19. For human subjects research in which the Outside Entity a) sponsors the study, or b) owns or licenses any intellectual property used in the study:
- a. Report the conflict and provide a copy of this management plan to the IRB;
  - b. Disclose the conflict to participants in the study (unless the IRB determines otherwise);
  - c. Refrain from participating in the recruitment, enrollment, or consent of participants;
  - d. Designate a non-conflicted co-Investigator responsible for acting as an independent reviewer of the data analysis, and/or appoint an external independent reviewer of the raw data and manuscript;
  - e. Use double-blind study design and data analysis when possible;
  - f. If more than Minimal Risk involved, refrain from serving as the PI or co-PI, unless approved by the Chief Research Officer;
  - g. Divest relevant personal interests in or sever the relationship with the Outside Entity research sponsor if necessary.

### **C. Oversight Plan:**

**Oversight Manager agrees to:** *[use only the paragraphs that apply to the situation]*

1. Exercise reasonable oversight to verify that Faculty Member's service to or work for Outside Entity, compensated or uncompensated, does not interfere with the Faculty Member's university responsibilities.
2. Exercise reasonable oversight to verify that Faculty Member is not put in the position of discussing or making a decision to purchase products or services from Outside Entity in his/her University role.
3. Review all invoices from Outside Entity (or assign a designee to do so) and provide final approval of payment to Outside Entity.
4. Review and approve any agreements for use of university facilities, equipment, materials, and/or resources by Faculty Member or the Outside Entity.
5. Exercise reasonable oversight to verify that Faculty Member is not involved in the hiring, supervising, advising, or evaluation process of any immediate family members or close friends.
6. Exercise reasonable oversight to verify that Faculty Member is not involved in making a University employment decision, academic decision, or performance evaluation about any students or staff who also have an interest in Outside Entity.
7. Review this Management Plan with Faculty Member at least on an annual basis to determine progress and what, if any, changes may need to be made to this plan.

Full Name acknowledges that the University will monitor and evaluate this plan as well as policies related to it, and, at any time should UNC Asheville determine, in its sole discretion, that the plan is not sufficient to guard actual or apparent conflicts of interest or is otherwise not in the interest of UNC Asheville, may determine the conflicts as not capable of management and may ask Full Name not to pursue the conflicting activities while an employee of UNC Asheville. Full Name further acknowledges their personal duty to ensure their compliance with the North Carolina Ethics Act (as applicable) and that this plan is not a substitute for that responsibility.

### **Acknowledgement and Agreement**

By signing below, I, Full Name, acknowledge my agreement and intent to comply with the principles and safeguards of this Conflict of Interest/Commitment Management Plan.

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Full Name  
Title of Faculty  
Department or Office

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Date

We approve the above Plan for handling the conflict of interest identified by the faculty member.

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Full Name of Supervisor  
Title of Supervisor  
Department or Office

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Date

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Full Name of Dean  
Dean of Applicable Area

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Date

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Full Name of Chief Research Officer

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Date

*All final and signed Conflict of Interest/Commitment Management Plans or Agreements shall be sent to [research@unca.edu](mailto:research@unca.edu) and maintained by UNC Asheville's Chief Research Officer.*