Conflict of Interest and Commitment System Frequently Asked Questions

New Policy Specific FAQs

---

1. Healthcare Vendors at Regularly Scheduled Conferences

A. As healthcare vendors are no longer allowed to sponsor/provide food for regularly scheduled departmental meetings/conferences, is it possible for the healthcare representatives to meet with the physicians a few minutes prior to each event as a concession to them not being allowed to sponsor the event?

ANSWER: *In regards to the questions about whether healthcare vendor reps can be on the premises of regularly scheduled conferences and have a set time to meet with the physicians prior to the event, this activity would be not be allowed under the revised policy. The intent of the policy is to remove the marketing intent from these events and keep them wholly educational in nature. Having a set time for healthcare industry reps to make their pitch to the physicians prior to these conferences would negate that intent.*

B. May vendors attend educational events at all?

ANSWER: *No. If the event is off campus and exhibit tables are set up, the vendor representative may man the table, but may not enter the presentation area.*

2. Medical Device/Pharmaceutical Vendor Providing Education

A. A pharmaceutical/medical device company is offering a program to provide further education on a product already in use in the Medical Center. The program includes a day of education and lectures on this product, as well as a first hand look at how the product is made. The company would pay for the travel expenses and the meal. Under the revised policy, is it permissible to attend this program?

ANSWER: *This event seems to be intended more for marketing and would, therefore, not be endorsable. The policy is written to capture those products that would necessitate an in-service to make sure that everyone is well trained on how to use the product. It is within the policy for the company to provide financial support to meet the training needs and this should be specified in the contract. This product appears to already be in use in multiple locations throughout the hospital, so there is uncertainty of the need for an in-service. If this product is already being used properly, there is no reason to attend this program.*

B. A pharmaceutical/medical device vendor is hosting an educational roundtable to discuss a type of therapy currently being provided at the Medical Center. This discussion is off campus and dinner will be provided. There will be a lecture, some education on the science behind the therapy and some hands-on training. Under the new policy, is it permissible to attend this event?

ANSWER: *The policy states that 'VUMC personnel may not accept meals or other hospitality funded directly by the Healthcare Industry, whether on or off campus.' It goes on to say that, 'In certain instances, ...meals may be offered by the Healthcare Industry related to necessary education regarding equipment, products, or other medical devices purchased previously by VUMC. Generally, these activities are foreseeable and should be addressed by specific language in the purchasing contract.'*

It appears as though this type of therapy has been used in the Medical Center for a while and that the staff are already trained on how to administer the therapy. If this sort of follow-up training wasn't discussed in the current purchasing agreement with the vendor, then it probably isn't endorsable for VUMC staff to attend this dinner, under the new policy.

3. National Organizations Holding Conferences on the Vanderbilt Campus:

Each year, institutions that have staff at meetings of a national professional organization rotate hosting the annual meeting on their own campus and, this year is Vanderbilt's turn to host. Typically, healthcare industry vendors sponsor certain sessions by providing refreshments, lunch, etc. The local branch of the organization could handle the receipt of donations and funds from industry. Is this type of sponsorship allowed, given that this is not a Vanderbilt event, but rather an event of a national organization?

ANSWER: *The policy does not deal directly with how national organizations holding events on Vanderbilt's campus should deal with healthcare vendors. It does state that "promotional items which incorporate or display a product or company logo of a Health Care Industry entity must not be used or displayed on the VUMC campus. This prohibition shall include exhibitions by industry representatives at, or adjacent to, certified continuing education activities." Therefore, the national organization should inform their vendor-sponsors of Vanderbilt's policy against the display or use of promotional items on its campus.*

4. Gifts

A. Is it allowable under the revised policy to accept vendor handouts (pens, water bottles, etc.) at a convention?

ANSWER: *It is allowable to take copies of educational materials but no gifts (pens, water bottles, etc). Approved vendor fairs would be those sanctioned by Vanderbilt for the purpose of better business planning. For example, there is an annual catering vendor fair which employees can visit booths from various vendors which allows for awareness of new business and assessment of appropriate caterers for planning functions.*

B. Is it still permissible to accept healthcare vendor items (pens, notepads, etc.) which are out of sight from patients' view?

