THE
UNIVERSITY
OF RHODE ISLAND

Policy on Conflict of Commitment in Research

Policy Title	**Policy on Conflict of Commitment in Research**
Policy #	01.018.2
Policy Owner	University of Rhode Island Board of Trustees
Contact Information	Questions about this policy can be directed to the Director of Research Integrity at 401-874-4813.
Approved By	University of Rhode Island Board of Trustees
Effective Date	November 6, 2026
Next Review Date	No later than November 30, 2030
Who Needs to Know About this Policy	All Employees of the University of Rhode Island ("University" or "URI") involved in the conduct, administration, or oversight of Research; as well as all Investigators associated with University Research regardless of professional affiliation.
Definitions	**Conflict of Commitment.** Outside Activities that interfere, or appear to interfere, with an Investigator's ability to fulfill their Institutional Responsibilities (even if the Outside Activity benefits the University or enhances the Investigator's professional growth). **Conflict-of-Interest Management Committee**. A committee established in accordance with the University of Rhode Island Board of Trustees Policy on Public-Private Partnership in Research and Development to advise the Designated Responsible Official on Financial Conflicts of Interest in Research and Conflicts of Commitment. **Designated Responsible Official ("DRO").** The individual responsible for reviewing and addressing disclosures of Outside Activities and managing Conflicts of Commitment as they relate to Research. For the purposes of this policy, the Designated Responsible Official will be the Vice President for Research and Economic Development at the University of Rhode Island. **Employee**. Any person employed by the University, including but not limited to faculty, staff, or a student worker; regardless of the source of funds from which they are paid. **Institutional Responsibilities.** Investigator's responsibilities associated with their University of Rhode Island appointment or position such as Research, teaching, service, support, administration, conference attendance, Research presentations or lectures at other universities,

	uncompensated publication review, and certain internal and external professional committee service. **Investigator.** Project director or principal Investigator and any other person, regardless of title or position, who is responsible for the design, conduct, and/or reporting of Research, which may include, for example, collaborators or consultants. Some sponsors have specific requirements for identifying Investigators. **Outside Activities.** Activities (paid or unpaid) such as external consulting, personal businesses, and professional and academic endeavors, performed outside of the Investigator's appointment to the University. **Research.** A systematic investigation, including development, testing, and evaluation of ideas, designed to develop or contribute to general knowledge. Research includes all basic, applied, clinical, translational, demonstration and creative activities in all academic and scholarly fields including, but not limited to the arts, sciences, liberal arts, applied sciences, social sciences, and professions, including Research activities involving human subjects and animals.
Statutes, Regulations, and Policies Governing or Necessitating This Policy	Conflicts of Interest, Conflicts of Commitment, Organizational Conflicts of Interest, and Other Matters of Concern, 2 C.F.R. Part 910, Subpart C. *Policy on Financial Conflict of Interest in Research.* *Policy on Conflict of Interest and Commitment.* *Policy on Malign Foreign Talent Recruitment Program Prohibition.*
Reason for Policy/Purpose	This policy is intended to meet the requirements of federal regulations and policies regarding Conflicts of Commitment in Research, and to ensure that the University and its Employees participating in Research activities conduct themselves in accordance with those regulations.
Forms Related to this Policy	URI Research Significant Financial Interest and Outside Activity Disclosure Form

Policy Statement

The University of Rhode Island ("University" or "URI") values the Outside Activities of Investigators when they further their professional development and enhance their teaching and Research capabilities. The intent of this policy is to aid Investigators in avoiding (or, if it's determined to be possible, managing) Conflicts of Commitment in Research, and to meet the requirements of applicable federal regulations and policies.

Investigators are required to disclose Outside Activities. Disclosure enables the University to determine if an Outside Activity creates a Conflict of Commitment or the appearance of a Conflict of Commitment. Effective management of a Conflict of Commitment depends on full and prompt disclosure.

This policy applies to ongoing and future activities as of the policy Effective Date. Past activities are subject to applicable University policies in place at the time those activities were undertaken.

The following additional policies related to conflicts of interest or commitment apply to individuals engaged in specific activities, and may prescribe corresponding pathways for self-disclosure and conflict management:

- The Policy on Financial Conflict of Interest in Research additionally applies to Employees engaged in sponsored research activities (and shares a common disclosure form);
- The Policy on Public-Private Partnership in Research and Development applies to Employees engaged in basic or applied Research and Development at the University;
- The Policy on Conflict of Interest and Commitment applies to all University Employees and guides compliance with the Rhode Island Code of Ethics; and
- The Policy on Consensual Relationships applies to Employees whose activity meets the definition of a consensual relationship as defined in that policy.

