Deconflicting Conflicts of Interest

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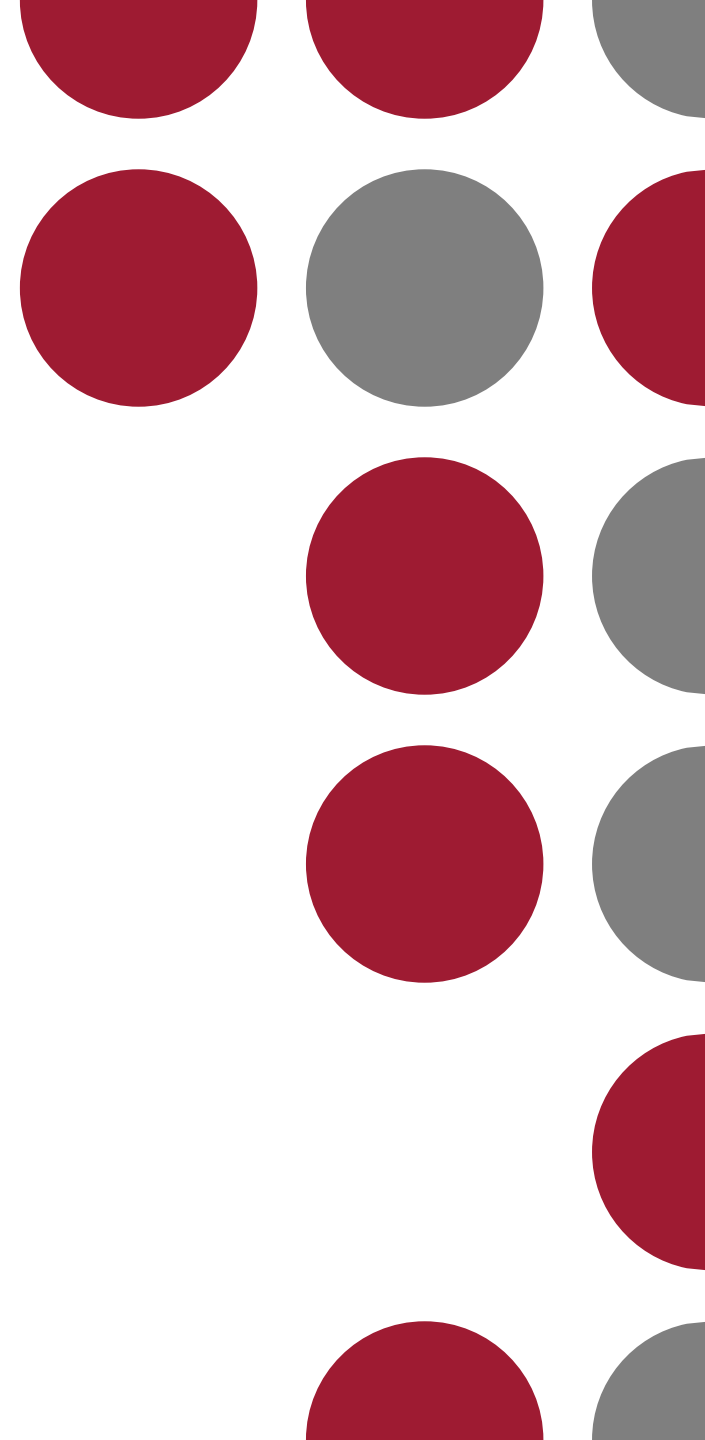
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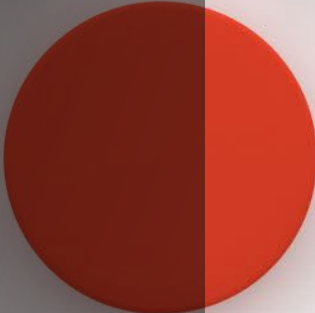
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Objectives

- Assess existing processes and improve coordination, efficiency and minimize redundancy.

- Gain executive support and departmental buy-in to create and execute a centralized COI process.

- Streamline disclosure submissions and reporting processes.

