
Conflict of Interest (COI) Risk ManagerTool Manager/Reviewer1 Guide

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The purpose of this guide is to provide step-by-step instructions for the **Supervisor/Reviewer Role** in the COI Risk Manager Tool.

Note: Supervisors are first level reviewers. After your review, the disclosure form will go to the Office of Compliance and/or Research Compliance & Assurance for the 2nd review. Here is the Conflicts of Interest Review Process:

- Employee completes and submits their online COI disclosure form
- If any questions are answered YES the form will route to the employee’s Supervisor
- Supervisor reviews the form, proposes any necessary follow-up, then submits to 2nd reviewer
- 2nd reviewer either concurs, adds note, or completes necessary Mgt Plan revisions
- 2nd reviewer includes the Supervisor’s Supervisor (i.e., Dean) to discuss any confirmed COI’s

How to Review a Submitted Disclosure Form

Supervisor receives system-generated email from COI Risk Manager Tool when a COI form with a Yes answer has been submitted, awaiting their review.

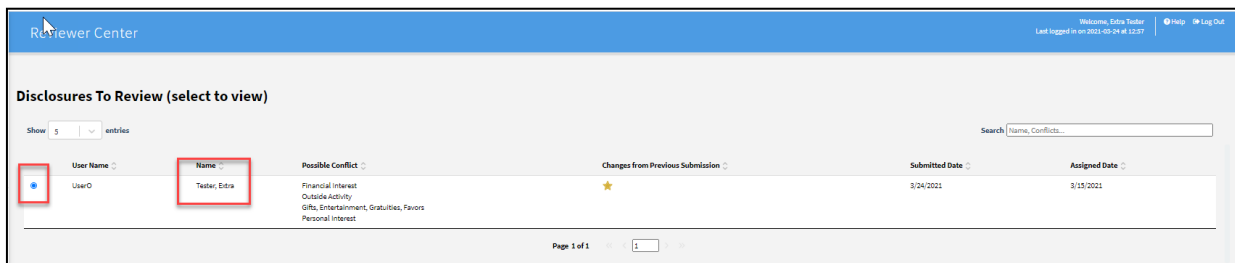
Step 1:

Click the link within the email to access COI Risk Manager. You can also also log into COI Risk Manager Tool by bookmarking the following link:

<https://usa.ospreycompliancesuite.com/coiriskmanager/>

Step 2:

From the Reviewer Center, click on the radio button to the left of Direct Report’s name.



Step 3:

In the first section, scroll down to view your Direct Report’s disclosure form by using the inner

scroll bar. Here you will see only their “Yes” responses to the COI form, including details they provided related to that particular conflict of interest category.

Extra Tester's disclosure
Please review the disclosure and complete steps below. Affirmative responses will appear with a flag in yellow.

Choose disclosure to view: 3/24/2021 CURRENTLY

Financial Interests

Yes
Type of interest: Financial Interest

Key Terms:
● Direct Financial Interest
● Indirect Financial Interest
● Financial Interest Example

Example:

Name of company	% Ownership	Description of Direct or Non-Direct Compensation or Benefit	Value	Relative with interest in business dealing BMS is interested in	Relative's % Ownership or other details?
AZ	11%	shares	\$M	N/A	N/A

Step 4:

Scroll down to the “Action Steps” section. There will be an action item corresponding to each “Yes” response above in the Disclosure Form Section. For example: if Direct Report selected “Yes” to three COI categories, then Manager will have three action steps (Actions 1, 2, 3).

Click on action icons or arrow button to move onto the next step.

Action Steps:

1 2 3 4

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

Financial Interests
Conflict: Financial Interest
Plan required?
 Yes No

Enter the management plan below:

>

Step 5:

For each of the numbered disclosures (Action Steps), you will need to determine if a Management Plan is needed by selecting “Yes” or “No” to the “Plan required?” question.

5.a. If you select “Yes” to “Plan Required”, you should select the Management Plan Template from the dropdown menu which best corresponds to the potential COI. You will have the following 6 choices:

- Action Steps in lieu of a formal Management Plan
- External Entity Related to University Duties
- External Entity Related to Research
- Familial Relationship in Sponsored Research
- Management Plan for Human Subjects Research
- Generic (non-Research)

After you make your selection, please review the associated guidance that appears in the text box.

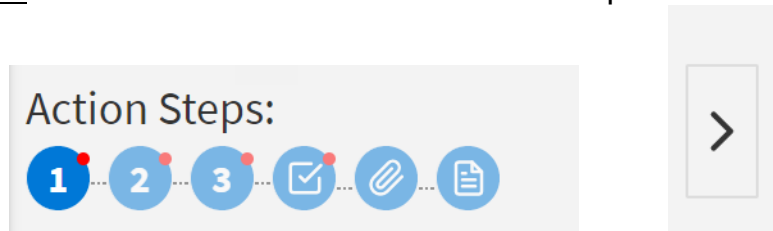
5.b. If you select “No”, the following statement will auto-fill in the textbox to explain your decision:

“No action necessary because the disclosed activities and/or relationships are compliant with University policy and the Alabama Ethics Law, and do not rise to the level of a perceived, potential or actual COI.”

