**VANDERBILT**
Office *of* the General Counsel
Conflicts of Interest and Commitment Management

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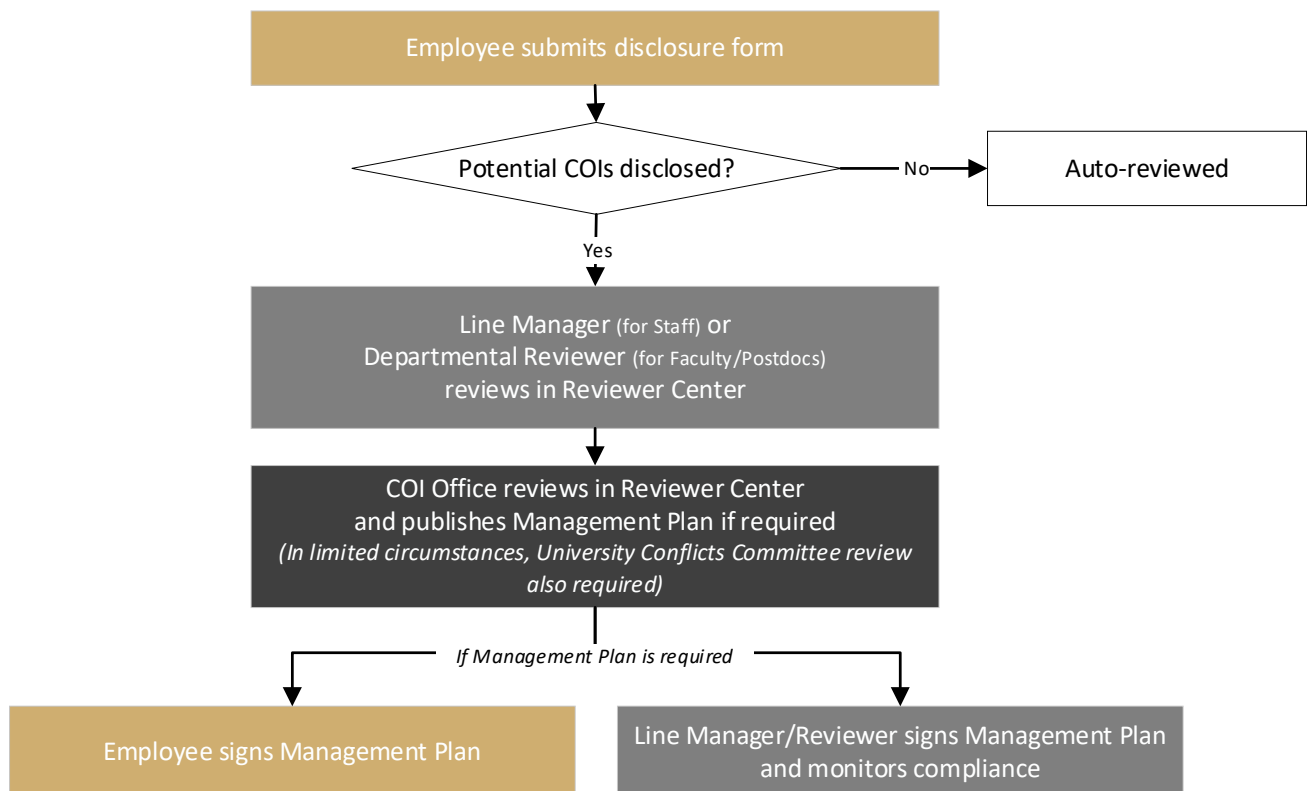
After departmental review, the COI Office will perform a second-level review and make the final determination as to whether a Management Plan is required.

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

For questions, email coi@vanderbilt.edu

For additional resources, visit the COI website.