ANSWER: *After the policy went into effect on July 1, 2009, acceptance of these items are no longer permitted. You do not have to throw out the supply that you already have, but you cannot accept anymore. This applies to all faculty and staff, even those who work in administrative areas as opposed to patient care areas.*

C. Article II, C of the policy states, "NO GIFTS, of any amount, may be accepted by individuals from...Health Care Industry." Does this mean that staff are not allowed to attend a dinner sponsored by a rep whose talk is related to a particular drug?

ANSWER: *Correct.*

D. The following paragraph in Article II, C states that "Individuals may, however, accept gifts...no greater in value than $300 per year..." Can you please clarify this?

ANSWER: *This paragraph goes on to say, "provided that the vendor is not included in the list above." The list refers to a list of Healthcare vendors from whom no gifts are allowed. The policy prohibits gifts from Healthcare Industry vendors, not from all vendors.*

E. What is the process to request monies to support events from the unrestricted account?

ANSWER: *Funds may still be donated by industry to support education but must be received as gifts through the VU Development office. If requests are for CME-certified events, the Division of CME must be made aware of the requests, and funding must be sent to the Division of CME for processing. In addition, a Letter of Agreement is required for each grant received in support of a CME-certified event.*

F. What percentage will DAR take for processing gifts?

ANSWER: *DAR does not take a percentage for processing gifts.*

G. May industry representatives attend patient reunions? If so, may they provide giveaways to patients if Vanderbilt staff promise not take any for themselves?

ANSWER: *No, industry representatives may not attend patient reunions. If a vendor wants to support these types of events, they may give an unrestricted gift to the department through the Development Office.*

H. A healthcare Organization is organizing a bi-annual conference in which multiple vendors are present to discuss the current services they provide or could potentially provide to VUMC. The organizing company would pay the expenses for the Vanderbilt employee to attend. This conference is funded by the pharmaceutical industry to support the actual operation.

It has been beneficial to attend this conference as in the past as it equips us in our preparation for purchase of equipment and medications and allows great networking opportunities. Is attendance endorsed under the policy?

ANSWER: *The policy states that "VUMC personnel may not accept or use personal gifts from Healthcare Industry representatives, regardless of the nature or value of the gift." It goes on to say that, "In certain instances, travel expenses or meals may be offered by the Healthcare Industry related to necessary education regarding equipment, products, or other medical devices purchased* ***previously*** *by VUMC......Under no circumstance may VUMC personnel accept offers from the Health Care Industry to pay for travel, meals, or other expenses which are related to procurement activities by VUMC and/or VUMC personnel."*

Having the healthcare organization pay for the personal expenses of attending the Conference would be considered a gift under the policy, as these expenses are not related to education on previously purchased equipment. The policy does not provide for acceptance of personal expenses from the healthcare industry for the purpose of procurement activities. If these vendor fairs are important to the Vanderbilt employee's education about potential hospital purchases, that employee's department should pay for the expenses of attending the conference.

5. Conference Presentations

A. Is it allowable under the revised policy for a conference sponsor to pay for an attendee's registration if that attendee is presenting at the conference?

ANSWER: *That is allowable as long as the content of the session is the work of the presenter and slides are not used to promote the vendor sponsor's product in any way and the vendor has not approved the material presented..*

B. Can staff receive educational funding for conferences from vendors? For example, in the past, healthcare vendors have provided funding for a portion of our staff to attend an annual conference.

ANSWER: *Individual staff may not directly receive educational funding. Funding may be accepted by the leadership of the operational unit provided that the provision is free from any actual or perceived conflict of interest. This funding is viewed not as a gift, but as revenue to the department. Industry may not earmark contributions to fund specific recipients or to support specific expenses. The funds must be provided to the department or the sponsoring professional organization rather than directly to the individual. The personnel must be selected according to clear criteria. The department must determine that the conference or training has educational merit. The recipient of the funds must not be subject to any implicit or explicit quid pro quo.*

6. Peer Inquiries

Is it allowable to share vendor and product information with peer institutes through phone calls, list serves, etc.?

ANSWER: *If staff receive questions about whether their area uses a particular company or product, they can answer and give information on their satisfaction, but should not be marketing on behalf of the company or give the impression that Vanderbilt is endorsing any company/product.*

7. Vendor-Provided Meals

A. Is it okay for a vendor to provide lunch for a go-live celebration and for training if there is no purchase involved?

ANSWER: *Health Care Industry vendors should not be providing food for training events, unless specified in purchasing agreement.*

B. The Reporter last year stated, "there will be some central financial support to balance this loss"...referring to additional cost for lunches at conferences. How do educators gain access to these monies for our staff? For example, in the past, companies have provided our nursing staff with free lunch for various events. Would we apply for assistance through the unrestricted funds account?

