Dear University of South Alabama Employees,

We are implementing a new electronic Conflict of Interest (COI) Disclosure reporting system, COI Risk Manager[™], designed to facilitate greater ease and accountability in reporting and managing conflicts of interest. This system will replace the paper process used in prior years by faculty. If you are in receipt of this notice, you should expect the reporting campaign to begin ____, 2021 by receipt of an e-mail prompting you to fill out a Disclosure Form.

As faculty members, managers, administrators, coaches, etc. we may periodically find ourselves in situations where a potential, perceived or actual conflict of interest develops, for instance, based on a relationship we have with an external entity which may also have a business relationship with USA. Relationships that tempt us to make decisions which favor our external interests over USA interests could give rise to a conflict of interest scenario.

You will be asked to complete a COI Disclosure on an annual basis. In the event of any potential conflicts of interest that you disclose, your supervisor will work with you on actions to take which help you avoid the conflict.

The COI Risk Manager™ application also includes a request process for faculty who wish to engage in an External Professional Activity. Requests will be routed to one's direct supervisor, and final approval would come from the Dean.

Included below is summarized information about the COI Disclosure reporting system, how it works, and when you will need to use it. Your honest and timely disclosure reporting allows management the opportunity to resolve issues early to avoid perceived, potential or actual conflict of interest.

If you have questions, please contact us in the Office of Compliance or the Office of Research Compliance and Assurance.

Chris Hansen Chief Compliance Officer Office of Compliance (251) 460-7115 chansen@southalabama.edu Dusty Layton Executive Director, Office of Research Compliance & Assurance (251) 460-6625 dlayton@southalabama.edu

How does the system work?

Upon receipt of a system-generated email, you'll follow the prompt and log-in to the COI Risk Manager system. Go to your "Home" page and click "Fill Out" next to your COI Disclosure form. Upon completion, there will be an attestation to agree to, then "Save and Submit." For more details, please see instructions on our <u>How to Disclose</u> web page.

Who will participate?

Faculty, administrative-managerial employees, coaches, board members, and other members of our workforce who may be involved in a research study or who make significant purchase decisions for the university.

What is it for?	How do I access it?
This system facilitates openness and transparency in our personal and university business dealings, consistent with our new Conflict of Interest and Conflict of Commitment policy, and promotes documented collaboration between employee and supervisor in efforts to avoid conflicts.	Via a link provided in annual COI Disclosure email announcements, or visiting USA's <u>How to Disclose</u> web page.
Does this system replace other reporting processes?	Can I follow up to assure my Disclosure Form has been reviewed?
Yes, it will replace our prior paper reporting process used by faculty and others involved in research. Visit our <u>COI</u> web page for more information on our COI-related policies, procedures, instructions, and helpful resources.	When you submit your Disclosure Form, you'll receive a system-generated e-mail confirmation of your completion. If during the review process your supervisor identifies a potential conflict, you will be notified.
External Professional Activities	Supervisor Review/Response
The system also accommodates an electronic request process for External Professional Activities (EPA's). The two USA policies which define and provide request guidelines are the External Professional Activities and Conflict of Interest and Conflict of Commitment policies.	Upon review of a COI Disclosure form, supervisors will determine either (1) there is no conflict, (2) a conflict may exist, and recommend informal steps to take to avoid a conflict, or (3) that a conflict definitely exists, and will develop a formal Management Plan. Please review Evaluating Disclosures for more details.