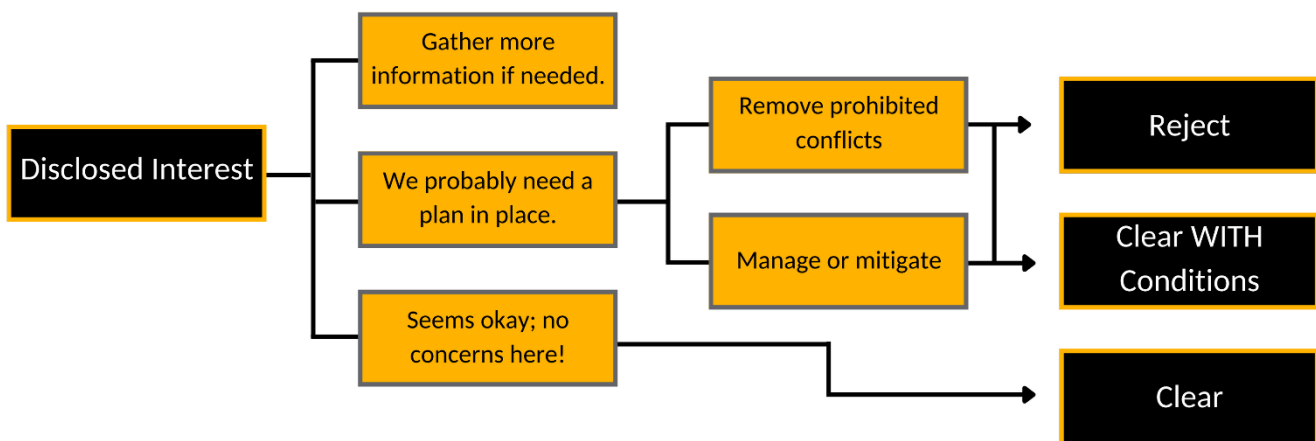


## Supervisor Guide: Reviewing and Clearing Disclosed Outside Interests and Activities

As a supervisor, you are responsible for reviewing any disclosures made by your direct reports and determining whether a conflict of interest or commitment exists. Use these guidelines and the assessment tool to help you assess disclosures and ultimately clear, clear with conditions, or reject them.

**Why do we ask employees to disclose outside interests and activities?** Governing agencies, accrediting bodies, and the public expect transparency in decision-making and the way VCU does business. Proactively disclosing and managing potential conflicts protects the reputation of our employees, keeps us in compliance with stakeholder requirements and expectations, and protects VCU's reputation as an ethical leader in higher education.

### The Basic Process: Review, Assess, Decide & Respond



*Key question to ask yourself:*

*Would a reasonable person think this employee's work-related decisions may be biased by this interest?*

### Review and Assess

Use the assessment tool on the next two pages to help you review and assess disclosures. Work through the consideration questions to determine whether an outside interest or activity creates a potential or actual conflict of interest that could negatively impact the employee, unit, or organization. See VCU's [Conflict of Interest & Commitment policy](#) here.

### Decide and Respond

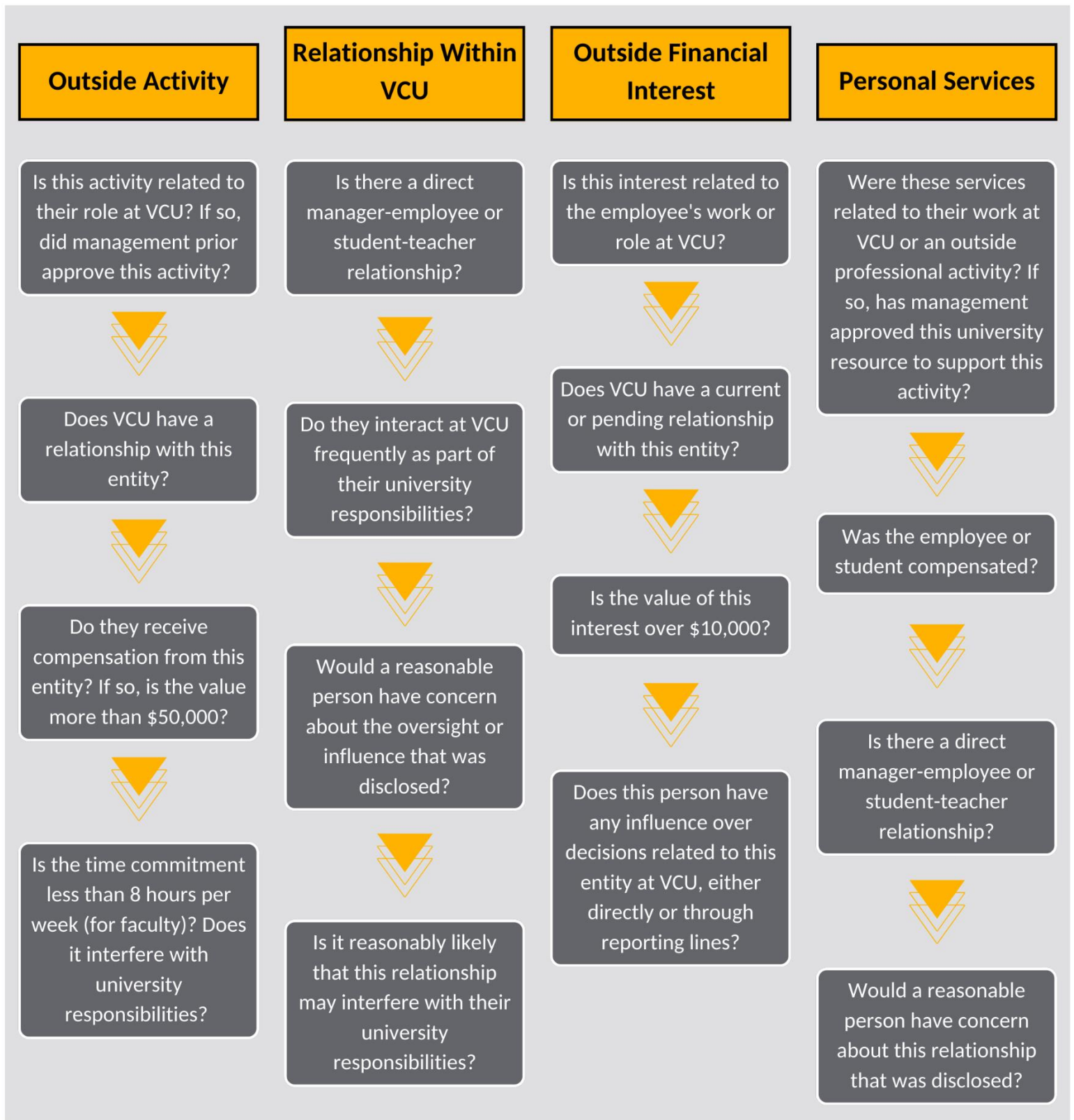
If you decide that a disclosed activity or interest should be rejected or cleared with conditions, use our escalation guidelines and suggested template for communication on page four of this guide. For conflicts that require a detailed management plan, contact the ICO for a customizable template and guidance as needed. For faculty, please review the [Outside Professional Activities guidelines](#) from the Office of the Provost.

