

# REPORT OF NON-UNIVERSITY ACTIVITIES (RNAU)

## DISCLOSURE AND REQUEST FOR PRIOR APPROVAL

### STEP-BY-STEP GUIDE TO CONDUCTING ADMINISTRATIVE REVIEW AND APPROVAL

(Full resources are available under the RNAU section of [www.research.uic.edu/conflict](http://www.research.uic.edu/conflict))

#### Preparing for the Review

- Please refer to the document outlining the unit head responsibilities under the RNAU section of [www.research.uic.edu/conflict](http://www.research.uic.edu/conflict). Review the information provided by employees on page 1 of the form, Parts I – III, and indicate the results of your review on page 2 of the form, Parts IV-VI.
- Attend carefully to the RNAU forms, consulting with employees and asking follow up questions as needed. You may request details from academic staff to clarify any reported activities *as well as any activities you think may have been overlooked or unreported*. Careful administrative review is required of forms originally submitted in the fall as well as any revised forms received during the academic year.
- Inform academic staff that forms, detailed instructions and additional resources are available under the RNAU section of [www.research.uic.edu/conflict](http://www.research.uic.edu/conflict). Academic staff includes faculty, academic professionals, and postdoctoral associates. Civil Service employees are covered under a different policy and do not complete the RNAU.
- Note and follow the deadlines:
  - September 18, 2009: RNAU forms released.
  - October 2, 2009: Completed forms due from employees to departments.
  - October 23, 2009: Reviewed forms due from departments to colleges.
  - November 13, 2009: Reviewed forms due from colleges to OVCR.
- Obtain the checklist under the RNAU section of [www.research.uic.edu/conflict](http://www.research.uic.edu/conflict) and update it as needed by adding or drawing a line through names on the list. The website also provides lists of employees in your unit holding joint appointments, and optional blank checklists for adding names.
- **Do not delete or obliterate any names on the checklist.** All names must be legible, even if the individual has left UIC. For each name that is crossed out, please provide an explanation (e.g., left UIC, deceased, etc.).
- Ensure that each academic staff member has completed the form. Follow up as needed to obtain completed forms from all employees who are required to report. Academic staff should understand that compliance with university policies is included in the terms of employment, and that the university *Policy on Conflict of Commitment and Interest* includes sanctions for noncompliance.
- If an individual who is still an employee is unable to complete a form, the unit head must:
  - Indicate on the checklist the reason the form was not completed (e.g., on medical leave, sabbatical, etc.), and
  - Prepare an RNAU form on behalf of the individual to keep in the department files. The unit head cannot “report” information on behalf of others, but must note on page 1 of the form why the individual did not complete the form, and must sign page 2 to indicate administrative review.
- If anyone in your unit has a paid joint appointment greater than 0% (indicated by an asterisk [\*] on the checklist) with another department, the other unit must also review and approve the information. These reports should be returned to the home unit and processed with the home unit’s complete set of forms.

## Conducting the Review: Step by Step

### FIRST LEVEL OF REVIEW

(usually the department head)

#### Reviewing Part I:

#### Conflict of Interest Screening Questions

1. You must respond within 14 days of receiving an employee's request for approval of activities. If 14 days pass without a response, the academic staff member has the right to take the request to the next higher administrative level.
2. Has the employee checked "yes" to *any* of the four questions in Part I, the conflict of interest screening questions?

NO: Proceed to Step 4. (Step 3 remains focused on these same screening questions.)

YES: The employee must provide a statement explaining each "yes" response. Read and evaluate the statement (or obtain one if not provided), then respond as follows:

- If you require more information from the employee regarding any reported activities or any activities you think may have been overlooked or unreported, obtain it. If you have sufficient information to evaluate the situation, indicate your response in Item A, Part IV (Conflict of Interest/Commitment Review). Confer with the employee as needed, and request any information you require to conduct your evaluation. Check one box on the form to indicate whether you believe no conflict of interest or commitment exists, you believe a conflict may exist but is being monitored by the department, or you believe a conflict may exist that warrants further review.
- Provide an explanation of your response. This should be as simple or as detailed as necessary. A simple explanation, particularly if there is no conflict or it is being monitored and managed, can be written in the blank space right on the form itself.
- Each form indicating a "yes" response to *any* of the four questions in Part I must be forwarded to the College, along with all statements and explanations. Proceed to Step 3.

3. Did the employee check "yes" to Question 3 in Part I, indicating student/faculty/staff involvement?

NO: Proceed to Step 4, reviewing the list of non-university income-producing activities.

YES: Read and evaluate the statement provided by the employee (obtain one if needed). Statements should include the names of the UI individuals involved in the external activities. Confer with the employee as needed, and request any information you require to conduct your evaluation. Indicate the results of your review in Item B, Part IV.

