REPORT OF NON-UNIVERSITY ACTIVITIES (RNUA)
DISCLOSURE AND REQUEST FOR PRIOR APPROVAL
FREQUENTLY ASKED QUESTIONS
Additional resources are available at http://research.uillinois.edu/conflict-interest/rnua

REPORT OF NON-UNIVERSITY ACTIVITIES: POLICIES

1. What is the Report of Non-University Activities (RNUA) and why is the Report of Non-University Activities (RNUA) important?
   - The RNUA form is an important means of managing real or perceived conflicts of commitment and interest. RNUA is a process by which academic staff members disclose and obtain prior written approval for Non-University income-producing activities.
   - Illinois state law and the University's Statutes and General Rules require faculty and other academic staff members to report certain categories of activities. Most Non-University activities are compatible with, and often beneficial to, the University duties of academic staff members.
   - The reporting process and the University's Policy on Conflicts of Commitment and Interest, are not meant to discourage external activities, but to assist academic staff members in disclosing them. Non-University income-producing professional activities of faculty and academic staff 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.

2. Who must report?
   - This Policy applies to all paid academic staff members, whether part time or full time employees of the University. The academic staff includes academic professionals, postdoctoral associates, and 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. All covered persons are referred to herein as "academic staff members."
   - For the purpose of this Policy, civil service staff, students, and medical residents (unless they are also employed as academic staff members) are not considered academic staff and therefore are not required to submit the RNUA form.
   - Although civil service staff, students, and medical residents are not covered by this policy, they are not exempted from making disclosures as required by federal or state laws and regulations, or from making situation-specific disclosures as described in Section III.D.3 of the University Policy on Conflicts of Commitment and Interest.

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 complete the RNUA form. Civil Service employees are covered by a different policy and do not complete the RNUA.
   - 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 Research website: http://research.uillinois.edu/conflict-interest/civil-service
4. Why do part-time academic staff members have to report?
Although the state law requires full-time staff members to make disclosures, the Policy on 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 duties.

5. How often does an academic staff member have to complete a form?
The state law and the Policy on Conflicts of Commitment and Interest require forms to be submitted annually. Forms should be updated throughout the year if changes in activity occur. It is the responsibility of the unit executive officer to collect all forms from faculty and academic staff members and to submit updates to the college office, which will forward them to the appropriate campus/UA office if necessary. Advance written approval of all external income-producing activities is required.

6. How do I file?
• The Report of Non-University Activities form and other related forms are available online at http://research.uillinois.edu/conflict-interest/rnua/forms-instructions
• Download and complete the form, then submit a hard copy with your signature to your unit executive officer for administrative review and prior approval. Please print and submit the form.
• If more than one outside entity, organization, or individual activity is disclosed, please complete the RNUA Part II Reporting sheet for multiple activities.

7. Where can I find more information?
The conflict of commitment and interest section on the OVPR web site is at http://research.uillinois.edu/conflict-interest. On that page you will find links to a variety of resources, including:
• RNUA form and detailed instructions
• Answers to frequently asked questions
• University Policy on Conflicts of Commitment and Interest
• Current University documents, state law and federal regulations relevant to this policy
• Campus conflict of interest officers contact information

REPORT OF NON-UNIVERSITY ACTIVITIES: PROCEDURES

8. Who signs and approves the individual’s RNUA form?
• The unit executive officer of the unit in which an academic staff member holds his/her primary appointment is responsible for evaluating all potential conflict situations reported (or otherwise known) before acting to approve or disapprove the activities.
• In cases of joint appointments greater than 0%, the unit executive officer of the secondary unit must also review and sign the form.
• The unit executive officer may determine that an RNUA form 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.).
9. **Who signs and approves the unit executive officer’s RNUA form?**
The academic officer next in the administrative reporting line (dean, provost, vice chancellor, etc.) signs the unit executive officer's form.

10. **Which forms should be forwarded to the college office?**
Original forms to be forwarded to the next level of review are:
- Forms where an academic staff member’s activities have been denied by the unit executive officer
- Forms for academic staff members who are determined by the UEO to have a real or potential conflict of interest or commitment
- The unit executive officer’s own RNUA form
- The Unit Checklist

11. **How long should forms be kept in department offices?**
Original and copies (when forms are forwarded) of all RNUA forms should be retained in the department office for as long as the staff member is at the University and should remain on file in the department after the employee’s termination.

