UNIVERSITY OF SOUTH ALABAMA

coi riskmanager™

Supervisor Reviewer Guide

Conflict of Interest Disclosures

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CONFLICTS OF INTEREST – DISCLOSURE REVIEW PROCESS

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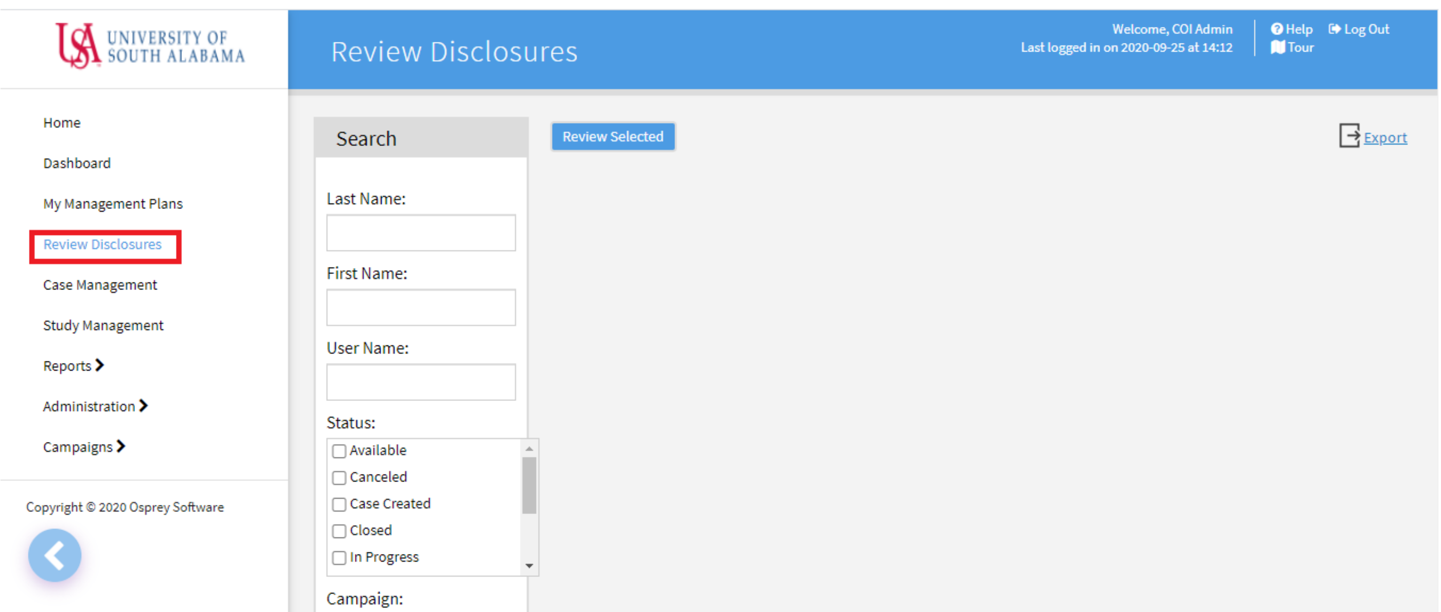
1. Access the System and View Employee Disclosures

1.1 As a supervisor (Primary Reviewer), you will receive an email notification informing you that a disclosure requires your attention in the system whenever one of your employees submits a disclosure form.

To access the system, go to the link provided in the email and log in with your JAG Number. This will bring you to your COI RiskManager Home page (there are numerous other ways to open this application, such as navigating via any USA web page to Logins, then click Faculty & Staff, More Applications, and scroll down to COI Risk Manager).

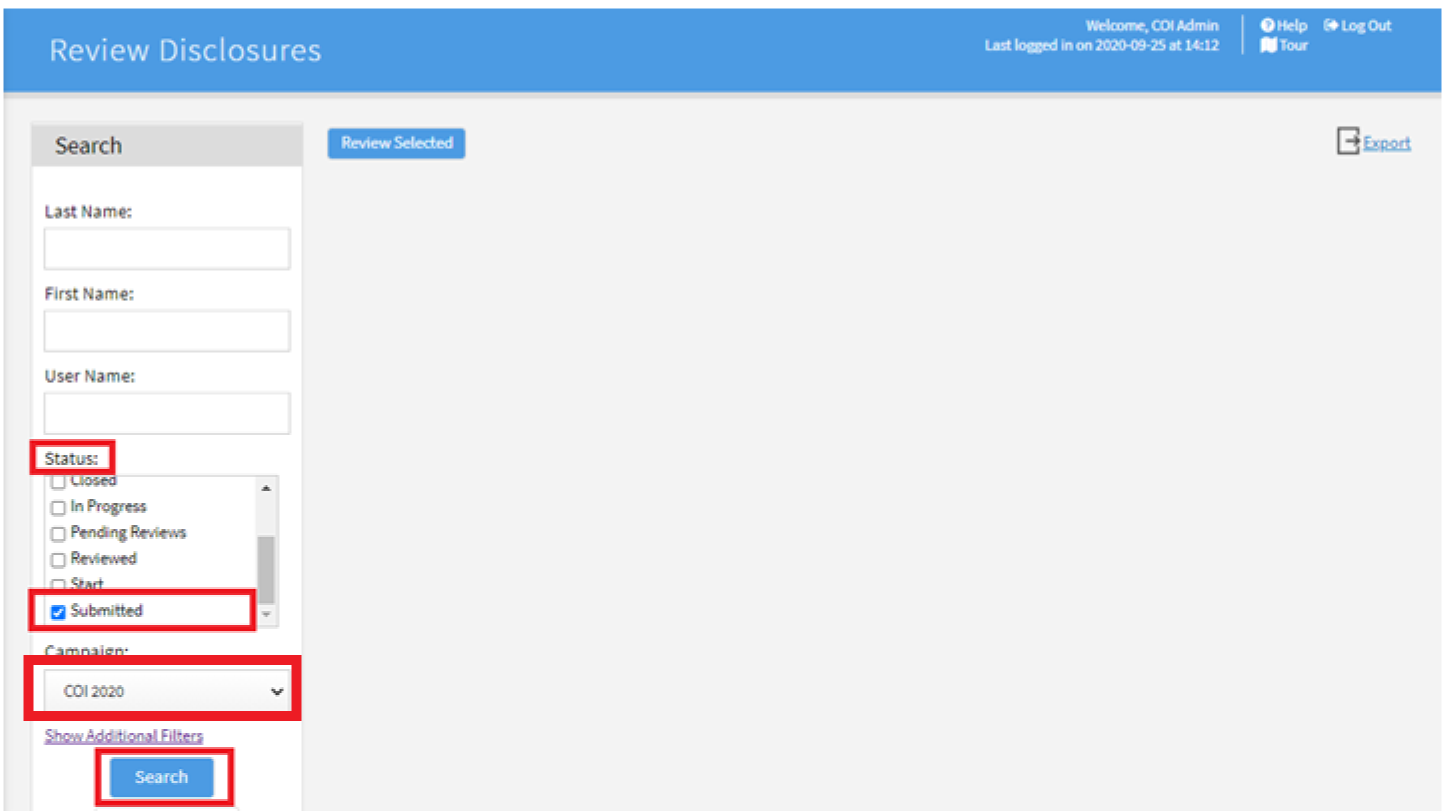
1.2. To view the disclosures that require your review, click on **Review Disclosures** on the left navigation pane. This will bring you to the Review Disclosures Page.



1.3. Using the Search pane on the left of the page, select the **Submitted** option in the dropdown selection under **Status**, then select **COI 2021** (or current year) from the **Campaign** drop down menu. Then hit **Search**.

