

## **Overview of main changes to the COCI Policy**

### Name change

The University Policy on Conflict of Commitment and Interest will be renamed the University of Illinois System Policy on Outside Activities and Conflict of Commitment and Interest.

### Definitions, terms added for:

Covered Individuals includes all academic staff under the 2018 policy and is expanded to include academic hourlies, hourly faculty, and individuals with 0% unpaid appointments focused on those involved in University research or have access to University laboratories or equipment for the purpose of research. Individuals with 0% unpaid appointments that have University Responsibilities only for teaching or non-research appointments may be exempted on a year-by-year basis by the Unit Executive Officer from the disclosure requirement.

Managing Conflict of Interests for Family Relationships was not previously defined although considered to be conflicts of interest that required disclosure and management. Given that the University has a requirement to manage conflicts of interest that arise from these relationships the policy was expanded to include the term for Immediate Family Members and include requirements to disclose and manage these conflicts in the scope of the policy.

University of Illinois Responsibilities is defined to create a distinction between the covered individual's obligations to the University of Illinois and the covered individual's outside activities including activities that occur at other universities.

Outside Activities is a change in terminology from "non-University activities" in the 2018 policy. The definition for Covered Individuals addresses the need to assure that the University has a policy aimed at transparency of appointments, affiliations, entrepreneurial activity, employment, a fiduciary role in an association, or sponsored or reimbursed travel of covered individuals and their immediate family members. The individual must disclose outside activities that reasonably appear related to or compete with the Covered Individuals' University of Illinois responsibilities or the University of Illinois mission of education, research, public service and economic development. In addition, Outside Activities [Immediate Family Members] was previously collapsed into the definition of non-University activities in the previous policy, but is now defined separately since these Outside Activities may be treated differently in university procedures.

### Definition Changes:

Conflict of Commitment definition in the 2018 Policy focused on time and attention being so demanding that it interferes with the individuals' responsibilities to the University. The 2023 revisions to the Policy focus on Outside Activities that reasonably appear to interfere with the covered individual's University of Illinois responsibilities.

Conflict of Interest was expanded from definition in the 2018 Policy to indicate that a conflict of interest "exists when the Covered Individual engages in Outside Activities that may directly or indirectly influence the Covered Individual's professional judgment in exercising any University Responsibilities to the detriment of the University."

### Statement of Policy

Clarifies that the university Responsible Official has “final authority with respect to establishing disclosure guidance and, the management or elimination of actual or perceived Conflicts of Commitment and/or Conflicts of Interest.”

Expanded to include requirements to disclose and manage or eliminate conflicts of interest that arise from family relationships.

### Principles

The revised policy includes a set of principles that are standard among all universities. The principles reflect elements from the 2018 policy with the addition of standards established to explain requirements for prior approval of outside activities and outside activity conflict management. The revised policy grants the responsible official the duty to assure accountability with the University policy.

### Procedures

The revised policy delegates procedures to be defined by each university.

### Violations

The revised policy expands the violations to include “Allegations for violations of the policy must be submitted to the Responsible Official for potential further investigation. If non-compliance cannot be mediated through corrective action, the Responsible Official will make recommendations to the university chancellor to determine the process to begin sanctions.”

## **Overview of main changes to the University of Illinois System Policy on Financial Conflicts of Interest in Research (FCOIR)**

The requirements of federal sponsors have changed since the FCOIR policy was last approved. The update to the policy ensures that the University will comply with the regulations and award terms and conditions of the federal sponsor in compliance with the sponsor’s requirements to implement compliance in accordance with the implementation deadline of the sponsor.

## **Overview of main changes to the University of Illinois System Policy on Organizational Conflicts of Interest (OCOI)**

The changes to the OCOI Policy are minimal. References to the myDisclosures non-University activity reporting system were removed because UIC transitioned to a product provided by a third party.