Background

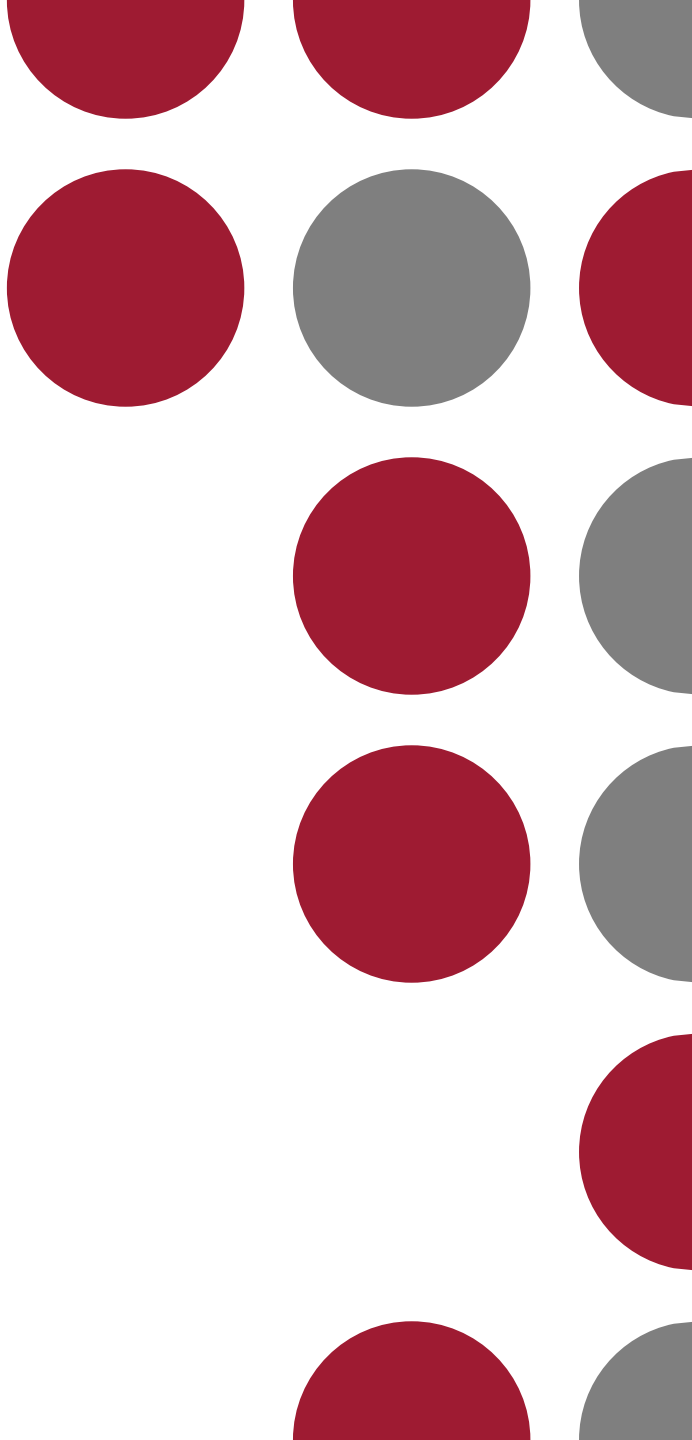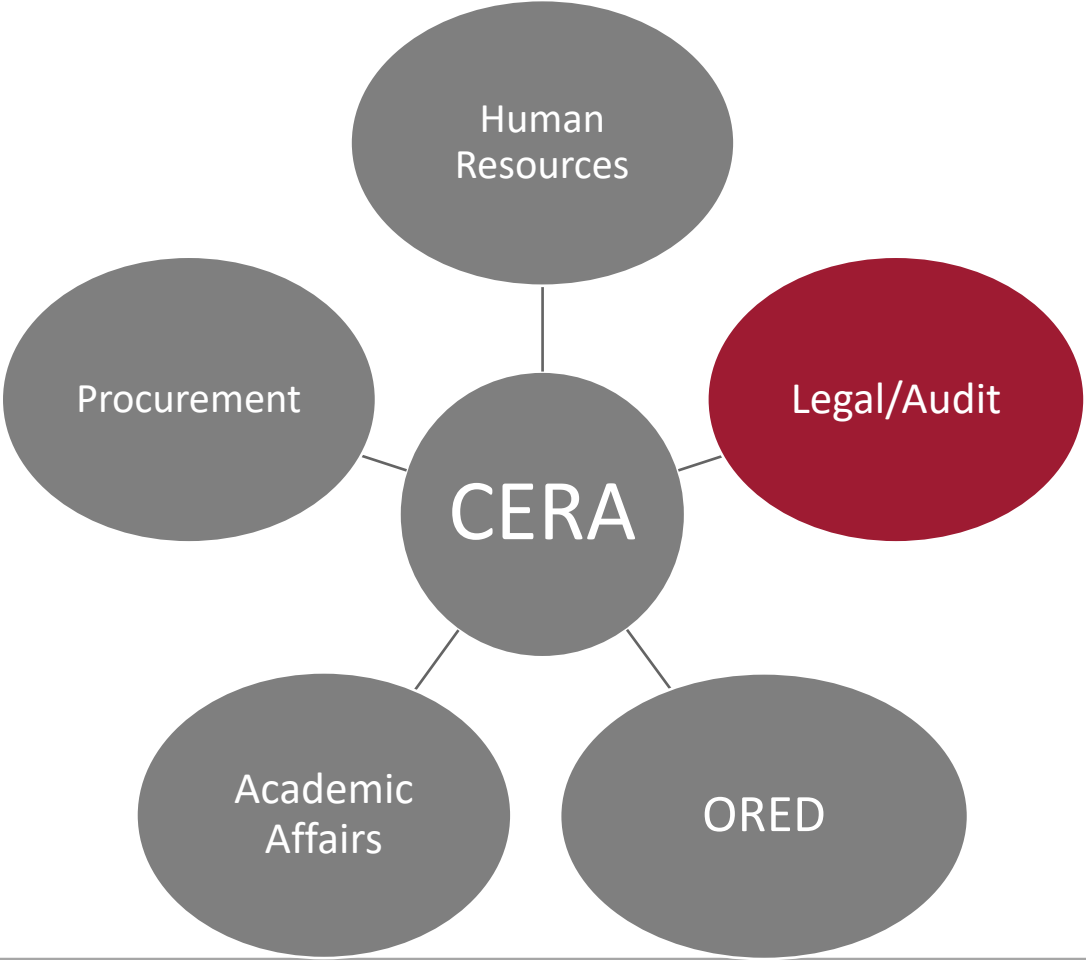Beginning in 2020, Internal Audit completed a review that identified:

1) Areas of possible improvement related to the management of Conflicts of Interest at The University of Alabama

2) Areas on campus with existing policies and procedures that needed review/consideration

Stakeholders

Identified Policies/Procedures

- Nepotism Policy – HR

- Consensual Romantic Relationships – Title IX and HR

- Faculty Handbook - OAA

- Employee Handbook - HR

- Supplemental Compensation – HR and OAA

- Conflict of Interest Financial Disclosure in Research and Other Sponsored Programs Policy - ORED