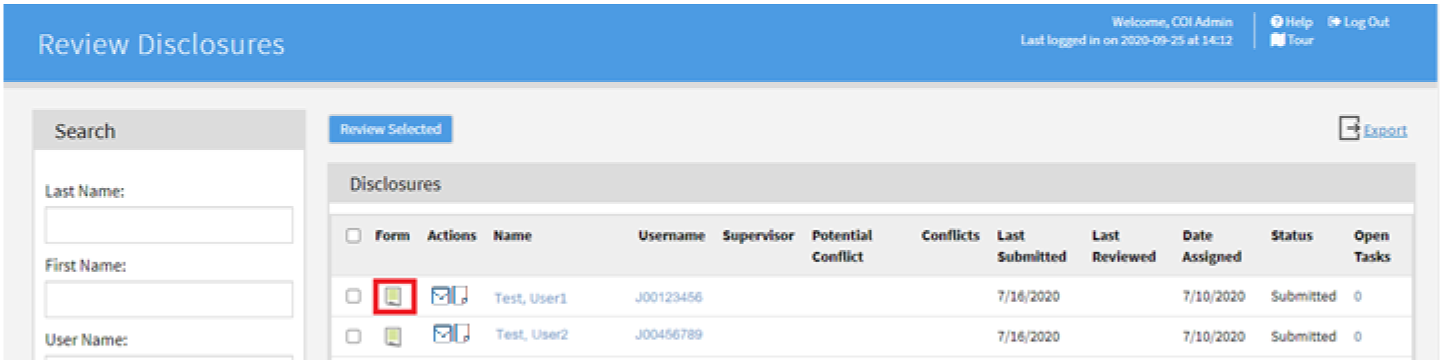
> **Note:** to view status of all your direct reports (who are assigned the annual COI Disclosure form), select the **Case Created, In Progress, Reviewed, Start** and **Submitted** Status options. Definitions of each Status are as follows:

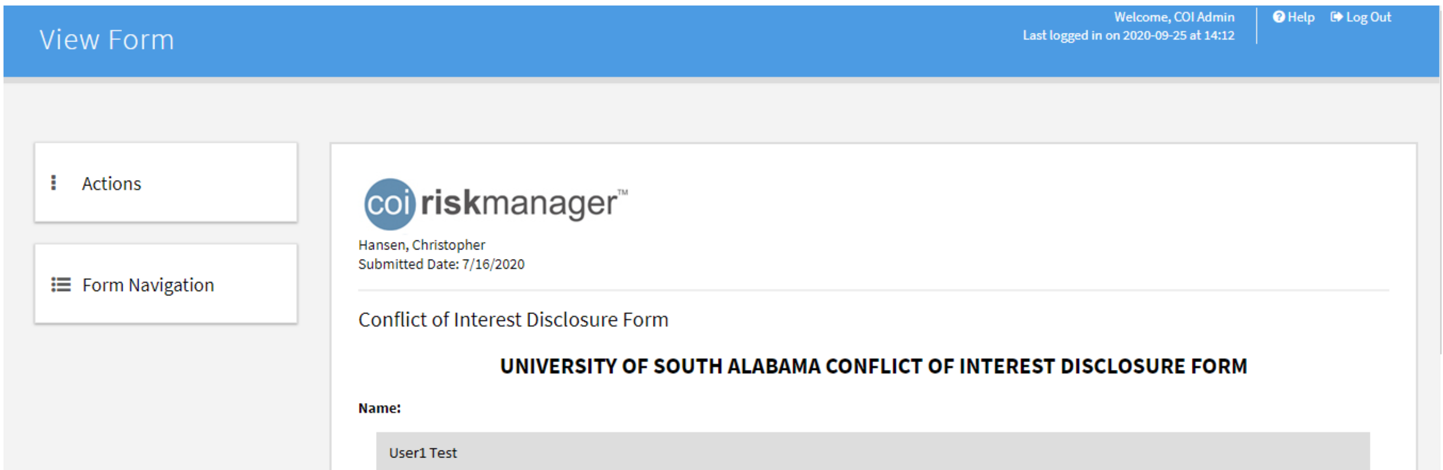
Status	Definition	What you need to do
Start	Participant has not completed and submitted their form	Remind your direct report to complete and submit their form
In Progress	Participant started their form but did not complete or submit	Remind your direct report to complete and submit their form
Submitted	Participant completed and submitted their COI form	Review their form
Case Created	You have opened a case but have not yet closed it	Document your analysis of the disclosure, save, close case, then Mark As Reviewed
Reviewed	Indicates you have completed your review	No further action necessary



The search results will include a list of disclosures with information such as name of the participant, a flag for disclosures that contain conflicts, list of potential conflicts, relevant dates, etc (see next illustration).

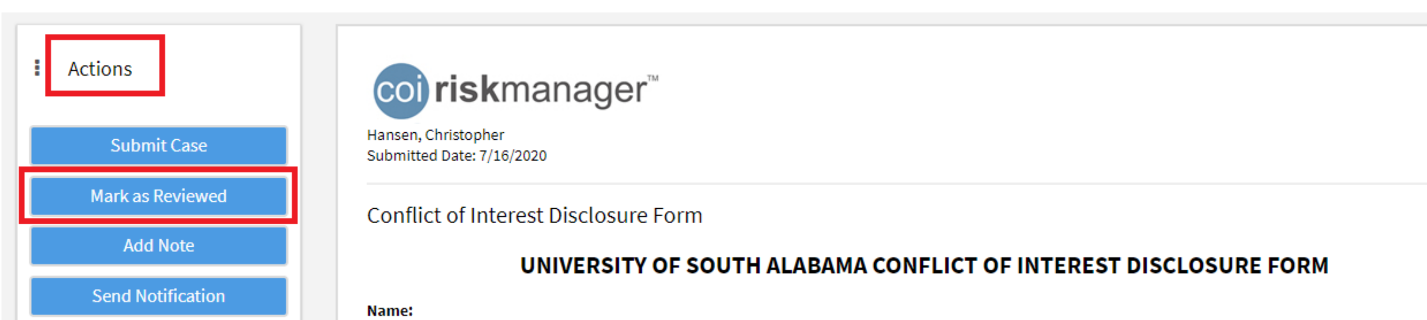
1.4. To view a disclosure, click on the form icon. This will bring you to the View Form page where you can see the disclosure.





2. Evaluate a Disclosure

2.1. If all responses are "no," or if there are no conflicts reported on the disclosure, go to the **Actions** menu and click **Mark as Reviewed**. The annual COI Disclosure submission and review cycle for this employee is now complete.

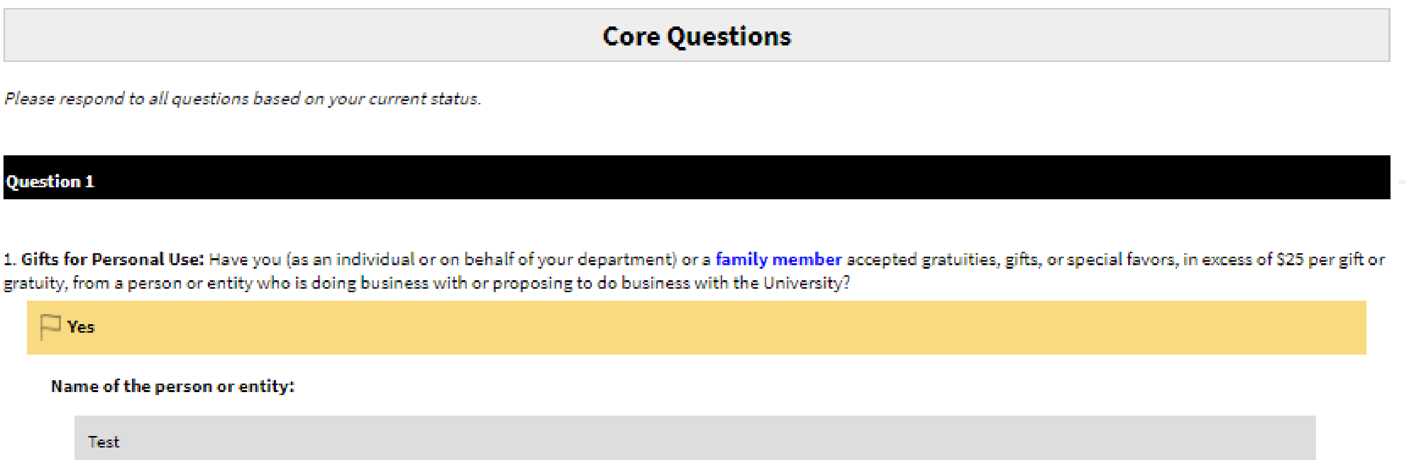


<u>Note</u>: Disclosures with only either a Research or Conflict of Commitment flag can be "Marked As Reviewed."

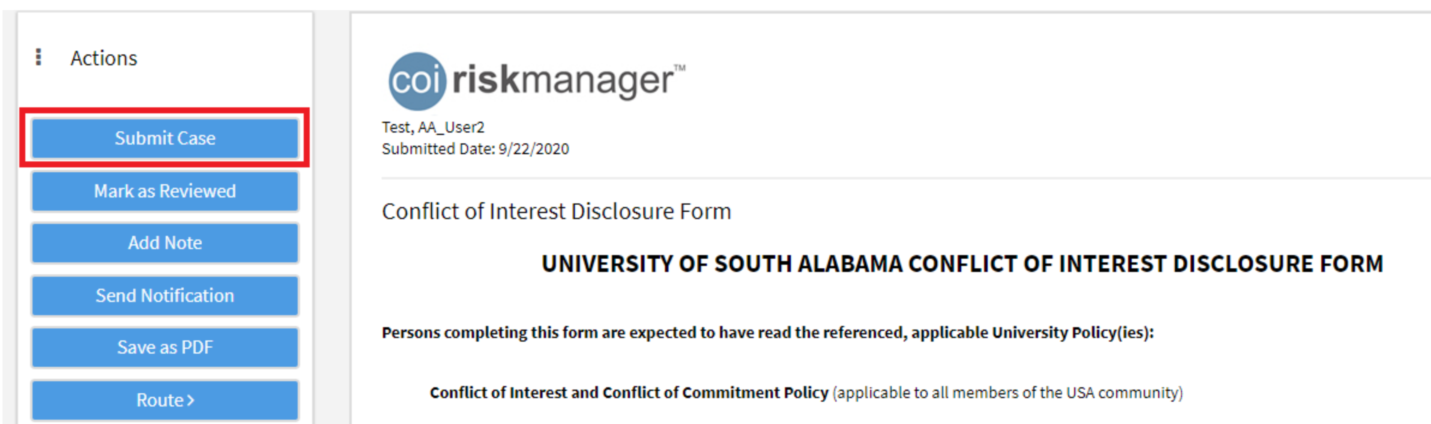
> **<u>Research flag</u>** – indicates your direct report participates in sponsored research, triggering additional research-specific questions. It is not in and of itself a potential conflict. However, if one of the research-specific dropdown questions are flagged, you'll need to Submit a Case.

