

## Quick Guide: Reviewing Annual Conflict of Interest Disclosure Forms

1. For those with direct reports who are assigned USA's annual COI Disclosure (per section 5.2 in our [Conflict of Interest and Conflict of Commitment Policy](#)), you have an additional responsibility in our COI Disclosure process: as Reviewers. Our due date for submission of Disclosure forms is March 11, 2021, and you will have another 6 weeks after that (April 22) to complete your reviews. Meanwhile, feel free to commence the Disclosure review process for any forms that are already submitted.

In your role as supervisor, you will be the Primary Reviewer for their annual COI Disclosure forms and will document your conclusions in the COI Risk Manager system. To review each form (please follow steps below, after logging-in to our [COI Risk Manager](#) app):

a. If there are no "Yes" responses on a Disclosure form, you will enter "Mark as Reviewed" to close it out. To accomplish this, click "Review Disclosures" in your left side menu; in the Search menu that appears immediately to the right, place a checkmark in the box for "Submitted" (in the Status scroll-down menu), and select "COI 2021" for Campaign. To the right should appear COI Disclosure forms submitted thus far. Click the "form" (📄) icon to view a Disclosure by one of your direct reports, then click the Actions menu, and click "Marked as Reviewed." For complete details you can also follow steps 1.1 through 1.4 (to view their Disclosure) in our COI Disclosure Review Guide, then step 2.1 (to "Mark as Reviewed").

b. If there are "Yes" responses on the form, but based on USA Conflict of Interest (COI) policies the issue does not rise to the level of a COI (and won't require any further action), you will:

- follow steps 1.1 - 1.4 in our [COI Disclosure Review Guide](#) to access and view the form,
- follow steps 2.2 - 2.5 to open a Case,
- follow step 3.1 to document your review determinations, and
- follow steps 3.2.1 through 3.2.3 to "Mark As Reviewed"

c. If there are "Yes" responses and the submitter's explanation leads you to believe (based on your review of USA Conflict of Interest policies) there may be a perceived, potential or actual conflict of interest, you will:

- follow steps 1.1 - 1.4 in our [COI Disclosure Review Guide](#) to access and view the form,
- follow steps 2.2 - 2.5 to open a Case,
- follow step 3.1 to document your review
- At this point you must decide between (1) recommending informal actions be taken by the submitter to avoid the conflict, or (2) recommending a formal Management Plan to assist the submitter in avoiding the conflict. See sections 3.3 (informal) or 3.4 (formal Management Plan) for next steps.

**Note:** For conflicts disclosed by a direct report requiring a formal Management Plan, concurrence with your Plan will be needed by your supervisor as a Senior or Secondary Reviewer (typically a Dean, VP or Sr. Director). Section B in our [COI Disclosure Review Guide](#) provides the necessary steps by the Senior or Secondary Reviewer in the review process, particularly for reviewing and approving proposed

Management Plans. Upon approval by your supervisor of the proposed Management Plan, you may initiate it with your direct report who submitted the Disclosure form.

2. For any individual or group who would like a short tutorial on the above steps, please contact the Office of Compliance (ph# 460-7115 or 6697, or [chansen@southalabama.edu](mailto:chansen@southalabama.edu)) to arrange a tutorial via a Zoom meeting. The Office of Compliance is also available to discuss the process for submitting and/or reviewing/approving External Professional Activities requests.

3. Notes & Observations:

a. Participants are encouraged to err on the side of excess while completing COI Disclosure forms. A "Yes" response itself does NOT necessarily constitute a COI; rather, a mere starting point in an analysis, which in most cases will likely be determined to not rise to the level of an actual COI;

b. When a Dean does a search for submitted disclosures, they will see all faculty disclosures, not just those of their Dept Chairs. Deans only need to be the Primary Reviewer for their Dept Chairs, who in turn will be the Primary Reviewer for their faculty;

c. See the Q&A and Scenarios on our COI info web page to help give you a sense of whether something needs to be reported, and, activities that may constitute a conflict, v. those that don't:

- [Types of Conflict](#);

- [Case Scenarios & Additional Quick-Answer Scenarios](#);

d. Deans who have completed their forms were probably not able to self-identify as "faculty," due to having an administrator employee code. Faculty have the following additional faculty-specific question, "*Do you require students to purchase textbooks or related instructional materials produced or authored by you or a family member, which produces compensation for you or a family member?*" If your answer to this question is yes, please update your Disclosure form with this info in question 8 of the Core section ("Is there anything not disclosed above which you believe might constitute a conflict of interest or an appearance of a conflict of interest?").

e. To update one's COI Disclosure form, log-in, scroll down and click the "Show Disclosures Available to Update" bar, then open your form by clicking the blue "Update" button. Proceed with your updates, then re-submit.

f. The EPA (External Professional Activities) Request form in COI Risk Manager should be ignored, unless you have an actual EPA to request.