

Conflict of Interest and Commitment System Frequently Asked Questions

Discloser FAQs

1. Who is required to complete a disclosure?

ANSWER: Everyone except Medical School faculty (who have their own system for reporting conflicts), students, fellows and housestaff.

2. How often do I need to complete a disclosure?

ANSWER: Each fiscal year (annually, between July 1 and June 30) you are required to complete a new disclosure. You should also complete a new disclosure if a change occurs in your circumstances during the year that may create a potential conflict of interest or commitment. It is not unusual for staff to have multiple disclosures completed during a fiscal year.

3. If I complete a disclosure each year as part of my annual performance evaluation process, have I met the reporting requirements?

ANSWER: Yes, you are required to complete a new disclosure each fiscal year. Once your approver has approved your disclosure for the fiscal year in the Conflict Disclosure System, the annual requirement is met. Compliance with the disclosure requirement is reflected in your performance evaluation on the "Policy & Safety Compliance" page.

4. If I complete a disclosure at the Medical Center's safety fair each year, have I met the reporting requirements?

ANSWER: Yes, you are required to complete a new disclosure each fiscal year. Once your approval has approved your disclosure for the fiscal year in the Conflict Disclosure System, the annual requirement is completed. Compliance with the disclosure requirement is reflected in your performance evaluation on the "Policy & Safety Compliance" page.

5. Could or Should I complete more than one disclosure during the fiscal year?

ANSWER: Yes. You should complete a new disclosure at any time in the fiscal year, or when a change occurs in your circumstances that may create a potential conflict of interest or commitment.

6. Who determines whether a conflict exists?

ANSWER: If you and your approver believe a **potential** conflict exists, please report it. A review committee will evaluate all Disclosures to determine whether an **actual** conflict exists.

7. What happens when I report that a conflict is present?

ANSWER: The description of the conflict is reviewed by your approver and our general counsel's office. If further information is needed to understand the situation, they will contact you directly. They will also work with you to develop a management plan, if one is needed.

8. What if I have more than one conflict to report?

ANSWER: The Conflict Disclosure System will allow you to enter more than one conflict, except for the legal and disbarment question. After you enter information about your first conflict, return to the *Disclosure Details Summary* page. Select the **Create Conflict Detail** tab to add additional conflicts. Each conflict entered will be shown individually on your *Disclosure Details Summary* page.

9. What does the question mean which asks about the “appearance” of a conflict?

ANSWER: If you have a situation you think might fall into this category, go ahead and report it. Neither you nor your approver need to determine whether or not an actual conflict exists. You are simply reporting anything which might be a conflict.

10. 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.

11. How do I know if my disclosure has been approved?

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

12. Who should I select as my approver?

ANSWER: For University faculty and staff, your approver will either be the approver assigned by the system or you will be notified by a representative of your school or by the individual in charge of your division with this information.

For MC staff and SON faculty, your 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.

13. What if I selected the wrong approver and need to change it?

ANSWER: After the disclosure is submitted, you will need to contact the approver and ask them to return the disclosure to you (within the system) to allow you to change the approver. If the wrong approver was selected, they will also most likely return the disclosure to you upon discovery of the error.

14. What steps do I follow to change my approver?

ANSWER: Once your disclosure has been returned to you, please open the disclosure and move within the system to the **Select Approver** page. Enter the last name of the new approver into the **Search for Approver** field. Select the **Search** key. The system will list all staff having the last name you entered. Select from the listing the appropriate staff to be your approver. Once you confirm that the staff listed is the correct person to approve your disclosure, select the **Continue** key. Then proceed to select the **Submit** key to finish.

15. If I report a potential conflict and my approver provides a management plan and approves my Disclosure, what happens next?

ANSWER: The Office of Conflict of Interest and Conflict Management will review all reported conflicts and will notify you and your approver if more information is necessary. In all cases you will receive a status report, either to seek information or to inform you that no further action is necessary.

16. Why do I continue to receive emails?

ANSWER: The system automatically sends emails to individuals who have an activity to complete in the disclosure process. For disclosers, the activity may be that your disclosure has been saved, but not yet submitted and remains in a draft status. You will continue to receive the emails until you complete the required activity. If you have a disclosure in a draft status, and it is not needed, please delete it. Otherwise, you will continue to receive the emails.

17. What happens when a disclosure is returned to me from my approver?

ANSWER: You should follow the instructions in the email sent to you to determine what action is required. You should also contact your approver, if you have questions about why a disclosure was returned.

18. 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.

19. What is my role as a faculty or staff member working under a management plan?

ANSWER: Individuals working under a management plan should follow the management plan at all times. If at any time during their employment, a change occurs in their conflict situation, it is the responsibility of the employee to inform their supervisor and the Conflict of Interest Office of the change. The details about the change will determine if the management plan should be adjusted.

20. 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.