Conflict of Commitment - (faculty only) indicates your direct report was prompted to separately fill out and submit an External Professional Activities request form for your review. Therefore, use this flag only to prompt you to look for their EPA request form. More details on EPA request forms are available in the EPA section of the COI web page.

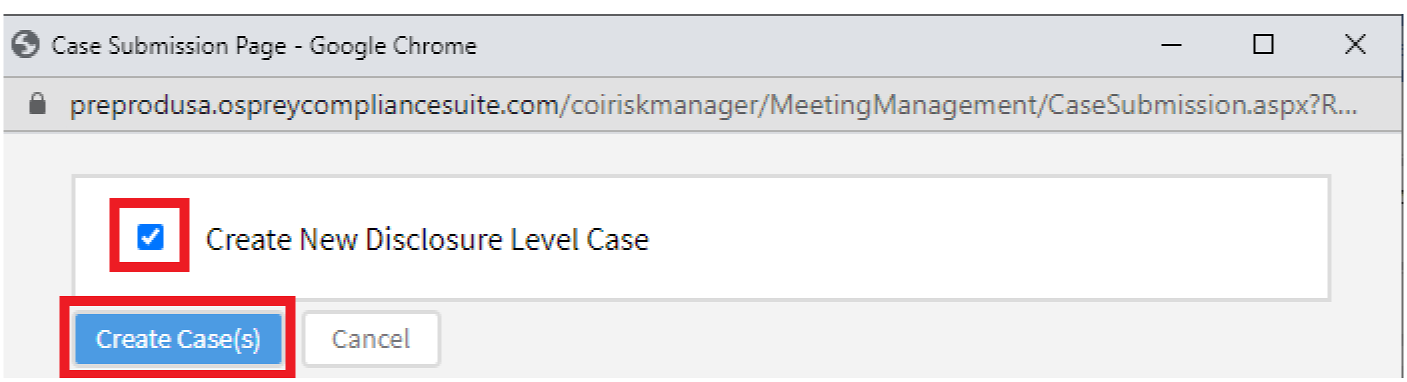
2.2. If "yes" answers are reported on the form, review the disclosed information to determine whether a conflict exists (actual, potential or perceived) and/or if any mitigating measures are necessary. Potential conflicts will be highlighted in yellow. For guidance in determining whether a disclosed scenario rises to the level of either a perceived, potential or actual conflict of interest, feel free to review our Q&A and scenarios in our COI web page located here [(1)] and here [(2)].



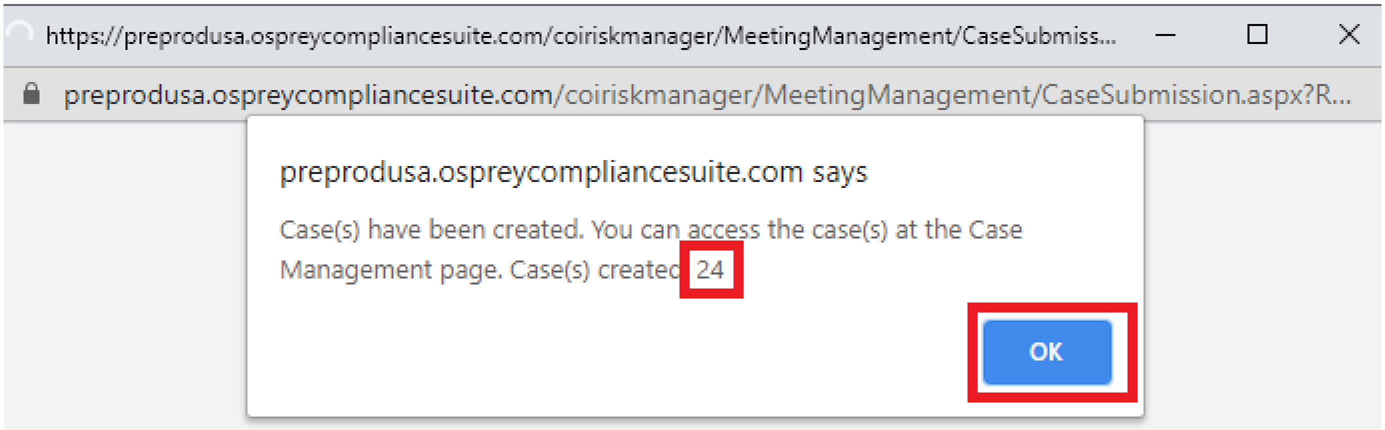
2.3. Go to the **Actions** menu and click **Submit Case** to begin documenting your assessment.



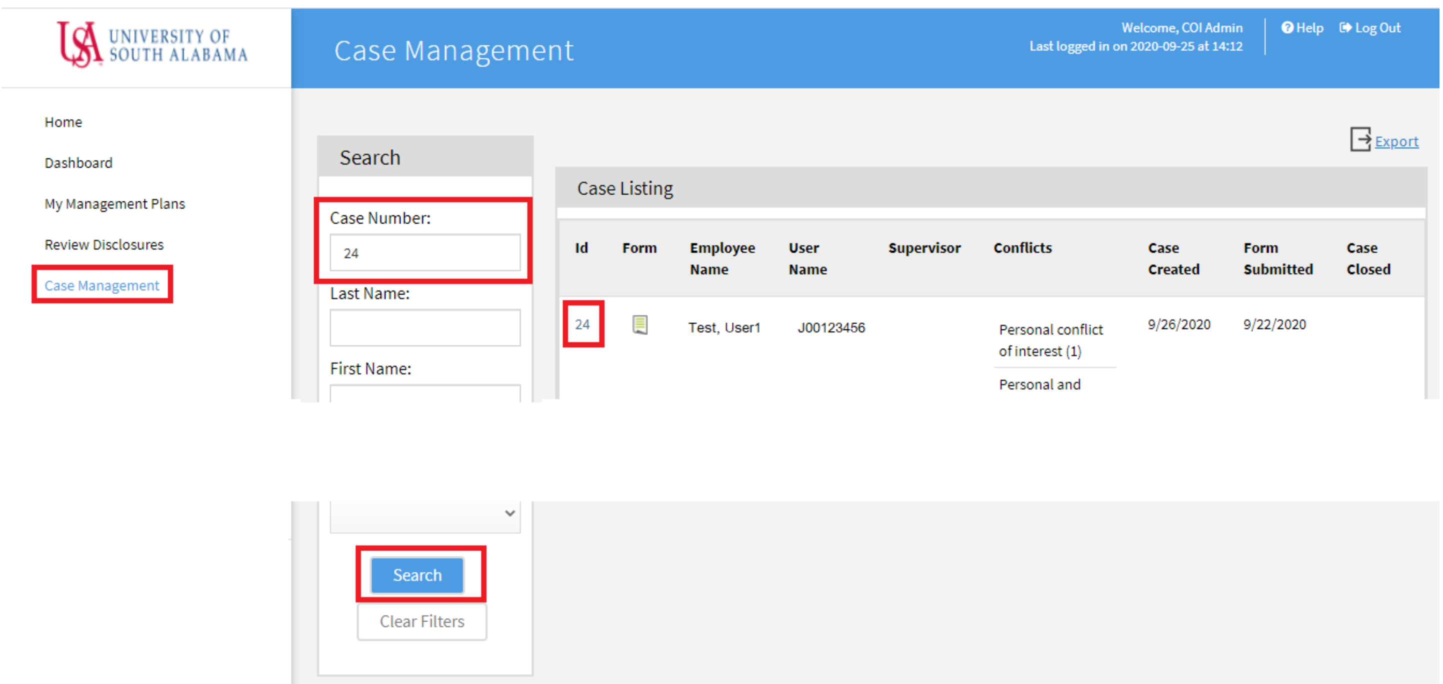
2.4. Check **Create New Disclosure Level Case** in the pop-up box and click **Create Case**(s).



A system message will appear with the Case ID # which you will need for the next step; click OK.



