

TRAINING FOR APPROVERS

VANDERBILT UNIVERSITY CONFLICT OF INTEREST AND COMMITMENT



VANDERBILT



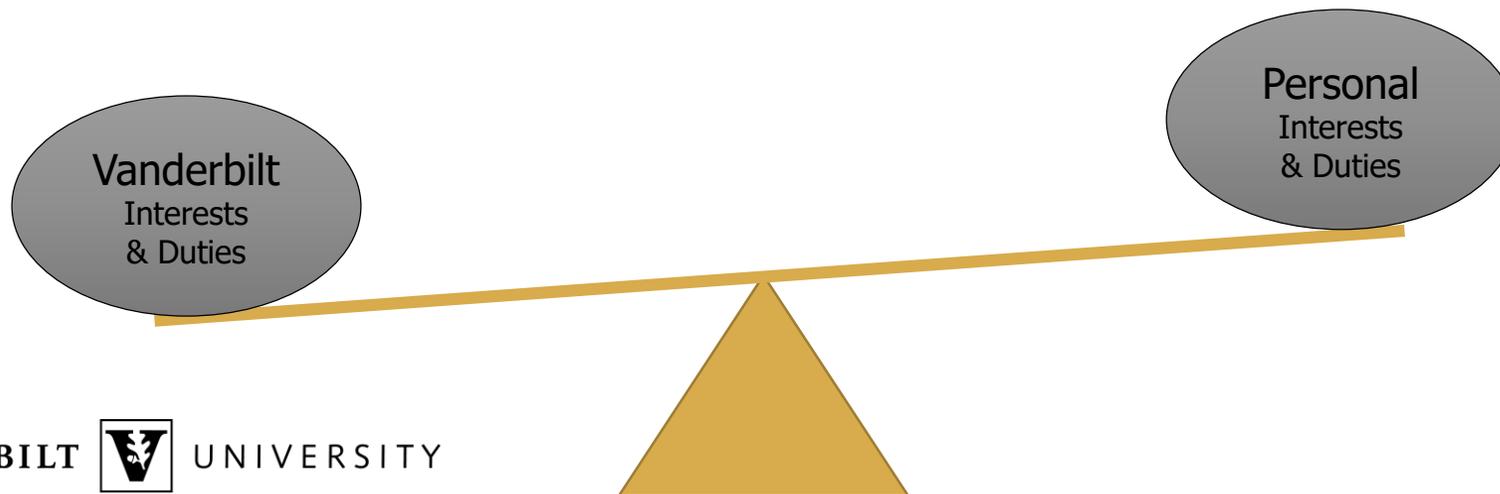
UNIVERSITY

WHAT IS A COI?

Individual **conflicts of interest** refer to situations in which an individual's or family member's financial, professional, or other personal considerations may directly or indirectly affect, or have the appearance of affecting, an individual's professional judgment in exercising any university duty or responsibility, including the conduct or reporting or research.

WHAT IS A COI (IN *PLAIN LANGUAGE*)?

- A COI may occur any time an individual's interests outside Vanderbilt may interact in any way with the individual's role at Vanderbilt.
- This can happen with financial interests, with family members, and with extra jobs. These are just common examples—there are many types of conflicts.



WHY IS THIS POLICY IMPORTANT?

- **Public Trust & Confidence**

- The policy helps protect the trust and confidence that the public has in Vanderbilt as an academic center and research institution.

- **Individual & Institutional Reputations**

- Without the policy, individual and institutional reputations could be harmed.

- **Sponsored Research Requirements**

- Many research sponsors require it in their contracts or grant terms and conditions.

- **Protecting Individuals & Vanderbilt**

- The policy serves to protect BOTH the University's interests and the interests of the faculty and staff who are disclosing.

THE ROLE OF THE APPROVER

For University faculty and staff, an Approver for a department is assigned by the Dean or Vice-Chancellor to review and approve disclosures each year within the Conflict Disclosure System. The Approver is also responsible for ensuring a management plan is followed during the year, as needed.

BASIC APPROVER DUTIES

- **Review**

- Approvers review ALL disclosures submitted to them.

- **Return**

- Approvers return any disclosures received in error.

- Approvers return incomplete disclosures and request that the discloser resubmit with additional details about any conflicts.

- **Approve**

- Approvers review information in properly submitted disclosures to determine if the disclosure should be approved. If the information provided is sufficient to determine whether a management plan is necessary, the approver should approve the disclosure.

BASIC APPROVER DUTIES (continued)

- **Create Management Plans**

- If a conflict requires a management plan the approver can create a plan from the pre-written plans in the Conflict Disclosure System, or the approver may consult with the COI Office to develop a plan.