**REPORT OF NON-UNIVERSITY ACTIVITIES: EMPLOYEE DISCLOSURE**

12. **Do I need to have approval for outside activities?**
Yes. Academic staff members must obtain prior written approval from their unit executive officer to engage in Non-University income-generating activities (regardless of net revenue) 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.

**Retrospective Disclosure:**
The University Policy on Conflict 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 also be reported retrospectively. Reporting of retrospective activities must be done as promptly as possible. To report activities retrospectively, you must update your disclosure on the RNUA form and provide an explanation for why the activities were not disclosed prior to engaging in the activities. The additional explanation should also indicate if the activities will continue or if the activities have ended. Attach the additional explanation statement to your updated RNUA form and submit the RNUA form to your UEO for review.

Failure to seek prior approval for non-University activities, as per the University Policy (see Section IV.E. on Sanctions), may result in sanctions. Severity of sanctions depends on the extent of the violations of the Policy.

13. **I requested approval for all outside activities last year. Why do I need to report the number of days spent on prior activities?**
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.
14. Do I have to report my Non-University income-producing activities if there is a net loss?  
Yes.

15. Does the amount of money received for a Non-University incoming-producing activity need to be reported?  
No. Information about amount of income is not required on the RNUA form; unit executive officers may require such information separately if needed to assess the potential, actual, or apparent conflicts presented by a Non-University income-producing activity.

Federal regulations, however, 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 ranges for the financial interest and travel that are reasonably relate to your University responsibilities. Please complete the disclosure form used at your campus [UIUC] [UIC] [UIS] in addition to the RNUA.

16. How should time spent on Non-University income-producing activities be calculated?  
All time should be reported in terms of the number of days devoted to Non-University income-producing activities. Eight hours of activity should be reported as one day of external activities. You should report the aggregate (total) number of days requested.

17. When reporting time spent on Non-University income-producing activities, do I have to include travel time?  
Yes.

18. Does the ownership of rental property or farm income need to be reported?  
Yes. Time spent on these activities should be reported. Ownership of income property and farm income must be considered when assessing potential conflicts of interest and/or conflicts of commitment.

19. Am I required to report outside consulting activity?  
Yes. (See examples in questions 26 & 27)

20. Am I required to report income-producing activity that is not directly connected to my research or to companies in which I have an interest?  
Yes. (See examples in questions 26 & 27)

21. Must Non-University income-producing activities performed during evenings and weekends be reported?  
Yes. All Non-University income-producing activities should be reported even if activities occur during the evening, weekends, or holidays.

22. Are retired faculty and staff who work for the University required to report?  
Retired faculty and staff are required to report if they are paid by the University. If they answer “yes” in Part I of the form, then they should explain in Part II.
23. 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 questions in Part I.

24. Do new staff members have to report their activities performed before their University of Illinois employment?
No. They need only report their activities as of the date of employment with the University.

25. 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 income-producing activities.

26. Do staff members who are out of the country, on a leave of absence, on sabbatical, or on sick leave need to complete a reporting form?
Not while away. Please note their absence and anticipated return date on the checklist. The department is responsible for ensuring that they complete and submit a form upon their return. If the absent academic staff member applies for a federal grant or contract while on leave or out of the country, the academic staff member should make sure to disclose any potential Conflicts of Commitment or Interest.

27. What are examples of allowable income-producing activities?
The following are examples of activities described in the University Policy on Conflicts of Commitment and Interest (see Part III, Section E) 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 honoraria from prohibited sources. For further information, please consult with the University Ethics Office.

Also note that 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 on the RNUA form may require reporting to the unit responsible for conflict of interest matters on your campus. 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 income-producing activities:
- Preparing, publishing, or presenting scholarly or creative works, including books, articles, and software, even if honoraria, stipends, or royalties may be provided.
- Participating at professional conferences for the purpose of making scholarly presentations, conducting seminars or workshops, even if paid an honorarium.
- Serving as a special reviewer or on a review panel for academic or governmental organizations, even if paid an honorarium.
- Serving as a reviewer or editor for a scholarly journal, even if financial consideration is provided.
• Participating in a clinical practice plan approved by the University of Illinois Board of Trustees.
• Receiving royalties under the University's royalty distribution policies while currently employed or otherwise appointed by the University.
• Earning income from passive investments such as interest or dividends from banks, mutual funds, or stocks and bonds.

28. 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.