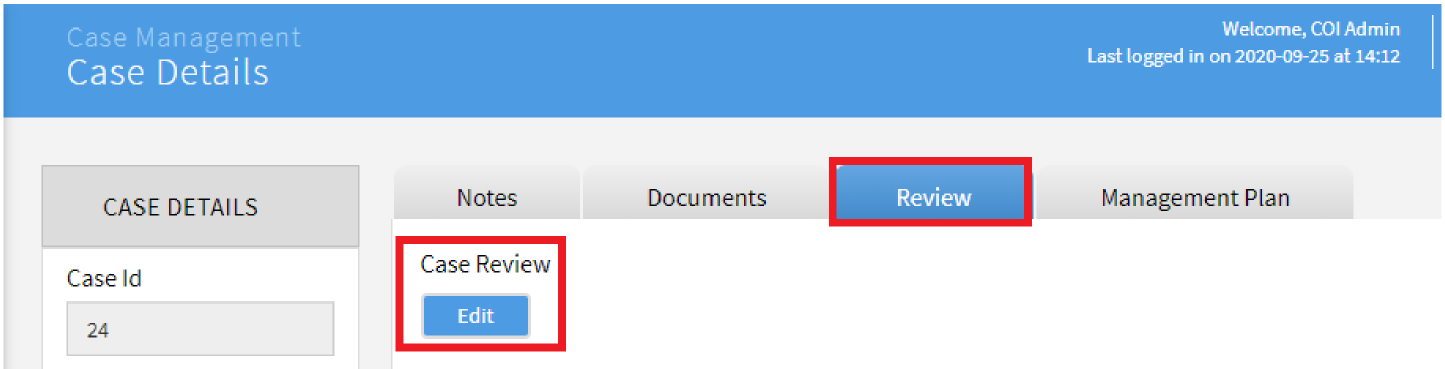
2.5. To access the case, go to the **Case Management** page (left-screen menu). Use the Search pane on the left to search on the Case ID # or discloser's name (or, scroll down your log of all Cases to the right, to the Case # you are seeking). Click on the Case ID # to access the case.



3. Case Documentation

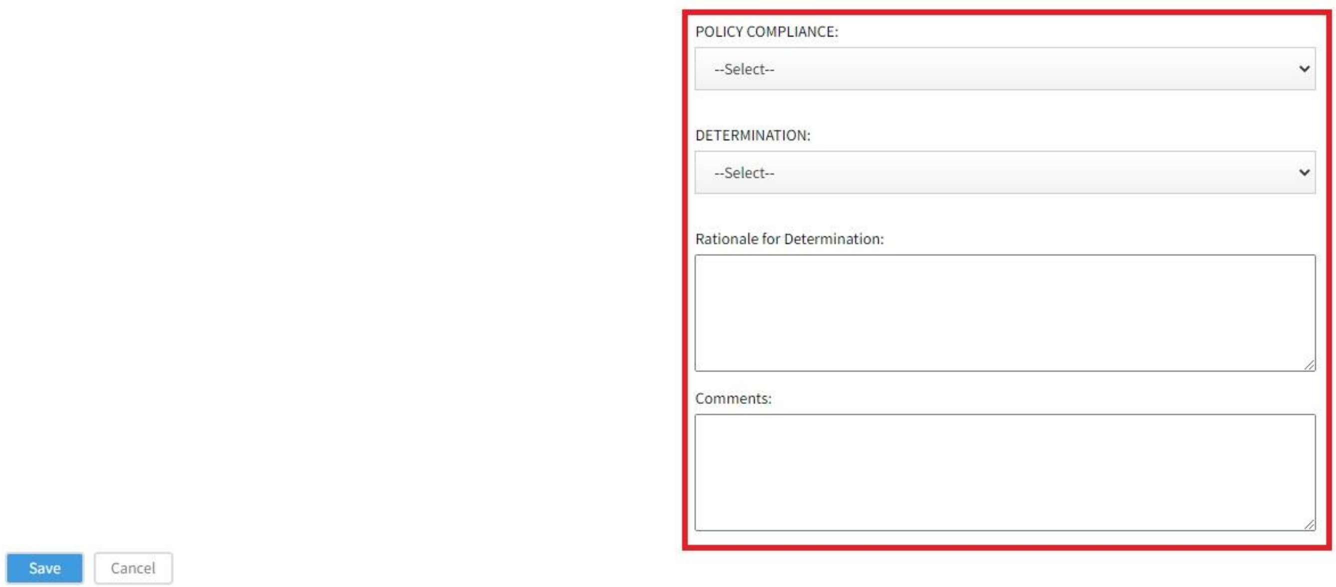
3.1. CASE REVIEW TAB

In the open case, go to the **Review** tab, click **Edit**.



Record your initial assessment of the reported conflicts in the following fields (skip over the shaded "Flagged Responses" section which may only show a portion of the submitter's responses):

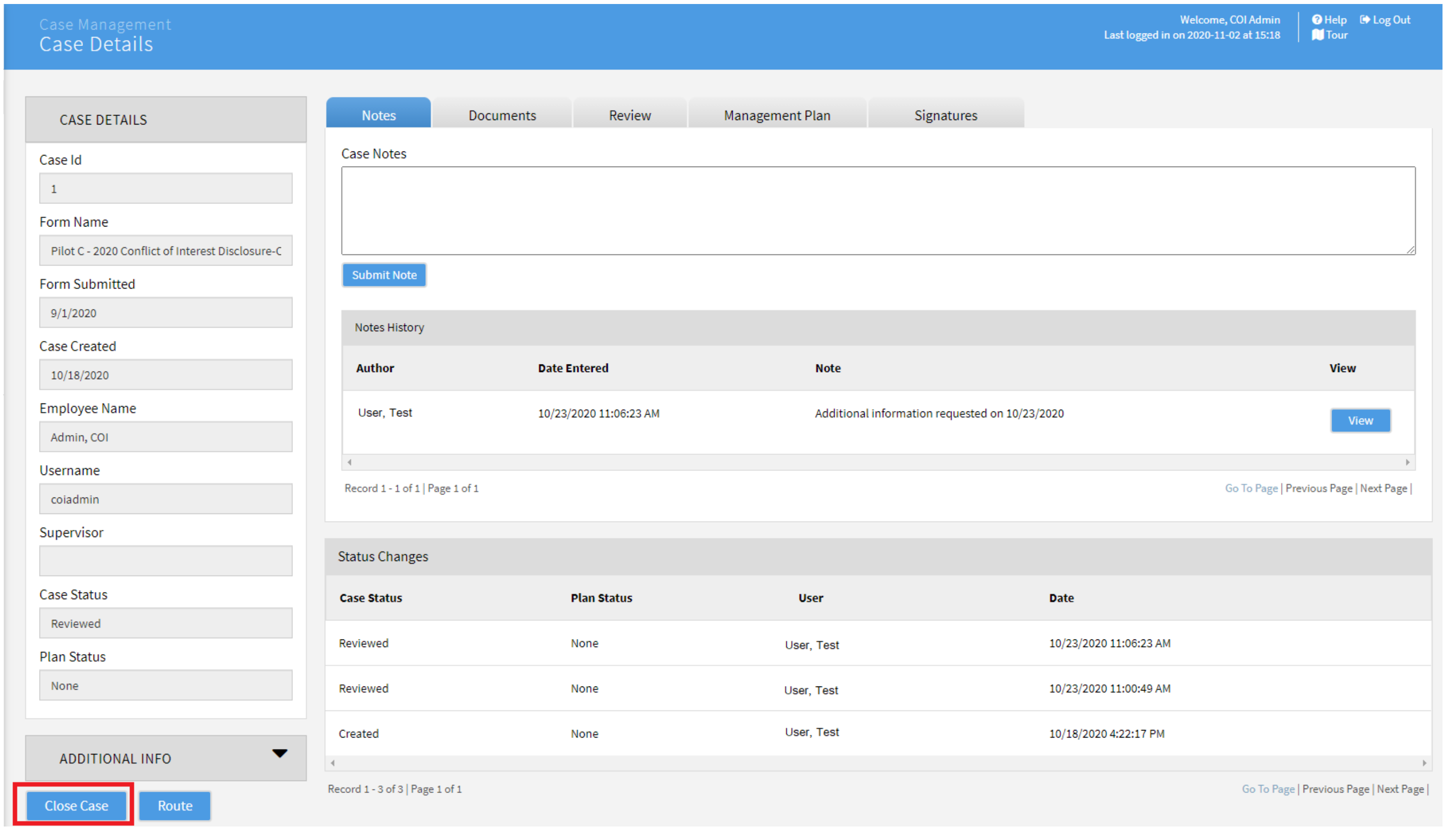
- **Policy Compliance** – Select whether or not the disclosed conflicts are consistent with USA's Conflict of Interest and Conflict of Commitment Policy or other related policies (as applicable).
- **Determination** – Select the response that best represents your assessment of the conflicts.
- **Rationale for Determination** – Provide an explanation for your assessment in the text box.
- **Comments** (if applicable) – Use this to document required action items (if any) or other information about this case.