- Policy for the Disclosure of External Activity By Faculty and Other Research Grant and Contract Eligible Employees - ORED
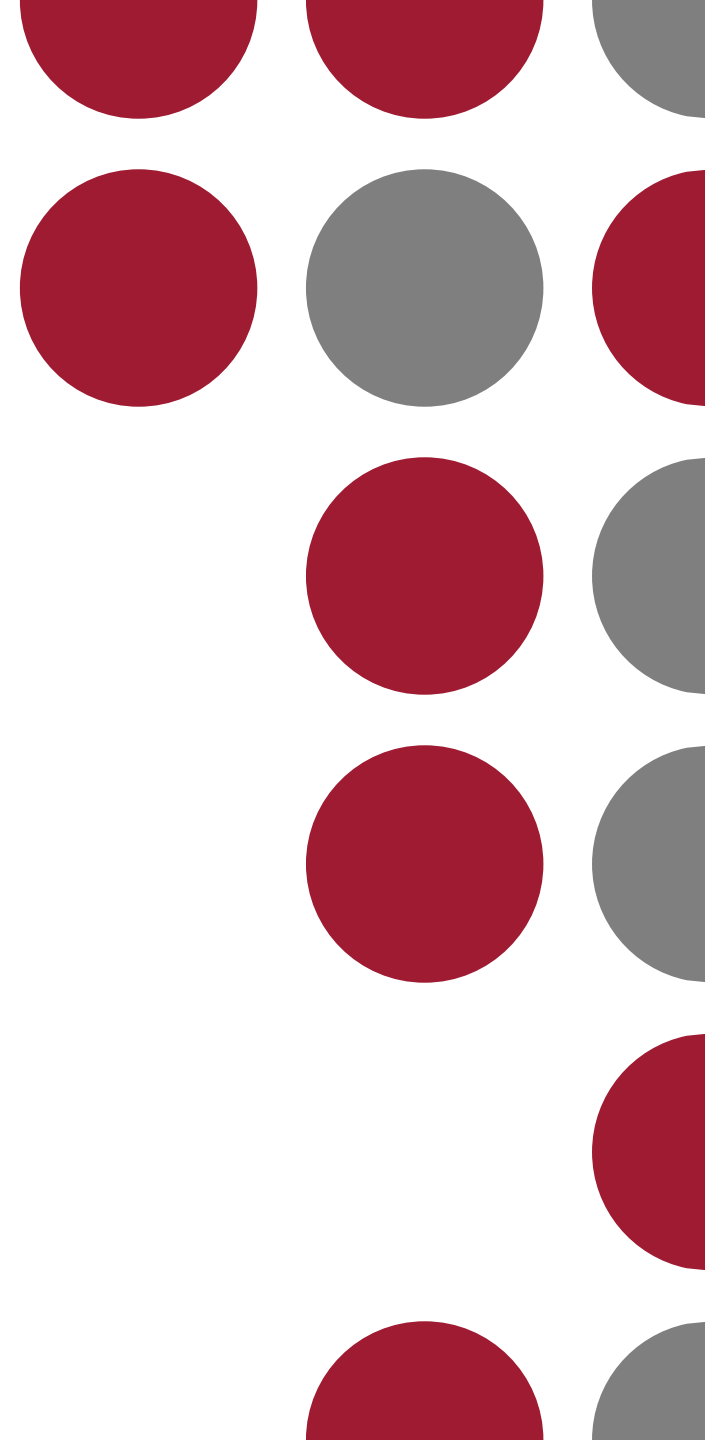
Level Set:
Agreed Upon Definitions

A Conflict of Interest (COI) refers to a situation in which an *individual's financial, professional, or other personal considerations* may **directly or indirectly affect, or have the appearance of affecting,** an individual's professional judgment in exercising *any University duty or responsibility*.

A Conflict of Commitment (COC) refers to a situation in which an *individual engages in external activities*, **either paid or unpaid,** that *interfere with their primary obligation and commitment to the University.*

Example of Inconsistencies in Identified Processes

Nepotism

The UA Nepotism Policy required a form to be completed for any nepotistic conduct.

The form was not linked or readily available.
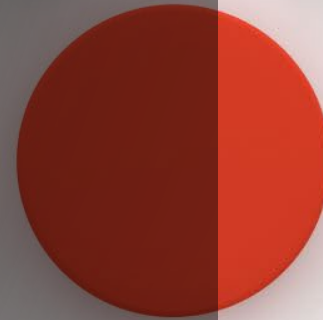
Example of Overlap in Identified Processes