- **Certify/Monitor Management Plans**

- The Approver certifies that the management plan has been implemented by clicking the checkbox at the bottom left of the Management Plan page.
- The Approver monitors the situation to ensure the plan is followed during the year.

HIGH LEVEL APPROVER DUTIES

- Maintain awareness of faculty and staff conflicts.
- Communicate with faculty and staff to ensure disclosure of all conflicts.
- Report back to the Dean (or Vice Chancellor) to ensure awareness of all conflicts.

ADDITIONAL APPROVER DUTIES

- Approvers may be asked to assist the COI office in obtaining disclosures during the annual disclosure process.
- In addition, when novel questions arise, the Approver may be asked to be a liaison with the Dean or Vice-Chancellor to determine how an individual school or area wants to address a conflict situation.

APPROVER AWARENESS

- As an approver, you should remain available as a resource for faculty and staff completing disclosures.
- If you have reason to believe that any person completing a disclosure does not understand the questions (due to complexity or due to a language barrier), please contact the Office of Conflict of Interest and Commitment Management at any time for assistance.

ACTING AS A DEAN'S DESIGNEE OR A VICE CHANCELLOR'S DESIGNEE

- Approvers are considered designees of the Dean or Vice Chancellor. When an approver completes the conflict disclosure process, the approval given is viewed as the Dean's or Vice Chancellor's approval.
- Not only shall approvers maintain knowledge and understanding of ongoing conflicts of interest and commitment in their area, approvers must also report that information back to the Dean or Vice Chancellor to ensure awareness and to ensure consistency.

REVIEW OF COI DISCLOSURES

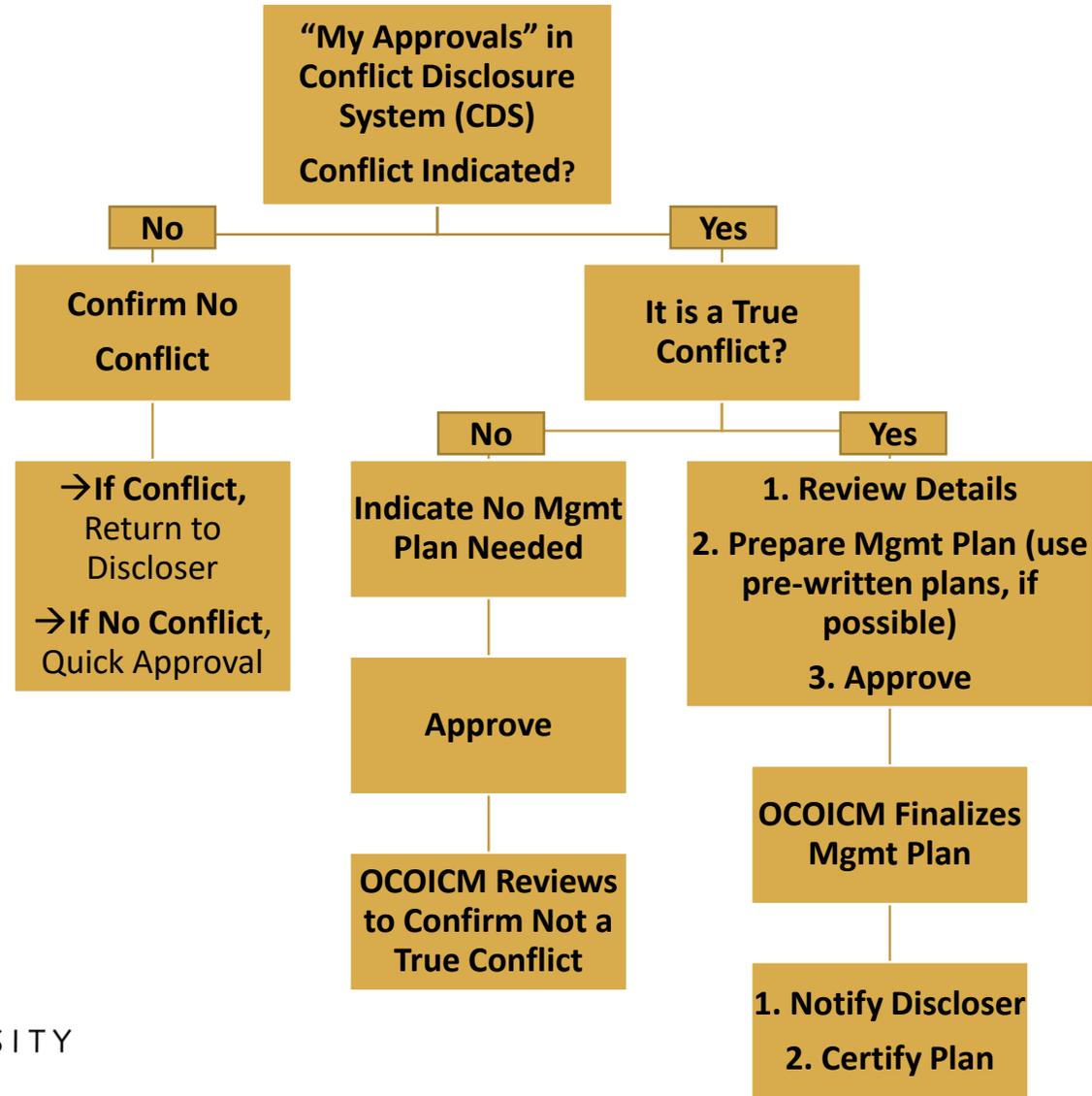
WHAT HAPPENS WHEN YOU SUBMIT A DISCLOSURE?