Click **Save** to save your responses to the questions on the Review tab. See the next sections for guidance on steps to take for each type of COI Disclosure Determination.

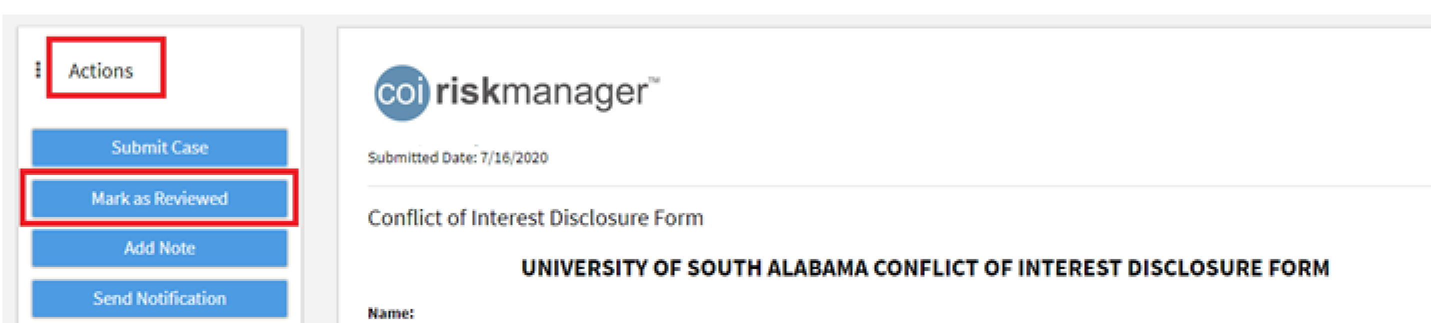
3.2. COI DETERMINATION: NO FURTHER ACTION REQUIRED

3.2.1. Confirm that your reasons are documented in the **Rationale for Determination** field. Then click **Close Case**.



3.2.2. Scroll down to **Related Forms** (or return to Review Disclosures) and click on the form icon to open the most recent version of the disclosure form.

3.2.3. In the opened form click Actions and then click **Mark as Reviewed (and "OK")**. The annual COI Disclosure submission and review cycle for this employee is now complete.

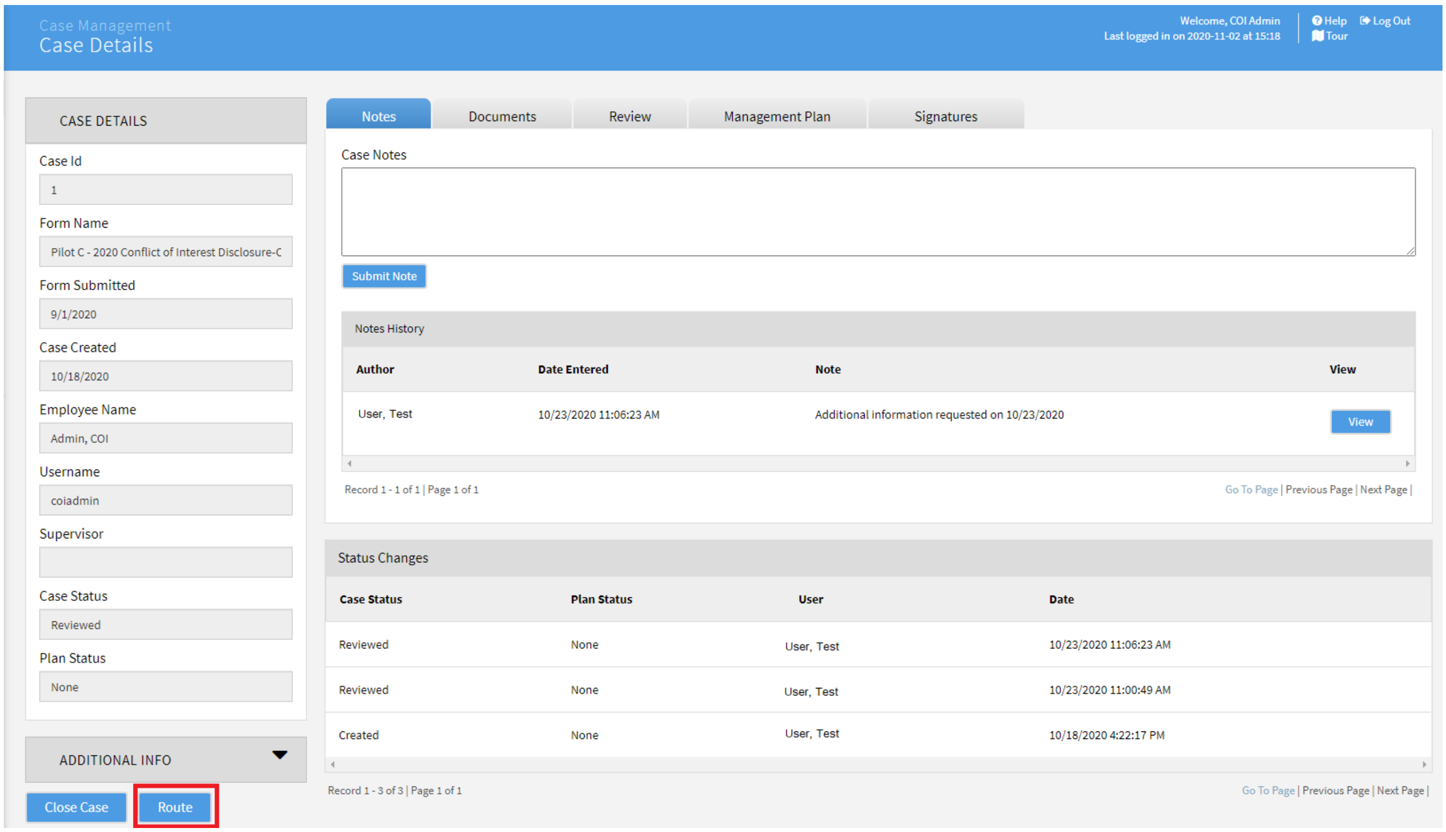


3.3. COI DETERMINATION: ACTION ITEMS REQUIRED-NO MANAGEMENT PLAN

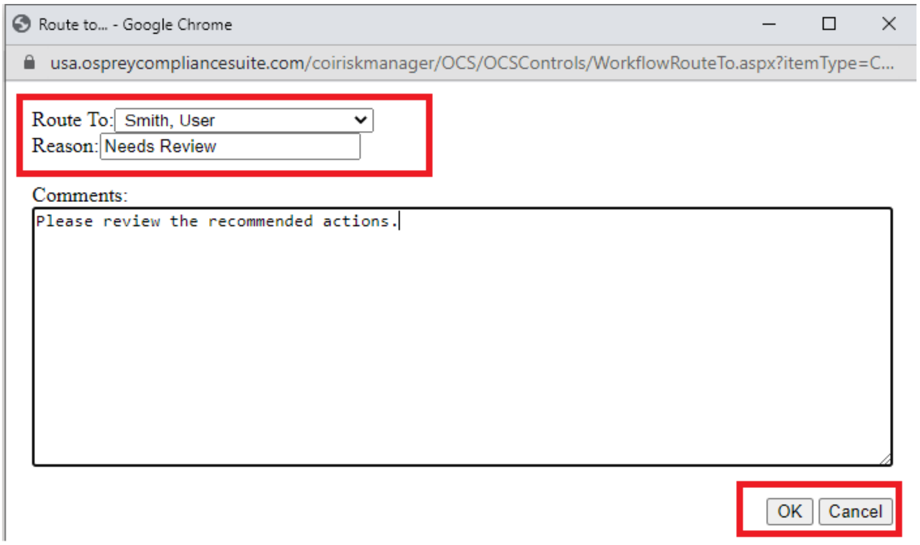
3.3.1. Confirm that the required action items are documented in the **Comments** field, and that your reasons are documented in the **Rationale for Determination** field.