Nepotism

HR was responsible for nepotistic conduct in employment. ORED was responsible for COI reporting in research. No one was addressing nepotistic conduct in research.
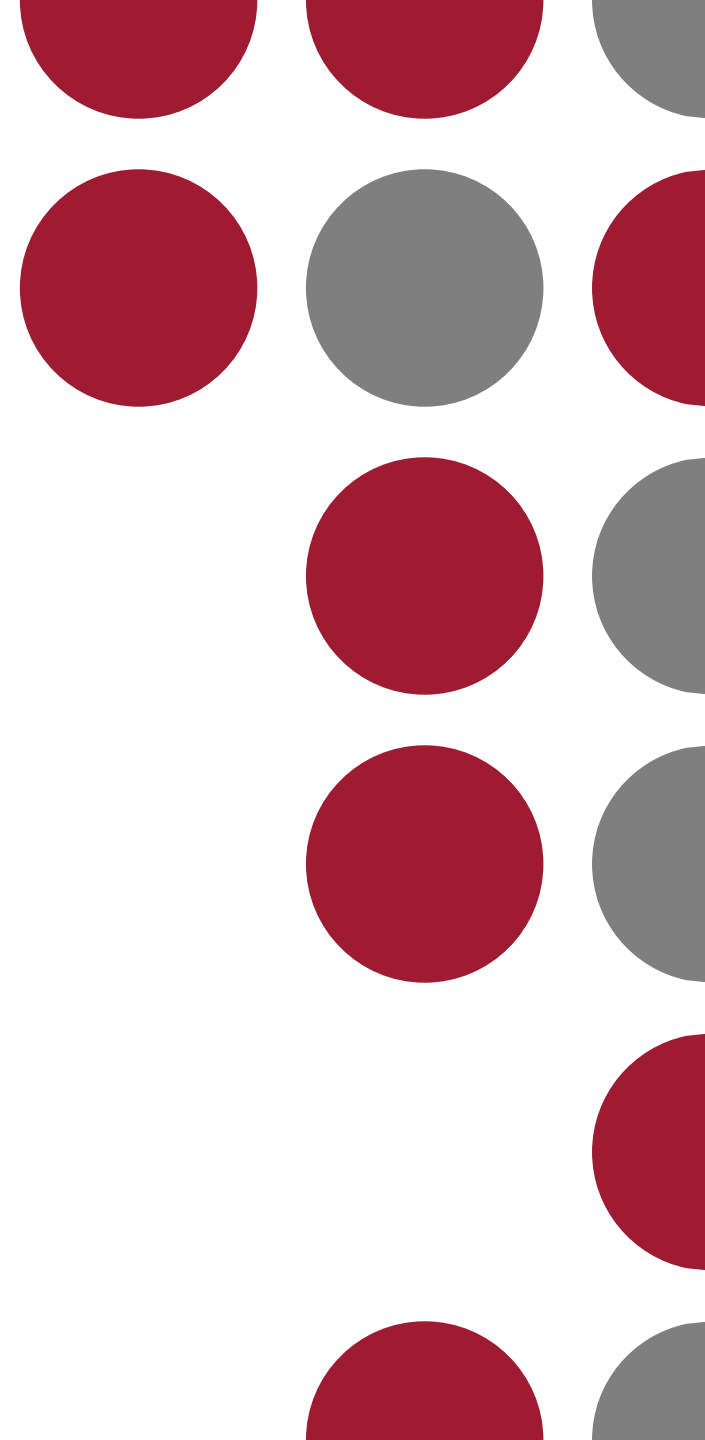
Using this one example, it is clear UA would benefit from centralized process and coordination related to disclosures and management.

COI Working Group

- Institutional Conflict of Interest/Conflict of Commitment Policy

- COI Disclosure Procedures

  - Questionnaire

  - Timing

  - Tools/Software

- Establish Institutional COI Program

Goals of COI/COC Program

The primary goals of our Program are to

(a) prevent the personal interests and activities of employees from adversely or inappropriately influencing UA operations

(b) provide a framework for recognizing and managing employee conflicts of interest

(c) provide education and guidance to help minimize even the appearance of conflicts of interest

(d) standardize University-wide procedures for the disclosure, review, management, and approval of actual or possible conflicts of interest.

If you build it…….

Buy-in
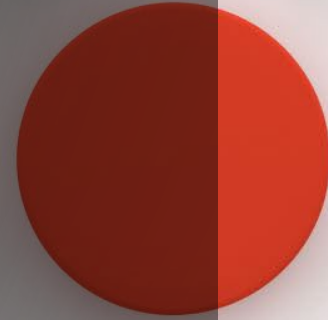
Achieving Buy In from Executive Leadership

Senior Leadership Oversight Committee

- Will meet annually once fully implemented
- Meets and reviews each major step of program development
- Incorporate UA's strategic goals and mission into policy and training
- Leadership included in all pilots, testing
- Phased roll out to demonstrate the effectiveness of the program
- Follow up reports to Leadership after each phased roll out
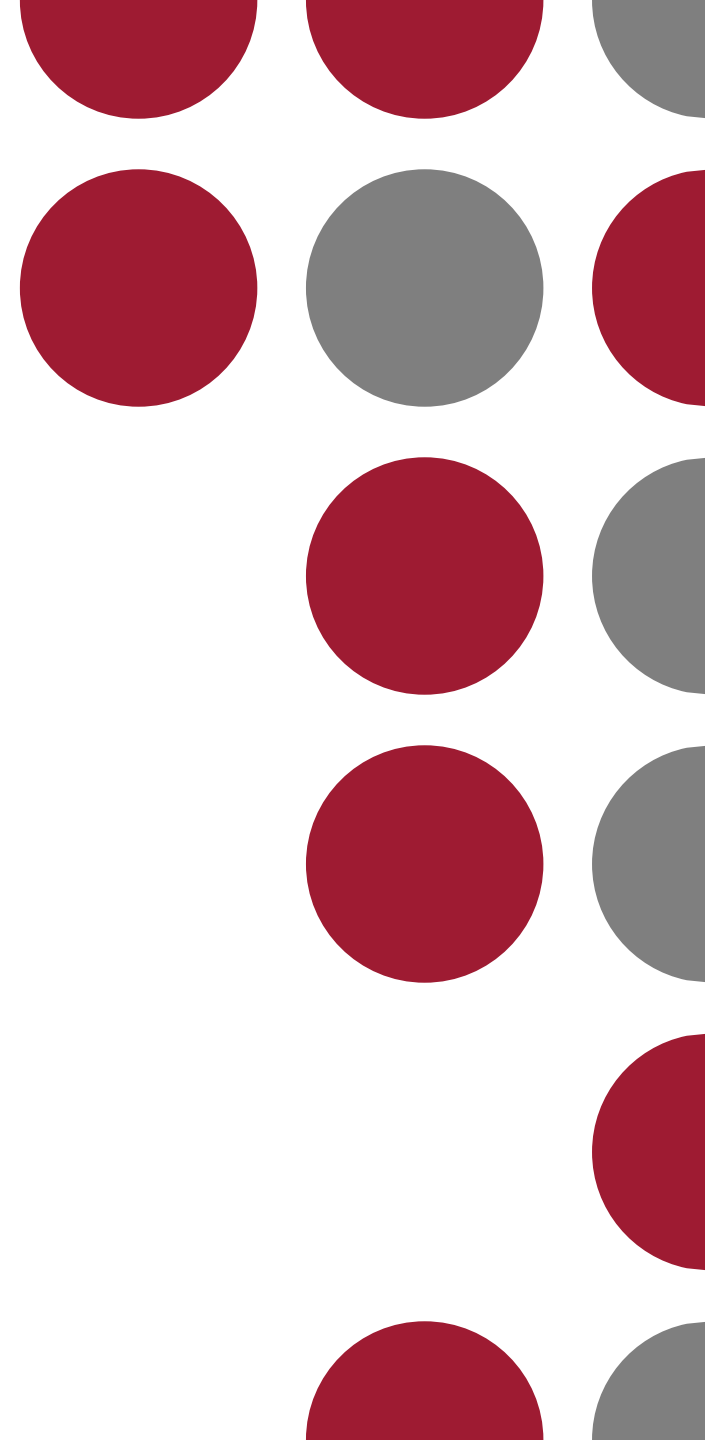
Achieving Buy In from Department Leaders