ANSWER: *A central source of funds has not been established. The comments about financial support were made before Vanderbilt was compelled to implement budget austerity measures due to the national economic downturn last year. Funds may still be donated by industry to support education but must be received as gifts through the VU Development office. A vendor who donates through the Development Office will not be associated as being the direct sponsor of any single event. Departments should continue to follow discretionary spending policies and seek approval from their Administrator prior to ordering food for meetings, etc.*

C. If a rep is providing education on a new piece of equipment, are they allowed to provide candy/food during the training?

ANSWER: *If a rep is to provide food during training regarding equipment purchased by VUMC, this should be delineated by language in the* ***purchasing contract*** *specifying the party to be responsible for all training expenses, timing and location of training, and related items such as food.*

D. May vendors continue to take physicians and residents to dinner?

ANSWER: *No. These types of gifts are strictly prohibited under the policy.*

8. Vendor Logos

A. Are we allowed to use educational material with a company logo?

ANSWER: *If the branded materials are intended to promote safe and appropriate use of medication or a medical device that has been clinically judged to be the best product for the care of an individual patient, the materials are permissible.*

B. The Reporter states, "While on the VUMC campus, personnel will not wear any clothing, uniform or item that displays the name of a non-Vanderbilt health care service, product or logo." Is this in place? A few months ago, I encountered a VMC administrator who wore a badge pull with a company logo.

ANSWER: *After July 1, 2009, VUMC personnel should not wear non-Vanderbilt logos.*

C. Outside of permitted educational materials, are vendor logos allowed?

ANSWER: *No. Promotional items which incorporate or display a product or company logo of a health care industry entity must not be used or displayed on Vanderbilt's campus.*

D. May staff accept/use giveaways with vendor logos?

ANSWER: *No. Giveaways from vendors would be viewed as gifts under the policy and should not be accepted.*

E. Are logos for groups such as "Donate Life" allowed on badge pulls?

ANSWER: *The policy prohibits VU personnel wearing or displaying anything with the name of a non-Vanderbilt health care service, health care product or company logo. Logos from non-profit and/or professional organizations which promote health in general or promote research, prevention, treatment and/or education in a specific disease or health area* ***are*** *permitted under the policy. If Donate Life falls into the latter group, use of its logo is not prohibited.*

9. Continuing Education

A. Some companies provide free medical education. Is this allowed?

ANSWER: *VUMC personnel cannot receive compensation for participating as a learner in education sponsored by the Health Care Industry. If the education (e.g., web site training) is offered to anyone at no charge, then there is no prohibition against VUMC personnel utilizing such a resource.*

B. The new COI policy says that all educational events must adhere to the ACCME Standards for Commercial Support; what is this document and where do I find it online?

ANSWER: *The ACCME Standards for Commercial Support provide guidelines for ensuring independent educational content. A copy of Standards may be found on the Division of CME website (www.cme.vanderbilt.edu).*

10. Tax-Exempt Payments

Under the revised policy, how will the service of faculty members on boards of tax-exempt organizations be treated? What if payments are made to the faculty member or his/her department from the organization? What if the faculty member makes funding decisions for this tax-exempt organization?

ANSWER: *Service by faculty members on boards of tax-exempt organizations should be treated as consulting (under a written agreement between the entity and the faculty member), especially if there are any payments by the organization. If there is payment of travel and lodging expenses related to attending meetings, these could be paid directly by the organization or reimbursed to the faculty. Payments of any honoraria should be specified under the contracting agreement to be either paid to the faculty member or sent to the Development Office as a gift. If the faculty consultant reviews grant applications or otherwise can influence allocation of the foundations funds, recusal for any discussion involving Vanderbilt or a VU faculty member would be appropriate.*

11. Exhibits

A. Should exhibit fees be sent to DAR?

ANSWER: *No. Exhibit fees represent an exchange of goods, i.e., they are paid directly to a department or division to purchase space at events held off-campus.*

B. Are exhibits allowed at educational events?

ANSWER: *Exhibits are NOT allowed at on-campus events, but ARE permitted at off-campus events.*

C. I understand that the new policy allows exhibits off-campus only, but what is meant by "off campus?"

ANSWER: *"Off Campus" would be property that is not leased or owned by Vanderbilt University. For example:*

- *100 Oaks Mall = on campus*
- *Student Life Center = on campus*
- *Peabody Campus = on campus*
- *University Club = on campus*
- *Marriott at Vanderbilt = off campus*

D. If I have already begun planning/implementing an educational event on campus to include exhibits, am I in violation of the new COI policy?

