
Reviewing a Conflict Disclosure & Forming a Management Plan in the Vanderbilt University Conflict Disclosure System

Introduction

If you are a Reviewer for faculty or staff disclosures, below are instructions to help you complete the review process and create a draft Management Plan.

After departmental review, the COI Office will perform a second-level review and make the final determination as to whether a Management Plan is required.

Finalized Management Plans will be routed back to the discloser and departmental reviewer for signatures.

For questions email: coi@vanderbilt.edu

For additional resources visit: <https://www.vanderbilt.edu/generalcounsel/conflictinterest/index.php>.

Reviewing a Conflict Disclosure

1. Open the Vanderbilt University Conflict Disclosure System at:
<https://vanderbilt.ospreycompliancesuite.com/coiriskmanager/>
2. Log in with your VUnetID and password.
3. Use the navigation pane on the left to open the “**Reviewer Center**” screen.
4. A list of disclosures for your review is populated. Click on the circle next to the disclosure you would like to review.



5. The flagged responses will open below for the selected disclosure. All answers indicating potential conflicts will be highlighted, and any sub-questions will also be visible for you to examine.

[name redacted] 's disclosure

Please review the disclosure and complete steps below. Affirmative responses will appear with a flag in yellow. ?

Choose disclosure to view: 1/26/2021 (CURRENT) v

2. Do you or a family member have a professional relationship with a NON-PUBLICLY TRADED ENTITY that constitutes a significant financial interest and that could reasonably be viewed as related to your institutional responsibilities?

The following constitutes a significant financial interest in a NON-PUBLICLY TRADED ENTITY:

- You or your family member receives income related to Intellectual property rights and interests not paid by Vanderbilt, OR
- The sum of payments or remuneration (salary, consulting fees, honoraria, paid authorship, etc.) received in past 12 months exceeds \$5,000, OR
- You/your family member holds ANY equity interest (stock, stock option, or other ownership interest).

Yes

Type of Interest: **SFI**

Please complete data grid fields for each relationship:

Note: if there are no potential conflicts flagged, the disclosure will be auto-approved and you will not see it in Reviewer Center. Please see **Review Disclosures Page** section for more details on viewing disclosure statuses.

- If you know of any missing or incorrect information on the form, please email the discloser to request they update and resubmit their form.

If you would like to view the submitted form in its entirety, please see instructions in the **Review Disclosures Page** section.

- After reviewing all the flagged responses, scroll down to “Action Steps.”
- Click on the Number 1, corresponding to the first flagged conflict:

Action Steps:

1 2 3 4 5 6 7 [envelope icon] [document icon] [document icon] [document icon]

[View Previous Management Plan](#)

For the possible conflict of interest below, indicate if a management plan is required. ?

B2. Do you or a family member have a business relationship with any entity that has a contractual relationship with Vanderbilt, or provides goods or services to Vanderbilt--other than those disclosed in Questions A or B1? (You do not need to provide responses here for relationships disclosed in Questions A or B1.)

Conflict: SFI

Plan required?

Yes No

Examine the answer in the form and determine whether a Management Plan is required for this potential conflict. **Note:** the COI Office will make the final determination after you submit.

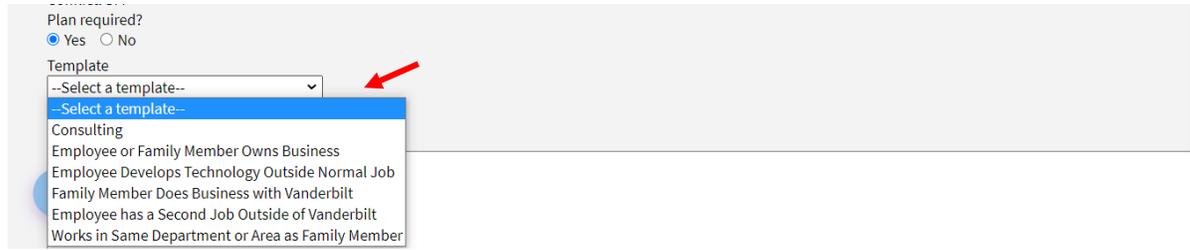
If No Plan Required, click No. In the text box, add an explanation for why this response does not necessitate a Management Plan:

Write “No COI” if the flagged response does not constitute a COI.