I. Applicability

This policy and its attendant procedures apply to any University Employee identified as an Investigator who receives and/or proposes to receive funding from external sources for Research at the University.

Collaborators, sub-contractors, sub-recipients, and visiting scientists that are identified as Investigators must either comply with this policy and its attendant procedures or provide a certification to the Director of Sponsored Projects that their institutions are in compliance with pertinent federal policies and that they in turn are in compliance with their own institutional policies.

II. Disclosure Process

Investigators must disclose Outside Activities (1) before submitting an application for external funding, (2) at least annually thereafter, and (3) within 15 days of acquiring a new Outside Activity.

The Associate Vice President for Research Administration, in consultation with the DRO and the Conflict-of-Interest Management Committee, will design procedures for the reporting of Outside Activities. Investigators are responsible for completing disclosures of Outside Activities as described in the procedures attendant to this Policy.

III. Training

All Investigators who receive and / or propose to receive funding from external sources for Research at the University must complete required training as described in the attendant procedures prior to engaging in the funded Research at the University, and at least every two (2) years thereafter. Investigators must also complete training within a period of time determined by the DRO if 1) this policy is substantively amended and 2) the DRO determines that the Investigator has not complied with this policy or with a management plan related to their Research.

IV. Review and Evaluation of Disclosures

The Associate Vice President for Research Administration, in consultation with the DRO and the Conflict-of-Interest Management Committee, will review disclosures as described in the attendant procedures. The intent of the review is to determine:

(1) Whether the disclosed Outside Activities constitute real or perceived Conflicts of Commitment; and
(2) Whether the real or perceived Conflicts of Commitment shall be managed or eliminated.

V. Management and Elimination of Conflicts of Commitment

If it is determined that a real or perceived Conflict of Commitment may be managed, the Associate Vice President for Research Administration will develop a draft management plan and submit it for review and approval as described in the attendant procedures.

The Investigator may not commence or participate in the Research (or alternatively, the Outside Activity) that gives rise to a Conflict of Commitment, or the appearance thereof, until the management plan is fully approved and executed. Once approved, the Investigator must adhere strictly to all aspects of the management plan. Compliance with the management plan will be monitored as described therein.

If it is determined that a real or perceived Conflict of Commitment may not be managed, the Investigator must either 1) eliminate the Outside Activity before commencing or participating in the Research that gives rise to the Conflict of Commitment, or 2) decline to participate in the Research that gives rise to the Conflict of Commitment.

VI. Appeals

If an Investigator believes that a determination regarding an Outside Activity or a Conflict of Commitment is not appropriate or is based on erroneous information, they may request reconsideration by submitting a written request to the Associate Vice President for Research Administration. If, after a second review, the Investigator still wishes to appeal the decision, they may appeal to the DRO. The DRO's decision is final.

VII. Reporting

The Associate Vice President for Research Administration is responsible for reporting identified Conflicts of Commitment and any noncompliance with management plans in cases where federal regulation or the sponsor terms and conditions require reporting.

VIII. Retrospective Review

If the University discovers an Outside Activity or a Conflict of Commitment that was not identified in the disclosure and evaluation process, the Associate Vice President for Research Administration, in consultation with the DRO and the Conflict-of-Interest Management Committee, will conduct a retrospective review to determine if a conflict exists and if any mitigating actions are required. This review and any required mitigation report, if appliable, will be conducted, documented, and submitted according to federal regulation or sponsor terms.

IX. Sanctions for Failure to Comply

Failure to comply with this policy or with an approved management plan will be subject to review by the Designated Responsible Official. If the DRO determines a policy violation has occurred, the Investigator may be subject to University discipline up to and including termination of external funding, limitation or revocation of authorization to request or receive external funding, and termination of appointment.

X. Public Accessibility

This policy document will be posted on the University's public website. If required to do so by federal or state law, or by sponsor terms and conditions, the University will make information regarding Conflicts of Commitment, including the management thereof, available to the public upon request.

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XI. Record Retention

The Associate Vice President for Research Administration will retain all disclosures, conflict management plans, and related documents for a period of at least three (3) years following submission of the final expenditure report for the applicable project to the sponsor of the Research that gives rise to the conflict unless any litigation, claim or negotiation, audit, or other action involving the records is commenced before expiration of the three (3)-year period, in which case, records will be retained until completion of the action and resolution of all issues.

Exceptions

None

Policy Review and Revisions

Policy #	Effective Date	Reason for Change	Changes to Policy
01.018.1	November 7, 2025	n/a	n/a
01.018.2	November 6, 2026	Compliance updates to align with the DOE conflicts of interest regulation at 2 C.F.R. Part 910, Subpart C.	Shortened the disclosure window to within 15 days of acquiring a new Outside Activity, and added a section on Training.