

Reviewing a Disclosure

University of Central Florida's Conflict of Interest & Commitment System

This Training Session will cover:

❖ Reviewing a Disclosure

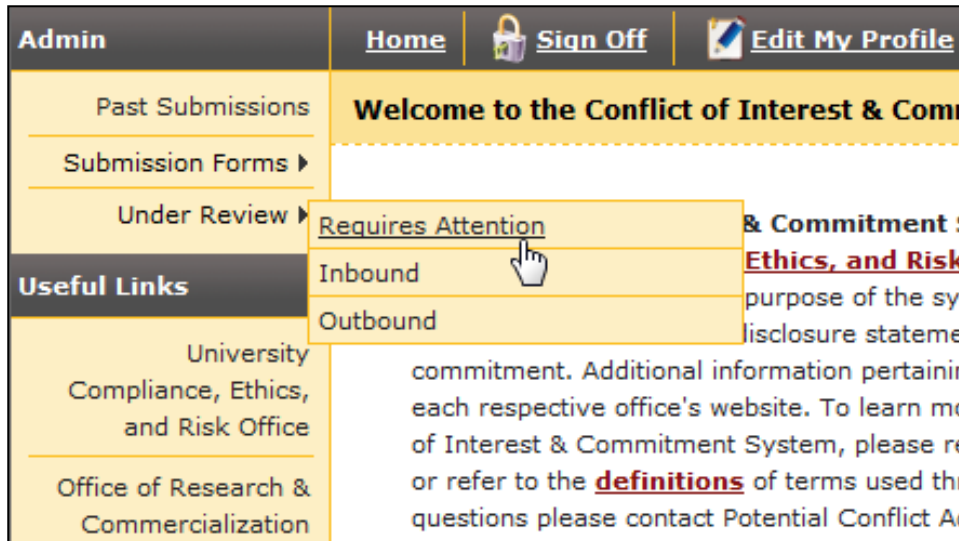
- Locating the disclosure to review
- Reviewing training materials provided
- Workflow, conducting a review, and reviewer options
- Review process rules
- Submission and final review status
- How to ensure disclosures under your unit have been submitted

Training Sessions available separately:

- ❖ **Introduction**
- ❖ **Guidance for Responding/Reviewing Disclosure Questions**
- ❖ **Submitting an Annual Disclosure**
- ❖ **Editing an Annual Disclosure or Amendment**
- ❖ **Submitting an Amendment**
- ❖ **Definitions**

❖ Locating the Disclosure to Review – 2 ways:

1. **When it is time to conduct your review, an email will be sent with a direct link to the review form. Sign On when prompted.**
2. **You may also directly access the COI System and Sign On. The left menu will adjust for you to access the **Under Review/Requires Attention** section.** The Conflict of Interest & Commitment System website is located at <https://argis.research.ucf.edu/coi>



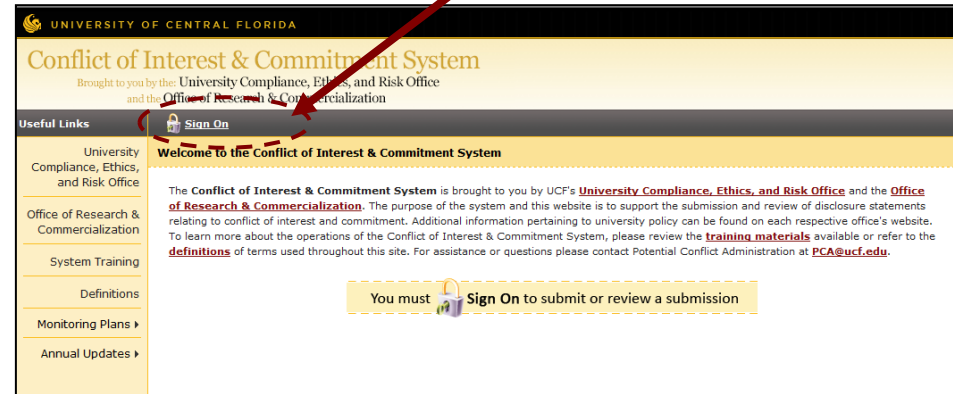
❖ Under Review Menu Options:

- **Requires Attention** – submissions awaiting your review *RIGHT NOW*
- **Inbound** – submissions headed your way for review
- **Outbound** – submissions you reviewed that moved forward to the next reviewer