If there is a real or potential COI but you feel no plan should be required, write a brief description of the COI and the reason that no plan is required.

If a Management Plan is required, click Yes.

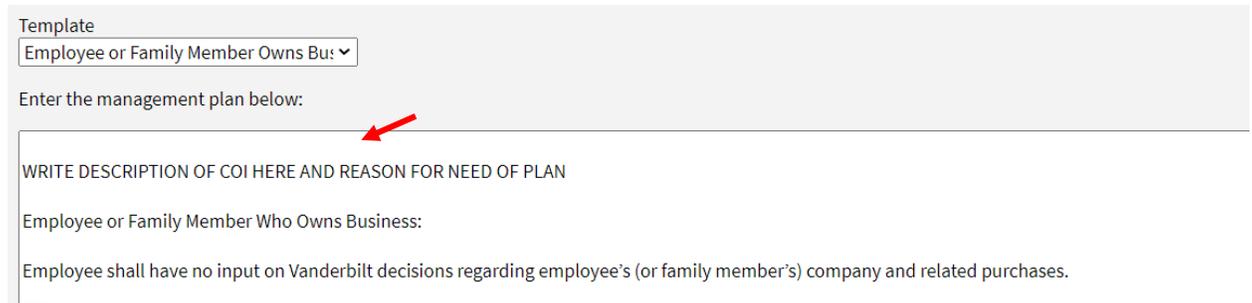
Select one of the templates to use the COI Office’s standard management plan text, or create your own Management Plan in the text box:



Plan required?
 Yes No

Template
--Select a template--
--Select a template--
Consulting
Employee or Family Member Owns Business
Employee Develops Technology Outside Normal Job
Family Member Does Business with Vanderbilt
Employee has a Second Job Outside of Vanderbilt
Works in Same Department or Area as Family Member

In the text box, write a brief description of the conflict **above the Management Plan text.**



Template
Employee or Family Member Owns Bu: ▾

Enter the management plan below:

WRITE DESCRIPTION OF COI HERE AND REASON FOR NEED OF PLAN

Employee or Family Member Who Owns Business:

Employee shall have no input on Vanderbilt decisions regarding employee’s (or family member’s) company and related purchases.

9. Click Number 2 (if there is another flagged response) to move on to the next potential conflict. Continue until each potential conflict has been addressed. If more than one Management Plan is needed, they will be combined into a single plan, finalized by the COI Office.
10. Once you have addressed each number, check the box acknowledging that you have reviewed all the possible COIs. Each number should show a green dot:



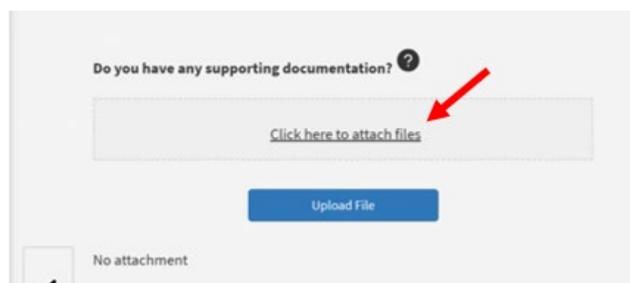
Action Steps:

1 2 3 4 5 6 7 [Checked] [Paperclip] [Document]

I have reviewed the entire disclosure and all of the possible conflicts of interest.

11. On the Attachments (paper clip) tab, attach any supporting documents (relevant emails, etc.) that you want to share with the COI office.

First, click on “Click here to attach files.”



Do you have any supporting documentation? [?]

