

**Annual Reports of Non-University Activities**  
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- **Topics (1 of 2)**
  - What is the Report of Non-University Activities (RNUA)?
  - Who is covered by the policy?
  - Why do we require annual completion of the RNUA form?
  - When do people need to update their form?
  - Should people be reluctant to disclose external activities?
  - How much is too much?
  - What if all external activities occur on the weekend?
  - What about outside teaching?
  - What is the Unit Head's role in the RNUA process?
  
- **Topics (2 of 2)**
  - What does the Unit Head need to do?
  - How does the Unit Head conduct the Conflict of Interest/Commitment Review?
  - What do the Deans do with the forms?
  - Can decisions be appealed?
  - Examples of activities which do and do not need to be reported.
  - Excerpts from State Law and University Regulations
  - Additional resources.
  
- **What is RNUA? (1 of 3)**
  - The Report of Non-University Activities form is the University's implementation of State law and University regulations requiring all faculty and academic staff to report their non-University income producing activities each year.
    - Detailed instructions, forms, frequently asked questions, and much more are available at <http://www.uic.edu/depts/ovcr/policies/coi.html>
  
- **What is RNUA (2 of 3)**
  - The reporting objective is not to discourage outside activities, but to help ensure they are compatible with University employment.
  - Since outside professional activities of faculty and academic staff often enhance professional skills and serve the public, such activities are appropriate unless they give rise to a conflict of commitment or interest.
  
- **What is RNUA (3 of 3)**
  - Academic staff members must obtain prior written approval for outside activities from the unit executive officer.
  - University policy permits academic staff to perform outside activity if the unit head approves the activity according to campus guidelines.
  - Forms must be updated during the year if one's situation changes.

- Personal activities (unrelated to professional skills) are generally not the University’s concern, unless they impinge upon service to the University.
- **Who is covered by the policy? (1 of 3)**
  - “This Policy applies to all paid academic staff members, whether part time or full time, of the University of Illinois. The academic staff includes the faculty ranks of professor, associate professor, assistant professor (and all of the foregoing whose appointments contain such terms as 'research,' 'adjunct,' 'visiting,' or 'clinical'), instructor, and lecturer, as well as academic professionals and postdoctoral associates.”
- **Who is covered by the policy? (2 of 3)**
  - Even part-time employees may have outside activities that are in conflict or appear to be in conflict with their University duties.
  - As a result, *every* academic staff member with an appointment greater than 0% is required to complete an annual *Report of Non-University Activities* (RNUA).
    - The main reporting occurs in Part 1 and Part 2 of the RNUA form. *People with less than 75% appointment only need to complete Part 1.*
- **Who is covered by the policy? (3 of 3)**
  - Students, including medical residents, graduate Teaching Assistants and graduate Research Assistants, are not considered academic staff, and are not covered by the policy.
  - Civil Service employees are covered by a different policy and do not need to complete the RNUA.
- **Why do we require annual completion of the RNUA form?**
  - Because the RNUA process represents the University’s implementation of its legal obligations, all academic staff members are required to complete the form annually, even if they have no activities to report.
  - *Because all activities must be approved in advance, additional reporting is required if one’s situation changes during the year.*
- **When do employees need to update their RNUA forms?**
  - All activities must have **prior** written approval.
  - If your activities change after you have completed the RNUA form, you must obtain written approval before you engage in the new activities. The best way to obtain written approval is to complete a new RNUA form and submit it to your unit head.
- **Should people be reluctant to disclose external activities? (1 of 3)**
  - *Never* be reluctant to disclose external activities!
  - The reporting objective is not to discourage outside activities, but to help ensure they are compatible with University employment.
    - Outside professional activities often enhance professional skills and serve the public.