ANSWER: *Not if your exhibit space was sold prior to July 1, 2009 or if your application for CME credit was submitted prior to July 1, 2009.*

E. Is it possible to allow different levels of exhibit support at educational events? For example, Platinum level exhibitors will be given table space next to the meeting room and will receive full page acknowledgment in the course syllabus, while Silver level exhibitors will be given space farthest away from the meeting room and receive no acknowledgment in the course syllabus.

ANSWER: *No, as this could be construed as preferential treatment. The space and acknowledgments provide should be as uniform as possible. The course syllabus or program should acknowledge all of the supporters in a group listing, i.e., "Thanks to Company A, Company B, Company C, etc. for their generous support of this program…."*

F. What kinds of materials may be distributed by exhibitors?

ANSWER: *Educational materials may be distributed at exhibit tables. It is best if the materials do not contain logos, however, if the logo can not be easily removed, the logo may remain. Promotional items, giveaways, or any sorts of gifts devoid of educational purpose MAY NOT be distributed.*

12. COI Vendor List

A. What is the COI vendor list and where do I find it online?

ANSWER: *The vendor list is a compiled listing of business considered to be Health Care Industry, currently doing business with Vanderbilt. These businesses would be prohibited from providing "gifts" directly to an individual. It may be found online at* http://www.vanderbilt.edu/compliance/html/Vendor_listing.htm

B. Is the list of suppliers on the COI vendor list all inclusive?

ANSWER: *Because business agreements with companies change daily, the list may not reflect the most current vendors. If you have a question about whether a vendor should be included on the list, please inquire through the COI mailbox at* coi@vanderbilt.edu

C. Some suppliers on the list have several divisions; does this mean all divisions are restricted or just the medical divisions?

ANSWER: *Businesses are considered to be one entity, therefore if there is a division of the business that is a Health Care vendor, all divisions of the business should fall under the New COI Policy.*

D. How often will the list be updated?

ANSWER: *At least annually and more often if needed.*

13. Implementation

A. Whose responsibility is it to make a visiting speaker aware of the new COI policy?

ANSWER: *It is the responsibility of whoever is coordinating the program involving that speaker.*

B. If a violation is observed, who should be notified?

ANSWER: *If the person in violation of the policy is a Vanderbilt faculty/staff member, there is always the option of reporting it to your supervisor or on up the chain of command, if you fee l comfortable doing so. If you do not, a message can always be sent to the coi@vanderbilt.edu mailbox explaining the situation. If you prefer to remain anonymous, you can call the University Central Confidential Helpline at* (615) 322-5162 *or the Medical Center Confidential Helpline at* (615) 343-2777. *If the person in violation of the policy is a vendor, please contact Michael O'Neal (pharmaceuticals) or Lacy DePew (devices).*

14. Gift Processing

A. Will all gift funds remain in DAR for allocation, or will funds be distributed to respective departments?

ANSWER: *The gift processing office routinely receives checks and other documentation either through campus mail or by hand delivery. Once received, the check is immediately deposited and routed within 2-3 business days (or less) into the appropriate account if back-up documentation is on-hand to indicate intended use and there is no COI issue present. When additional documentation is needed or COI questions exist, the goal is to have the money in the account within 5-7 business days. But, to be clear, the funds are distributed to appropriate account for the department's use.*

B. Who will approve and sign off on the letters of agreement with the industry funding agent?

ANSWER: *There are two parts to this response as the processes and procedures for CME and non-CME events vary.*

If your approved CME activity receives educational grants from pharmaceutical companies and/or medical device manufacturers, a signed letter of agreement (LOA) must be obtained from each company that provides a grant. This must be achieved prior to the CME activity taking place. Because Vanderbilt School of Medicine is the accredited provider, the director of the Division of Continuing Medical Education is the only individual authorized to sign off on an LOA.

