

## Approving Disclosures

Outlined below are the steps an approver follows to review and approve a disclosure that has been submitted for approval in the Conflict Disclosure System.

1. Login to the Conflict Disclosure System. See the [How Do I Get to the Conflict Disclosure System](#) section of this document for information on how to access the login page.
2. Click on the **My Approvals** link to access a list of disclosures that have been assigned to you as an approver.
3. The **My Approvals** page lists all disclosures that have been assigned to you for approval. The list can be filtered by **Status** and/or by **Submitted Date**. Click the **Submitted** option next to **Filter by Status** to display disclosures that are ready for approval.
  - Outlined below are all **Filter by Status** options along with their definitions:
    - **All** – lists all disclosures assigned to the approver regardless of status.
    - **Submitted** – lists all disclosures that are ready to be approved by you, the approver.
    - **Returned** – lists all disclosures that you, the approver, have returned to the discloser for more information. These disclosures cannot be approved until the discloser resubmits them for approval.
    - **Submitted or Returned** – lists all disclosures that are assigned to you and are in a submitted or returned status.
    - **Approved** - lists all disclosures that have been approved by you, the approver.
    - **Mgt Plans Awaiting Confirmation** – lists disclosures that the COI committee has reviewed and determined that a management plan is needed, and are waiting for the approver to agree to and acknowledge that the management plan has been implemented.
  - Use the **Filter by Submitted Date** option to further narrow the **My Approvals** list. Enter a **From** and **End Date** and click the **Filter** button to search for disclosures with a submitted date between the From and End dates entered.

**My Approvals**

You can filter your list by status by clicking a radio button on the **Filter By Status** line. To remove the filter, click the radio button "All".

**Filter by Status:**  All  Submitted or Returned  Submitted  Returned  Approved  Mgt Plans Awaiting Confirmation

**Filter by Submitted Date:** From  To

(Enter dates in mm/dd/yyyy format)

Name	Job Title	Home Department	Date Submitted	Has Conflicts	Status	COID #	Mgt Plan	Print
<a href="#">Mindingall, Joi M.</a>	Mgr, Program	General Counsel	10/27/2008	Yes	Approved	47474	<input type="button" value="View"/>	<input type="button" value="Print"/>
<a href="#">Mindingall, Joi M.</a>	Mgr, Program	General Counsel	10/27/2008	Yes	Approved	47470	<input type="button" value="View"/>	<input type="button" value="Print"/>
<a href="#">Mindingall, Joi M.</a>	Mgr, Program	General Counsel	1/11/2008	Yes	Approved	22302	<input type="button" value="View"/>	<input type="button" value="Print"/>

- The process to approve a disclosure differs depending on whether the disclosure has a potential conflict or not. The **Has Conflicts** column of the **My Approvals** page provides information on whether a disclosure has a potential conflict or not. If the **Has Conflicts** column contains a **No** for the disclosure go to step #5 below for information on how to approve the disclosure from the **My Approvals** page. If the **Has Conflicts** column contains a **Yes** for the disclosure go to step #6 below for information on how to approve the disclosure from the **Management Plan** page.
- A disclosure that does not have any potential conflicts can be approved directly from the **My Approvals** page. Each disclosure without potential conflicts has a **No** in the **Has Conflicts** column and also has a checkbox next to the name of the discloser. Click the checkbox next to the discloser name and click the **Approve Selected Disclosure** button at the bottom of the page.

**My Approvals**

You can filter your list by status by clicking a radio button on the **Filter By Status** line. To remove the filter, click the radio button "All".

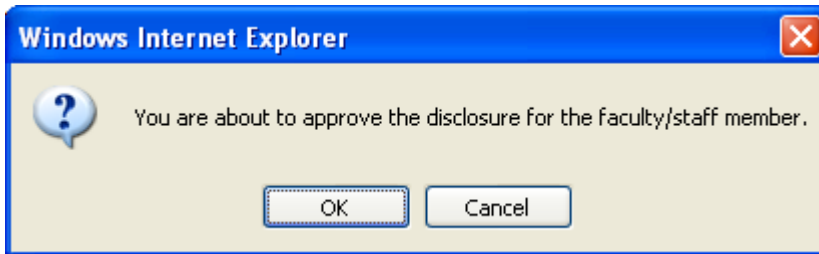
**Filter by Status:**  All  Submitted or Returned  Submitted  Returned  Approved  Mgt Plans Awaiting Confirmation

**Filter by Submitted Date:** From  To

(Enter dates in mm/dd/yyyy format)

Name	Job Title	Home Department	Date Submitted	Has Conflicts	Status	COID #	Mgt Plan	Print
<input checked="" type="checkbox"/> <a href="#">Cooper, Alison R.</a>	Mgr, Program	General Counsel	1/11/2013	No	Submitted	190474		<input type="button" value="Print"/>
<input type="checkbox"/> <a href="#">Prewitt, Terry W.</a>	Legal Asst	General Counsel	1/11/2013	Yes	Submitted	190475		<input type="button" value="Print"/>

- When prompted click **OK** to approve the disclosure. Alternately, click **Cancel** to stop the process.