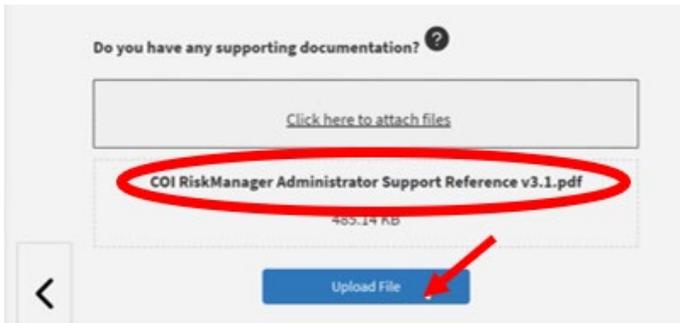
[Click here to attach files](#)

Upload File

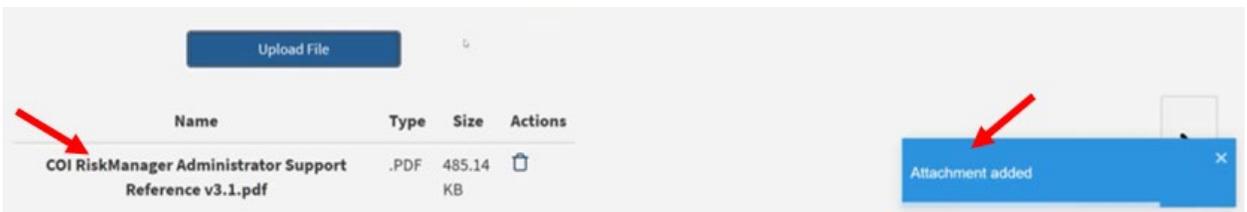
No attachment

Next, select the file you need from your computer, and click Open.

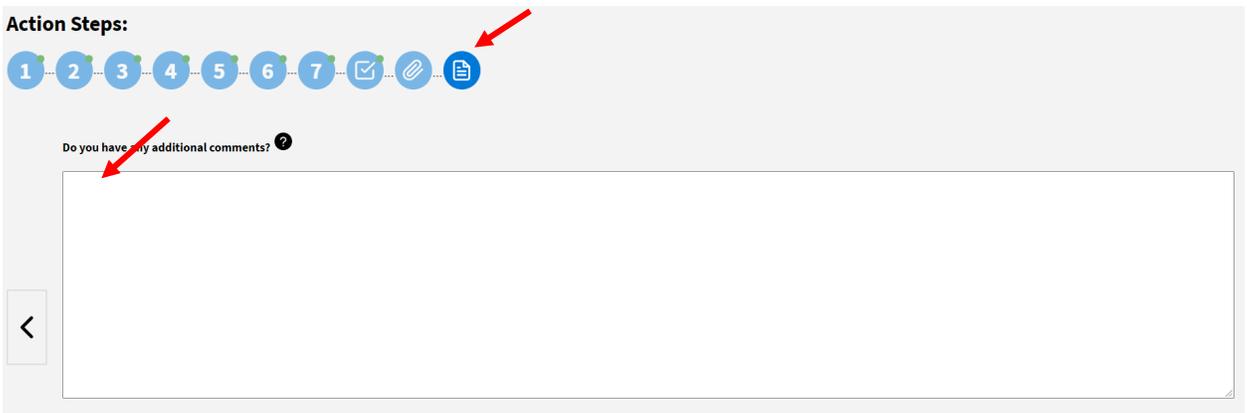
Once you see the name of your file, click “Upload File.”



A box in the lower right-hand corner will confirm that the attachment has been added, and you will see the attachment below the Upload File button:

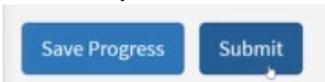


12. Move on to the Notes section. Click the text box to add your comments. All comments will be shared with the COI Office and considered before a Management Plan is finalized.



13. Scroll down. If you are ready to submit, click “Submit.”

If you would like to leave and submit at a later time, click “Save Progress.” The disclosure will remain in your Reviewer Center until you submit.

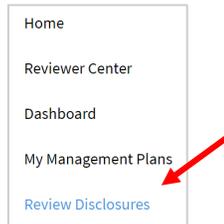


14. A “Potential Case” has now been created for this disclosure. Next, the COI Office will review (including your notes and attachments) and finalize a Management Plan if needed. If a Management Plan is published, you will receive an email notification prompting you to review and sign the plan in the system.