Deans, Department Heads, Individuals

- Deans and AVPs, involved in pilots, testing
- Phased rollout to areas
  - Communications to Deans/AVPs
  - Communications to Department Chairs, Heads, Directors
  - Communications to individuals
  - Public Q&A sessions
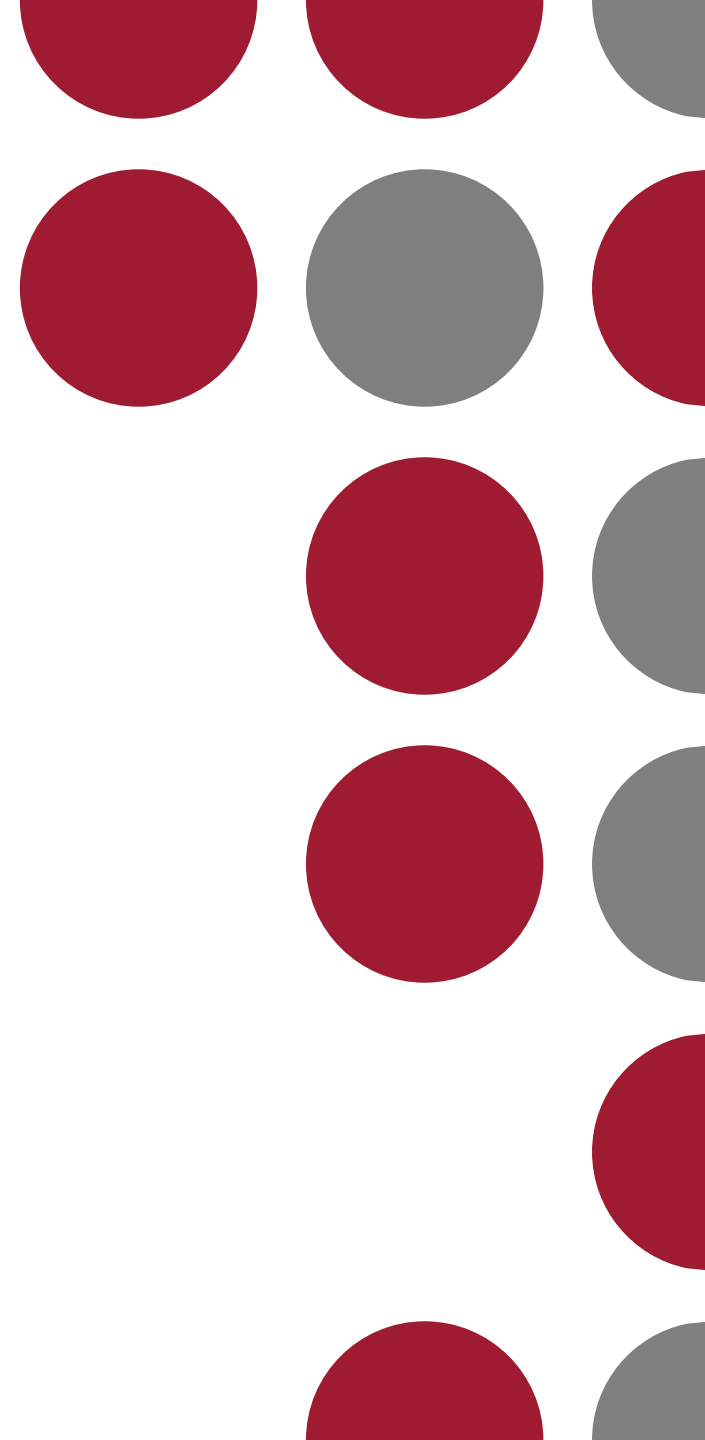
Achieving Buy In from Campus Partners