**Process Overview**

```
┌─────────────────────────────────────────────┐
│      Employee submits disclosure form        │
└─────────────────────────────────────────────┘
                      │
                      ▼
             ◇ Potential COIs disclosed? ◇ ──No──▶ ┌──────────────┐
                      │                             │ Auto-reviewed │
                     Yes                            └──────────────┘
                      │
                      ▼
┌─────────────────────────────────────────────┐
│      Line Manager (for Staff) or             │
│   Departmental Reviewer (for Faculty/Postdocs)│
│         reviews in Reviewer Center           │
└─────────────────────────────────────────────┘
                      │
                      ▼
┌─────────────────────────────────────────────┐
│   COI Office reviews in Reviewer Center      │
│ and publishes Management Plan if required    │
│ (In limited circumstances, University        │
│  Conflicts Committee review also required)   │
└─────────────────────────────────────────────┘
                      │
          If Management Plan is required
            ┌─────────┴─────────┐
            ▼                   ▼
┌──────────────────────┐  ┌──────────────────────────────┐
│ Employee signs       │  │ Line Manager/Reviewer signs  │
│ Management Plan       │  │ Management Plan and monitors │
│                      │  │ compliance                   │
└──────────────────────┘  └──────────────────────────────┘
```
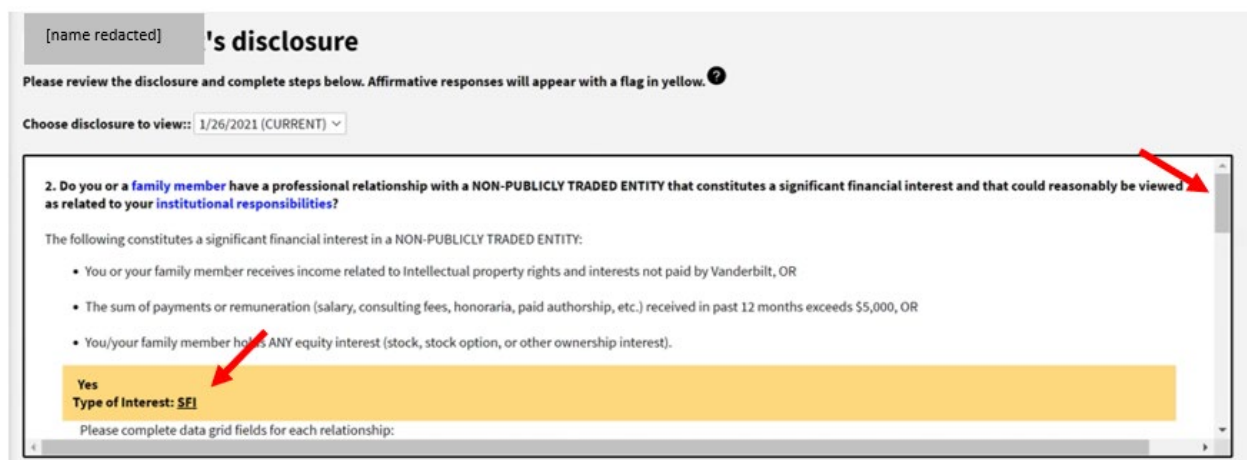
**Reviewing a Conflict Disclosure**

1.  Open the [Vanderbilt University Conflict Disclosure System](#).

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.



**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.

6.  **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.

7.  After reviewing all the flagged responses, scroll down to "**Action Steps**."

8.  Click on the Number 1, corresponding to the first flagged conflict:

**Action Steps:**



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:



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



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:**



☑ I have reviewed the entire disclosure and all of the possible conflicts of interest.
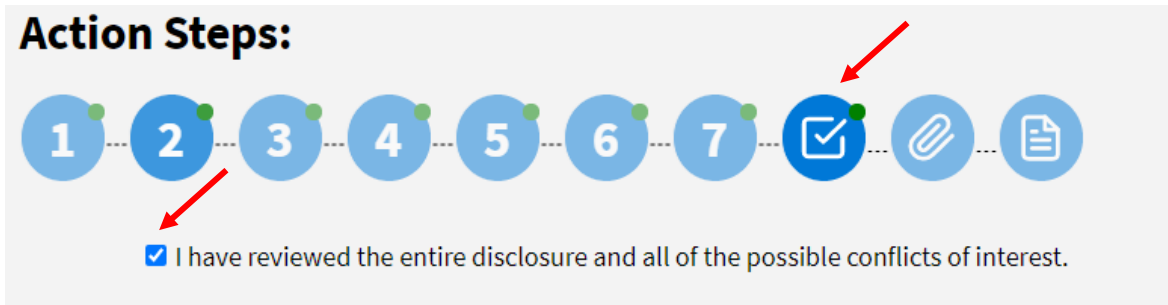
11. On the Attachments (paper clip) tab, you may attach any supporting documents (relevant emails, etc.) that you want to share with the COI office.
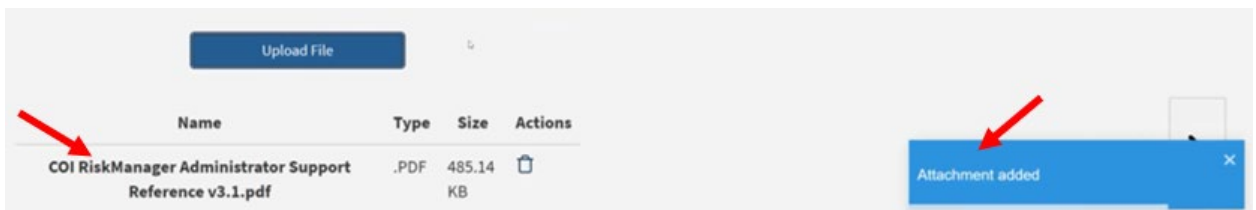
   First, click on "**Click here to attach files.**"
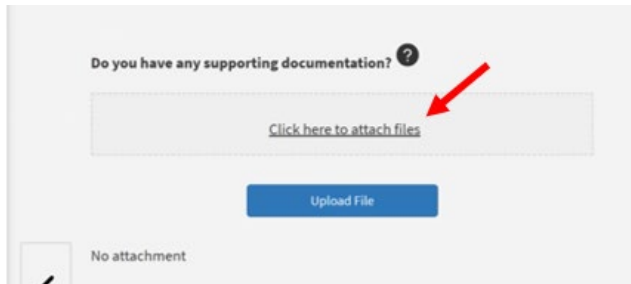


   Next, select the file you need from your computer, and click Open.