3.3.2. Route the case to your supervisor (Secondary Reviewer) to share your recommendations. To do this:

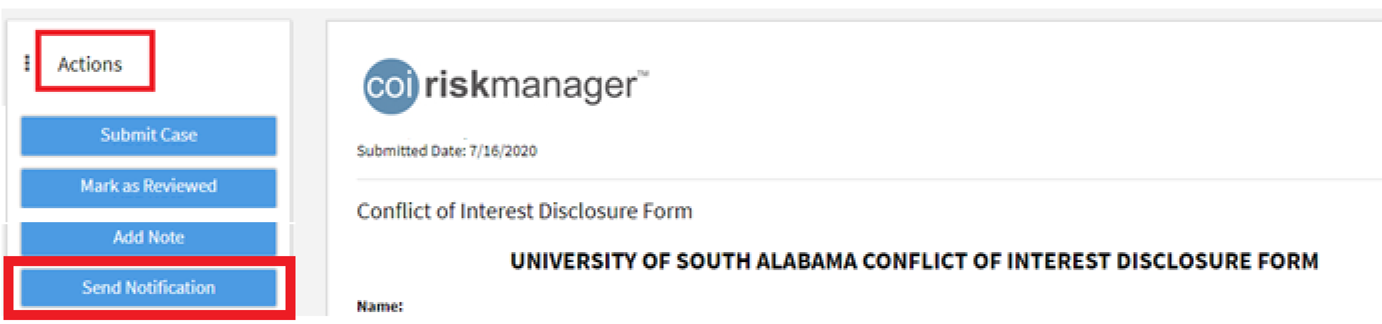
- Click **Route**



- Select your supervisor's name from the **Route To:** dropdown and fill out the **Reason:** field and **Comments** box if necessary (example: "please review my recommended actions for this case"). Click **OK**. This will result in a notification to the individual selected in the **Route To:** field.

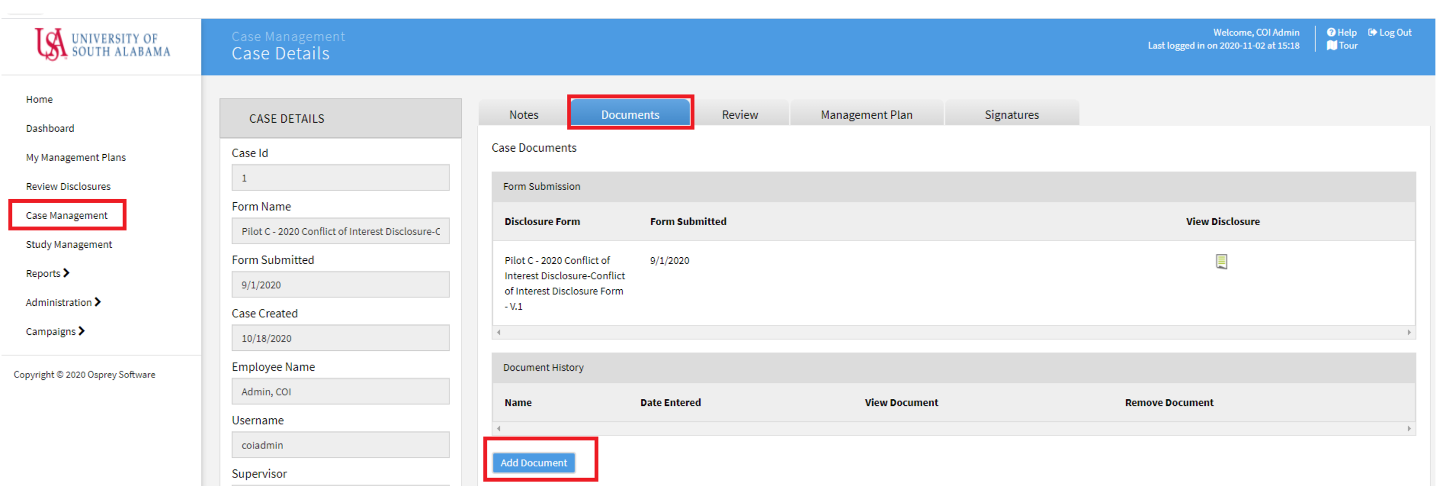


3.3.3. After the case is updated and you and your supervisor agree over the Recommended Actions for the discloser, send a notification to the discloser informing them of the recommended actions. Please see **Send Notification** (last section of this Reviewer Guide) for details of these steps. Or, email or phone them, but be sure to document that you communicated with them (in the Notes tab of the Case, or Add Note feature in the form's Actions menu).

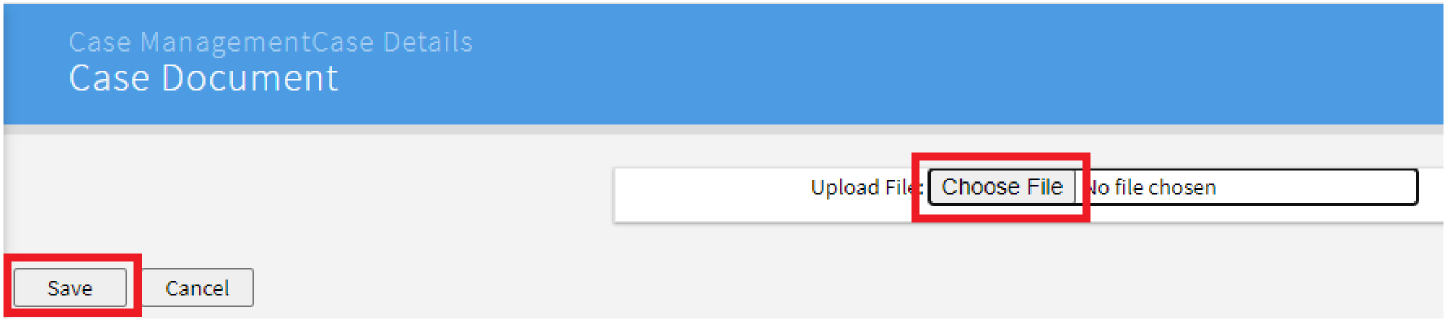


3.3.4. After you receive the discloser's agreement with the required action items (such as a verbal or email response), document the agreement in the **Notes** tab in the Case. Or, you may prefer to attach a document which portrays the same: return to Case Management, click the applicable case number, and attach the document to the Case in the **Documents** tab in the Case. To do this:

- Go to the Documents tab and click **Add Document:**



- Click **Choose file** on the Case Document page to browse for the file to be attached. Click **Save** when finished.

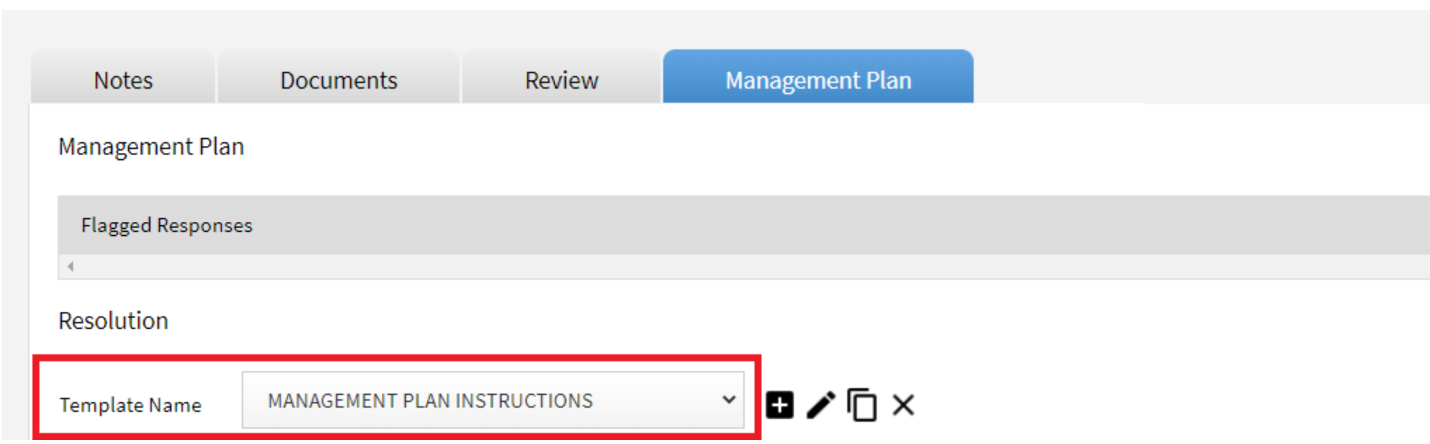


3.3.5. The annual COI Disclosure submission and review cycle for this employee is now complete. A periodic review of the assigned action steps is recommended, to assure sustained compliance.