• Using University resources to conduct research that is sponsored by an entity in which the academic staff member or his/her immediate family member has a significant financial interest.
• Serving in an executive or managerial capacity or holding significant financial interests in an entity doing business with the University.
• Serving in an executive or managerial capacity or holding significant financial interests in an entity in one's field of research.
• Serving on the board of directors or a major advisory committee of an entity that sponsors the academic staff member's research or provides gift funds for the use of the academic staff member or his/her department.
• Conducting consulting or other Non-University income-producing activities involving University students or other University staff.
• Utilizing University students or employees in the academic staff member's University activities supported by gift funds from an entity in which the academic staff member has a significant financial interest.
• Utilizing University students or employees in the academic staff member's University research sponsored by an entity in which the academic staff member has a significant financial interest.
• Conducting testing or clinical trials of products, devices, or services owned or controlled by an entity in which the academic staff member or a member of his/her immediate family has a significant financial interest.
• 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 staff member or a member of his/her immediate family has a significant financial interest, managerial, or executive role).
• Owning an entity from which the University may seek to procure goods or services.
• Influencing the University’s decision to procure goods or services from an entity owned by one’s immediate family member.
• Submitting grant proposals or making sub award arrangements involving the purchase of goods or services from an entity in which an academic staff member or a member of his/her immediate family has a significant financial interest.
• While acting in the context of his/her University duties, making professional referrals to an entity in which an academic staff member or a member of his/her immediate family has a significant financial interest.
• Spending more than one day per seven-day-week (as defined in Section III.C.1), averaged over the contract period, on Non-University income-producing activities.
• Other examples of activities for which prior approval is required include, but are not limited to:
  o Ownership and/or management of rental property
  o Working at a retail entity
  o Paid coaching
  o Providing or directing paid professional entertainment services.

29. Do I need to attach a statement to explain my activities in Part I?
No. Academic staff that answer “yes” to question in Part I of the RNUA form should complete Part II of the RNUA form. Part II provides an explanation of Non-University Activities disclosed under Part I. You should indicate that the explanation in Part II corresponds with the list of activities identified as 1-6 in Part I. If there is not enough space on the form, additional explanatory information may be attached.

30. I have more than one Non-University income-producing activity; how can I list multiple activities on this form?
For additional activities, please complete another RNUA “Part II Reporting” form available at http://research.uiuillinois.edu/rnua/forms-instructions.

31. I have less than a 75% appointment; do I need to complete Part II?
Yes. Regardless of your percentage of appointment, if you disclose activities in Part I, you must complete Part II.

32. Where do I find information about my University appointment?
Consult NESSIE for your notice of appointment (https://nessie.uihr.uiuillinois.edu/cf/info/index.cfm?select1=0).

33. How does the policy define immediate family?
The University Policy on Conflicts of Commitment and Interest defines “immediate family” as one’s spouse or domestic partner, parents, siblings, and children.

REPORT OF NON-UNIVERSITY ACTIVITIES: ADMINISTRATIVE REVIEW

34. Who is the unit executive officer?
The University Policy on Conflicts of Commitment and Interest defines the “unit executive officer” (UEO) as the department head/chair, or equivalent office of other units. For RNUA forms for unit executive officers, the term refers to the administrators at the next higher level in the normal University reporting lines.

35. Can the unit executive officer delegate the responsibility for reviewing and approving RNUA forms?
No. The University Policy on Conflict of Commitment and Interest states the unit executive officer is responsible for reviewing and evaluating RNUA forms for academic staff in the unit.

36. What are the guidelines for the unit executive officer to determine potential conflicts of commitment?
The Unit Executive Officer (UEO) may determine that an academic staff member has a conflict of commitment which may require additional management and monitoring and may require a second level of review, if the academic staff member:

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

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

The Unit Executive Officer (UEO) may determine that an academic staff member has a conflict of interest that may require additional management and monitoring and may require a second level of review, if the academic staff member:

- (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 academic staff member 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 academic staff member’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 academic staff member’s external activities.

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

The following are options for the unit executive officer in approving or denying an academic staff member’s disclosure:

- If no activities were reported, then the UEO will skip Part IV and complete the review of the form by signing the form in Part V. Generally, no further review is required unless the employee has an secondary appointment. Once the unit head signs the form, it should be filed in the department.
- If activities are reported, then the UEO should complete the review and approval, Part IV (1) and (2).

1. Activities. UEO may approve or deny activities.
   - If activities are denied, the UEO should provide an explanation for denial of the activities, and suggest corrective actions to manage the activities in a separate
statement attached to the RNUA form or in the section called “UEO Notes” at the
bottom of the page.

