

FREQUENTLY ASKED QUESTIONS

REPORT OF NON-UNIVERSITY ACTIVITIES (RNAU)

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REPORT OF NON-UNIVERSITY ACTIVITIES: POLICY QUESTIONS

1. What is the Report of Non-University Activities (RNUA) and why is it important?

- The RNUA is an important means of managing real or perceived conflicts of commitment and interest. The RNUA is a process by which Covered Individuals disclose and obtain prior approval for non-University activities.
- Illinois state law and the University's Statutes and General Rules require Covered Individuals to report certain categories of activities. Most Non-University activities are compatible with, and often beneficial to, the University duties of Covered Individuals.
- The reporting process and the University's [Policy on Outside Activities and Conflicts of Commitment and Interest](#) ("Policy") are not meant to discourage external activities, but to assist Covered Individuals in disclosing them. Non-University professional activities of Covered Individuals often enhance professional skills and serve the public, and such activities are appropriate unless they give rise to a conflict of commitment or interest. However, there are some activities that might present conflicts with University duties and those activities must be carefully reviewed and monitored.
- [START myDisclosures](#) is an online application that allows users to enter, submit, route, review, and retain RNUA disclosures.

2. Who must complete an RNUA disclosure?

- The Policy applies to all "Covered Individuals" defined as academic professionals, academic hourlies, hourly faculty, postdoctoral associates, and the faculty ranks for professor, associate professor, assistant professor (and all of the foregoing whose appointments contain such terms as "specialized", "research", "adjunct", "visiting", "teaching", "clinical", or "emeritus"), instructors, and lecturers. This definition includes retired individuals with active appointments, as well as individuals with 0% unpaid appointments consistent with those named above who have University Responsibilities involving University research or who have access to University laboratories or equipment for the purpose of research.

3. My position has been reclassified from Academic Professional to Civil Service; am I required to complete the RNUA form?

- No. If your position at the University has been reclassified from Academic Professional to Civil Service, then you are not required to make an RNUA disclosure. Civil Service employees are covered by a different policy and are not required to complete an RNUA disclosure.
- Civil Service employees should refer to the Conflict of Interest Policy for Civil Service Staff. See Rule 16.01; https://nessie.uihr.uillinois.edu/cf/policies/index.cfm?Item_id=390
- Additional guidance and resources for Civil Service employee conflict of commitment and interest disclosure and management is available on the Vice President for Academic Affairs website: https://www.vpaa.uillinois.edu/rnua/civil_service/

4. Why do Covered Individuals with less than 100% appointments have to disclose?

Although the state law requires full-time staff members to disclose, the [Policy on Outside Activities and Conflicts of Commitment and Interest](#) also requires part-time staff members to disclose outside activities. Even part-time employees may have outside activities that are in conflict or appear to be in conflict with their University responsibilities.

5. How often does a Covered Individual have to complete an RNUA?

The state law and the *Policy on Outside Activities and Conflicts of Commitment and Interest* require an annual disclosure. The RNUA must be updated throughout the year if a new activity occurs or a change in a previously-disclosed activity occurs.

REPORT OF NON-UNIVERSITY ACTIVITIES: PROCEDURES

6. How do I complete the RNUA?

Please refer to the step by step instructions on the [START myDisclosures Users' Guide](#).

7. Who approves my RNUA form?

- The unit executive officer (UEO) of the unit in which a Covered Individual holds their primary appointment is responsible for evaluating all potential conflict situations reported in the disclosure (or otherwise known) before acting to approve or request revisions of the activities.
- In cases of secondary/joint appointments greater than 0%, the unit executive officer of the secondary unit must also review the disclosure. START myDisclosures will route the disclosure to the secondary UEO after the home department UEO completes her/his review.
- If the UEO requires the Covered Individual to revise the disclosure, the form will be returned to the Covered Individual for changes. The Covered Individual will receive an email notification.
- The UEO may determine that a disclosure requires a second level of review. The second level of review follows the reporting line of the staff member's primary unit (dean, vice chancellor, etc.).

8. Who reviews and approves the unit executive officer's RNUA form?

The academic officer next in the administrative reporting line (e.g. school director, college dean, or vice chancellor, etc.) reviews and approves the unit executive officer's form.