- The **My Approvals** page is displayed. Click on the **All** filter to confirm that the selected disclosure's status was changed to **Approved**. A message indicating that the disclosure has been approved will be displayed. At this point, the disclosure is approved and the process is completed.
- **NOTE:** You can approve multiple submitted disclosures without potential conflicts at once by clicking the checkbox next to each name and clicking the **Approve Selected Disclosure** button. You can also automatically select all submitted disclosures without potential conflicts on the page by clicking the checkbox next to the **Name** column heading on the page.



6. If a disclosure has potential conflicts, the approver must review the disclosure details, fill out the management plan page for the potential conflict(s), and approve the disclosure from the **Management Plan** page. The disclosure cannot be approved from the **My Approvals** page. Click on the name of the faculty/staff member to open the disclosure.



- On the main disclosure page, review the questions with a **Yes** answer.
- The **Comments** section can be used to provide information about the potential conflict that is not covered in one of the questions. Review any comments that have been added by the discloser. The approver can also add comments by clicking the **Add** button in the **Comment** section. The ability to edit or delete a comment you have added is also provided.
- The **Attachments** section can be used to provide files (Word documents, Excel spreadsheets, etc) of additional information about the potential conflict to your approver or to COI administration. Some example attachments are: the management plan that is already in place, documents explaining what the outside business does, any relevant contracts or business agreements, documents authorizing engagement in activity, etc. Review any attachments that have been added by the discloser. The approver can also add attachments by clicking the **Add** button in the **Attachments** section. The ability to delete an attachment you have added is also provided.
- Click the **Continue** button at the bottom of the main disclosure page to open the **Disclosure Details Summary**. Alternately, click the **Click Here to View Details** button under a question with a **Yes** answer to access the summary page.
- On the **Disclosure Details Summary** page, click the **Open** button next to the disclosure details record and review the details provided by the discloser about the potential conflict. Click the **Back to Details Summary** page button at the bottom of the **Disclosure Details** to return to the **Disclosure Details Summary** page. Complete these steps for each disclosure detail record that was provided.
- After all detail information provided by the discloser has been reviewed, click the **Continue to Management Plan** button at the bottom of the **Disclosure Details Summary** page.

Disclosure Details Summary	
Name:	Nanette J. Gould
Employee ID:	1234567
Job Title:	Consultant, Fin Svc Training
Home Department:	Department of Finance
Approver:	Christy R. Hooper
Disclosure Status:	Submitted
COID#:	22218

Click the "Open" button beside any potential conflict to view the details reported

**B. Family Members Working Together at Vanderbilt**

Open/Print

Back to Disclosure      Continue to Management Plan

- On the **Management Plan** page, complete the **Follow Up Process** field and select whether a management action plan is needed in the **Management Action Plan Needed** field.

**Management Plan**

Name: Nanette J. Oquid Job Title: Consultant, Fin Bk Training  
 Employee ID: 1234567 Home Department: Department of Finance  
 Approver: Christy R. Hooper  
 Disclosure Status: Submitted COID#: 22218

**TYPE OF POTENTIAL OR ACTUAL CONFLICT:**  
 0. Family Members Working Together at Vanderbilt

As the Approver of this Conflicts Disclosure, you are responsible for enforcing the Conflicts Policy. If you are aware of any additional information that is incorrect or incomplete, return the Disclosure back to the individual submitting the Disclosure to you for approval by clicking the "Return Disclosure" button below. You must also communicate with the individual as to why their Conflicts Disclosure is being returned.

The Office of the General Counsel will review all breaches of this Policy, including failure to comply with the process (by refusing to respond, by responding with incomplete or knowingly inaccurate or misleading information), failure to remedy conflicts, and failure to comply with a prescribed monitoring plan. Penalties for deliberate breach of this Policy will be adjudicated in accordance with applicable disciplinary policies and procedures of the University in the Faculty Manual and the Human Resources Services Staff Guidelines.

**FOLLOW UP PROCESS**  
 What was your follow-up process and what additional information was obtained in determining whether a Management Action Plan is needed?

**MANAGEMENT ACTION PLAN**  
 Management Action Plan Needed?  Yes  No

What actions should be taken to manage this potential conflict?

Select Action: Plan for Employee who Participates in Consulting, Speaker's Bureaus, etc.  
 Select Action: Plan for Employee or Family Member Who Owns Business  
 Select Action: Plan for Employee Who Develops Technology Outside Normal Job Duties  
 Select Action: Plan for Employee Who Developed Product Prior to Working at Vanderbilt and Wants to Market it  
 Select Action: Plan for Employee Who Has a Family Member Who Does Business with Vanderbilt (When Employee Has Purchasing or Contracting Power)  
 Select Action: Plan for Employee Who Has a Second Job Outside of Vanderbilt

- If **Yes** is answered on the **Management Plan Needed** question, select the management plans and actions to be followed under **"What actions should be taken to manage this potential conflict?"** Click the checkbox next to the plan you want to select. You will be presented with the **Select Actions** popup where you can select the actions that will be followed to manage the conflict. Select all applicable actions and click **Done** on the **Select Actions** popup. Select additional plans and actions if needed. Note that you can change the actions that were selected by clicking the **Select Actions** button next to the selected plan. You can deselect a plan by un-checking the checkbox next to the plan.