❖ Sign On

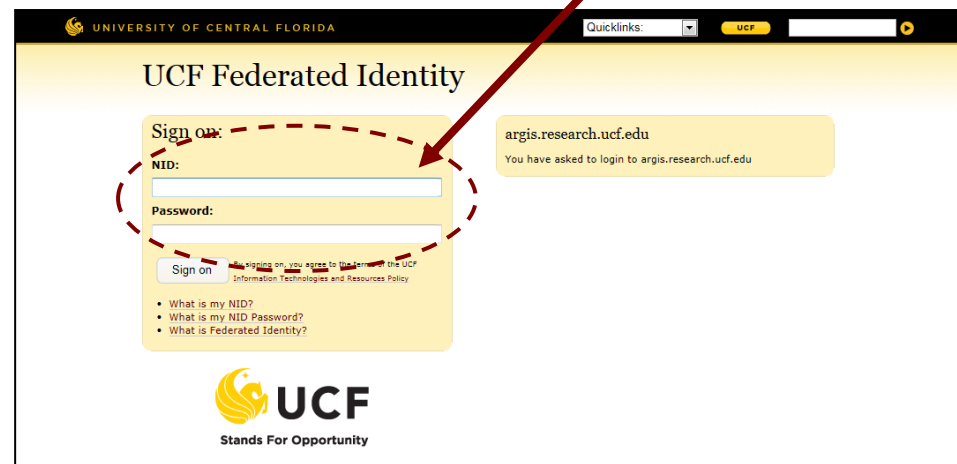
- All employees have an account.
- Use your UCF credentials when prompted to Sign On.

Sign On

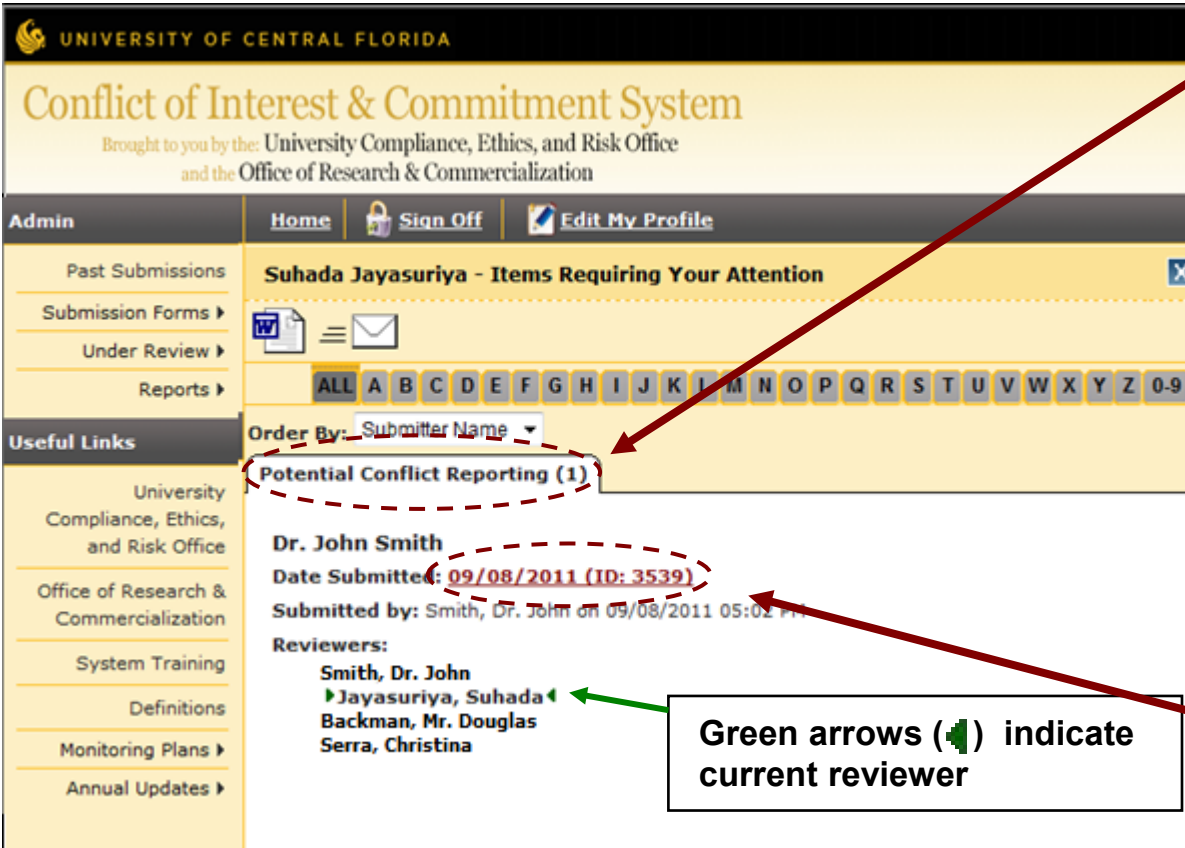


<https://argis.research.ucf.edu/coi>

Enter your UCF Credentials



❖ After making a selection from the “Under Review” menu:



The screenshot shows the University of Central Florida's Conflict of Interest & Commitment System. The main content area displays a submission for **Suhada Jayasuriya - Items Requiring Your Attention**. The submission details include:

- Order By:** Submitter Name
- Potential Conflict Reporting (1)** (highlighted with a red dashed circle)
- Dr. John Smith** (highlighted with a red dashed circle)
- Date Submitted:** 09/08/2011 (ID: 3539)
- Submitted by:** Smith, Dr. John on 09/08/2011 05:02 PM
- Reviewers:**
 - Smith, Dr. John
 - Jayasuriya, Suhada** (highlighted with a green arrow)
 - Backman, Mr. Douglas
 - Serra, Christina

A text box with a green arrow pointing to the reviewer name states: **Green arrows (➡) indicate current reviewer**.

- Select the Potential Conflict Reporting tab

- The reviewers involved will be displayed, along with dates and comments if the form was sent back and forth

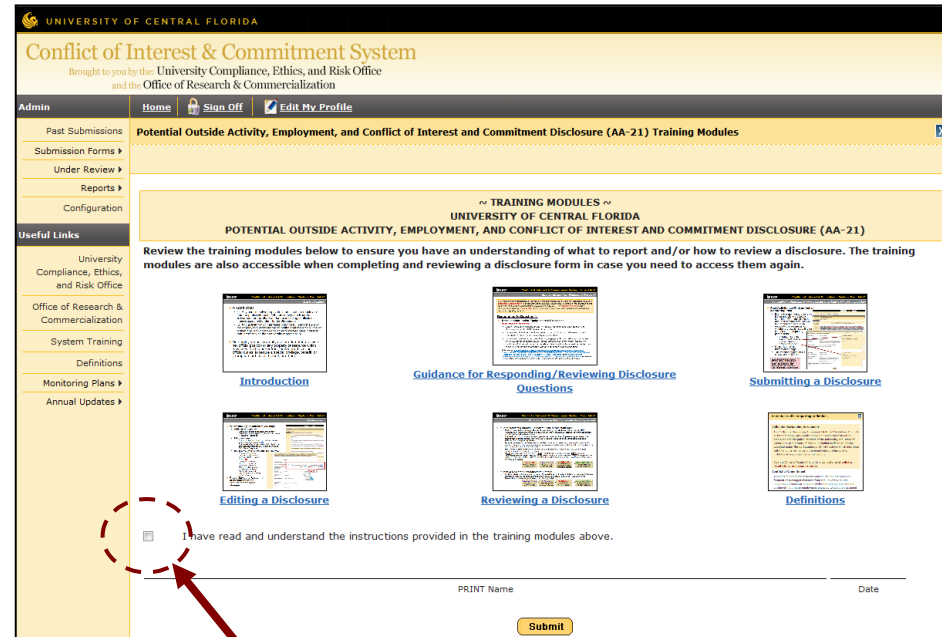
- Select the date of submission to conduct your review

❖ **Prior to accessing the review pages, the following training modules are provided:**

- Introduction
- Guidance for Responding/Reviewing
- Submitting a Disclosure
- Editing an Annual Disclosure or Amendment
- Reviewing a Disclosure
- Submitting an Amendment
- Definitions


❖ **Acknowledge you have read and understand the training materials:**


- Select the thumbnail provided to view a module
- Check the box next to the text at the bottom of the page, then press “Submit”





~ TRAINING MODULES ~
UNIVERSITY OF CENTRAL FLORIDA
POTENTIAL OUTSIDE ACTIVITY, EMPLOYMENT, AND CONFLICT OF INTEREST AND COMMITMENT DISCLOSURE (AA-21)


Review the training modules below to ensure you have an understanding of what to report and/or how to review a disclosure. The training modules are also accessible when completing and reviewing a disclosure form in case you need to access them again.