- Such activities are appropriate unless they give rise to a conflict of commitment or interest.
- **Should people be reluctant to disclose external activities? (2 of 3)**
  - External activities are desirable and are encouraged when the relationship enhances the professional skills of staff members, or constitutes a public service activity and is a benefit to the University.
    - Activities must be for “reasonable periods of time.”
    - Academic staff are welcomed to accept payment for such activities.
- **Should people be reluctant to disclose external activities? (3 of 3)**
  - Although external activities can be desirable, some activities might present conflicts with University duties.
  - Therefore, all such activities *must* be carefully reviewed and monitored to prevent problems.
    - Our policy and reporting process help manage conflicts by
      - *informing* academic staff of University policy,
      - *guiding* staff as they engage in non-University activities, and
      - *enabling* these activities to be monitored appropriately.
- **How much is too much? (1 of 3)**
  - University guidelines are generally to allow (with prior approval):
    - the equivalent of up to one day per week for full-time faculty, or
    - 52 days per calendar year appointment, and 40 days per academic year appointment.
      - For reporting and review purposes, conflicts of commitment only occur during the contract period; conflicts of interest can occur beyond the contract period.
- **How much is too much? (2 of 3)**
  - The amount approved will vary among individuals, from discipline to discipline, from one type of proposed activity to another.
    - The amount approved will be affected by specific departmental needs to meet teaching, research, service, and governance functions.
    - External activities are not an automatic entitlement and require prior written approval by the unit executive officer.
- **How much is too much? (3 of 3)**
  - When external activities begin to take up too much time, one’s university duties may suffer.
    - Just as with conflicts of interest, the situation must be *managed*.

- Conflict of interest resources are available at the website cited at the end of this presentation.
- **What if all external activities occur on the weekend?**
  - Because conflicts are a function of the situation, the regulations and policy are not concerned with the precise timing of the activities.
  - Report all external activities during the contract period, regardless of time of day or day of week.
    - *The University contract period includes evenings, weekends and holidays during the term of employment.*
- **What about outside teaching? (1 of 2)**
  - University of Illinois teaching loads are different from those at many other colleges and universities, due to the expectations of the faculty in areas of research and public service. Teaching, other than that assigned or approved by the department, likely represents a conflict of commitment. Furthermore, it could be a conflict of interest if it competes with courses offered by the University. In special cases, the institution would benefit by our faculty participating in courses offered by others. In any case, prior written approval is required.
- **What about outside teaching? (2 of 2)**
  - Occasionally, the University may contract with another institution to provide instruction, such as a collaboration within the CIC. Such cases are normally contractual between the institutions and comprise part of the faculty member's teaching load. Any approval of outside teaching should be renewed on an annual basis.
  - University policy allows faculty, with prior approval, to consult one day per week. However, teaching is not consulting and not subject, on this basis, to the one day per week privilege.
    - For more about outside teaching, go to [www.vpaa.uillinois.edu/policies/conflict\\_clarification.asp](http://www.vpaa.uillinois.edu/policies/conflict_clarification.asp)
- **What is the Unit Head's role in the RNUA process?**
  - The Unit Head is responsible for reviewing and approving or denying *all* external activities disclosed in the annual RNUA process.
  - The Unit Head bears primary responsibility for ensuring all activities are properly reported, managed, and monitored.
- **What does the Unit Head need to do? (1 of 3)**
  - Ensure faculty know that the forms, detailed instructions and additional resources are available on the web site
  - Obtain completed report forms from the faculty and academic staff in their units each year,
  - Complete Page 2 of each form,
  - Keep copies of the reporting forms on file in the department,

- **What does the Unit Head need to do? (2 of 3)**
  - Submit the completed departmental checklist (updating the checklist as needed by adding or deleting names to reflect the current department roster), and forward any forms requiring additional review and/or approval.
  - Pursue to satisfactory resolution any questions of possible conflicts of interest or commitment with the affected staff members, and (if appropriate) with their Dean.
  
- **What does the Unit Head need to do? (2 of 3)**
  - If an employee is not able to complete a form, the unit head must sign the employee's form and retain it in the department's files. The unit's checklists should note the reason for the employee's failure to complete the form.
  
- **How does the Unit Head conduct the Conflict of Interest/Commitment Review? (1 of 6)**
  - As reported activities are reviewed, be sensitive to problems that can arise from non-University activities. Consider, for example:
    - whether educational programs/progress (or other interests) of students or other staff might be hampered by the staff member's involvement in the outside activities;
    - whether university research programs and agendas might be inappropriately influenced by the outside interests or involvements;
    - whether the dissemination of knowledge might be unduly constrained; or
    - whether public resources might be used for private gain.
  