**Reviewers for submitted disclosures**

- Include in development and review process
- Find ways we can help them address their problems
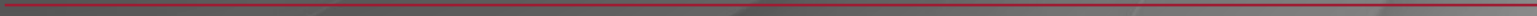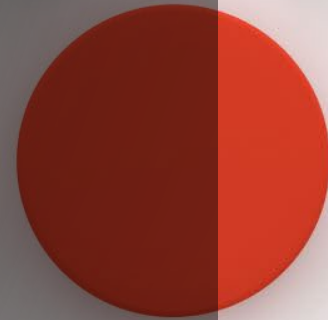- Address gaps in existing with our process, help them "own" their processes
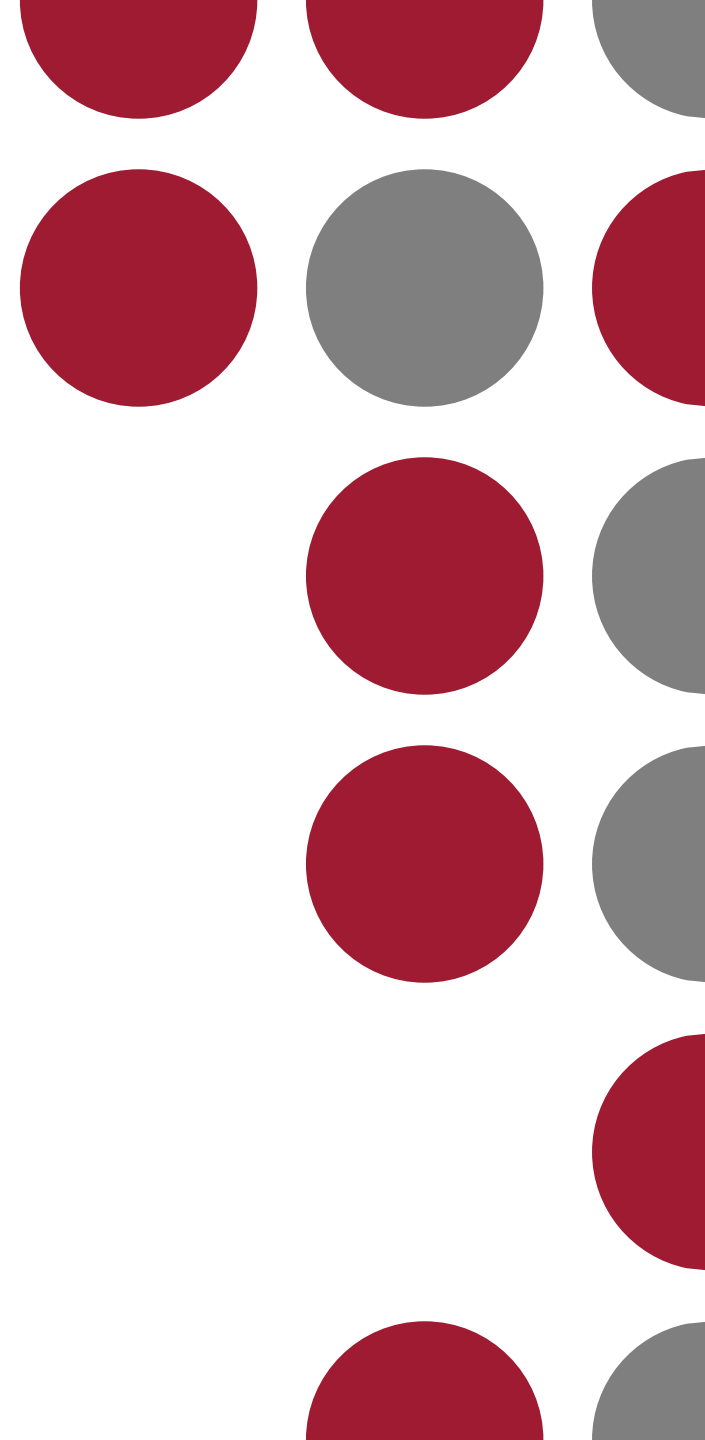
Challenges