9. Which disclosures will be routed for a second level of review?

- Disclosures of a real or potential conflict will be identified by the UEO and routed by the system to a second level of review.
- The unit executive officer's own disclosure will automatically be routed to the second level of review.

10. Can I submit scanned or digital versions of my disclosure?

No.

11. How long will disclosures be retained?

In compliance with University policy on [Records Disposal Authorization](#), electronic RNUA disclosures along with any attachments will be retained as an official record for at least six years from the year of submission.

REPORT OF NON-UNIVERSITY ACTIVITIES (RNUA): EMPLOYEE DISCLOSURE QUESTIONS

12. I was asked to add an activity. What is an activity?

An activity is any appointment, affiliation, entrepreneurial activity, employment, fiduciary role in an association, or Sponsored or Reimbursed Travel of the Covered Individual with an entity other than the University that reasonably appears related to or competes with the Covered Individual's University Responsibilities or the University's mission of education, research, public service and economic development, regardless of compensation or level of financial interest. Outside Activities may be, but are not necessarily, formalized through a written agreement.. A non-University activity may be associated with:

- a company or other organization;
- a non-profit organization;
- another University or educational institution, whether public, private, for-profit or non-profit;
- self-employment or freelance work.

13. Under "Adding information about a non-University activity," I was asked to provide an "Entity Description." What is an entity?

An entity is the company or organization with which you conduct your non-University activity; or in which you have a financial interest; OR the circumstances surrounding your non-University activity (e.g. freelance/not registered as a business). Here are some examples.

- If you are disclosing individual consulting activity with an established company, list the name of that company (e.g. Pfizer, Caterpillar).
- If you have a financial interest in a start-up company, list the name of that company.
- If you are teaching at another University, public, private or non-profit, list the name of the University.
- If you have a fiduciary role (e.g. Treasurer, CEO, CFO) for an organization, list the name of that organization.
- If you have formed a company to conduct outside consulting, list the name of your consulting company.
- If you are conducting freelance work, list "freelance."

You will have the opportunity to enter multiple entities. Enter each activity separately.

Be as specific as possible and avoid descriptions such as:

- Various
- Consulting
- Multiple

14. My start-up company is located in University incubator space (EnterpriseWorks). Should it be considered an outside activity?

Yes.

15. Under “Level of Financial Interest,” I was asked to select a description for my entity.

What if I don’t know whether it is public or private?

If you don’t know, then select “Privately held or start-up company.” You will answer a follow-up question which will inform your Unit Executive Officer if you have any equity in the entity.

16. Do I need to have approval for outside activities?

Yes. Covered Individuals must obtain prior approval from their unit executive officer to engage in Outside or Non-University activities (regardless of financial interest) and all other external activities that may present a conflict of commitment with their University responsibilities.

If your activities or interests change during the year, you must update your disclosure and seek approval from the unit executive officer prior to engaging in the outside activities.

17. How do I complete a retrospective disclosure?

When you are completing the online disclosure, you will be asked to provide information on “My Time Commitment.” This allows you to report the time spent during the past year (retrospective) and the coming year (prospective).

The University [Policy on Outside Activities and Conflicts of Commitment and Interest](#) requires that you both prospectively and retrospectively report non-University activities (see [example of activities that require reporting](#)). If you have engaged in non-University activities but did not report and obtain approval prospectively for activities that require disclosure and approval, then these previously unreported activities must be reported retrospectively. Reporting of retrospective activities must be done as promptly as possible.

To report activities retrospectively in the START myDisclosures application, you must disclose your activities for the previous reporting period on the current RNUA disclosure. Provide a full compilation of all outside activities. Clearly identify that you are reporting an activity that occurred retrospectively. Include time period during which the activity occurred. At the end of your disclosure, on the “Add Additional Information Page,” either provide an explanation in the comments section or upload a document explaining why the activities were not disclosed in advance. The additional explanation should also indicate whether you propose to continue the activities or whether the activities have ended. Your disclosure will be routed to your UEO for approval.

Failure to seek prior approval for non-University activities, as per the University Policy (see [Section IX. Violations](#)), may result in sanctions. Severity of sanctions depends on the extent of the violations of the Policy.

18. I requested approval for all outside activities last year. Do I still need to report the number of days spent on prior activities?