- **How does the Unit Head conduct the Conflict of Interest/Commitment Review? (2 of 6)**
  - **If activity is reported**, mark the appropriate line. If you mark (b) or (c), indicating that a conflict of interest or commitment may exist, the activity should be discussed with the staff member. Attach an explanation of your evaluation. Forward the report form and your statement to the next administrative level for review.
  - If **question 3 on Page 1** of the form is answered affirmatively, read the employee's statement and indicate whether you agree or disagree with it. If you disagree, attach an explanation and forward to the Dean.
  
- **How does the Unit Head conduct the Conflict of Interest/Commitment Review? (3 of 6)**
  - **Approval of Activities.** Mark the appropriate line for both prospective activities and retrospective activities.
  - **Before indicating non-approval**, the activity should be discussed with the employee. In cases of non-approval, the employee must be given a chance to respond. Identify any activities that are not approved and prepare an explanatory statement, to be forwarded with the report. Where differences of opinion exist, the unit head may request a decision on the specific issue from the next administrative level (e.g., Department Head to Dean; Dean to Vice Chancellor).

- **How does the Unit Head conduct the Conflict of Interest/Commitment Review? (4 of 6)**
  - **Unit Head Signature.** Sign and date. (Your own form should be forwarded to the next administrative level for review and signature. *Do not sign Page 2 of your own form.*)
  - **Forwarding of Forms by Unit Head.** Forward to your college office (or next administrative level) forms for faculty and academic staff members when any of the following occurs. These forms require a second level of review and approval.
  
- **How does the Unit Head conduct the Conflict of Interest/Commitment Review? (5 of 6)**
  - Forward forms when you determine there is a real or potential conflict of interest or commitment.
  - Forward forms that report more than 40 days for 9 month appointments and 52 days for calendar year appointment of non-University activities.
  - Forward forms that report involvement of other University faculty, staff or students in outside activities.
  - Forward forms that indicate denial of activities.
  
- **How does the Unit Head conduct the Conflict of Interest/Commitment Review? (6 of 6)**
  - Written explanations regarding the above situations should be attached.
  - Your own form is to be forwarded to the next administrative level for review and approval.
  - The unit checklist also should be forwarded to the Dean.
  - Keep all original documents that have not been forwarded; keep copies of everything (including completed checklist) that is forwarded.
  - Respond to internal or external auditing procedures in a timely fashion.
  
- **What do the Deans do with the forms?**
  - The Dean's signature (or that of the person representing the next level of review) is required on checklists, and on forms forwarded to the Dean for approval.
  - The college office will forward to the Office of the Vice Chancellor for Research all forms received from the unit heads, along with the unit checklists.
  
- **When should we pay special attention? (1 of 2)**
  - Several different situations are worthy of increased scrutiny. These include but are not limited to:
    - consulting or other financial relationships with a sponsor of one's research;
    - managerial role or significant financial relationship with a company in one's field of research or a company that does business with the University;
  
- **When should we pay special attention (2 of 2)**
  - External activities or business that involve University students or employees;

- Relationships, commitments, or activities on the part of the academic staff member or his/her family that might present or appear to present a conflict of commitment or interest with regard to one's University appointment.
  - These relationships may be of a financial, fiduciary, or uncompensated nature.
- **Can decisions be appealed? (1 of 3)**
  - When approval of an external activity is denied or when a remedy or sanction is imposed, an academic staff member shall be afforded the opportunity to respond before the request is transmitted to the next level of review. These administrative appeals are up to and including the Vice Chancellor for Research in all matters of conflict of commitment and to the Vice President for Academic Affairs in matters of conflict of interest.
- **Can decisions be appealed? (2 of 3)**
  - An academic staff member is entitled to make a final appeal of sanctions to the Chancellor in matters of conflict of commitment or to the President in matters of conflict of interest. This appeal must be made in writing and within 45 calendar days.
- **Can decisions be appealed? (3 of 3)**
  - The Chancellor or President will solicit the advice of the Faculty Advisory Committee (in the case of faculty) or the Professional Advisory Committee (in the case of academic professionals) who will investigate the matter, afford a hearing to the academic staff member, and make a recommendation to the Chancellor or President. The Chancellor's or President's decision shall be final and shall be based on whether, in light of institutional obligations, fundamental fairness was afforded the academic staff member.
- **What sorts of activities should be reported? (1 of 4)**
  - This list of examples of non-University income producing activities that *should be reported* is not exhaustive. Others may need to be reported.
  - As a general rule (with the exceptions listed below) you should report activities from which you derive income that you are obliged to report to the IRS.
    - Some of these items might represent conflicts of interest which must be managed. *COI resources are available at the website cited at the end of this presentation.*
- **What sorts of activities should be reported? (2 of 4)**
  - Relationships with companies that do business with the University
  - Relationships with sponsors of your research
  - Service as an officer, director, or trustee in businesses or organizations related to your professional field
  - Ownership or financial interest in or management of organizations related to professional field
- **What sorts of activities should be reported? (3 of 4)**

