

# Conflict of Interest and Commitment System Frequently Asked Questions

## Approver FAQs

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1. What is an approver and what is their role?

ANSWER: An approver is typically the person you report to on a daily basis. It may be your supervisor or someone that reviews and approves your pay. To determine the correct approver to select, please talk with your supervisor. The approver reviews your disclosure each year and approves it within the Conflict Disclosure System. They are also responsible for ensuring a management plan is followed during the year, if one has been designed for you.

2. How do I know if the disclosures have been approved?

ANSWER: Once a disclosure is completed, the Conflict Disclosure System will automatically send the approver an email. The approver will open the disclosure, review the information and approve it. Once this action has been completed by the approver, an email will automatically be sent to the discloser, notifying the discloser that it has been approved.

3. What is the role of an approver?

ANSWER: An approver has several roles.

- 1) They should review all disclosures submitted to them from their staff.
- 2) They should return any disclosure received in error that was not submitted from their staff.
- 3) They should review the information and determine if the disclosure should be approved. If the information is sufficient, they should approve the disclosure.
- 4) They should return a disclosure to an employee to obtain additional information about a conflict.
- 5) If a conflict requires a management plan, they should work with the University Conflicts and Commitment Office to develop it and ensure it is followed by the employee and the supervisor during the fiscal year.

4. How does the system notify an approver that a disclosure requires their review and approval?

ANSWER: The system automatically generates an email to the approver to notify them when a disclosure is present to approve. The approver will continue to receive these notifications until all disclosures (submitted by staff which selected them as their approver) have been approved by them.

5. How do I approve a submitted disclosure?

ANSWER: The Approver should login to the system and view **My Approvals**. A disclosure can be viewed by clicking the faculty/staff member name link corresponding to the disclosure. Disclosures without potential conflicts reported can be approved directly from the **My Approvals** page by selecting the disclosure and clicking the **Approve Selected Disclosures** button. Disclosures with conflicts can be approved from the **Management Plan** page, which is found on the last page of the disclosure. The Approver should review all the details of a disclosure when a conflict is reported. Once all information is

reviewed and the Approver has entered their comments in the **Follow-Up** and **Management Action Plan** sections, the Approver can approve the disclosure.

6. Should I approve a disclosure from someone that I do not know? If not, what should I do if this happens?

ANSWER: No, you should not approve a disclosure for someone you do not know. Please return the disclosure to the person who submitted it to you. The system provides a field for you to add an explanation about the reason the disclosure was returned.

7. What should an approver do when more information is needed to understand a disclosed conflict?

ANSWER: The approver should return the disclosure to the person who submitted it. The system provides a field for you to add an explanation about the actions needed to be completed or added to the disclosure.

8. If I need to return a Disclosure, will the Conflict Disclosure system alert them that their Disclosure has been returned for further action?

ANSWER: The discloser will receive an email alerting them that their Disclosure has been returned, along with your reasons for the return. You will have an opportunity to write specific comments when you need to return a Disclosure.

9. Does the Status change to Resubmitted once the discloser resubmits a returned disclosure?

ANSWER: No, the status will return to Submitted.

10. Should I be able to make changes to the Management Plan while a Disclosure is in a Returned status waiting for more information from the discloser?

ANSWER: Yes, if you wish. The Disclosure cannot be submitted to the review committee until the discloser has resubmitted to you for final action and you have submitted it for review.

11. What is a management plan?

ANSWER: A management plan is a written plan created to protect faculty/staff members as well as the University from even the appearance of a conflict of interest or commitment.

12. What is my role as a supervisor when I have a staff member working under a management plan?

ANSWER: It is the supervisor's duty to be aware of the existence of the conflicts of their staff members and to be knowledgeable about the contents of their assigned management plans. They have the task of ensuring that the management plan is implemented in a timely fashion and followed by the staff member at all times. It is also the supervisor's duty to monitor any changes in the staff member's conflict situation and determine whether the management plan should be adjusted based on those changes.

13. Why do some names have check boxes next to them and some do not in the My Approvals section?

ANSWER: A Disclosure will only have a check box if the discloser has reported no conflicts. If there is no check box, the discloser has reported one or more potential conflicts and you must open the Disclosure to provide a Management Plan.

14. What if the conflict changes and the discloser has a management plan?

ANSWER: If the conflict changes, the faculty/staff member should inform their supervisor and update their disclosure in the system. The Conflict of Interest Office will review the new disclosure and the comments of the Approver to determine if the management plan needs to be changed.

15. What if the conflict is removed and the discloser has a management plan?

ANSWER: If the conflict is removed, the faculty/staff member should inform their supervisor and update their disclosure in the system. The system allows Disclosers to add comments. The Discloser should add a comment to their disclosure explaining why they no longer have a conflict to report. The Conflict of Interest Office will review the new disclosure and the comments of the Approver to determine whether a management plan is still required.

16. Whom should I contact if I have a question about a management plan?

ANSWER: All management plan questions should be sent to the [coi@vanderbilt.edu](mailto:coi@vanderbilt.edu) mailbox. If you do not have access to email, please call the Office of Conflict of Interest and Commitment Management at 322-8363 or 322-2401.

17. If the discloser has a management plan to follow, how long should he/she follow it?

ANSWER: The management plan created and should be followed at all times. If the conflict situation changes, instruct the employee to simply create a new disclosure. At that point, the new disclosure should be reviewed to determine if another plan should be put in place or if a plan is needed at all.

18. Why did I receive an email telling me to review the management plan?

ANSWER: The Office of Conflict of Interest and Commitment Management reviews all approved disclosures and makes the final determination of the management action plan content. The Discloser and the Approver are then asked to review the plan for accuracy and all three areas work together to resolve any issues with the plan to ensure that it is drafted to adequately handle the disclosed situation.

19. How do I return a disclosure, if I need to return it to the person who submitted it?

ANSWER: For those disclosures where no conflict was reported, the Approver can return the disclosure from the **My Approvals** page by selecting the disclosure and clicking the **Return Selected Disclosures** button at the bottom of the page. Disclosures with potential conflicts can be returned from the **Management Plan** page by clicking the **Return Disclosures** button. If a disclosure is returned, the Approver will select a reason for return and can enter additional comments about the return.

20. Why do some names on my list of people to approve have a box beside it, while others don't?

ANSWER: Only disclosures in which no conflict was disclosed will have a box beside it. This denotes that no additional information is available for the Approver to review. If a conflict was reported, the approver will not see a check box besides the disclosure. For each disclosure without a check box, the Approver is required to view the disclosure and review the details of the disclosed conflict before the approval process is completed.

21. Who should I contact to answer any question that I might have about this process?

ANSWER: Questions regarding Conflict of Interest and Commitment will be answered by representatives monitoring the mailbox at [coi@vanderbilt.edu](mailto:coi@vanderbilt.edu).