[Introduction](#)


[Guidance for Responding / Reviewing Disclosure Questions](#)


[Submitting a Disclosure](#)


[Editing a Disclosure](#)


[Reviewing a Disclosure](#)


[Definitions](#)

I have read and understand the instructions provided in the training modules above.

PRINT Name _____ Date _____

Submit

Check the box then Submit

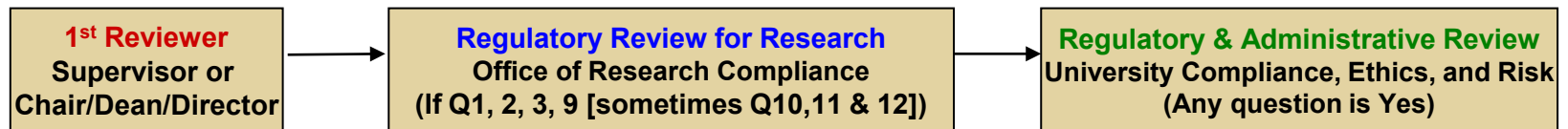
❖ Review Process

- **First reviewer is the supervisor the employee directly reports to as defined within UCF PeopleSoft HR records, unless this value is blank, then the Chair/Director of the home department will be the first reviewer instead.**
 - The first reviewer will be the **ONLY** reviewer on behalf of the college/unit. Supervisors are encouraged to consult with other decision makers within the college or unit prior to entering their final decision in ARGIS.
 - Unit Chairs/Deans have access to view all departmental disclosures.

- **If ALL questions are answered No, after the first reviewer selects “Reviewed, No Conflicts”, the workflow stops.** Status of the submission is set to Reviewed, No Conflicts.

- **If Questions 1, 2, or 3 are answered yes and/or question 9, then the UCF Office of Research Compliance is included for a regulatory review for how the outside activity may affect sponsored research activities. In some cases Questions 10, 11, and 12 will be reviewed by Office of Research Compliance if responses indicate sponsored research activities.**

- **The last review ends with the University Compliance, Ethics, and Risk.**



Conducting a review:

Each response to each question must be reviewed.

❖ Select 1 Review Option:

- No Conflict**
- Conflict Identified, Monitoring Plan Required**
- Unapproved Conflict**

❖ Enter required comment which is viewable to all reviewers and the discloser.

❖ Familiarize yourself with the definitions of what constitutes a conflict of interest and commitment (see next slide)

- Can use Info icon next to each question to locate policies and examples.
- Definitions are also provided for each underlined word in the question.
- Note: Entity name must be provided by discloser (various, unknown, etc. are not acceptable answers)

Select link to view the uploaded file

Choose a review option

Use Info icon next to question to locate policies and examples

Q-9

9. During the current reporting period do you intend to commit university resources (i.e., personnel, materials & supplies, equipment, facilities, use, departmental or project funds) to purchase goods and services from or provide services to any entity in which you or your immediate family are an officer, partner or proprietor of the entity, have a material interest (direct or indirect ownership) of 5% or more of the total assets or capital stock of the business entity, and/or hold any employment or contractual relationship with the entity? You must report proposed subcontract SBIR/STTR sponsored funding activity to the university from any entities owned or managed by you and/or your immediate family members.

Yes

R-1 Responses:

Entity Name: 3M Company

Sponsoring your research: Yes

Intellectual property rights: Yes

Managerial Position?: No

Material Interest?: No

Employment or Contractual Relationship?: No

In accordance with FS 112.313(12)(a) - (j) exemptions, are you exempt?: No

Exemption Form: [Exemption Form](#) (Original Filename: Exemption.doc) Filesize: 144 KB Uploaded: 09/08/2011

Review:

[R] No Conflict

Conflict Identified, Monitoring Plan Required

Unapproved Conflict

[R] Comments:

Review Options for Response 1

Review:

[R] No Conflict

Conflict Identified, Monitoring Plan Required

Unapproved Conflict

[R] Comments:

Review Options for Response 2

❖ A conflict of interest is:

- Any conflict between private interests of the employee and the public interests of the university, the Board of Governors, or the State of Florida, including conflicts of interest specified under Florida Statutes; or
- Any activity which interferes with the full performance of the employee's professional or institutional responsibilities or obligations.

❖ A conflict of commitment is:

- Outside activities that involve frequent or prolonged absences from the university on non-university business; or
- Outside activities that engage a substantial portion of the time an employee is expected to spend on assigned duties or university-related activities.