You may edit this statement to be more specific, for instance to cite exactly why you don’t believe the activity or relationship is a perceived, potential or actual COI.

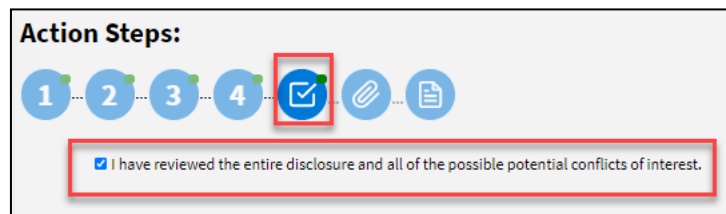
Note: Be sure to repeat the above steps for each additional potential conflict of interest disclosed by your employee (numbered 1, 2, 3, etc.).

Click on action step icons or arrow button to advance to the next step.

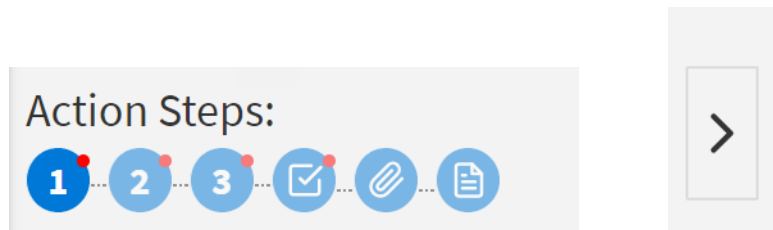


Step 6:

When you have responded to each of the potential conflicts (represented by the Action Step numerals), click the check box to certify that you have reviewed the entire disclosure and all the possible potential conflicts of interest.

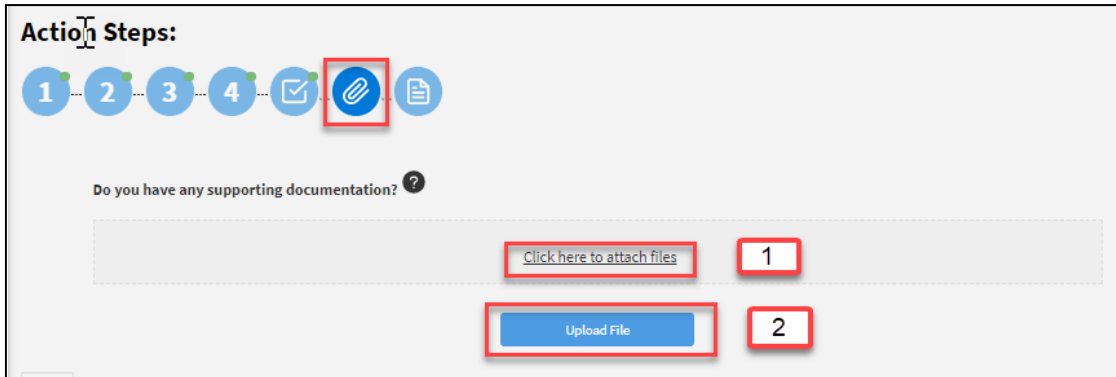


Click on either the action icons, or arrow button, to advance to the next step.



Step 7:

You have the option to add supporting documents by selecting “Click here to attach files”, choose documents, and then click “Upload Files”.



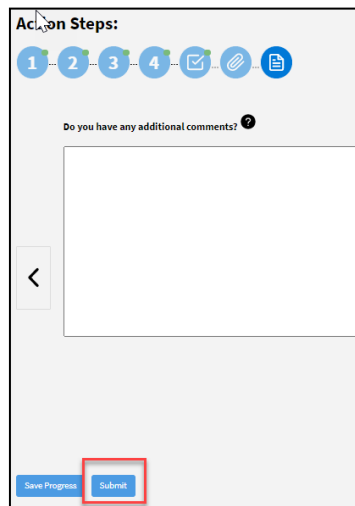
Step 8:

You have the option to add any additional comments before finalizing review.



Step 9:

You can “Save Progress” if you are not ready to submit your final review. Otherwise, click the



“Submit” button. The employee’s disclosure form with your comments, recommendations, and management plan details will then be routed for a 2nd review by the Office of Compliance and/or Office of Research Compliance & Assurance.

