

External Professional Activities (EPA)

Anique Falconer and Alan Fellers

Conflict of Interest Programs

Office of Research Integrity & Ethics

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Policy Overview

External Professional Activities (EPA) Policy aligns the University with updated requirements from federal funding agencies and enable Schools/Departments to assess for conflicts of commitment.

- This policy supplements existing financial disclosure requirements established under WashU's current conflicts of interest policies.
- Requires disclosure of external professional activities (EPAs) conducted with entities other than Washington University, even if individuals are not compensated for these activities.
- Some activities require Department/School approval **prior to engaging in the activity.**

Covered Population:

Full and Part-time Faculty

- having a >0.0 FTE appointment) academic appointment of instructor or higher regardless of track
 - (i.e., Tenure, Teaching, Investigator/Research, Clinical, Practice).
- Does not currently include Lecturer, Senior Lecturer , and **most adjuncts.**

Others

Any other individual independently responsible for the design, conduct, or reporting of research at WUSTL as defined by the Research Conflicts of Interest Policy

*When in doubt,
please contact the
COI office for
verification of
Covered
Individuals*

Disclosure Requirements:

All professional activities with entities other than Washington University must be disclosed, even if the individual is not compensated. EPAs generally rely on the individual's professional, academic, research, or clinical expertise.

Examples include:

- Teaching a summer course at another institution*
- Serving on a Board of Directors*
- Voluntary service on a scientific advisory board
- Reviewing grant applications for a non-US funding agency
- Serving as Principal Investigator on a project on behalf of another organization outside of WashU*

* Prior Approval is required before engaging in or agreeing to this type of activity.

Disclosure Requirements (Exclusions):

Does not Require Disclosure:

- **Activities unrelated to a Covered Individual's professional, academic, or scientific expertise (e.g. owning a rental property, other unrelated volunteer work);**
- **Activities deemed necessary or expected for academic appointment progression that do not include remuneration:**
 - Professional Membership in U.S. academic or professional society, including serving as an officer or on the board;
 - Speaking, Conferences, & Seminars: providing presentations for U.S. professional societies or academic institutions;
 - Academic Peer Review Activities: Reviewing proposals for a U.S. government sponsor, or a domestic non-profit organization; serving as a journal editor/editorial reviews;
 - Consulting or mentoring on a U.S. federal grant outside the University (with no effort); and
 - Thesis/Dissertation: Serving as an external member of a thesis or dissertation committee at a U.S. academic institution.

Prior Approval Requests:

EPAs that are more likely to overlap with an individual's Institutional Responsibilities require approval prior to initiating the activity.

Provides a concise way to inform the University of a potential new EPA (without updating the full disclosure).

Goal is to maintain transparency and enable schools to advise individuals on how best to structure the relationship

Enables the University to proactively address overlap between a proposed EPA and University activities.

Prior Approval Requests:

What activities require prior approval?

External Appointments: All academic, scientific, or institutional appointments outside of WashU

External PI Role: Serving as Principal Investigator on research outside of WashU

External Research Engagement: Performing research at or on behalf of another entity (not within the scope of WashU research activities.)

External Executive/Fiduciary Role: Service, position, or a role involving a fiduciary responsibility to an outside entity

Prior Approval Requests:

Prior Approval is also required when an EPA overlaps with WU in certain ways.

Involving WashU Resources: using University resources, equipment, or space to fulfill obligations under an EPA beyond basic office equipment and supplies.

Involving WashU Students or Staff: employing students, or University staff in an EPA creating overlapping supervisory or authoritative relationships

External Research Resources: any EPA providing access to resources, space, or services made available to individuals.

Creates Obligation on WashU: Any EPA that creates obligations on WashU

Full EPA Disclosures:

- Formerly called Financial Disclosure Statement or FDS
- Must be done at least once a year, even if there are no changes to your external activities.
- Prior Approval requests that are approved will automatically be pulled into the next disclosure.
- All existing data is still in the system and will pull into the disclosure automatically when you go to update your disclosure the first time.
 - There are some new questions on the disclosure so those will need to be answered before you will be able to submit.
- The COI Office will continue to notify you to update your disclosure two weeks prior to its expiring. No need to immediately submit a new one until you are due or if you acquire a new interest.

Submit Disclosures using RMS:

All disclosures are submitted using the COI Module in the Research Management System (RMS).

- Full EPA Disclosures must be submitted at least once a year or within 30 days for newly acquired interests or activities.
- Prior Approval Requests must be submitted prior to engaging in the activity, and at least 30 days prior to the anticipated start date of the activity when possible.
- RMS web address: <https://rms.wustl.edu>
- COI website: <https://coi.wustl.edu>
 - Policies
 - Guides for Disclosing
 - FAQs
 - List of Designated Reviewers and School Specific Guidance

- Conflict of Interest
- SPIN

- Create/Update Disclosure
- Locate Records

Search Management System

For Assistance
Technical
 Password reset, security management

Create/Update Disclosure

Name: ▾

Last Disclosure: **No Disclosures Filed**

External Professional Activities Disclosure

Comprehensive disclosure to be completed, at a minimum, annually, or as major changes occur

Enter/Update

View Previous

Prior Approval Request for External Activities

Request School/Dept approval to initiate a new EPA requiring prior approval

New Request

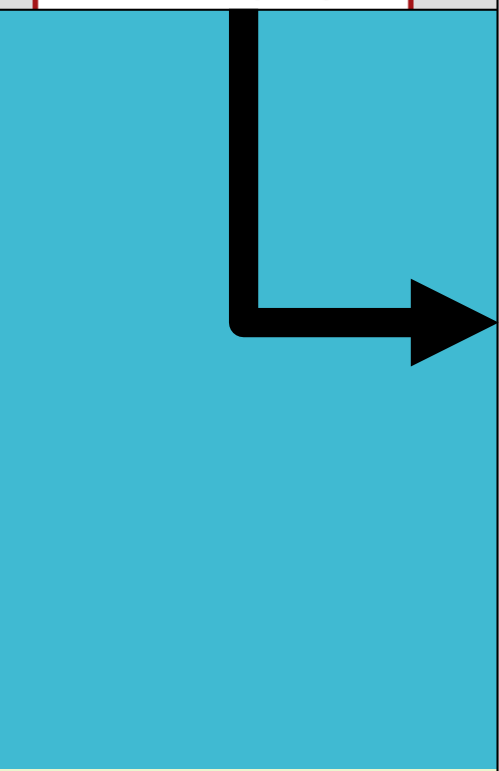
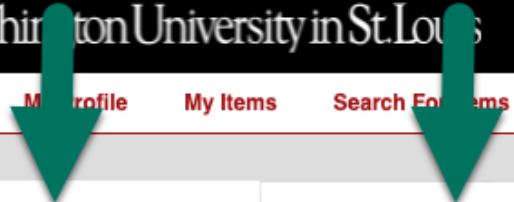
Current Status & History

Research Disclosure

Disclose additional research details for specific projects
(You will be notified if you need to complete this form)

Enter/Update

View Previous



Review Process:

Deans of each of the schools have identified Designated Reviewers with the appropriate expertise and authority to assess and manage EPAs.

Basic review steps once a disclosure (full EPA or Prior Approval Request) is submitted:

- 1.** The COI Office completes a preliminary assessment for compliance with institutional policies and school/department review requirements.
- 2.** Disclosed activities needing review are then routed to the Designated Reviewers for review and assessment.
- 3.** For prior approvals, the requester is notified of the outcome by the COI Office when the review is completed.

Questions:

ask COI

314-747-4181
COI@wustl.edu



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