- ❖ No employee shall corruptly use or attempt to use his or her official position or any property or resource which may be within his or her trust, or perform his or her official duties, to secure a special privilege, benefit, or exemption for himself, herself, or others.


Conducting a Review with a Monitoring Plan

- ❖ **In general, all reviewers have the same options as the first reviewer with exception of the monitoring plan** (and annual update, see slide 11):
 - If a monitoring plan is requested, the form returns to the employee to upload a plan and then the form goes through the review workflow again. The review options change to ask if the monitoring plan is approved:
 - **Yes** (form moves to next reviewer)
 - **No** (form is returned to employee with comments, then review starts over)
 - **Unnecessary** (Plan is retained for historical reference. Reviewer must select No Conflict or Unapproved Conflict as the reason the plan was unnecessary.)

9. During the current reporting period do you intend to commit university resources (i.e., personnel, materials & supplies, equipment, facility use, departmental or project funds) to purchase goods and services from or provide services to any **entity** in which you or your **immediate family** are an officer, partner or proprietor of the **entity**, have a material interest (direct or indirect ownership) of 5% or more of the total assets or capital stock of the business **entity**, and/or hold any employment or contractual relationship with the **entity**? You must report proposed subcontract SBIR/STTR sponsored funding activity to the university from any entities owned or managed by you and/or your **immediate family members**.


Yes

Responses:

Entity Name:	3M Company
Sponsoring your research:	Yes
Intellectual property rights:	Yes
Managerial Position?:	No
Material Interest?:	No
Employment or Contractual Relationship?:	No
In accordance with FS 112.313(12)(a) - (j) exemptions, are you exempt?:	No
Exemption Form:	 Exemption Form (Original Filename: Exemption.doc) Filesize: 144 KB Uploaded: 09/08/2011

Review:

Conflict Identified, Monitoring Plan Required: **Yes**

Review the  Monitoring Plan (Original Filename: MonitoringPlan.doc) Filesize: 124 KB Uploaded: 09/08/2011 10:00:43 AM

[R] Approve Plan?: Yes No Unnecessary

[R] Comments:

Suhada Jayasuriya
09/08/2011 09:51AM: Conflict Identified, Monitoring Plan Required
Comments: Since this company is sponsoring your research, a monitoring plan is required.

Select link to view the uploaded file

Review options change once a monitoring plan is attached.

Monitoring Plans

There are two types of Monitoring Plans

Reviewers must notify the employee to use the appropriate form based on the nature of the conflict

1. Sponsored Programs/Research

The *Monitoring Plan for Potential Conflicts of Interest (MP-1)* form is found on the Office of Research Compliance website

<http://www.coi.ucf.edu/forms.html>

Note: **Request for Exemption** forms are also found on this site

2. Non-Sponsored Programs/Non-Research

The *Conflict of Interest or Commitment Monitoring Plan (non-sponsored programs or research)* form is found on the University Compliance, Ethics, and Risk website.

<http://compliance.ucf.edu/conflict-of-interest/>



Conflict of Interest Monitoring Plan (Sponsored Programs)

This Monitoring Plan addresses actual or potential conflicts of interest arising from an employee's outside activity with the outside entity listed below (the Entity).

Employee Name:	
University Position:	
% Full Time Equivalent (FTE)	
Faculty Appointment Type:	<input type="checkbox"/> N/A <input type="checkbox"/> 9 month <input type="checkbox"/> 12 month <input type="checkbox"/> Tenured
Department and College/Research Unit:	
E-Mail:	
Entity Name:	
Date:	

SECTION 1: Reason for Monitoring *(Select the option that applies)*

- I disclosed a financial interest and/or outside activity that requires an exemption pursuant to Section 112.313(12)(h), Florida Statutes. **The Conflict of Interest Exemption Form is attached.** This Monitoring Plan is effective the same period approved for the corresponding Exemption.
Skip to Section 4
- I disclosed a financial interest and/or outside activity that does not require an exemption from Florida Statutes, but will only be permitted with an approved Monitoring Plan. This Monitoring Plan is effective upon execution of all parties and will remain in effect until circumstances are documented that dictate otherwise.
Continue to Section 2














Conflict of Interest or Commitment Monitoring Plan (Non-sponsored programs or research)

Is this a new monitoring plan or an update to an existing plan?