**Management Plan**

Name: Nanette J. Oquid Job Title: Consultant, Fin Bk Training  
 Employee ID: 1234567 Home Department: Department of Finance  
 Approver: Christy R. Hooper  
 Disclosure Status: Submitted COID#: 22218

**TYPE OF POTENTIAL OR ACTUAL CONFLICT:**  
 0. Family Members Working Together at Vanderbilt

As the Approver of this Conflicts Disclosure, you are responsible for enforcing the Conflicts Policy. If you are aware of any additional information that is incorrect or incomplete, return the Disclosure back to the individual submitting the Disclosure to you for approval by clicking the "Return Disclosure" button below. You must also communicate with the individual as to why their Conflicts Disclosure is being returned.

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**FOLLOW UP PROCESS**  
 What was your follow-up process and what additional information was obtained in determining whether a Management Action Plan is needed?  
 This is the process.

**MANAGEMENT ACTION PLAN**  
 Management Action Plan Needed?  Yes  No

What actions should be taken to manage this potential conflict?

Select Action: Plan for Employee who Participates in Consulting, Speaker's Bureaus, etc.

**Select Actions**  
 Plan for Employee who Participates in Consulting, Speaker's Bureaus, etc.  
 Employee's supervisor must approve vacation time in advance for his/her consulting activities.  
 Employee should not be permitted to serve on the Value Analysis Committee (VAC) for that particular company's products or services.  
 Employee must refrain from using Vanderbilt resources in connection with his/her consulting activities.  
 Employee's speeches must include a clear disclosure that he/she is a paid consultant for that company. Standard disclosure slides can be provided by the Office of Conflict of Interest and Commitment Management.

- If none of the standard plans apply or if you believe the conflict may not be manageable, then enter the management plan information in the **Other** field at the bottom of the management plan page. You can also use this field to include additional information about the plan.

- After all information is completed on the **Management Plan** page, click the **Continue** button at the bottom of the page to continue to the **Approve Disclosure** page.

**MANAGEMENT ACTION PLAN**

Management Action Plan Needed?  Yes  No

What actions should be taken to manage this potential conflict?

Plan for Employee who Participates in Consulting, Speaker's Bureaus, etc.

- Employee's supervisor must approve vacation time in advance for his/her consulting activities.

Plan for Employee or Family Member Who Owns Business

Plan for Employee Who Develops Technology Outside Normal Job Duties

Plan for Employee Who Developed Product Prior to Working at Vanderbilt and Wants to Market It

Plan for Employee Who Has a Family Member Who Does Business with Vanderbilt (When Employee Has Purchasing or Contracting Power)

Plan for Employee Who Has a Second Job Outside of Vanderbilt

Other:

Approved: Christy R. Hooper Approved Date: (Not approved)

Job Title: Asst Vice Chancellor Home Department: General Counsel

**COI REVIEW COMMITTEE ACTION:**

Management Plan Endorsed - Management Plan Returned for Revisions

Notes:

By: \_\_\_\_\_ Date: \_\_\_\_\_

- All management plan information must be completed before the disclosure can be approved. Any missing information will be listed on the **Approve Disclosure** page, along with a **Go to Page** button that can be clicked to go directly to the **Management Plan** page where the required information is missing. The information that is missing on the page will have an exclamation mark (⚠) next to it. Complete any missing information and navigate back to the **Approve Disclosure** page.

**Approve Disclosure**

Name: Nanelle J. Gould Job Title: Consultant, Fin Dev Training

Employee ID: 1234567 Home Department: Department of Finance

Approver: Christy R. Hooper

Disclosure Status: Submitted COI ID: 22218

If you can approve the Conflict of Interest Disclosure, you must correct the errors or missing information outlined below.

You must complete the question "What was your follow up process and what additional information was obtained in determining whether a Management Action Plan is needed?"

- When all information is completed, click the **Approve** button on the **Approve Disclosure** page to approve the disclosure and complete the process. When the disclosure is approved, the approver no longer has the ability to edit the disclosure. An email is sent to the discloser notifying him/her that the disclosure has been approved.

**Approve Disclosure**

Name: Nanelle J. Gould Job Title: Consultant, Fin Dev Training

Employee ID: 1234567 Home Department: Department of Finance

Approver: Christy R. Hooper

Disclosure Status: Submitted COI ID: 22218

When you click Approve, the Disclosure, Details and Management Plan cannot be changed, and will be reviewed by a conflicts committee. You may be contacted if required. The committee will notify you of the final status.