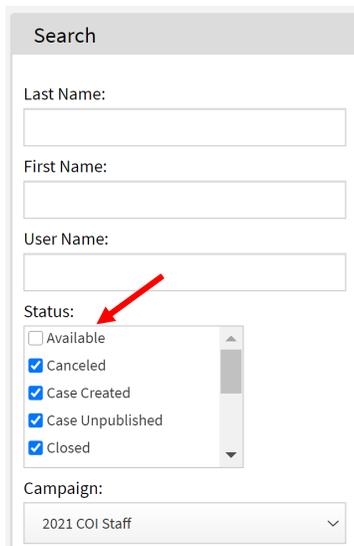
Review Disclosures Page

The Review Disclosures Page is where you can track disclosure submission statuses, as well as view full disclosure forms.

1. Open the Review Disclosures tab.



2. Under Status, select all checkboxes except Available, then click **Search**.



A search form titled 'Search' with the following fields: Last Name, First Name, User Name, Status, and Campaign. The Status field has a dropdown menu with the following options: Available (unchecked), Canceled (checked), Case Created (checked), Case Unpublished (checked), and Closed (checked). The Campaign field has a dropdown menu with the option '2021 COI Staff' selected. A red arrow points to the Status dropdown.

You may also filter by Campaign, Name, or VUNetID.

3. In the Submitted column, you will see whether or not the disclosure was submitted.



A table titled 'Disclosures' with the following columns: Form, Actions, Name, Username, Supervisor, Potential Conflict, Conflicts, Last Submitted, Last Reviewed, Date Assigned, Status, and Submitted. The Submitted column has a red arrow pointing to it. The table contains two rows of data:

Form	Actions	Name	Username	Supervisor	Potential Conflict	Conflicts	Last Submitted	Last Reviewed	Date Assigned	Status	Submitted
		Employee, Mark	mark.employee	Reviewer, Ryan					3/29/2021	Start	Not Submitted
		Employee, Harry	harry.employee	Reviewer, Ryan					3/29/2021	Start	Not Submitted

4. To download the list to Excel, click the Export button.



5. To view a particular form submission, click on the form symbol next to the disclosure you wish to view.



Signing a Management Plan

If the COI Office determines that a Management Plan is required, the discloser and reviewer will receive a notification from coi@vanderbilt.edu requesting they log into the COI system and sign the plan.

Please follow the emailed instructions and read the management plan carefully. The text box includes the flagged question(s), type(s) of conflict, and the management plan text.

If you have multiple conflicts requiring management plans, there will be separate plans separated by horizontal lines.

VANDERBILT UNIVERSITY

Home
Reviewer Center
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Study Management
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Plan Details

B. Business/Professional Relationships
To save your answers and complete at a later time, click "Save and Exit" at the top or bottom of the page.

B1. Do you or a family member have a business relationship with any entity that sponsors or is involved in research activities at Vanderbilt--other than those disclosed in Question A?
(You do not need to provide responses here for relationships disclosed in Question A.)
Possible Conflict: SFI
ManagementPlan:

MANAGEMENT PLAN - Employee or Family Member Who Owns Business:

Employee shall have no input on Vanderbilt decisions regarding employee's (or family member's) company and related purchases.

Employee shall not use any Vanderbilt resources and shall not conduct any company-related activities on Vanderbilt time.

Employee shall not use employee's position at Vanderbilt to solicit business for employee's company.

B2. Do you or a family member have a business relationship with any entity that has a contractual relationship with Vanderbilt, or provides goods or services to Vanderbilt--other than those disclosed in Questions A or B1?
(You do not need to provide responses here for relationships disclosed in Questions A or B1.)
Possible Conflict: SFI
ManagementPlan:

MANAGEMENT PLAN - Consulting:

Employee's supervisor must approve paid time off in advance for consulting activities.

Employee must refrain from using Vanderbilt resources in connection with consulting activities.

Employee's speeches must include a clear disclosure that employee is a paid consultant for that company. Standard disclosure slides can be provided by the

Sign

Click "Sign" then "OK" when you are ready to sign the plan. If you have any questions, please direct them to coi@vanderbilt.edu.