Full Name:		EmpID:	
College/Area:		Department/Unit:	
Campus Address:			
Campus Phone:		Campus E-mail:	

Current Position: 9 month 12 month

Review Options (located at bottom of review form)

REVIEW OPTIONS	DESCRIPTION	PROCESS
<div style="text-align: center; margin-bottom: 10px;">  </div> <div style="text-align: center;">  </div>	<p>If all questions have been responded to with a "No" and your review is complete, choose the button labeled “Reviewed, No Conflicts”. Review process then moves to the next reviewer.</p> <p>For any question responded to with a "Yes", you must review each response provided and select the appropriate review option displayed with a comment that reflects the reason for the review decision. When your review is complete, choose the button labeled “Submit” at the bottom of the form.</p>	<div style="text-align: center; margin-bottom: 10px;">  </div> <p style="text-align: center;">Depends on review option selected...</p>
<div style="text-align: center;">  </div>	<p>If a disclosure requires edits, either at request of the employee or if the form has not been adequately completed, choose the button labeled “Return to Employee, Additional Info Needed”. When prompted, provide your comments. An email will be sent to the employee and the submission returned to allow edits.</p>	<div style="text-align: center;">  </div>
<div style="text-align: center;">  </div>	<p>To meet with the employee, choose the button labeled “Request Employee Conference”. When prompted, provide your comments and enter any other emails to be CC'd. Request will be logged in the disclosure's review history and an email will be sent on your behalf. Disclosure will remain in your review box.</p>	<div style="text-align: center;">  </div>
<div style="text-align: center;">  </div>	<p>To meet with other reviewers, choose the button labeled “Request Reviewer Conference”. When prompted, provide your comments and select from the drop down provided the specific reviewer or all reviewers and enter any other emails to be CC'd. Request will be logged in the disclosure's review history and an email will be sent on your behalf. Disclosure will remain in your review box.</p>	<div style="text-align: center;">  </div>
<div style="text-align: center;">  </div>	<p>If you cannot complete the review and need to withdraw yourself, choose the button labeled “Recuse Myself as a Reviewer”. An Administrator will be notified of your request and they will then move the disclosure from your review box.</p>	<div style="text-align: center;">  </div>

Conducting a Review with an Annual Update

- ❖ **Employee activities** submitted in a previous year, with a monitoring plan provision must be updated annually to indicate if the activity is continuing into the current reporting period or not.
- ❖ The review options change to ask if the annual update is approved or to acknowledge the activity has ended.
- ❖ **If an activity continues**, an annual update is required. Reviewers must assess the file uploaded by the employee and approve the update or not.
 - **Yes** (form moves to next reviewer)
 - **No** (form returned to employee, review starts over)

- ❖ **If an activity ended**, the date ended will be presented along with comments by the employee.
 - No Conflict - activity has ended, no further monitoring is necessary.
 - Conflict Identified, Annual Update and/or Revision Required - activity does not appear to be completely ended, an annual update is still needed.

Select links to view the uploaded files. Previously submitted monitoring plans are also available for review.

R-1

Responses:

Entity Name: American University

Course/Activity Name: Computer Communication Networks

Instructional Method: Face-to-face

Instructional Method: Web-based

Description: Network models. Media access protocols. Data link control. Routing and flow control. Internetworking. Current architectures and protocols: OSI, ethernet, token, ring, FDDI, HSLC, X.25, etc.

Time Commitment: 3 Hours Per Week from 08/08/2011 - 08/07/2012

Indicate the total amount of time committed to this activity: 1 1/2 hour lecture, twice per week.

Review:

Review the **Annual Update** (Original Filename: coi_annual_update.pdf) Filesize: 5 KB Uploaded: 10/11/2011 09:25:14 AM

[R] Approved: Yes No

[R] Comments:

On File: **Monitoring Plan** (Original Filename: coi_monitoring_plan.pdf) Filesize: 140 KB Uploaded: 12/21/2010 02:38:09 AM

R-2

Entity Name: American University

Course/Activity Name: Computer Architecture

Instructional Method: Face-to-face

Instructional Method: Web-based

Description: Computer systems performance and evaluation, processor datapath and control, microprogrammed architectures, instruction and arithmetic pipelines, cache and virtual memory, and RISCvs. CISC.

Time Commitment: 3 Hours Per Week from 08/08/2011 - 08/07/2012

Indicate the total amount of time committed to this activity: 1 1/2 hour lecture, twice per week.

