UF UNIVERSITY of FLORIDA eDisclose

ANNUAL DISCLOSURE PROFILE – SUPERVISOR REVIEWER CHECKLIST

For each direct report, supervisors will conduct an annual review of the Disclosure Profile in eDisclose prompted by a system email notification. To conduct an Annual Review, consider the following questions:

1. ARE ANY OF THE DISCLOSED INTERESTS PART OF THE EMPLOYEE'S INSTITUTIONAL RESPONSIBILITIES?

If a faculty member will include an activity on their Faculty Annual Report or a staff member is performing an activity as part of their UF job and representing UF, it should not be included on the Disclosure Profile.

If you identify Institutional Responsibilities on the Disclosure Profile, before approving the annual certification, send a request for clarification in the system and require the employee to remove them from the Disclosure Profile.

For more guidance and examples, consult Guide to Understanding Institutional Responsibilities.

2. ARE ANY OF THE DISCLOSED INTERESTS UNALLOWABLE?

The UF COI and COC Policy prohibits: 1) Malign Foreign Talent Recruitment Programs and 2) Outside Research. If you identify one of these activities on the Disclosure Profile, your review must mark "yes" to the question asking if there is an unresolvable conflict of interest. The COI Program will then follow up with the discloser to ensure the discloser ceases the activity and the Disclosable Interest remove from their Disclosure Profile.

For additional assistance identifying a Malign Foreign Talent Recruitment Program, visit the RISC website.

For further clarification regarding what is considered Outside Research, consult Guide to Outside Research Restrictions.

3. IS PRIOR APPROVAL REQUIRED, AND IF SO, HAS IT YET BEEN SECURED?

If a Disclosed Interest requires a Pre Approval Request (PAR), ensure the discloser has submitted one. If there is not a PAR on record, send a request for clarification in the system and require the employee to submit one.

The UF COI and COC Policy states what requires a PAR. The one-page Guide to What and When to Disclose provides a list of when a PAR is necessary.

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4. DOES ANYTHING DISCLOSED CREATE AN UNRESOLVABLE CONFLICT OF INTEREST OR CONFLICT OF COMMITMENT?

IF A DISCLOSED INTEREST PREVENTS THE EMPLOYEE FROM FAIRLY CARRYING OUT THEIR UF JOB OR A DISCLOSED INTEREST RESULTS IN PERSONAL GAIN FROM THEIR PUBLIC JOB AS A STATE EMPLOYEE, THAT IS AN UNRESOLVABLE **CONFLICT OF INTEREST**.

When you identify a *potential* conflict of interest, consider the following to determine if you can mitigate the conflict. If you mitigate the conflict of interest, by one of more of the following, confirm in your review that there is not a conflict of interest.

- Discloser alters their activities such that you are satisfied they can fairly carry out their UF position and they are not using UF resources or their UF position for personal gain.
- There is an approved PAR identifying the Florida Code of Ethics exemption for the circumstances, when applicable.

If there is not a way for you to mitigate the conflict, indicate "yes," there is a conflict of interest and explain the circumstances in the reviewer box. The COI Program will then ensure the Disclosable Interest is ceased and removed from the Disclosure Profile.

Note on Research Conflicts: The COI Program reviews all new sponsored research agreements and IRB protocols for relatedness to Significant Financial Interests that may create Financial Conflicts of Interest. This centralized function means you are not being asked to ensure research conflicts of interest are addressed in your annual review of the Disclosure Profile.

IF A DISCLOSED INTEREST PREVENTS THE EMPLOYEE FROM EFFECTIVELY CARRYING OUT THEIR UF JOB DUE TO TIME CONSTRAINTS OR OBLIGATIONS TO THE OUTSIDE ENTITY, THIS IS AN UNRESOLVABLE **CONFLICT OF COMMITMENT**.

If in your discussions with the employee, they can reduce the time or alter the activities such that you are satisfied they can successfully carry out their UF position concurrently with the Disclosed Interest, you have mitigated the conflict of commitment issue and you can confirm in your review that there is not an unresolvable conflict of commitment.

If there is not a way for the employee to alter their time commitment or activity such that the conflict of commitment can be resolved, indicate "yes," there is an unresolvable conflict of commitment in your annual review and explain the circumstances in the reviewer box. The COI Program will then ensure the discloser ceases the Disclosable Interest and removes from the Disclosure Profile.

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SYSTEM NAVIGATION

For assistance navigating eDisclose, including how to locate a Pre Approval Request, assign a Disclosure Profile for ancillary review and complete reviews, visit the COI Program eDisclose Resources website.