- If activities require the UEO’s review for approval or denial, then the UEO must complete Part IV (2).
- If activities do not require reporting, the UEO should indicate in Part IV (1) that activities “Do not require reporting.” The UEO should skip Part IV (2) and proceed to complete the review in Part V.

2. The UEO must make a determination that either:
   - Activities reported do not present a conflict of commitment or interest. In such cases, the RNUA form does not require a second level of review. The form should be signed by the unit executive officer and kept on file in the department.
   - Activities reported were approved and require an explanation on how activities will be monitored and a secondary level of review. The UEO should attach an explanation to the academic staff member’s RNUA form. The RNUA form should be submitted to the next level of review.
   - Activities reported were denied and/or may present a conflict of commitment or interest. The UEO should attach an explanation to the academic staff member’s RNUA form. The UEO’s statement should explain the denial of activities and should suggest management mechanisms (e.g. eliminating or reducing external activities). Notify the academic staff member and allow him/her the opportunity to respond before transmitting the form to the next level of review.

39. Does the unit executive officer need to attach a statement?
When activities are denied or when the UEO determines that a conflict of commitment or interest exists, then the unit executive officer should provide an explanation for denial of the activities, and suggest corrective actions to manage the activities in a separate statement attached to the RNUA form or in the section called “UEO Notes” at the bottom of the page.

40. If activities are denied by the unit executive officer, what should be communicated to the academic staff member?
UEO must notify the academic staff member and allow the employee the opportunity to respond before transmitting the form to the next level of review. See COCI Policy Section IV D, Appealing Denials by the UEO.

41. If activities are denied by the unit executive officer, what should be communicated to the second level of review?
After the academic staff member has had the opportunity to respond (see COCI Policy, Section IV D), then the RNUA form and statements from the UEO and any statements from the academic staff member should be transmitted to the next level of review.

42. How should the unit executive officer review previously unapproved activities that are reported retrospectively?
If an academic staff member 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 academic staff member must provide an explanation why the activities were not reported prior to engaging in the outside activities. The academic staff member’s explanation should also indicate if the activities will continue or if the activities have ended.
The UEO must assess the retrospective disclosure and determine whether to approve or deny the activities. The UEO must also determine if the retrospective activities present conflicts of commitment or interest. If activities are denied or present conflicts of commitment or interest, then the UEO must attach a statement 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 academic staff member that all activities must be disclosed and approved prior to engaging in non-University activities.

**DISCLOSURE FOR PUBLIC HEALTH SERVICES REGULATIONS**

43. I am an investigator or key research personnel on PHS, HHS, or NIH sponsored research. Am I required to complete any other disclosures in addition to the RNUA?

Yes. If you are an investigator or key research personnel on a research award that is sponsored by Public Health Services (PHS), Department of Health and Human Services (HHS), or the National Institutes for Health (NIH), or a non-federal agency that has adopted the PHS regulations, then you should also complete the annual disclosure of your significant financial interest. Forms, guidelines, and training on the PHS Financial Conflict of Interest regulations are available at the campus Vice Chancellor for Research Office and UIS Provost Office.

**UIUC:**
UIUC investigators and key research personnel should submit a disclosure form to (phsdisclosure@illinois.edu).
Form: [http://research.illinois.edu/coi/PIFID_2012.pdf](http://research.illinois.edu/coi/PIFID_2012.pdf)
Guidelines: [http://www.research.illinois.edu/coi/PHS_Disclosure_Regulations.cfm](http://www.research.illinois.edu/coi/PHS_Disclosure_Regulations.cfm)

**UIC:**
UIC investigators and key research personnel should submit a disclosure form to (COI@uic.edu).
Training: [http://tigger.uic.edu/depts/ovcr/research/conflict/RNUA/training.html](http://tigger.uic.edu/depts/ovcr/research/conflict/RNUA/training.html)

**UIS**
UIS investigators and key research personnel should submit a disclosure form to Office of Grants, Contracts & Research Administration or emailed to ccorn1@uis.edu.

**STATEMENT OF ECONOMIC INTERESTS**
44. 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/.

The University official who can assist you with other questions about this form is:

Donna McNeely
University Ethics Officer
Human Resources Building, Room 20
One University Plaza, MS HRB 20
Springfield, Illinois 62703
Ethics Help Line: 1-866-758-2146
Phone: 217-206-6202
Fax: 217-206-6211
e-mail: ethicsofficer@uillinois.edu