- Check the box labeled "Agree" if you believe such involvement is *not* detrimental to the others; check the box labeled "Disagree" if you believe such involvement *is* detrimental to the others.
- Provide an explanation of all "Disagree" responses. Proceed to Step 4, reviewing the list of non-university income-producing activities.
- If the other university personnel involved in the external activities are in the same unit, and are required to complete the RNUA form, the unit head should check that the other personnel have also disclosed the activities.

## **Reviewing Part II:**

### **Conflict of Commitment/Interest**

#### **List of Non-University Income Producing Activities**

4. Determine the extent of activity reported in Part II. Calculate how many days of external activity, *total*, the employee reported. A day is defined as *any* 8-hour period during the contract period, including nights and weekends. For *either* the prior reporting period (retrospective activities) *or* the upcoming reporting period (prospective activities) did the employee indicate a total of more than one day per week of external activity during the contract period (40 days for 9-month employees; 52 days for 12-month employees)?

NO: Proceed to Step 5, to review retrospective activities.

YES: Note that after you complete your review, you should forward the employee's form, including attached statements, to the College. Proceed to Step 5 and review retrospective activities.

5. Were any *retrospective* activities reported?

NO: In Part V (Approval of Activities), check the box labeled "no retrospective activities are reported or all retrospective activities are approved." Proceed to Step 6 to review prospective activities.

YES: Were all retrospective activities approved?

– YES: In Part V, check the box labeled "no retrospective activities are reported or all retrospective activities are approved." Proceed to Step 6 to review prospective activities.

– NO: Discuss the activity with the staff member before indicating non-approval. If the activities are still not approved, check the box labeled "some or all retrospective activities are not approved." Provide employees the opportunity to respond before the form is transmitted to the next administrative level if you deny any activities or don't reach voluntary agreement with the employee about how to manage or eliminate the conflict. Attach an explanation and forward the form to the next level of review. The unit head may request advice on the specific issue from the next administrative level or the conflict of interest officer. Proceed to Step 6 to review prospective activities.

6. Were any *prospective* activities reported?

NO: In Part V, check the box labeled "no prospective activities are reported or all prospective activities are approved." Proceed to Step 7.

YES: Were all prospective activities approved?

– YES: In Part V, check the box labeled "no prospective activities are reported or all prospective activities are approved." Proceed to Step 7.

– NO: Discuss the activity with the staff member before indicating non-approval. If the activities are still not approved, check the box labeled "some or all prospective activities are not approved." Provide employees the opportunity to respond before the form is transmitted to the next administrative level if you deny any activities or don't reach voluntary agreement with the employee about how to manage or eliminate the conflict. Attach an explanation and forward the form to the next level of review. The unit head may request advice on the specific issue from the next administrative level or the conflict of interest officer. Proceed to Step 7.

7. Sign and date the form at the bottom of Part V of the administrative review and approval.
8. When you have completed reviewing forms for all of the academic staff in your unit, complete and sign/date the checklist.
9. Forward the signed checklist and any required RNUA forms, including statements and explanations, to the next level of review. Make a copy of all items that are forwarded. Forms that need to be forwarded are:
  - Forms indicating a “yes” response to any of the four boxes in Part I.
  - Forms reporting more than one day per week outside activity during the contract period in Part II.
  - Forms indicating non-approval of retrospective or prospective activities, or when voluntary agreement is not reached about how to manage or eliminate the conflict
  - Your form. (Because one cannot review one’s own form, all Unit Heads’ forms must be forwarded; the Dean, Provost, Vice Chancellor or Vice President serves as the first level of review).
10. Keep all items on file in the department. Be prepared to comply with requests for copies of forms in the event of a federal audit, freedom of information act request, or administrative request for review.

## **SECOND LEVEL OF REVIEW**

**(usually the Dean, Provost, Vice Chancellor or Vice President)**

1. Review all materials submitted by the units. Follow up as needed so that you have all of the information you require to complete your review.
  - Indicate your approval/disapproval, and attach an explanation if you disapprove.
  - When you have completed your review, please sign the checklist. Also sign *each* of the forwarded forms in Part VI on page 2.
2. Forward the signed checklists, and *all* of the forms and statements you have received, to OVCR:  
Jacquelyn Jancius, Conflict of Interest Coordinator  
Office of the Vice Chancellor for Research (m/c 672)  
310 AOB

**Questions?** Contact the conflict of interest officer at [coi@uic.edu](mailto:coi@uic.edu) or (312) 996-4070, or consult the frequently asked questions available under the RNUA section of [www.research.uic.edu/conflict](http://www.research.uic.edu/conflict).