- Time for reviews; timing for campus surveys
- Automation versus manual processes
- Integration with current processes
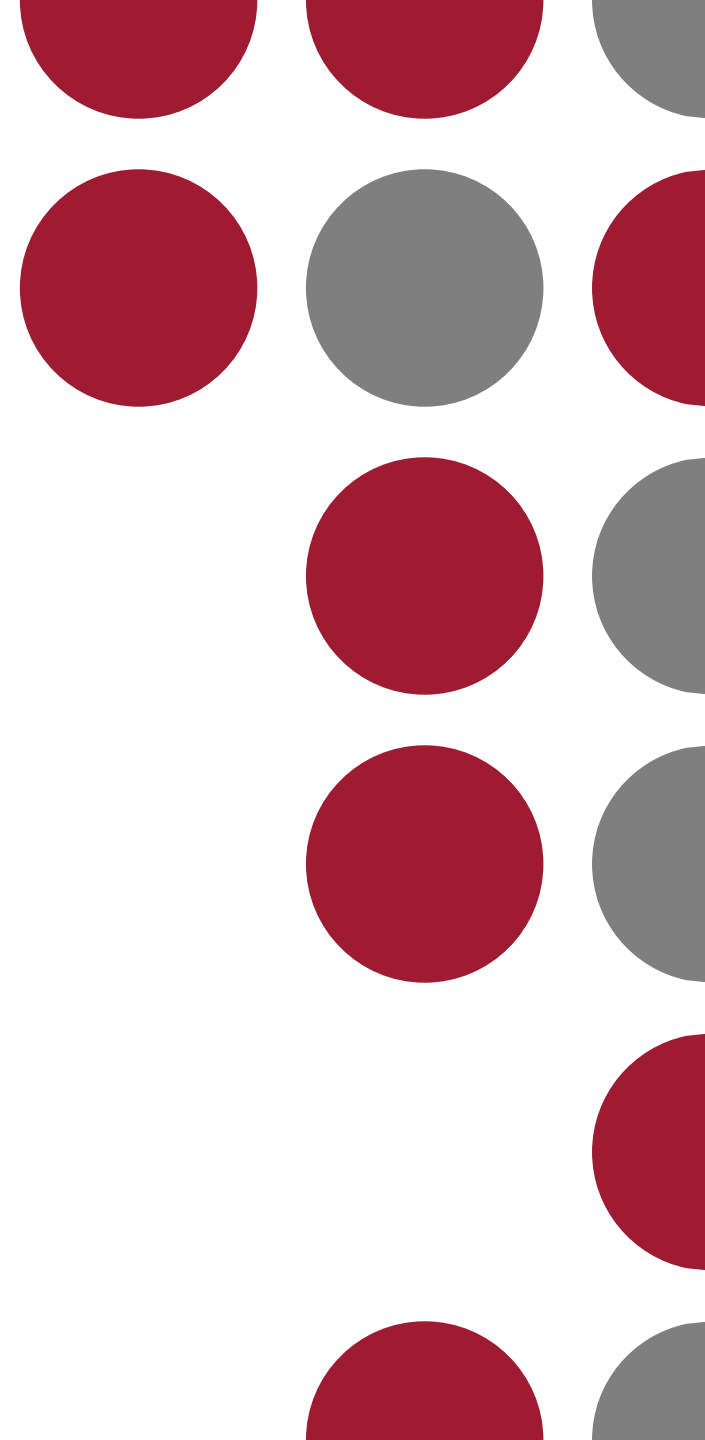- Always remember: It is impossible to make everyone happy.
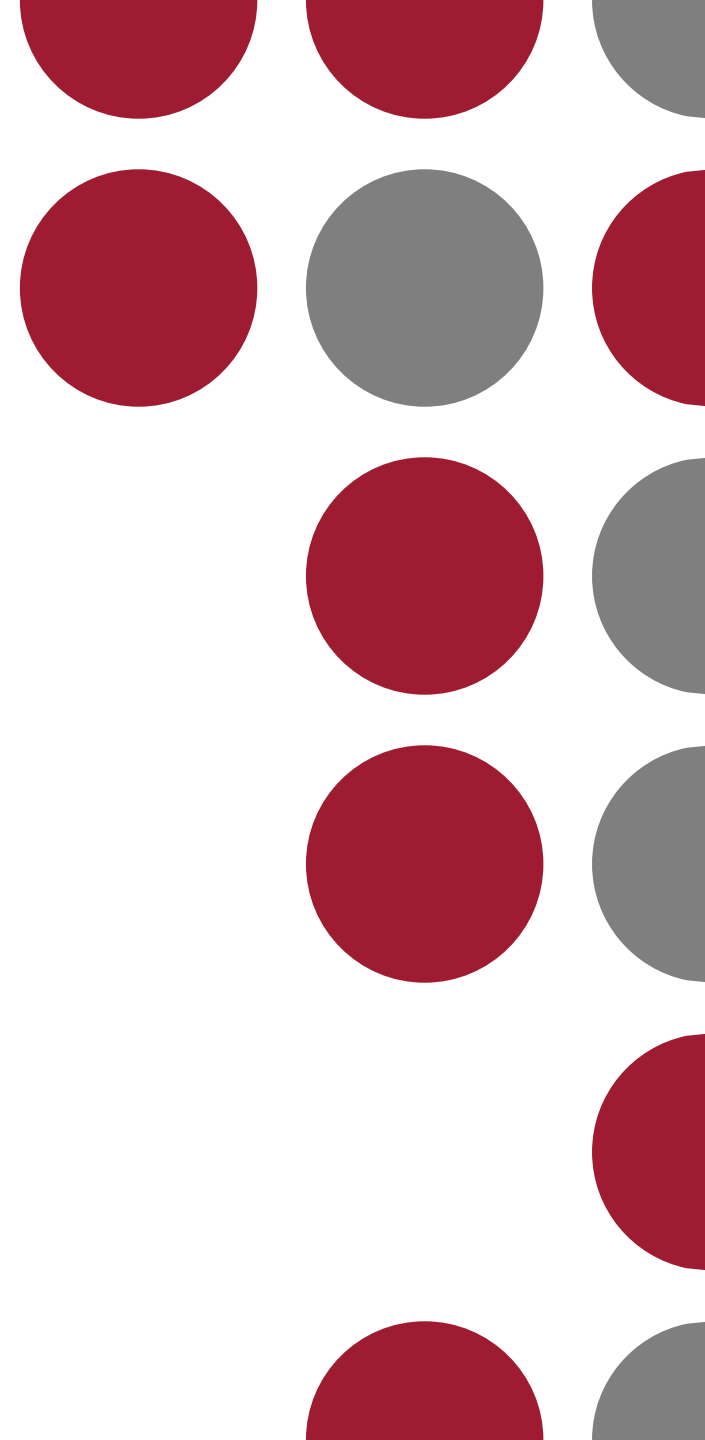
They will come....

Disclosures

Disclosures

- Annual process for disclosures
- What to disclose, who to disclose, why it mattered
- Overlap between processes on campus
  - ORED for research-activity individuals
  - UAS for executive leadership
  - State of Alabama for specific employees
- Ideal Timing – partner with annual compliance training

Phase I - Approach

With guidance from Executive Leadership, we decided on a phased rollout to begin implementation.