3.4. COI DETERMINATION: MANAGEMENT PLAN REQUIRED

3.4.1. Confirm that your reasons are documented in the **Rationale for Determination** field.

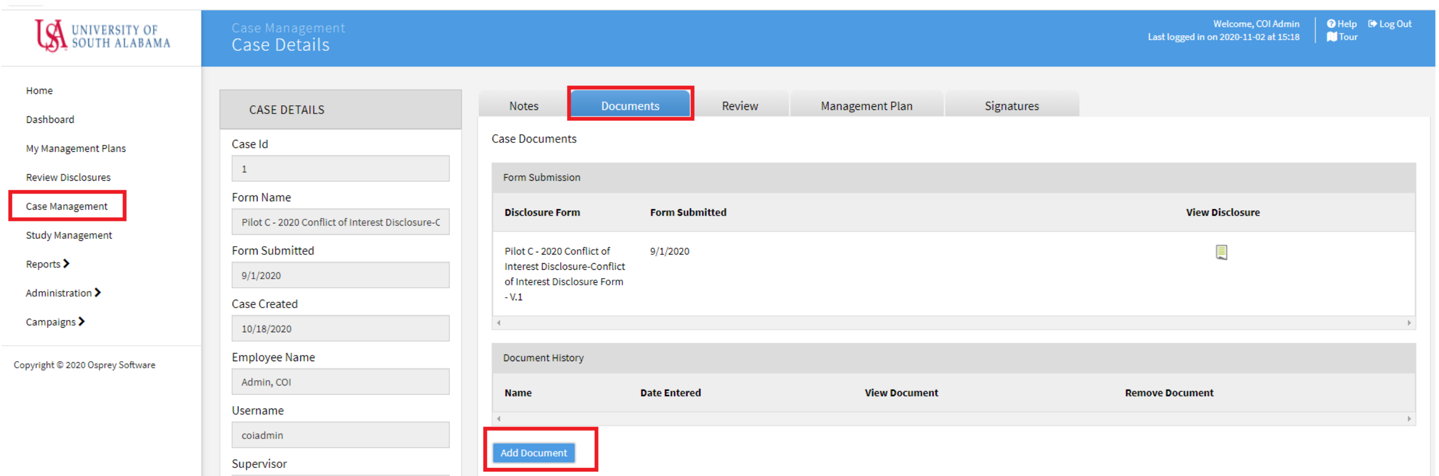
3.4.2. Go to the Management Plan tab and select MANAGEMENT PLAN INSTRUCTIONS in the **Template Name** dropdown menu (**Resolution** section) for instructions on creating a proposed management plan.



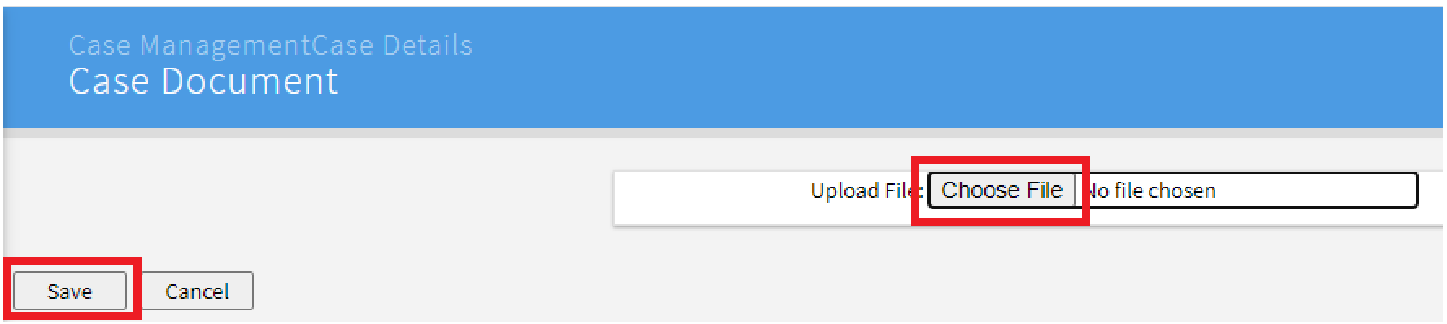
3.4.3. When you have selected the applicable Management Plan template and tailored it to address the specific conflict(s), return to the case and upload it as a Word document under the **Documents** tab.

In the Documents tab:

- Click **Add Document:**

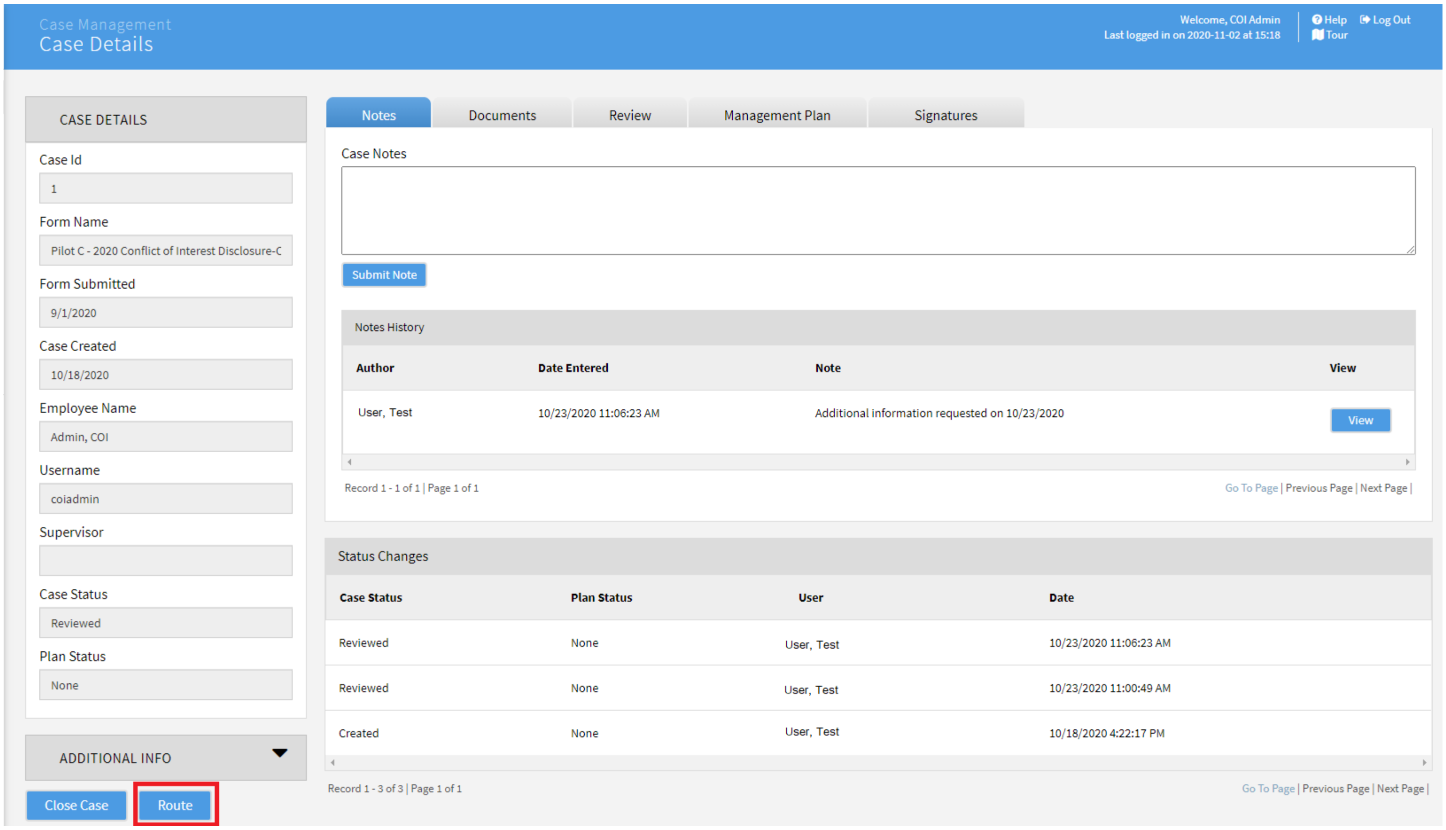


- Click **Choose file** on the Case Document page to browse for the file to be attached. Click **Save** when finished.



3.4.4. Click **Route** to notify your supervisor that the Case, with attached Management Plan, is awaiting review.

- Click **Route**



- Select the supervisor's name from the **Route To:** dropdown and fill out the **Reason:** field, and provide necessary instructions in the **Comments** box. Click **OK**. This will result in an email notification to the individual selected in the **Route To:** field. The notification should essentially instruct the recipient to log-in to COI Risk Manager and review the submitter's COI Disclosure form, and your proposed Management Plan document.

3.4.5. Await notification from your supervisor (e.g., Senior/Secondary Reviewer, typically a Dean, VP, or other senior administrator). If they are in agreement with your recommended Management Plan, follow the steps in section C.1. ("How To"), "Send A Notification," to notify the discloser of the Management Plan (similar to steps in sections 3.3.3 & 3.3.4, above). Instruct the discloser to download the plan, print, sign to indicate their agreement with the Management Plan, scan, save as pdf file, then return to you. The discloser can either upload it to the case (log-in, click **Home** on the menu, click **Show Disclosures Available to Update**, click the **Update** button next to your current COI Disclosure form, scroll down to the very bottom of your form, and click Yes to the question, "Do you have supporting documentation to attach to your disclosure?" and follow instructions to upload the file), or email it to you to upload. A finalized Management Plan should have both discloser and your signatures).

