



THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL
Office of the Chancellor

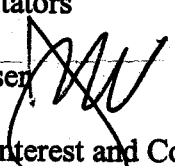
September 6, 2001

James C. Moeser
Chancellor

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MEMORANDUM

TO: Deans, Directors and Department Chairs
All Faculty and EPA Non Faculty Employees
Human Resource Facilitators

FROM: Chancellor James Moeser 

SUBJECT: Policy on Conflicts of Interest and Commitment

Events over the past year, including shutdowns of clinical trials at other institutions, have heightened scrutiny of conflict of interest issues nationwide and have demonstrated that the values reflected in our Policy on Conflicts of Interest and Commitment are essential to the protection of the integrity of the University's mission. Informed by these events, and consistent with our practice each year since its initial adoption, we have again made significant revisions to the Policy on Conflicts of Interest and Commitment and its associated disclosure form in an effort to refine our evaluation and management of conflicts of interest and to facilitate compliance with the Policy by clarifying several issues and simplifying the disclosure process.

Structurally, the most significant change is that disclosures will be centrally collected and distributed to the appropriate Deans, Directors and Department Chairs. We expect this change to facilitate timely and reliable review and documentation of our compliance with ethical and regulatory requirements as well as assure that the forms receive confidential personnel file treatment. Disclosure questions have also been reworded to clarify that for any given conflict of interest, involvement of human subjects research raises the level of examination. We have emphasized the obligation to shield students from inappropriate intrusion of commercial considerations into the academic mission. The most significant additional changes are embodied in the defined terms:

- In lieu of referring to clinical research, the policy uses a more broadly defined term, "human subjects study."
- "Sponsored research" has been replaced by two defined terms, "University project" covering a range of projects conducted under University auspices, and "project support" covering many types of support including in kind support and gifts.
- The computation of "significant financial interest" now includes all royalties, regardless of whether or not they are distributed to the covered individual through the University.

Please take the time to review the revised Policy in its entirety

The Policy and form are available on the University's policy website at <http://www.unc.edu/campus/policies.html>. Conflict of interest disclosure forms must be filed by covered individuals (described below) by October 1, 2001. For the first time, we can offer the option of filing annual conflict of interest disclosure forms electronically. Those who wish to file their form electronically may do so beginning September 11, 2001, by linking to the online disclosure form through the University's policy website noted above or by going directly to <https://www-s2.ais.unc.edu/coi/>. Those who wish to file a paper copy of their form may print the disclosure form from the same website, fill it out and forward the completed form to the Office of the Vice Chancellor and General Counsel, CB# 9100, 103 South Building, rather than submitting their form to their department as has been the practice in the past. The Office of the Vice Chancellor and General Counsel will be responsible for distributing the disclosures to the appropriate Deans, Directors and Department Chairs.

The Policy on Conflicts of Interest and Commitment covers full-time faculty and EPA non-faculty employees, part-time faculty and EPA non-faculty employees insofar as their University responsibilities are concerned, and faculty and EPA non-faculty employees who are on leave if the leave is funded at least partially from University sources. EPA non-faculty employees are those employees who are exempt from the State Personnel Act and whose base appointment is not as a member of the faculty. This Policy does not apply to SPA employees (those subject to the State Personnel Act). Post-doctoral fellows are covered by this Policy. Undergraduate and graduate students are not covered by this Policy except to the extent they are assigned to a project involving research on human subjects that requires IRB approval, in which case it is the responsibility of the Principal Investigator, not the student, to identify and notify the student of the necessity for the student to comply with this Policy.

On Tuesday, September 11, at 2:00 p.m. in Wilson Library, Pleasants Family Assembly Room, a campus forum will be held to discuss the Policy and the disclosure form and to answer questions. In addition, the School of Medicine has scheduled meetings on Thursday, September 13, 3:00-5:00 p.m. in 105 Berryhill Hall, and on Monday, September 17, 3:30-5:00 p.m. in 103 Berryhill Hall, to discuss conflict of interest issues, with special emphasis on clinical trials. All of these meetings are open to the campus community.

Please ask for assistance if you have questions about any aspect of the Policy or form. The telephone numbers and e-mail addresses of those in the Office of University Counsel who can assist you with the Policy are listed below.

Susan Ehringhaus (962-1219), susan_ehringhaus@unc.edu
Jennifer Nall (962-1219), jennifer_nall@unc.edu
David Parker (966-3929), david_m_parker@unc.edu
Adrian Shelton (962-0338), adrian_shelton@unc.edu

To resolve any technical difficulties in using the disclosure website, please contact Adrian Shelton.

I appreciate your commitment to effective implementation of this Policy. It is an essential element in protecting the integrity of the University's missions in teaching, research, patient care and public service.