Disclosure campaigns to targeted groups, one per month

Phase I - COI Assignments
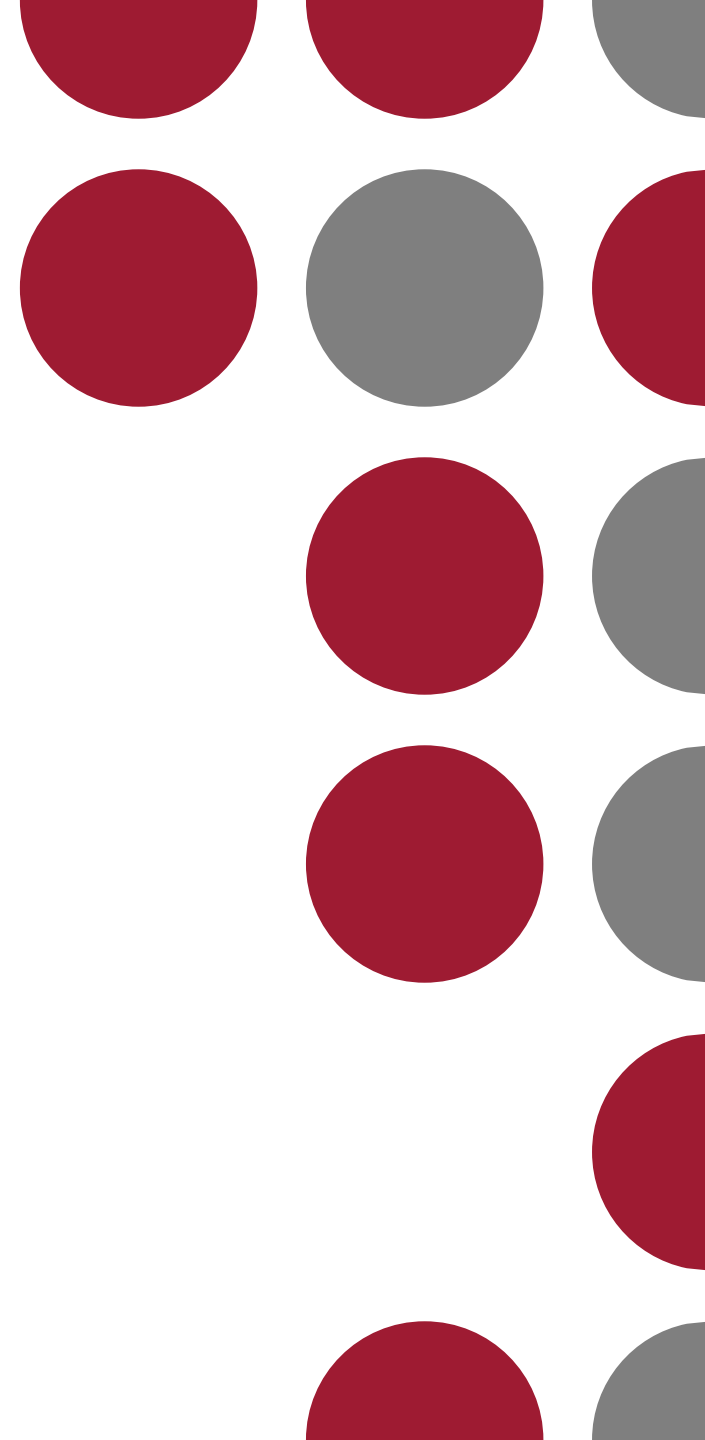
Training

Disclosure

Phase I – Relationship Disclosures

Personal

Family

Numbers – Completion, Phase I

- 7,476 people surveyed/trained
- 825 disclosures submitted
- 44 new management plans created

Upcoming – Phase II

- Expanding included population to all employees
- Expanding topics

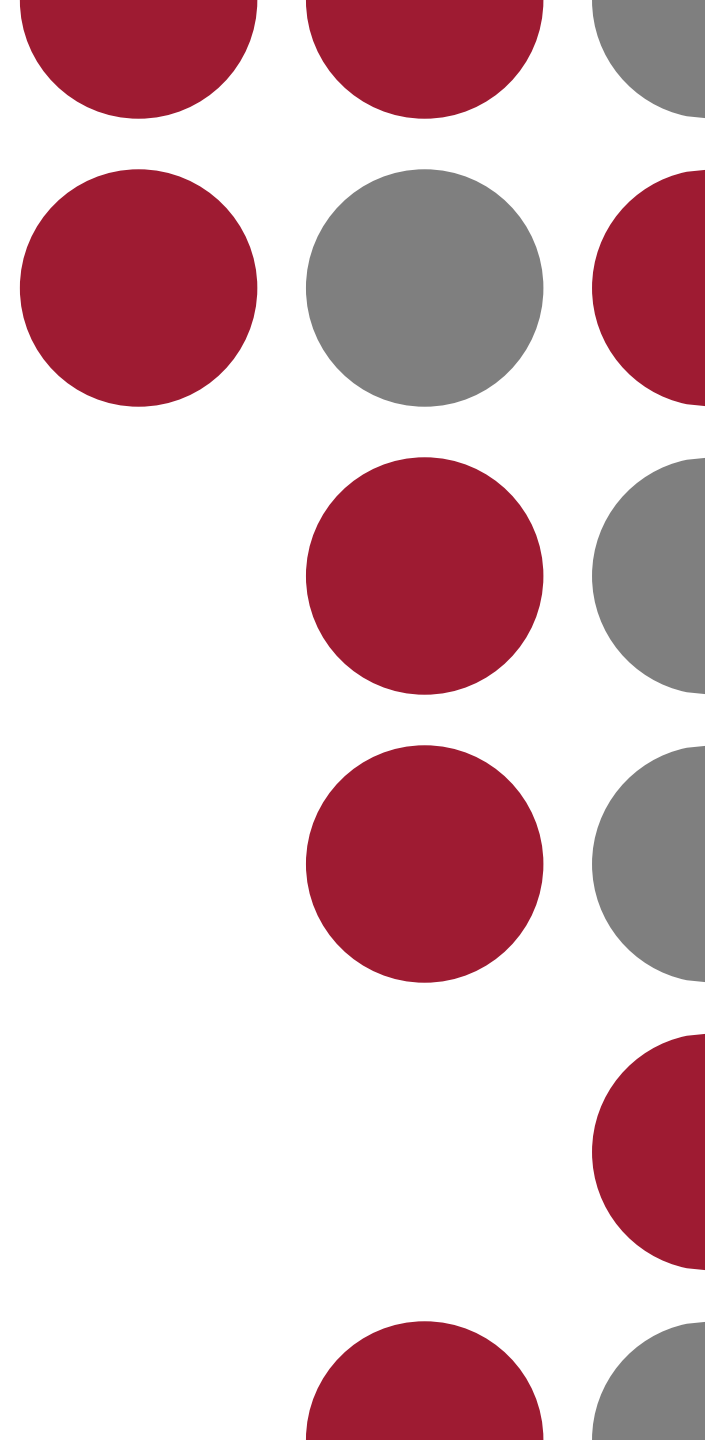# Phase II - Disclosure Categories

Relationships – Family or Personal

Board Involvement

Financial Interests – Business Relationships, Travel, Gifts Given/Received

External Activities

Other

Questions?