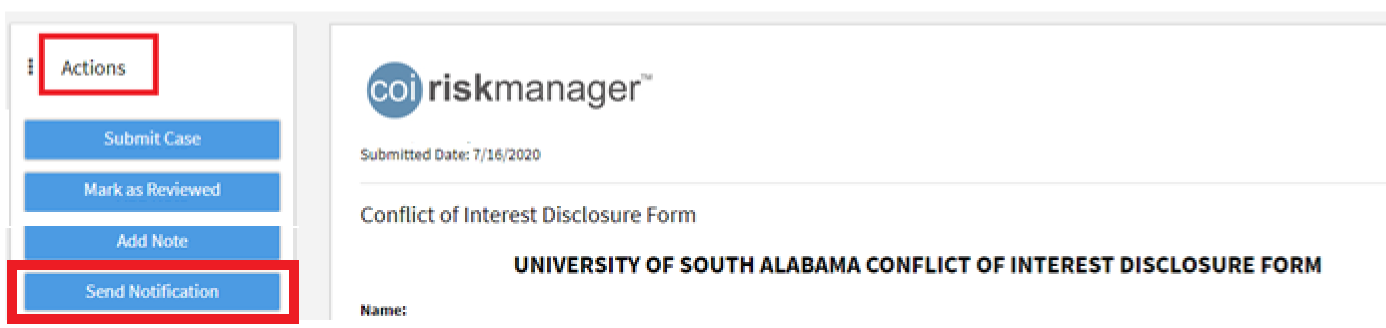
- If your supervisor (second-level reviewer) proposes edits to the plan or another course of action, be sure to document a final agreement between the two of you by updating the **Comments** box in the **Review** section of the **Case** (the **Notes** feature in the **Case** can also be used to summarize the communications between you and the second-level reviewer), and/or upload a final version of the Management Plan.

3.4.6. Upon completion of uploading the signed version of the Management Plan as a pdf file, and their Disclosure form is Marked As Reviewed, the annual COI Disclosure submission and review cycle for this employee is now complete. A periodic review of the Management Plan should be performed to assure sustained compliance.

3.5. COI DETERMINATION: REQUEST ADDITIONAL INFO FROM DISCLOSER

3.5.1. To request additional information from the discloser before making a determination, scroll down to **Related Forms** (while still in the Case **Review** tab) and click on the form icon to open the most recent version of the disclosure.

3.5.2. In the open form click **Actions** and then **Send Notification** to send a notification to the discloser.



See **Send a Notification** for detailed instructions on the next steps.

B. OVERVIEW OF SENIOR REVIEWER STEPS:

1. Introduction: A Senior/Secondary Reviewer (supervisor of the Primary Reviewer) would typically only need to be involved in a faculty or employee's COI Disclosure if disclosed information is determined by the Primary Reviewer to be a potential, perceived or actual conflict of interest. If the primary reviewer approves a COI Disclosure on the condition that *recommended actions* are met, concurrence by the Senior/Secondary Reviewer is optional. However, for approvals determined to need a Management Plan, concurrence by the Senior/Secondary Reviewer will be required.

2. To Review Cases Routed by the Primary Reviewer (e.g., Dept Chair or Director):

- The Senior/Secondary Reviewer receives a notification via email when a Case has been routed for their attention;
- Log-in to COI Risk Manager, and click the *folder* icon (in the "Item" column) in the **Tasks to Complete** section (in your **Home** menu) to go to the **Case;**
- Click the **Review** tab from the menu across the upper part of your screen, then scroll down beyond the **Flagged Responses** section to where the primary reviewer entered their determinations (including **Rationale for Determination** and **Comments**);
- To review the submitter's COI Disclosure form while still in the Case **Review** tab, scroll down to **Related Forms** and click the document icon to view the most recent version;
- Upon review of the form and the primary reviewer's assessment, determine whether you are in agreement;
- Return to the Case from your review of the disclosure form, by either clicking the "back" arrow in the upper left of your screen, or, click Case Management in the left-side menu and search for the Case number again. Document your decision by clicking the Notes tab in the Case (from the menu across the upper part of your screen). Enter your note in the text box, then click **Submit Note**.

3. Notify Primary Reviewer of your determination, or request for further information, analysis, etc.

a. If the Primary Reviewer recommended, "Approved with Required Actions," you may:

- click the **Review** tab in the **Case** and scroll down to the **Related Forms** section;
- click on the document icon of the submitter's COI Disclosure form;
- click **Actions**, then the **Send Notification** button. To send to the Primary Reviewer, you must change the default **User** by selecting **Supervisor** in the **To:** option;
- Enter a subject;
- Select the **Adhoc Notification Template** from the **Notification Type** dropdown menu;
- Prepare your message in the **Body** text box (either that you concur with recommended actions, or need to modify them), then click **Send Mail**;
- You also have the option of sending to the original submitter by selecting **User** in the **To:** option (in which case, the Primary Reviewer's email is included as a default cc:). The notification should direct their attention to your note.

b. If the Primary Reviewer recommends, "Approved with Management Plan," you may:

- click the **Documents** tab in the **Case** menu across your upper screen;
- look down to the **Document History** section and click the document icon to review the Management Plan submitted by the Primary Reviewer;

- To either concur with the Management Plan or request an edit, document your decision using the **Notes** tab as in step 2 (last bullet) above, then notify the Primary Reviewer either by phone, email, or the **Send Notification** feature (step a, 3rd bullet, above). You may also upload an edited version of the Management Plan in the **Documents** tab of the **Case** (use **Add Document**).

c. If additional information is needed from the submitter, either the Primary or Secondary Reviewer can use the **Send Notification** feature to request it. Follow steps in C.1 and C.2, below.

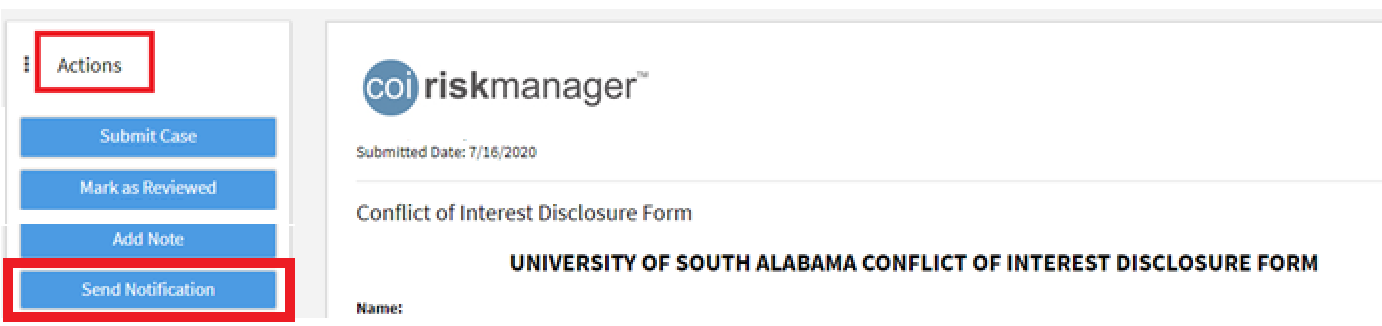
<u>**Note 1**</u>: When using the Send Notification feature, the default recipient is **User** which is the original submitter of the COI Disclosure form. In this instance, the submitter's supervisor (Primary Reviewer) email address will auto-appear in the cc: line. Additional email addresses can be included if necessary. Changing the recipient to **Supervisor** will automatically route your message to the submitter's supervisor (Primary Reviewer).

<u>**Note 2**</u>**:** In lieu of the Secondary Reviewer's use of the application's **Send Notification** feature to relay a determination, they may communicate with the Primary Reviewer using other means such as email, phone, in-person meeting, etc. In which case, the Primary Reviewer should document the Secondary Reviewer's determination in the Case Notes.

C. HOW TO…

Send a Notification

1. From within the COI Disclosure form, click on **Actions** and then **Send Notification**:



2. In the **Notification** window select the following fields:

- **To:** Check that **User** is selected if your intended recipient is the discloser, or **Supervisor** if your intended recipient is the Primary Reviewer (submitter's supervisor). You may cc: additional recipients if necessary by entering their email addresses, for instance the email of the Secondary Reviewer (**Supervisor** is always a default cc).

- **Notification Type:** Select the template for the type of communication you want to send to the user:

    - **Additional Information Needed** – For requesting additional information from the discloser before making a final determination.
    - **Management Plan** – provides general instructions to Primary Reviewer, Secondary Reviewer and Submitter roles.

- ○ **Adhoc Notification Template** – blank slate for drafting your own message
- ○ **Campaign Start Notification** – for re-sending in case an employee missed the original notification
- ○ **User Added to Campaign** – for re-sending in case an employee missed the original notification.

- **Body:** You can edit the default message text to fit your needs based on what you need from the recipient. Note: if [[FirstName]] [[LastName]] appear in the pre-prepared **Body**, they are placeholders that will automatically populate the notification with the discloser's name when it is sent.

Click **Send Mail** when you are ready to send the notification.