

Syracuse University

Conflict of Interest (COI) Online Reporting System

Instructions for Designated 'Reviewers'

- ✓ ***Duties and Responsibilities*** - As a senior SU official in your operating division designated to review conflicts of interest (COI) disclosed by your employees, it is your responsibility to assess the significance or risk to the university (financial, reputational, or political) of the reported COI and determine what (if any) management plan is needed to minimize or mitigate the conflict of interest. When an employee submits his/her COI disclosure questionnaire containing a conflict via the online reporting system, it will first be screened by an 'Approver' who will make an initial assessment as to the significance of the COI. In situations where the reported COI is obviously insignificant, the Approver has the authority to approve and file the questionnaire with no management plan or other action required. However, if the reported COI appears to be more than merely incidental, or lacks sufficient details to make such determination, the Approver will forward the COI questionnaire to you, as the designated 'Reviewer,' to decide the appropriate management plan to assign.

- ✓ ***Management Plans*** - Since the types of COIs disclosed by employees can vary widely; any management plan to address them must be customized to fit the specific circumstances. For purposes of the online COI reporting system, three (3) basic categories of management plans have been defined as follows:
 1. **No management plan needed** - This category is appropriate when the reported COI poses no risk or negative impact on SU's operations. This is the management plan category Approvers may assign (see above) in their initial screening of the COI questionnaire and is available to Reviewers as well, if determined to be appropriate upon further assessment of the facts.

 2. **Management plan already in place or COI is considered minor** - This category is appropriate when no further action is necessary since the reported COI has previously been addressed and is being effectively managed. This category may also be used to indicate that the reported COI, while considered minor at this time, will be monitored in the event it develops into a more significant risk.

 3. **New management plan needed** - This category is appropriate when the reported COI may potentially pose a significant risk to the university and has yet to be sufficiently addressed.

Reviewers are encouraged (especially when management plan categories 2 or 3 are assigned) to include as much detail as necessary to explain the management plan that will be implemented, or that may already be in place to address the reported COI. Reviewers should consult with the employee's immediate supervisor in determining the most appropriate management plan, communicating the plan to the employee, and effectively implementing the plan.

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- ✓ ***Navigating the COI Online Reporting System*** - Please follow these steps to evaluate the COIs reported and determine the most appropriate management plans:
 1. Log into MySlice using your NetID and password
 2. Locate the Human Capital Management link. This will take you to a new page
 3. Locate and select the Conflict of Interest link. This will take you to the Conflict Review by Department.
 4. A summary list of employees in your operating division who have reported COIs will appear on the screen.
 5. Click on the yellow button titled '**View Survey**' to view the COI survey of the employee selected for review.
 6. Click on the '*Questionnaire*' tab and locate the question(s) to which the employee has answered 'yes'.
 7. Click on '*Details*' to read the explanation of the COI being reported.
 8. Upon reviewing the COI details, click the '*OK*' button to return to the 'Questionnaire' and then click the 'OK' button to return to the summary list of employees. (#1 above).
 9. For the employee selected for review, click on the yellow button titled '*Management Plan*'.
 10. Determine which management plan category is appropriate for the specific circumstances and select #1, #2, or #3 from the drop-down menu (See definitions above).
 11. As considered necessary (especially when management plan categories 2 or 3 are assigned), describe the details of the management plan you intend to implement, or the plan that is already in place, in the text area of the screen. When completed, click '*OK*' to return to the summary list (#1 above). The contents on the Management Plan page are not viewable by the employee.
 12. The final step is to locate the '*Status*' indicator and select '***Pending Approval***' from the drop-down menu. This will automatically return the COI questionnaire back to the Approver.

- ✓ ***Additional Comments*** - For communication with the 'Approver' you may add additional informal comments relative to an employee's COI questionnaire or management plan by clicking on the yellow '*Comments*' button on the summary screen (#1 above). This page serves as a log for correspondence during the COI review process. All entries will be date & time stamped with the name of the person posting the comment. The contents on the Comments page are not viewable by the employee.

- ✓ ***Coordination with the Approver*** - During the time period from early May through July of each year, employees who have not completed their COI disclosure questionnaires will receive system generated emails reminding them to complete and submit their forms. During August, the Approver will generate reports to obtain a list of those employees and will make personal contact with them to complete and submit their forms. The Approver will also generate lists of employees whose COI forms have been completed and submitted, but are awaiting action by either the Reviewer or Approver. The Approver and Reviewers are expected to work together, and with the respective employees in their areas of responsibility, to complete the COI disclosure process in a timely manner prior to the beginning of the new fall semester.

- ✓ ***Reporting and Monitoring*** - The COI Administrator will summarize the results of the entire COI disclosure effort each year and provide a report to the Audit Committee of the Board of Trustees for review and comment at their semi-annual fall meeting. The Human Resources Business Partners will periodically contact Reviewers and/or supervisors to check on the effectiveness of the COI management plans currently in effect.