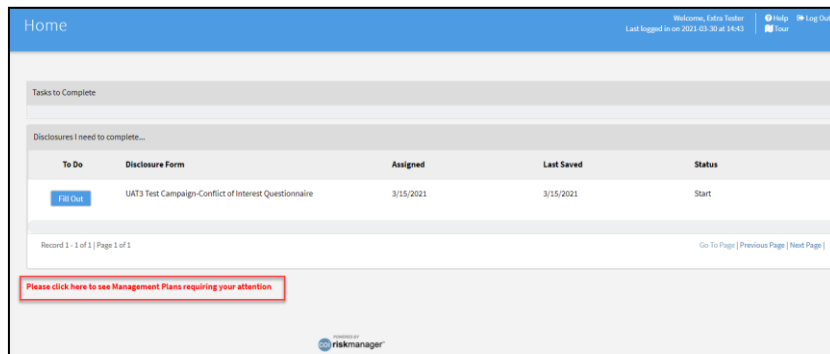
How to Sign a Management Plan

If it is determined a Management Plan is needed, the employee, Supervisor, Compliance, and the manager’s supervisor will sign off on a Management Plan once it is finalized (example: a faculty member’s Mgt Plan will also be signed by their Dept Chair and Dean). Each signatory will be contacted by Compliance for next steps.

How to Sign “Action Steps”

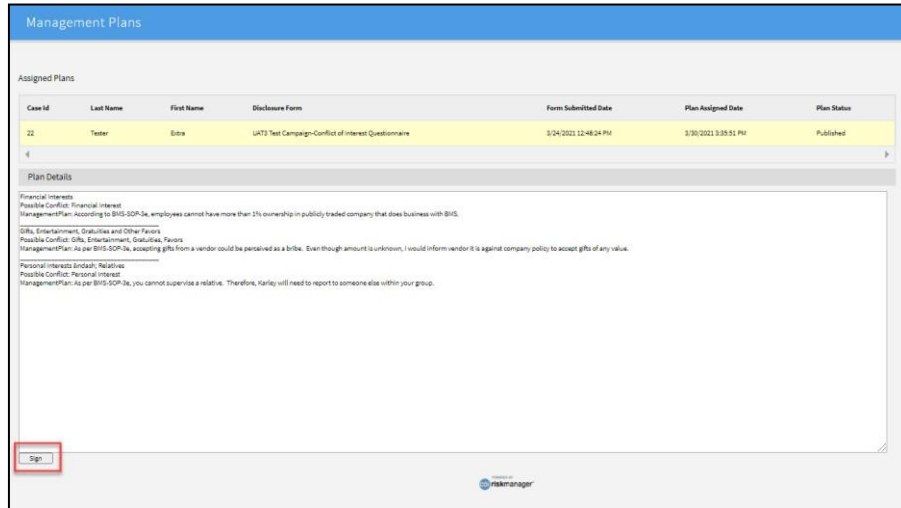
Use this step only if “Action Steps in lieu of a formal Management Plan” was selected and entered in the Reviewer Center text box.

1. If you receive a system-generated notification that a Mgt Plan is awaiting your attention, proceed to your Home Page and click **“Please click here to see Management Plans requiring your attention”**.

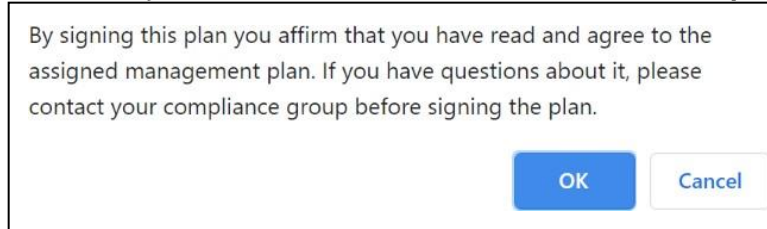


2. Review Management Plan details, which includes Conflict of Interest Category and comments from Reviewers.

3. Click the **“Sign”** button to agree to the Management Plan.



A pop-up box will appear, and you need to click “Ok” in order to complete the process.



4. You will receive a system-generated email confirming completion of management plan sign-off.

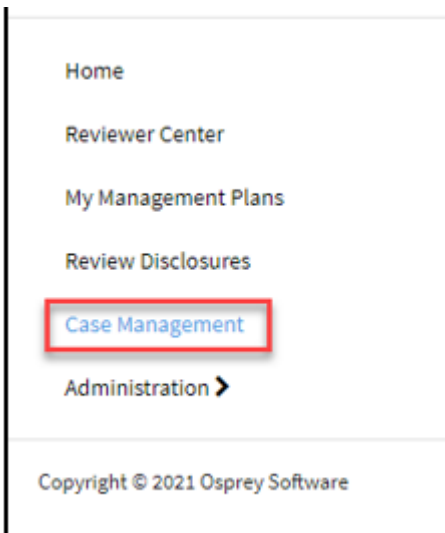
How to View Cases and Management Plans

Step 1:

