

Steps to Consider
After the President Approves Your Unit's COI/COC Implementation Policy

I. Develop a plan for implementation of the unit COI/COC policy

Designate authority/responsibility, as needed

If not articulated in the unit implementation plan, the dean or director should designate the individual(s) who will serve in the role of Conflicts of Interest and Conflicts of Commitment Manager. For example, this could be a dean or director, associate dean or associate director, or another high level administrator.

Become informed about COI/COC policies

The COI/COC manager and anyone else who will be involved in administering the unit implementation policy should become familiar with University and unit policies and procedures, including University SPG 201.65-1, the unit's implementation policy, and other related policies, especially policies that are particularly relevant to faculty and staff in the unit.

Plan for an annual disclosure process, if applicable

If the unit requires annual disclosure, decide how the unit will manage this process and develop the necessary tools (e.g., through an annual disclosure form, which could be handled on paper or electronically). (*Tool kit: Review of other unit implementation policies on the Provost's Office's website that include a disclosure form.*)

Prepare for record keeping

The COI/COC manager or his or her designate should establish or oversee the development of protocols for recordkeeping of COI/COC files.

- Identify a secure location for the files that ensures confidentiality.
- Assign responsibility for maintaining the files.
- Assign responsibility for receiving and acting on requests for access to the files.

Develop a plan for disseminating the policy and communicating expectations

Identify the unit's expectations of faculty and staff.

See a sample list of options below.

- Read the policy.
- Complete the faculty or staff online tutorial.
- Attend individual or group meetings with a supervisor, the COI/COC manager, or any other individual whom the unit has designed to provide additional training.

Develop a process for disseminating the unit implementation policy to all faculty and staff in the unit, and for providing any additional education about the policy and procedures, as described more fully in the section below.

Compile information about unit procedures that will be shared with staff and faculty, for example:

- Who has designated authority for overseeing implementation of the unit policy
- What the unit expects of its staff and faculty
- Record keeping procedures
- How FOIA requests will be handled

With regard to disseminating the policy, consider any obstacles that may arise. For example, if the unit decides to post the unit implementation policy on the unit website, some faculty or staff may not be in a position to access the policy online. The unit would need to provide paper copies of the policy to these individuals instead.

Develop a plan for any additional training or educational efforts (for all staff and faculty)

Beyond dissemination of the unit policy, consider and decide on ways to inform staff and faculty in the unit, which could include one or more of the options described below:

- Develop a set of examples of potential COI/COCs that are relevant to faculty or staff in the unit. Although some examples may have been included in the unit implementation policy, depending on the size of the unit it may be beneficial for different sections of the unit to develop examples specific to the work done there. (*Tool kit: Review of other unit implementation policies on the Provost's Office website that provide such examples.*)
- Ask staff to complete the COI/COC tutorial for staff. Make faculty aware of the COI/COC tutorial for faculty.
- Hold group meetings to discuss the COI/COC policies and to answer questions. (*Tool kit: Template PowerPoint presentation*)
- Hold individual meetings (e.g., with new faculty or staff members as part of their unit orientation)

NOTE: When developing a plan for disseminating the policy and doing additional training and education, consider the need for information and training for different groups of people at different points in time:

- Initial training (roll-out of unit implementation policy)
- Training for all new employees
- Refresher or continued training (e.g., annually)

(*Tool kit: Online tutorial for staff and online tutorial for faculty*)

Develop a plan for any additional training or educational efforts (for persons with authority for implementing COI/COC policies)

- Decide what type of training, if any, the unit will provide for persons to whom the dean or director has designated responsibility for implementing the unit COI/COC

implementation policy (e.g., a newly designated *COI/COC manager*) which could include the options described below:

- Modify documents in the tool kit so that they apply more directly to the unit (e.g., the PowerPoint template about COI/COCs and *Scenarios and Questions: A Training Tool*)
- Distribute documents in the tool kit to each person.
- Convene these individuals for a conversation/training session.
- Periodically reconvene these individuals to discuss potential COI/COCs that have arisen in the unit.

(Tool kit:

- *Online tutorial for staff and online tutorial for faculty*
- *Template for a PowerPoint presentation about COI/COCs*
- *Basic Steps to Take After an Employee Discloses a Potential Conflict of Interest or Conflict of Commitment: A Tool for Supervisors and Managers*
- *Conflicts of Interest and Conflicts of Commitment/Scenarios and Questions: A Training Tool*)

II. Implement the plan

Disseminate the policy and any additional communication from the dean, director, or COI/COC manager.

Provide additional information/training for staff and faculty, as applicable.

Provide additional information/training for persons with authority for implementing COI/COC policies)

Take additional steps, both immediately and over time, as needed.