**Disclosure Review Process – For UH Senior Administrators (Reviewers)**

Senior Administrators (President, Vice Presidents, Chancellors, Vice Chancellors, Deans, and Directors), or their designees, are primarily responsible for reviewing their employee’s disclosure forms.

* Ensure disclosure forms are complete, signed and dated.

For E5.214 Annual disclosures:

* “Yes” to ANY Part I questions requires completion of Part II;
* All forms with Part II disclosures **require** further review;
* Determine if Significant Financial Interests (SFI) and/or other personal interests could appear to be a Financial Conflict of Interest (FCOI) or other COI (SEE REVIEWER CHECKLIST);
* Resolve potential FCOI/COI issues (manage, reduce, or eliminate);
* When assistance is needed for FCOI/COI identification or management, disclosure forms with Part II completions should be forwarded to ORS Compliance at (compliance@ors.hawaii.edu) for possible referral to the Conflicts of Interest Committee (COIC).

For myGrant related disclosures:

* Review ORS FCOI-1 form;
* Determine if SFI and/or other personal disclosures could appear to be a FCOI or other COI

(SEE REVIEWER CHECKLIST);

* Resolve potential FCOI/COI issues (manage, reduce, or eliminate).

**Reviewer Checklist**

* Identify disclosure forms that require further review and potential conflict resolution or management. (In other words, separate the “yes” from the “no”)
* Review each disclosure and gather any additional information (i.e., ask the employee questions) to determine if disclosed financial/other interests meet the definition of significant financial interest (SFI).
	+ Is stock ownership in a mutual fund (e.g., via retirement plan) not controlled by the employee and, therefore, not a SFI.
	+ Is compensation, remuneration, or travel sponsorship $5,000 or less, when aggregated, or from an excluded entity? (Excluded entities: Federal, State, or local government agency, or U.S. Institution of higher education)
* If SFI is identified, determine if related to the employee’s institutional responsibility.
	+ Related to funded and/or proposed research or other institutional/scholarly activity (teaching, review, review board)?
* If SFI appears to be related to a specific research project, proposal, or scholarly activity then it could be considered a FCOI or other COI.
	+ Determine whether the FCOI/COI can be managed, reduced, or eliminated.
	+ If managed, outline a basic management plan on how the conflict will be handled, including monitoring/oversight procedures, or how the COI will be eliminated.
	+ If related to PHS agency, 1) Investigators are required to complete FCOI training, 2) FCOI reporting to PHS funding agency is required, and 3) FCOI information must be posted on ORS website.
* Contact ORS Compliance (compliance @ors.hawaii.edu) with any questions /concerns or when further assistance is needed.