Yes. Due to a state law, regardless of whether an activity was disclosed in advance for the previous year, the time spent on the activity still needs to be reported retrospectively.

19. Do I have to report my Non-University activities if there is a net loss?

Yes.

20. Does the amount of money received for a Non-University activity need to be reported?

The exact amount of income is not required as part of your disclosure; unit executive officers may require such information separately if needed to assess the potential, actual, or apparent conflicts presented by a Non-University activity.

Federal regulations may require disclosure of specified ranges of financial interests.

If you are an investigator or key research personnel on a federal award from the Department of Health and Human Services, Public Health Services, or the National Institutes for Health, then you are required to comply with federal financial conflict of interest regulations. In addition to the RNUA, you must complete the disclosure of your significant financial interest which requires specifying the amount for financial interests and travel that are reasonably related to your University responsibilities. Please make sure to complete a “sponsor specific” disclosure. Campus specific resources are available here:

<https://www.vpaa.uillinois.edu/cms/One.aspx?portalId=420456&pageId=466286>.

21. How should time spent on Non-University activities be calculated?

All time should be reported in terms of the number of days devoted to Non-University activities. An accumulation of eight hours is equal to one day, regardless of time of day or day of week. You should report the aggregate (total) number of days requested.

A [time calculator tool](#) is available to assist you. The tool calculates time to be reported or requested by determining any overlap in appointment percentage and multiplying the appropriate hours per week by your appointment period at the University.

22. If I am a part-time employee, how much time should I report for my Non-University activities?

As a part-time employee, you should disclose your Non-University activities and answer questions about your interests. You should only report time spent on your Non-University activities to the extent that it impinges on your University activities.

A [time calculator tool](#) is available to assist you. The tool calculates time to be reported or requested by determining any overlap in appointment percentage and multiplying the appropriate hours per week by your appointment period at the University.

23. If I am an adjunct staff member at the University, how should I report time spent on my outside activity (primary employment)?

Please see FAQ 22. You should disclose your primary employment as an outside activity and answer questions about your interests, but only report the overlap of time between your adjunct employment and your primary employment outside the University. Please use the [time calculator tool](#).

24. If I am a locum or have a 0% appointment with compensation (e.g., lump sum) at the University, how should I report time spent on my outside activity (primary employment)?

As a locum or a 0% employee that receives compensation at the University, there is no overlap between your University employment and your primary employment. You should disclose the name of your primary employer and report any financial interests and enter zero (e.g., 0) for your time commitment.

25. When reporting time spent on Non-University activities, do I have to include travel time?

Yes.

Time spent on travel for activities must be accounted for in number of days. A "day" is defined as any accumulation of eight hours, regardless of time of day or day of week, including nights and weekends, during the contract period. Even if you are using your vacation time, you must report the time spent in the number of days for travel and the business activities.

It is recommended that you account for travel time by either:

- Calculating the number of hours from the time and day you left your house (or started your travel) for the travel to the time and day you return home from your travel (completed your travel). Divide the total number of hours by 8 to obtain the number of days you must report on your RNUA disclosure.
- If the travel related to your non-University activities intermingles with your personal travel/expenses and you want to differentiate the time you spent on travel related to your non-University activities from personal travel at your own expense (that is not reimbursable by any entity), you must keep a log of travel events and document time spent on any travel sponsored by or reimbursed by the non-University activity, including but not limited to time spent in transit, time spent in meetings, time spent in hotel or lodging paid for or reimbursed by the non-University entity, time spent in meals paid for or reimbursed by the non-University entity, or time spent in any other activities that were paid for or reimbursed by the non-University entity.

Travel logs must be signed and dated by your Unit Executive Officer upon completion of your travel and return to the University. The record must be kept on file by the department. A copy of the travel log must be uploaded as an attachment with your Report of Non-University Activities.

If you had requested sufficient time on the RNUA prior to engaging the non-University activity, then you do not need to upload your travel log until you submit your disclosure of retrospective

time in the next academic year. If you did not request sufficient time, then you must update your RNUA disclosure and upload a copy of the travel log with your updated RNUA disclosure.

A template for a travel log is available [here](#).

26. Am I required to report outside consulting activity?

Yes. (See examples in questions 35 and 36)

27. Must Non-University activities performed during evenings and weekends be reported?

Yes. All Non-University activities should be reported even if activities occur during the evening, weekends, or holidays.