   Once you see the name of your file, click "**Upload File.**"
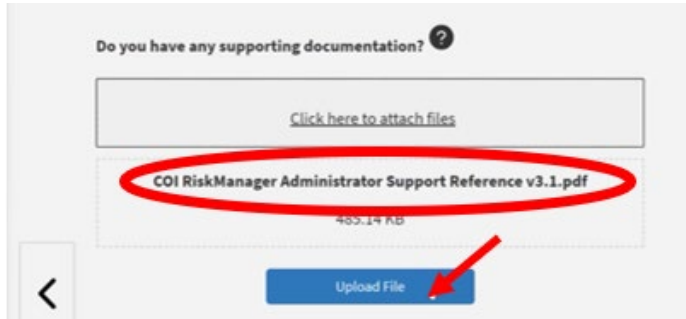


   A box in the lower right-hand corner will confirm that the attachment has been added, and you will see the attachment below the Upload File button:



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.

Updated February 2023

**Action Steps:**

① ② ③ ④ ⑤ ⑥ ⑦ ☑ 📎 📄

Do you have any additional comments? ❓

<
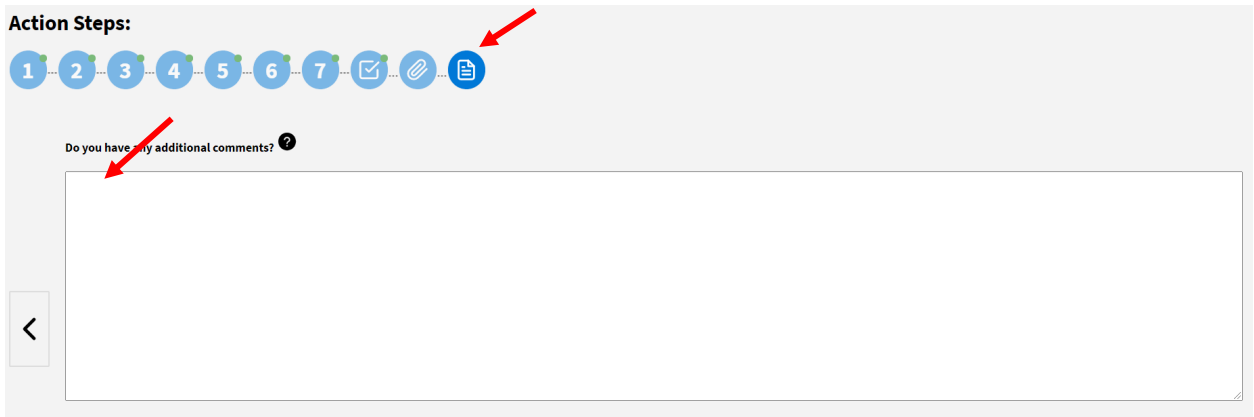
13. Scroll down. If you are ready to submit, click "**Submit**."

    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.

    Save Progress  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 sign the plan in the system. Management plans are found on the **My Management Plans** tab from your Home page.

## 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.

    Home

    Reviewer Center

    Dashboard

    My Management Plans

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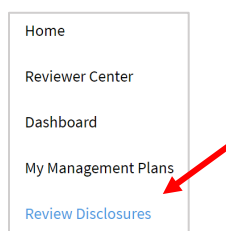
2. Under Status, select all checkboxes except Available, then click **Search**.

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

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

| | 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. The Status column reveals the exact status of the disclosure form:

**Start** – not yet started
**In Progress** – saved but not submitted
**Reviewed** – submitted with no potential COIs, auto-reviewed
**Submitted** – submitted with potential COI(s), currently on 1$^{st}$ level of review
**Case Unpublished** – submitted with potential COI(s), currently on 2$^{nd}$ level of review
**Case Created** – submitted with potential COI(s), fully reviewed
**Available** – potential new version of form available to a user who has already submitted, in case they need to revise. Disregard this status

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

6. 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](mailto:coi@vanderbilt.edu) requesting they log into the COI system and sign the plan.

All Management Plans requiring your signature are found on your **My Management Plans tab** in the system. 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.



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