CONSIDERATIONS FOR REVIEW

- Does this disclosure constitute a conflict of interest that requires management?
- If it is a conflict, can it be properly managed?
- If it can be managed, what requirements should the management plan contain?
- Conflicts that cannot be managed may be presented to the University Conflicts Committee for resolution (ie. cease and desist or other actions).

APPROVER QUICK REFERENCE GUIDE



FREQUENTLY ASKED QUESTIONS FOR APPROVERS

HOW DO I APPROVE A SUBMITTED DISCLOSURE?

- The approver should log in to the system and select My Approvals.
- A disclosure can be viewed by clicking the faculty/staff member name link corresponding to the disclosure.
- Disclosures with no reported conflicts 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 only 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.

**Detailed instructions on this process are available from the COI Office. The COI Office is also always happy to walk you through any of these steps in-person or via phone.*

SHOULD I APPROVE A DISCLOSURE FROM SOMEONE THAT I DO NOT KNOW?

- 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. (A “Return Selected Disclosures” button is displayed on the My Approvals page.) The system provides a field for you to add an explanation about the reason the disclosure was returned.

HOW SOON SHOULD I REVIEW A DISCLOSURE SUBMITTED TO ME?

- As soon as possible!
- Federal regulations have many time-related requirements. If you fail to approve a disclosure, research funding may be at risk for your school or area.
- Reviews should occur all year long (not just during the annual disclosure process), on a weekly basis, so that you can ensure compliance with rules and regulations.

WHAT HAPPENS IF I FAIL TO APPROVE DISCLOSURES IN A TIMELY MANNER?

- You are putting federal funding at risk!
- The University has no more than 60 days to report back to some funding agencies about potential conflicts. If the approver does not complete the process in a timely manner, the COI Office and the University Conflicts Committee cannot review and potentially implement a management plan as required by COI policy and federal regulation.

DOES THE COI OFFICE REVIEW A DISCLOSURE BEFORE THE APPROVER?

- NO! The COI Office is one of the final steps in the COI review process. No notifications go to the COI Office until the approver has completed the initial review process!
- Timely review by the approver is necessary to the process.

WHAT ARE THE APPROVER DUTIES AFTER A MANAGEMENT PLAN IS PUT INTO PLACE?

- As an approver, you have been assigned the duty to be aware of the existence of the conflicts of all faculty and staff members in your area and to be knowledgeable about the contents of their assigned management plans. Approvers have the task of ensuring that the management plan is implemented in a timely fashion and is followed by the faculty or staff member. It is also the approver'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.

WHAT IF THE CONFLICT CHANGES OR GOES AWAY WHEN THERE IS A MANAGEMENT PLAN IN PLACE?

- If a conflict changes, the faculty/staff member should inform their approver or supervisor and create a new disclosure in the system indicating the changes to the conflict. The approver and the COI Office will review the new disclosure to determine if the management plan needs to be changed.
- Likewise, if a conflict is removed, the faculty/staff member should inform their approver/supervisor and create a new disclosure in the system. The discloser should add a comment to their disclosure explaining why they no longer have a conflict to report. The COI Office will review the new disclosure and the comments of the approver to determine whether a management plan is still required.

OFFICE OF CONFLICT OF INTEREST AND COMMITMENT MANAGEMENT

The **Office of Conflict of Interest and Commitment Management** strives to provide excellent services to our customers, and our website includes many conflict of interest resources. Please feel free to contact us if you have any questions or would like our office to provide conflict of interest training to your University department.

CONTACT US

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Visit our website for additional resources:

<https://www.vanderbilt.edu/generalcounsel/conflictinterest/index.php>

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