For non-CME events, letters of agreement are typically circulated between the Development Office (DAR), Dr. Raiford, and others (General Counsel's Office) when necessary. When the company offers a letter of agreement that they want to use, it has been Dr. Raiford's Office and DAR where the first review has taken place.

C. Should grant monies and exhibit fees for CME and non-CME events be sent to Development and Alumni Relations (DAR)?

ANSWER: *Exhibit fees should be sent directly to the department, as these are not gifts, but the funds derived from the vendor purchasing an exhibit table.*
As to grant monies there are two parts to this response as the processes and procedures for CME and non-CME events vary.

Grant monies in support of approved CME activities must be sent to the Division of CME (VCME). Upon receipt, VCME will send checks to the Development Office (DAR) for processing. VCME will also send a copy of the check to you for your records. DAR will contact you to obtain your conference cost center number and deposit your check accordingly. All of these processes should be completed within a matter of days.

For non-CME events, and in cases where the only option is payment to the department, these payments should be routed to the Development Office. When received by the department, the check should be sent to the attention of Pam Burton or Terry Garmon in gift processing. They can ensure quick review and transfer of the funds into the appropriate accounts and can contact the department staff to obtain back-up documentation on the support, its purpose and appropriate allocation.

System Access FAQs

1. How do I access the disclosure system?

ANSWER: *The disclosure system can be accessed at: https://webapp-a.mis.vanderbilt.edu/coi*

2. What if I do not know my VUNet ID and/or e-password?

ANSWER: *Everyone has a VUNet ID, even if you don't know what it is, or if it has never been activated. You should call the Help Desk at 3-4357 (3-HELP) or contact ITS or through their website at http://www.vanderbilt.edu/epassword/*

3. How do I access the user guide?

ANSWER: *The User Guide can be found at the following link: http://finweb.mc.vanderbilt.edu/Support/Training/ApplicationTraining/COI_User_Guide_Ph2.pdf*

4. Who do I contact if I have problems accessing the Conflict Disclosure System?

ANSWER: *You should call the Help Desk at 3-4357 (3-HELP). Questions may also be directed to the mailbox at coi@vanderbilt.edu.*

5. Who should I contact if I have questions about a specific activity that either I or my department currently engages in, to ensure we are in compliance with the policy?

ANSWER: *Questions regarding Conflict of Interest and Commitment will be answered by representatives monitoring the mailbox at coi@vanderbilt.edu. Our goal is to have your questions answered within seven (7) working days.*

6. If I use my browser's Back button to return to the previous page, I get a message that the page has expired.

ANSWER: *Please do not use your browser's navigation buttons to move through the application. The buttons for moving through the system are provided at the bottom of each screen.*

7. Why is there a save button?

ANSWER: *Because the Conflict Disclosure system has an automatic time-out feature, it is advisable for you to save your work frequently as you proceed. The Previous and Continue buttons do perform a save function but if you have a lot of text to enter you may want to save your work before you complete a page.*

8. Can I print my Disclosure(s)?

ANSWER: *Yes, both disclosers and approvers can print the entire Disclosure. However, Disclosures will remain in the system and you may access them at any time, so printing should not be necessary.*

9. Why do the column headings appear to be clickable/sortable if we can only create one disclosure?

ANSWER: *The system will retain your Disclosures from year to year and when you have several it will be helpful to be able to sort them.*

10. Why don't I see a **Create Disclosure** button?

ANSWER: *If you have a Disclosure in **Draft** status you need to complete and submit that Disclosure, rather than beginning a new one. You may also delete the Draft Disclosure and then you would be able to create a new one.*

11. What is my COI ID number?

ANSWER: *This is a system-generated number that is used primarily by the system administrators. However, once you have completed several Disclosures it may be helpful to you and your approver to refer to them by their COI ID number.*

12. Why does my Approver section say "Not yet Selected?"

ANSWER: *You must select your Approver each time you complete a Disclosure, and that field will be marked "Not yet Selected" until you search for and select the appropriate approver.*

13. Is there a way for the system to automatically enter the approver name, based upon the user's home dept?

ANSWER: *If you are a **University** faculty or staff member, your approver will be assigned by the office of Conflict of Interest and Commitment Management. If you are **Medical Center staff**, you must select the appropriate person. This should be the person who completes your annual performance evaluation or your immediate supervisor. Currently there is no way to automate this selection.*

