In instances where there is an organizational conflict or the existence of conflicting roles that might bias judgment as in the case of working with Family Members, the following management plan will help to address any existing or perceived biases.

The Code of Federal Regulations[[1]](#footnote-1) defines Family Members as any individual with any of the following relationships to another party:

1. Spouse, and parents thereof;
2. Children, and spouses thereof;
3. Parents, and spouses thereof;
4. Siblings, and spouses thereof;
5. Grandparents and grandchildren, and spouses thereof;
6. Domestic partner and parents thereof, including domestic partners of any individual in 2 through 5 of this definition; and
7. Any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship.
8. **Ownership Interests**

All UNCG employees have the responsibility to disclose a spouse/partner or Family Member owned company that seeks to engage in collaborative research or any other project with UNCG.

Significant COI risks are involved whenever a Family Member is expected to perform a part of the project as a contract employee or contractor (non-university employee), or when a subcontract is anticipated with the Family Member-owned company.

**Management Strategies:**

In the case of ownership interests that present conflicts, a management plan needs to include the following at a minimum:

* A plan that outlines the independent oversight of the work to be conducted by the Family Member-owned business other than by the PI. This would include any oversight for reimbursement, completion of deliverables, and supervision of any personnel.
* If the project itself is funded by a family-member’s company, the UNCG employee cannot be the sole PI. Therefore, the management plan would need to identify another UNCG individual who can serve as Co-PI and is willing to take on the duties of independent oversight.
* Additional management strategies may be required depending on the situation, including the possibility of not proceeding with the subcontract if adequate independence cannot be achieved.

1. **Reporting Structure:**

Conflicts can arise with respect to reporting structure such as where an employee’s spouse/partner or Family Member is involved in the same project or lab where the UNCG employee is the lead PI. State law and university policy specifically prohibit an employee from directly supervising their spouse or immediate Family Member.[[2]](#footnote-2)

In the case of reporting relationships that present conflicts, a management plan needs to include the following at a minimum.

**Management Strategies:**

* A management plan must outline an alternative reporting structure and oversight for all financial transactions for the spouse and any other immediate Family Member. An organizational chart can be attached to the management plan showing the alternative reporting structure. Alternative supervisor should be of equal or higher rank than the individuals involved, preferably the department head. The individual must be able to supervise and sign off on the quality of the work, attendance, and manage any personnel issues that might arise including remuneration.
* If the Family Member is to be reimbursed from the project, then a mechanism shall be established such that an independent person, of equal or higher rank than the PI, will need to be listed as the person who would approve any payments. This might include the establishment of a sub-fund. Ideally this individual would be the same as the person supervising the work. This individual is often the department head, but can be another independent co-PI of equal or higher rank than the PI who may be already on the project (with the approval of the department head). The co-PI providing oversight will be added to Banner as a co-PI with 0% credit, unless they are already a co-PI on the project.

Employee Information:

Discloser Name: Title/Rank

Department:

Campus Address:

Email Address:

|  |
| --- |
| Conflict Scenario: |
| Describe in detail the nature of the conflict; *Ownership Interest* or *Reporting Structure*  Including the name and role of family member and justification for use of services from Family-Member’s business or Family Member’s involvement in university project. |

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| --- |
| Actions to Manage or Reduce Potential Conflicts: |
| Describe in detail the Management Strategies that will be utilized to mitigate the COI, and explain how these oversight mechanisms are intended to address the potential conflict(s). |

Independent co-principal investigator:

Department

Email Address

**Acknowledgement**

By signing below, the employee attests that:

* S/He agrees to comply with the management mechanisms described herein.
* The information presented in this document is complete, accurate, and true to the best of their knowledge.
* They will annually recertify all relevant disclosures or update them within 30 days of discovering or acquiring any new financial interests or changes in the reported interests/relationship(s).

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| Printed Name & Title |  |  |  |
|  |  | Date: |  |
| Signature |  |  |  |
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**Administrative Review and Approval**

By signing below, the Department Head, Dean, Dean’s designee, or equivalent acknowledges:

* S/He has read and agrees to monitor the management mechanisms described herein, with annual reviews and updates to the plan as appropriate.
* The management plan is deemed to include mechanisms which are sufficient means to manage or eliminate financial conflicts of interest disclosed.

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| Printed Name & Title |  |  |  |
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|  |  | Date: |  |
| Signature |  |  |  |

**Approved**

Reviewed & approved by the ORI Director

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|  |  |  |  |
| Printed Name & Title |  |  |  |
|  |  |  |  |
|  |  | Date: |  |
| Signature |  |  |  |

1. CFR §200.465  [↑](#footnote-ref-1)
2. The UNC system Anti-Nepotism policy, to which UNCG is subject can be found here: [Employment of Related Persons (Anti-Nepotism Policy) (UNC 300.4.2)](http://www.northcarolina.edu/policy/index.php?pg=dl&id=328&format=pdf&inline=1) and guidelines [Implementing Anti-Nepotism Policy Guidelines (UNC 300.4.2.1[G])](http://www.northcarolina.edu/policy/index.php?pg=dl&id=329&format=pdf&inline=1) [↑](#footnote-ref-2)