



MANAGEMENT PLAN CONSIDERATIONS

A guide for COI/COC reviewers to help determine whether a disclosure will need a management plan and what happens when it does.

DISCLOSE



1 Covered persons are required to disclose annually and when their circumstances change. Disclosure is made through UVMClick. Reviewers will need to review the disclosure and take action.

MORE INFORMATION



2 What role does the discloser play related to this interest or activity? Is it financial, managerial, or operational? Is there a job nexus - does the relationship, interest or activity relate to their UVM job?

RELATIONSHIP



4 What is the relationship? Is there a contract or agreement? Is it for advisory services or a speaking engagement?

NATURE OF THE INTEREST



3 What is the nature of the interest? Does the discloser/family member have an ownership interest through equity, stock or some other means? Is the interest with a public, private, or not-for-profit entity? What form is the equity (financial, or intellectual property)?

CONFLICT IDENTIFIED



5 If there is an external interest or activity that is financial, managerial or operational in which the nature and the relationship is or is perceived to be in conflict with UVM or with the discloser's UVM job duties, it needs to be managed or eliminated.

If a conflict (real or perceived) is identified, a consult is required. Email coi.coc@uvm.edu.

DECIDE



6 The conflict will either be allowed (notify discloser that no further action is warranted), disallowed (the activity/arrangement cannot continue), or managed (which requires a written management plan - see template).

MONITOR



8 The management plan remains in effect until the conflict has resolved or until circumstances change. The discloser and their monitor are identified in the plan and monitoring requirements are specified.

MANAGE



7 The management plan will be reduced to writing. The discloser will be given the opportunity to participate in the process. Once finalized, the discloser is required to sign-off on the plan.