Review:

Date Activity Ended: 07/31/2011

[R] No Conflict
 Conflict Identified, Annual Update and/or Revision Required





[R] Comments:

On File: **Monitoring Plan** (Original Filename: coi_monitoring_plan.pdf) Filesize: 140 KB Uploaded: 12/21/2010 02:38:10 AM

Dr. John Smith
 10/11/2011 09:25AM: I will not engage in this activity or activity has ended
 Comments: This teaching engagement ended over the summer. Date Activity Ended: 07/31/2011

Review options change when a review of a previously monitored activity is conducted.

Review Options (located at bottom of review form)

REVIEW OPTIONS	DESCRIPTION	PROCESS
	<p>For questions responded to with a "Yes", you must review each response to each question by selecting the appropriate review option displayed with a comment that reflects the reason for the review decision. (defined below). When you have completed the review, choose the button labeled "Submit" at the bottom of the form.</p>	<p>See below</p>
<p>Review option 1: <u>"No Conflict"</u> If there is no conflict with the response provided to a question, choose this option. Review process continues to the next reviewer.</p>		
<p>Review option 2: <u>"Conflict Identified, Monitoring Plan Required"</u> If there is a conflict with the response provided to a question that can be mitigated through a monitoring plan defining the boundaries of the activity, choose this option. The form is returned to the employee for a monitoring plan to be completed and uploaded. The submission is then returned to you for approval of the monitoring plan.</p> <ul style="list-style-type: none"> • Upon upload of a monitoring plan, the workflow starts over allowing all reviewers to review. • The review options then change to focus on approval of the monitoring plan. Approve Plan options are: Yes, No, Unnecessary. • If a monitoring plan is not approved (regardless who does not approve), the submission is returned to the employee for a new plan to be uploaded. • If a monitoring plan is later identified as not being necessary, the choice of No Conflict or Unapproved Conflict appear. This now causes discrepancy with the previous reviewer and the form is returned to the previous reviewer for review. The monitoring plan is still retained for historical record. 		
<p>Review option 3: <u>"Unapproved Conflict"</u> If there is a conflict with the response provided to a question that cannot be mitigated, choose "Unapproved Conflict". The review process will continue to the next reviewer. At the conclusion of all reviews the employee is sent a letter to sign stating (s)he has terminated the activity.</p>		

- ❖ **Reviewer has the option to return form to the employee and request additional information. Comments are required.**
 - Use the “**red**” button at the bottom of the form to allow the employee to modify the answers they provided or to add new responses
 - Returning the form in this fashion **DOES NOT** permit edits to a monitoring plan OR to an annual update. You must conduct your review and use the reviewer option to disapprove the monitoring plan or annual update, then select the **blue** “Submit” button to allow the review process to return these documents back to the employee.
 - This helps ensure files are not swapped out without your knowledge and keeps the reviewer notes consistent with actions taken

- ❖ **If ALL questions are answered ‘No’**
 - Reviewer can choose “**Reviewed, No Conflicts**” OR “**Return to Employee, Additional Info Needed**”. The latter would likely be used when the reviewer is aware of items not included in the submission.

- ❖ **If ALL questions are answered No, AND 1st reviewer selects “Reviewed, No Conflicts”**
 - Workflow **stops** and the status of the form is set to “Reviewed, No Conflicts”
 - No further reviews will be conducted

- ❖ **If one or more questions are answered “Yes”**
 - Reviewer must respond to each question and each response

- ❖ **The FINAL Administrative Reviewer's selection for EACH Question/Response determines the overall submission status and status for each response.** For all questions answered yes, this decision falls to University Compliance, Ethics, and Risk.

- ❖ **Individual Question/Response Statuses**
 - Reviewed, No Conflict
 - Reviewed, With Monitoring Plan
 - In the subsequent reporting period, a prompt for an annual update will be presented for activities with a monitoring plan provision. Based on response, status of the previous reporting period's submission will be updated to indicate if the activity should continue to be monitored or not:
 - If activity continues: while the current year's submission is under review, the previous year's submission will temporarily reflect *Reviewed, with Monitoring Plan – Annual Update Under Review*. When review is complete, previous year's response status is set to **Reviewed with Monitoring Plan – Annual Update On File**. New reporting period's response status is **Reviewed, with Annual Update**
 - If activity ended: while current year's submission is under review, the previous year's submission will temporarily reflect *Reviewed with Monitoring Plan – Activity Indicated as Ended is Under Review*. When the review is complete, the previous year's response status is set to **Reviewed, Monitoring Plan No Longer Necessary**. New reporting period's response status is **Reviewed, Annual Update No Longer Necessary**
 - Reviewed, Unapproved Conflict, Requires Resolution
 - Upon upload of memo of conflict ending, changes to **Reviewed, Conflict Removed**