28. Are retired faculty and staff who work for the University required to disclose?

Retired faculty and staff are required to disclose if they are paid or engaged in research or have access to research facilities.

29. I have less than a 12-month appointment. Do I have to report my activities outside my contract period (i.e. summer)?

Although staff members with less than a 12-month appointment are not legally obligated to the University year-round, the potential exists for conflicts between Non-University activities and their University appointments. As a result, activities outside the contract period should be considered when responding to the disclosure questions.

30. Do new staff members have to disclose activities performed before their University of Illinois employment?

No. They need only report their activities as of the date of employment with the University.

31. Does time spent working for other University of Illinois units on a contractual basis need to be reported?

No. Payments received through the University of Illinois are not within the scope of the reporting process, which covers only *Non-University* activities.

32. Do staff members who are out of the country or on sabbatical need to complete a disclosure?

Yes.

33. What are examples of allowable activities?

The following are examples of activities described in the UIUC/UIS/SO COCI Procedures that are not generally considered conflicts of interest. They are exempt from reporting requirements, unless they are so extensive in time and effort that they constitute a potential conflict of commitment. Though these activities do not require disclosure, the State Officials and

Employees Ethics Act restricts the acceptance of gifts from prohibited sources. For further information, please consult with the [University Ethics Office](#).

Also note that University policy and federal regulations require disclosures of significant financial interests on research sponsored by the Health and Human Services (HHS), Public Health Services (PHS), and National Institutes of Health (NIH), as well as funding agencies that have adopted these federal conflict of interest regulations. Activities that may be exempted from disclosure in the RNUA process may require reporting as part of a sponsor-specific disclosure. Please follow campus guidelines on reporting these disclosures if you are an investigator or senior/key personnel on studies sponsored by these funding agencies.

Examples of allowable activities that generally do not require reporting on the RNUA:

1. Preparing, publishing, or presenting scholarly or creative works, including books, articles, and software.
2. Participating at professional conferences for the purpose of making scholarly presentations, conducting seminars or workshops.
3. Serving as a special reviewer or on a review panel for academic or governmental organizations.
4. Serving as a reviewer or editor for a scholarly journal.
5. Participating in a clinical practice plan approved by the University of Illinois Board of Trustees.
6. Receiving royalties under the University's royalty distribution policies while currently employed or otherwise appointed by the University.
7. Earning income from passive investments such as interest or dividends from banks, mutual funds, or stocks and bonds that do not otherwise create a conflict of interest with the Covered Individual's University responsibilities.

<https://www.vpaa.uillinois.edu/cms/One.aspx?portalId=420456&pageId=2256093#Examples%20of%20Activities%20Generally>

34. What are examples of potential or actual conflicts of commitment or interest?

The following activities represent examples of potential or actual conflicts of commitment or interest as described in the University Policy on Conflicts of Commitment and Interest (see Part III, Section F). The list is not inclusive and is intended to provide guidance. All examples are assumed to include both for-profit and not-for-profit entities.

1. Consulting work that is reasonably related to your University Responsibilities or scholarly expertise.
2. Conducting research that is reasonably related a Covered Individual's University Responsibilities or scholarly expertise for an entity other than the University of Illinois.
3. Teaching or training that is reasonably related to a Covered Individual's University Responsibilities or scholarly expertise.
4. Using University resources to conduct research that is sponsored by an entity in which the Covered Individual or their immediate family member has a financial interest or fiduciary role.