- Activities involving University students or staff
  - Outside research or consulting
  - Artistic performances
  - Expert witness testimony
  - Fellowships
  - Positions held at other institutions
  - Publishing contracts
  - Real estate holdings and management
- **What sorts of activities should be reported? (4 of 4)**
    - Testing or clinical trials of products
    - Workshops, seminars, or training programs
    - Honoraria (unless excepted below)
    - Test preparation
- **What sorts of activities do not need to be reported? (1 of 3)**
    - Regardless of your list of activities in Part II of the RNUA form, *all* of your activities must be considered in assessing possible conflicts of interest and commitment when responding to the questions in Part I.
    - You *do not* need to report the following types of activity or income, even though some may require reporting to the IRS.
- **What sorts of activities do not need to be reported? (2 of 3)**
    - Preparation of books, articles, lectures, works of art or artistic performances expected of you in the normal course of your University duties.
    - Presentations of scholarly work at other universities or at educational meetings sponsored by non-profit entities, as long as absence from campus does not interfere significantly with your University duties.
- **What sorts of activities do not need to be reported? (3 of 3)**
    - Service on government committees or review panels for university, government or professional organizations, when service does not interfere significantly with your University duties.
    - Prizes and royalties from past writings.
- **Excerpts from State Law and University Regulations (1 of 4)**
    - No full-time member of the faculty of any State-supported institution of higher learning may undertake, contract for or accept anything of value in return for research or consulting services for any person other than that institution on whose faculty he or she serves unless (a) he or she has the prior written approval of the President of that institution, or a designee of such President, to perform the outside research or consulting services, such request to contain an estimate of the amount of time which will be involved, and (b) he or she submits to the President of that institution or such designee, annually, a statement of the amount of actual time he or she has spent on such outside research or consulting services.
      - *110, Illinois Compiled Statutes (ILCS) 200/1*

- **Excerpts from State Law and University Regulations (2 of 4)**
  - No person employed by the University shall have any interests incompatible with that person's obligations to the University.
    - *The University of Illinois Statutes, (Article IX, Section 5b)*
  
- **Excerpts from State Law and University Regulations (3 of 4)**
  - The responsibilities to the University of full-time members of the academic staff are fulfilled by the performance, appropriate to rank and terms of appointment, of teaching, scholarly research, continuing education and public service, and committee work and special assignments. Such staff members may carry on some professional or business activities of an income producing character, so long as such activities are compatible and not in conflict with University interests. The head of the department of which the employee is a member should know and approve of these activities outside the University.
    - *The University of Illinois Statutes, (Article IX, Section 5d)*
  
- **Excerpts from State Law and University Regulations (4 of 4)**
  - Procurement contracts involving expenditures of University funds are governed by Regulations Governing Procurement and Bidding at State Systems Universities in Illinois as adopted and amended from time to time by the Board of Trustees. Other University contracts may be awarded to any business entity, including those in which a University officer or employee (or members of their immediate families) serve as major officers or primary employees thereof, or hold a significant equity interest therein, if such contract is deemed in the best interests of the University, and has the approval of the President or his designee. Documentation of such approval shall be filed with the contract.

***Annual Reports of Non-University Activities***

• **Additional Resources**

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