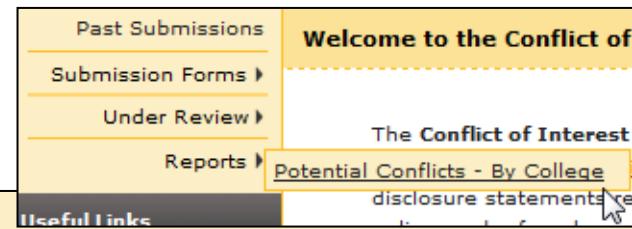
- ❖ **The overall submission of the form receives a status. The overall submission status values are:**
 - Under Review
 - Reviewed, No Conflicts (All questions were either answered no, or for each response submitted, No Conflict was selected)
 - Reviewed, With Conditions (At least one response to one question had a conflict)

How the review options equate to final response status

Reviewer Options	Status for <u>EACH</u> response to <u>EACH</u> Question
No Conflict	Reviewed, No Conflict
<p>Conflict Identified, Monitoring Plan Required</p> <ul style="list-style-type: none"> ▪ Once a Monitoring Plan is associated to a response, reviewer options change to ask if the plan is approved: <ul style="list-style-type: none"> • Yes (form moves to next reviewer) • No (form returned to submitter, process starts over) • Unnecessary (plan is removed, reviewer must then select either No Conflict or Unapproved Conflict) 	<p>Reviewed, With Monitoring Plan</p> <ul style="list-style-type: none"> ▪ On 2nd year review, if activity <u>continues</u>, an annual update is required. While annual update is under review, previous year's response status temporarily changes to <i>Reviewed, with Monitoring Plan – Annual Update Under Review</i>. When review ends, status is set to: Reviewed, With Monitoring Plan - Annual Update On File* <ul style="list-style-type: none"> ➤ Current year's submission is set to Reviewed, with Annual Update ▪ On 2nd year review, if activity <u>ends</u>, date ended is required. While under review, previous year's response status temporarily changes to <i>Reviewed with Monitoring Plan – Activity Indicated as Ended is Under Review</i>. When review ends, status is set to Reviewed, Monitoring Plan No Longer Necessary* <ul style="list-style-type: none"> ➤ Current year's submission is set to Reviewed, Annual Update No Longer Necessary <p>*This process helps identify activities that continue to require monitoring and those activities that ended where monitoring is no longer needed.</p>
Unapproved Conflict	<p>Reviewed, Unapproved Conflict Requires Resolution</p> <ul style="list-style-type: none"> ▪ Faculty notified via email to cease activity. Meeting is requested and memo is attached with the reviewer comments. ▪ Upon upload of signed memo, status changes to Reviewed, Conflict Removed

How to ensure disclosures under your unit have been submitted

- ❖ **Emails will be sent directly to everyone owing a report. Please ensure everyone is aware of the dates of submission each reporting period.**
- ❖ **Review the report available to COI Coordinators, Chairs, Deans, Directors, VPs, and other Administrative staff to help ensure all disclosures are submitted in a timely manner**
 - Go to COI System (<https://argis.research.ucf.edu/coi>), Sign On, then select Compliance/ Potential Conflicts – By College in the left menu
 - Select your unit from the list.
 - Each person owing a disclosure will be listed with their submission status.
 - Selecting the Under Review status link will display where the form is in the review process.



Smith, Dr. John

Date Submitted: [09/08/2011](#) (ID:3539)

Reviewers:

- Smith, Dr. John
 - Monitoring Plan and/or Annual Update Provided by Employee - 09/09/2011 08:46 AM
- Jayasuriya, Suhada
 - Review Conducted - Returned to Employee, Monitoring Plan and/or Annual Update Requested - 09/09/2011 08:45 AM
 - Review Conducted - 09/09/2011 08:50 AM
- ▶ Chow, Dr. Louis ◀** ← Green arrows indicate current reviewer
- Backman, Mr. Douglas
- Cooney, Lucretia

Under Review

- ❖ Information on COI policies, regulations, and requirements are available on the following websites:
 - University Compliance, Ethics, and Risk
<http://compliance.ucf.edu/conflict-of-interest>
 - Office of Research- Research Integrity Compliance
<http://www.coi.ucf.edu>
- ❖ For assistance or questions contact the Potential Conflicts Administration email, PCA@ucf.edu