Log into COI Risk Manager <https://usa.ospreycompliancesuite.com/coiriskmanager/>

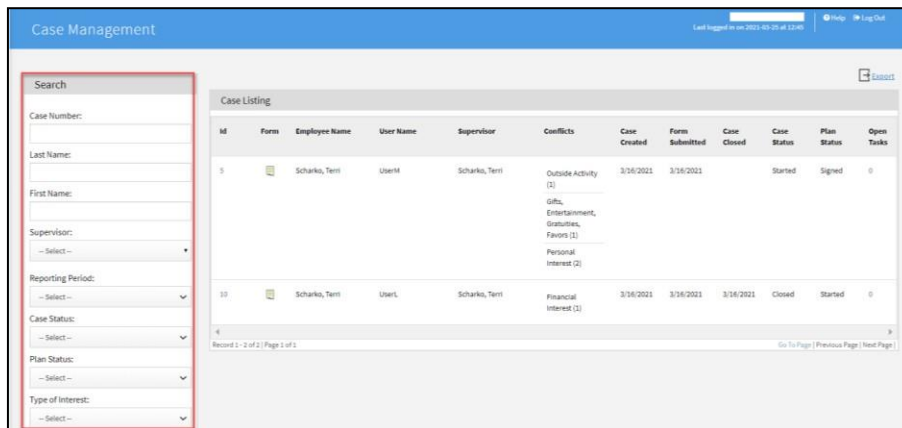
Step 2:

Click “Case Management” menu item.



Step 3:

Using the Search pane, search for cases created for your direct reports and where you were Reviewer 1. You can search by: Case Number, Last Name, First Name, Plan Status, Type of Conflict of Interest, etc.



Step 4

In the Case Listing Search results, click on the **Case ID** you want to open.

Case Listing											
Id	Form	Employee Name	User Name	Supervisor	Conflicts	Case Created	Form Submitted	Case Closed	Case Status	Plan Status	Open Tasks
5			UserM		Outside Activity (1) Gifts, Entertainment, Gratuities, Favors (1) Personal Interest (2)	3/16/2021	3/16/2021		Started	Signed	0
10			UserL		Financial Interest (1)	3/16/2021	3/16/2021	3/16/2021	Closed	Started	0

Record 1 - 2 of 2 | Page 1 of 1

Go To Page | Previous Page | Next Page

Step 5:

The page will refresh to show the details of the selected case.

Case Management
Case Details

Last logged in on 2021-03-25 at 12:05 | Help | Log Out | Your

Notes
 Documents
 Review
 Management Plan
 Signatures

Case Id
 5

Form Name
 UAT3 Test Campaign-Conflict of Interest Que

Form Submitted
 3/16/2021

Case Created
 3/16/2021

Employee Name
 [Redacted]

Username
 UserM

Supervisor
 [Redacted]

Case Status
 Started

Plan Status
 Signed

Management Plan

Flagged Responses No Plan Required

Resolution

Template Name:

Gifts, Entertainment, Gratuities and Other Favors
 Possible Conflict: Gifts, Entertainment, Gratuities, Favors
 ManagementPlan: As per BMS-SOP 3e, acceptance of gifts from BMS vendors is a conflict of interest and could be perceived as a bribe.

Agree with Reviewer 1 comments above, this is a conflict of interest. Employees must inform vendor that they cannot accept gifts over \$25 or anything that could be perceived as influence in relationships.

Personal Interests - Romantic Relationships
 Possible Conflict: Personal Interest
 ManagementPlan: For testing purposes only, disagree with Reviewer 1. This does pose a potential conflict of interest and needs a management plan. Employee needs to agree that their personal relationship will not interfere with Bradley's employment, bonus, etc...

The **Notes** tab will be selected by default but you can toggle through the other tabs: Documents, Review, Management Plan and Signatures.

On the **Documents** tab, you will find a copy of the disclosure PDF provided by the Submitter, for which the case has been created. The **Documents** tab will also allow you to browse and attach additional files (Windows file types supported) that should be attached to the case (including a pdf file version of the signed Management Plan).

The **Review** tab will display a variety of custom fields determined by your system administrator that can be used to track various aspects of the Case and Mitigation process.

The **Management Plan** tab will list specific details of the Management Plan, which includes Conflict of Interest Category and comments from Reviewers.

The **Signatures** tab will list all of the individuals who signed the Management Plan and the date they signed.

How to Get Help

Contact the Office of Research Compliance and Assurance for Research-related Conflicts

Dusty Layton
P: (251) 460-6625
dlayton@southalabama.edu

Contact the Office of Compliance for non Research-related Conflicts

Chris Hansen
P: (251) 460-7115
chansen@southalabama.edu