5. Conducting testing or clinical trials of products, devices, or services owned or controlled by an entity in which the Covered Individual or a member of their immediate family has a financial interest or fiduciary role.
6. Diverting research opportunities from the University to any external entity, (e.g., another academic institution, non-profit organization, federal laboratory, business, or consulting entity in which the Covered Individual or a member of their immediate family has a financial interest or fiduciary role).
7. Submitting grant proposals or making subaward arrangements involving the purchase of goods or services from an entity in which a Covered Individual or a member of their immediate family has a financial interest.
8. Serving in an executive or managerial capacity or holding financial interests in an entity in one's field of research.
9. Serving on the board of directors or a major advisory committee of an entity that sponsors the Covered Individual's research or provides gift funds for the use of the Covered Individual or his/her department.
10. Utilizing University students or employees in the staff member's University research sponsored by an entity in which the Covered Individual has a financial interest.
11. Conducting consulting or other Outside Activities involving University students or other University staff.
12. Utilizing University students or employees in the Covered Individual's University activities supported by gift funds from an entity in which the Covered Individual has a financial interest.
13. Serving in an executive or managerial capacity or holding a financial interest in an entity doing or seeking to do business with the University.
14. While acting in the context of the Covered Individual's University duties, making professional referrals to an entity in which a Covered Individual or a member of their immediate family has a financial interest.
15. For academic staff with greater than 50% appointment, spending more than one day per seven-day-week, averaged over the contract period, on Outside Activities.

<https://www.vpaa.uillinois.edu/cms/One.aspx?portalId=420456&pageId=2256093#See%20Examples>

35. Do I need to attach a statement to explain my activities?

You are not required to submit an additional explanation unless you are reporting an activity retrospectively when approval was not requested in advance. You may also submit an additional explanation if you need additional space to explain your activities or if your unit executive officer requests additional explanation. To attach additional information, in START myDisclosures, at the end of your RNUA disclosure, you will have the option to upload documentation in the "Add Additional Information" section. Please submit documents in PDF format (preferred).

36. I have more than one Non-University activity; how can I list multiple activities?

Follow the instructions in [START myDisclosures](#) to add additional activities to your disclosure. For additional guidance, see the step by step [User's Guide](#).

37. I have less than a 75% appointment; do I need to submit a disclosure?

Yes. You must complete a disclosure regardless of your percentage of paid appointment.

38. Where do I find information about my University appointment?

Consult [NESSIE](#) for your notice of appointment

39. What is a fiduciary?

A fiduciary has a legal obligation to act in the best interest of an entity or individual.

40. How does the policy define immediate family?

Consistent with the UI System HR Policy on Leave, Immediate Family Members include parents, siblings, spouse, domestic partner, civil union partner, children, grandparents, grandchildren, in-laws, and members of the Covered Individual's household.

REPORT OF NON-UNIVERSITY ACTIVITIES: ADMINISTRATIVE REVIEW

41. Who is the unit executive officer?

The University [Policy on Outside Activities and Conflicts of Commitment and Interest](#) defines the "unit executive officer" (UEO) as the department head/chair, or equivalent officer of other units. For disclosures by unit executive officers, the term refers to the administrators at the next higher level in the normal University reporting lines.

42. Can the unit executive officer delegate the responsibility for reviewing and approving disclosures?

No. The University [Policy on Outside Activities and Conflicts of Commitment and Interest](#) states the unit executive officer is responsible for reviewing and evaluating disclosures for academic staff in the unit. The START myDisclosures application allows "facilitators" to assist the UEO with review process, but only the UEO has authority to approve the activities.

43. What are the guidelines for the unit executive officer to determine potential conflicts of commitment?

The Unit Executive Officer (UEO) may determine that a Covered Individual has a conflict of commitment which that requires additional management and monitoring and requires a second level of review if the Covered Individual:

- Has external activities deemed by the UEO to involve excessive time commitment such that they diminish the Covered Individual's commitment or service to the University.
- Is a faculty member that teaches outside the University, unless assigned or approved by the department.

44. What are the guidelines for the unit executive officer to determine potential conflicts of interest?

The Unit Executive Officer (UEO) may determine that a Covered Individual has a conflict of interest that that requires additional management and monitoring and requires a second level of review, if the Covered Individual:

- (Applies to faculty only) teaches outside the University, including any form of instruction, whether in the classroom or via distance learning offered by other entities (including for-profit organizations), when the instruction competes with courses offered by the University.
- Undertakes research under circumstances deemed unacceptable by the University that limit dissemination of knowledge (by publication, by presentations in colloquia, workshops, seminars, and the like).
- Serves as an investigator on research agreement(s) with external entity/(-ies) with which the Covered Individual has a financial, managerial, or executive relationship.
- Diverts students and/or staff from their primary educational objectives.
- Diverts to external entities or other institutions opportunities for research support that could have been obtained on behalf of the University without prior written approval from the University.
- Uses University resources for Non-University activities without permission from the University.
- Influences University research or business decisions in ways that could lead to the Covered Individual's direct or indirect personal financial gain or which give improper advantage to third parties.
- Licenses, assigns, or grants use of University intellectual property to an external entity without prior approval from the University.
- Involves University students and/or staff in the Covered Individual's external activities.