14. What is the purpose of the Reset button?

ANSWER: *If you wish to return the current page to its last unsaved status you may use Reset to do so. However, text typed in text boxes will not be erased by the Reset button.*

15. How will this Disclosure tie back to my annual performance evaluation?

ANSWER: *For **Medical Center staff**, your compliance with COI will automatically populate your VPES performance evaluation. This <u>does not apply</u> to University faculty and staff.*

16. How do I know when I'm finished?

ANSWER: *When you see a green message on your My Disclosures page that says "your disclosure has been submitted," you are through and can log out and close your browser.*

Policy General FAQs

1. How do I access the current Conflict of Interest Policy?

ANSWER: *The current policy may be accessed using the following link:* *http://www.vanderbilt.edu/compliance . Simply click on the link shown for Conflict of Interest (Staff) or Conflict of Interest (Faculty). The new Policy is also shown and is effective on July 1, 2009.*

2. What is the effective date of the policy?

ANSWER: *July 1, 2009.*

3. What is a conflict?

ANSWER: *A conflict is defined in our policy. Please use the following link to view the policy and read the definition provided: http://www.vanderbilt.edu/compliance and click on the link for Conflict of Interest (Staff) or Conflict of Interest (Faculty).*

4. Why did the Policy change?

ANSWER: *The policy changes involving gifts and healthcare-sponsored activities were added to adequately address increased federal attention and scrutiny on conflicts of interests between academic medical centers and major research universities and the pharmaceutical/medical device industry. Our institution's goal is to better manage these relationships to ensure that all activities involving Vanderbilt faculty/staff is aligned with the mission of Vanderbilt University.*

5. How do these changes impact my job?

ANSWER: *Those most impacted will be in the Medical Center and Hospital staff and faculty. During the course of the year, you may have a question about a specific activity you currently perform or would like to engage in. If you believe it might be appropriate to obtain guidance on the matter, please submit your question or situation to the mailbox at coi@vanderbilt.edu.*

6. Who should I contact if I have questions about the policy?

ANSWER: *Questions regarding Conflict of Interest and Commitment will be answered by representatives monitoring the mailbox at coi@vanderbilt.edu.*

7. What educational resources are available to me as an employee to understand the policy?

ANSWER: *Faculty/staff can always send questions to the coi@vanderbilt.edu mailbox. Also, there will be a link on the Conflict Disclosure System's home page www.https://webapp-a.mis.vanderbilt.edu/coi/ to a listing of Frequently Asked Questions to help staff understand how various situations are being handled in the light of the new policy.*

8. What questions changed in the disclosure system?

ANSWER: *The biggest change is the addition of a new question concerning payment for healthcare industry-sponsored activities. The existing question concerning gifts was also changed to delineate between gifts from pharmaceutical/medical device vendors and all other Vanderbilt vendors. The remaining changes are minor and mainly clarify existing questions to provide Disclosers with more accurate answers.*

9. Should I complete a new disclosure after July 1, 2009? If so, why?

ANSWER: *Every Vanderbilt faculty and staff member is required to complete an annual disclosure. The annual time period begins July 1st and ends June 30th (fiscal year). At least one disclosure must be completed during that time frame. We encourage you to complete your annual disclosure in a timely manner.*

10. How does the new policy change a management plan that I currently follow?

ANSWER: *You should follow the management plan currently in place until your circumstances change and you complete a new conflict of interest disclosure. Each disclosure that contains a reported conflict is reviewed and a management plan created for each individual's circumstances.*

11. What if I now have a conflict to disclose, as a result of the new policy? What should I do?

ANSWER: *We encourage you to go ahead and submit your annual disclosure. This action will ensure it is evaluated and a workable management action plan is developed for you, if needed.*

12. What should I do if I read a Frequently Asked Question (FAQ) and have another question?

ANSWER: *If you have a question about the new policy, first ask your supervisor for an answer. If further information is needed to answer your question, please email your question to the COI mailbox: coimailbox@vandebilt.edu*

13. What questions and answers are available for me to access?

ANSWER: *The questions and answers will be retained for several weeks. You may search the FAQs to view questions and answers. You may find that your question has already been answered. Check the FAQs first before you submit a question to the COI mailbox.*

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* <u>*not yet submitted*</u> *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.*

Approver FAQs

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 <u>not submitted from their staff</u>.*
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 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.*