**Remember, conflicts are not inherently bad. They show an active and engaged organization. Proactively reporting and, if necessary, mitigating conflicts helps preserve public trust and our reputation.**

It is your responsibility to ensure disclosed interests and activities are addressed with an appropriate management plan or remediation as needed. The Integrity and Compliance Office is always available to assist you in making a final determination.

# VCU Disclosure Assessment Tool

You may not know the answers to all these questions, but use these considerations to help you decide whether to clear a disclosure, clear it with conditions, or reject it. If you need more information to make a decision, don't hesitate to follow up with the employee.



VCU Disclosure Assessment Tool, Cont'd



## What's Next?

Based on your assessment, if you believe the interest is low risk (that is, not likely to result in misconduct and does not violate laws, policies, or VCU's core values), you may clear the disclosure. You may clear with conditions if additional oversight or other controls are needed to mitigate misconduct or perceptions of misconduct, i.e. implement a management plan.

## When to Escalate a Disclosure

- For department chairs: review the [Outside Professional Activity \(OPA\) guidelines](#) from the Office of the Provost to determine whether an OPA should be escalated to the Dean. **NOTE: If the request involves use of university facilities, services, or other university personnel, additional approval is required—see the OPA guidelines.**
- Notify the Integrity and Compliance Office (ICO) for additional review any time a disclosure:
  - Involves an outside activity with a compensation value of \$50,000 or more annually
  - Requires a management plan with signatures to mitigate the conflict
  - Involves a product ownership or financial interest in a transaction involving VCU
  - Any time you feel unsure about how a disclosure should be assessed

## Rejecting a Disclosure

Rarely, a disclosure may reveal conduct prohibited by the state or a conflict that requires the employee to discontinue or distance from the activity or interest. The ICO recommends that you consult with us before rejecting a disclosure, for additional guidance and review.

### Sample Template: Closure Message for Clearing WITHOUT Conditions:

*Thank you for your disclosure. Based on the details provided, this conflict has been cleared.*

*Please note that you are responsible for updating any future changes to this disclosure through this reporting tool without unreasonable delay. Any circumstances related to this interest that might be perceived to impact your workplace decisions should be proactively discussed with your manager and/or the Integrity and Compliance Office. This will allow time to create an appropriate management plan.*

*Questions? Respond to this message or email [ucompliance@vcu.edu](mailto:ucompliance@vcu.edu).*

### Sample Template: Closure Message for Clearing WITH Conditions:

*Thank you for your disclosure. Based on the details provided, this conflict has been cleared with the following conditions:*

- *Condition 1 (e.g., additional approvals, recusing yourself from a decision, donating the gift)*
- *Condition 2 (e.g., additional approvals, recusing yourself from a decision, donating the gift)*

*Please note that you are responsible for updating any future changes to this disclosure through this reporting tool as soon as reasonably possible. Any circumstances related to this interest that may be perceived to impact your workplace decisions should be proactively discussed with your manager and/or the Integrity and Compliance Office. This will allow time to create an appropriate management plan.*

*Questions? Respond to this message or email [ucompliance@vcu.edu](mailto:ucompliance@vcu.edu).*

## Examples of Actions to Manage or Mitigate a Conflict:

- Additional approvals or oversight of an activity
- Separating the individual from relevant decision-making (e.g., selection of certain vendors)
- Transferring the supervisory role over an employee to someone outside the reporting line
- Returning gifts to the giver or transferring gifts to the University
- Transferring the employee to a different area

Need Help? Contact the Integrity and Compliance Office:  
[ucompliance@vcu.edu](mailto:ucompliance@vcu.edu) | 804-828-2336