45. What are the approval options for the unit executive officer?

START myDisclosures review process groups disclosure ready for review into two categories:

- Disclosures with **no** non-university activities reported
- Disclosures with non-university activities reported

Review process when NO non-university activities are reported:

Disclosures of no non-University activities are automatically routed to the Completed folder. Reviewers can use the sort function to list employees who listed zero activities. A list of staff members with no non-university activities will display. No additional information is present to review because the staff member indicated on his/her disclosure that he/she has no Non-University activities to report. The assistant and UEO should carefully review the list and follow-up with any staff members that have activities that were not reported but should have been, when known.

If activities should have been reported, but were not reported, the UEO/assistant should contact the employee by email.

The staff member may log into his/her account and view the updated status which will not appear as “*Approved [on DATE].*” The approved disclosure will be stored in the system and be available to the employee, the UEO, the Dean, the Provost, and campus COI staff.

Review process when non-university activities are reported:

There are three possible actions for the unit executive officer (UEO) at the first level of review in reviewing a staff member’s disclosure:



Approve. When activities were reported but did not require reporting, or when activities disclosed do not present a conflict of commitment or interest. The approved disclosure will be stored in the system and be available to the employee, the UEO, the Dean, the Provost, the Vice Chancellor for Health Affairs, and campus COI staff.



Return for Revisions. This option should be used when activities disclosed are not approved or when the UEO believes other activities exist that require disclosure. The UEO should provide an explanation for returning the disclosure to the employee and state expectations for revision, as well as corrective actions to manage the activities.



Forward for Further Review. This option is for activities that are approved but present potential conflicts that require management and monitoring. The UEO should clearly state the requirement for monitoring the activities and conflict management mechanisms in the comment box or attach a statement. By selecting this option, the online application will route the disclosure to the staff member’s second level of review (e.g., typically the dean).

The UEO at the second level of review has the function to either:



Approve. Accept the monitoring and management plan proposed by the first level of review.



Return for Revisions. Return the disclosure for revisions to the UEO at the first level of review. The UEO at the second level must provide an explanation for returning the disclosure and state expectations for revision, as well as corrective actions to manage the activities using either the comments or attachment tools in the online application.

Once the disclosure is approved by the second level of review, the approved disclosure will be stored in the system and be available to the employee, the UEO, the Dean, the Provost, the Vice Chancellor for Health Affairs, and campus COI staff.

46. How does the UEO deny an activity?

To deny an activity, the UEO should select the option to "Deny." The UEO or facilitator must provide an explanation for the denial. The Covered Individual may appeal the decision through the COCI Appeals Procedures,

<https://www.vpaa.uillinois.edu/cms/One.aspx?portalId=420456&pageId=2256093#COCI%20Appeals>.

47. How should the unit executive officer review previously undisclosed activities that are reported retrospectively?

If a Covered Individual discloses non-University activities after the activities have occurred and the staff member did not obtain prior approval for the activities, then the UEO must conduct the review of the activities retrospectively. The Covered Individual must upload an explanation as to why the activities were not reported prior to engaging in the outside activities. The Covered Individual's explanation should also indicate whether the activities will continue or whether the activities have ended.

The UEO must assess the retrospective disclosure. The UEO must determine whether the retrospective activities present conflicts of commitment or interest. If activities present conflicts of commitment or interest, the UEO must upload an explanation, and a second level of review is required.

Sanctions may apply for failure to obtain approval prior to engaging in non-University activities. The UEO should contact the campus Conflict of Interest Officer to discuss the review process when the UEO decides to apply sanctions.

For disclosures that require retrospective review, it is advisable that the UEO inform the Covered Individual that all activities must be disclosed and approved prior to engaging in non-University activities.

STATEMENT OF ECONOMIC INTERESTS

48. I just received a "Statement of Economic Interests" in the mail. Where do I find information that will help me fill out this form?

Information about the Statement of Economic Interests process can be found at <http://www.ethics.uillinois.edu/statements/>.