



Division of Finance

1 Castle Point Terrace
Hoboken, NJ 07030
stevens.edu

FY24 Manager Guidelines for Reviewing Annual Conflict of Interest

For the Reporting Period: July 1, 2023 - June 30, 2024

Guidelines for Managing Conflicts of Interest

As a manager, you will be required to approve FY24 Conflict of Interest Disclosure (COI) Forms for each of your direct reports. This document outlines the key steps and provides a few important resources.

Please refer to [How to Complete the Conflict of Interest Form - Managers](#) for additional instructions. In addition, we strongly encourage you to review the [Stevens Conflict of Interest Policy](#).

This policy requires that faculty and staff submit a formal disclosure of any actual or potential conflict of interests, and that their manager review the disclosure to ensure that any conflicts are appropriately managed.

Upon review, if you determine that a direct report has an actual, perceived, or possible conflict of interest, you will be responsible for providing a conflict management plan to manage, reduce, or eliminate the conflict.

To satisfy this review requirement, managers should access Workday regularly through the COI reporting period.

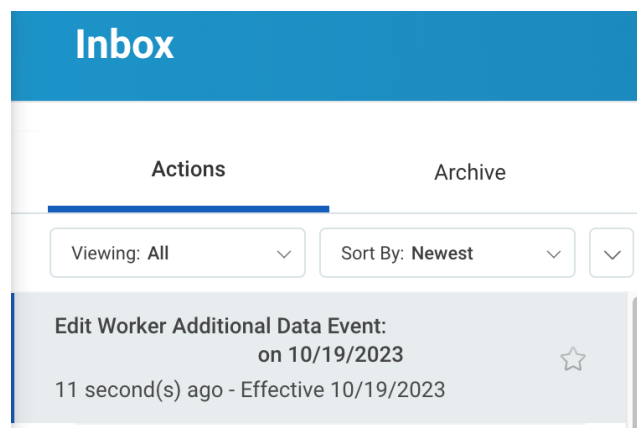
Timeline:

- Faculty and staff must complete the disclosure form by **December 8th, 2023**.
- Managers should complete their review of their direct reports' disclosure form and document any mitigation plan by **December 22nd, 2023**.



Accessing the COI Disclosure Forms in Workday for Your Direct Reports:

- 1) Employees will complete the disclosure questionnaire and acknowledgement form in Workday.
- 2) Upon completion and signing the acknowledgement statement, the form is routed for manager review and approval.
- 3) A task will appear in the manager's Workday Inbox to review the faculty/ staff member disclosure form (see below). Manager's will also receive notifications as part of their Workday Daily Digest email.



Reviewing the COI Form and Identifying Potential Conflicts of Interest:

The [Stevens Conflict of Interest Policy](#) outlines several situations that may create an actual or potential conflict between an individual's personal or professional interests and Stevens' interests. Employees should refrain from taking action or making decisions on behalf of the University in situations in which their individual interests may compromise, or appear to compromise, their professional judgment.

The following types of conflicts are outlined with examples in the [Stevens Conflict of Interest Policy](#):

- Individual Conflicts of Interest
- Conflicts Involving Family or Household Members
- Conflict of Commitment
- Conflict of Interest in Research and Entrepreneurial Activities
- Faculty Involvement with Start-up and Industry Activities
- Institutional Conflicts of Interest



Viewing the COI Disclosure Form from the Previous Year:

For your reference, you can view the disclosure form from the previous year for each direct report. Please refer to the instructions in [How to Complete the Conflict of Interest Form - Managers](#).

Completing the Manager Approval Task in Workday:

Please refer to the instructions in [How to Complete the Conflict of Interest Form - Managers](#).

I have reviewed this disclosure form and determined that: (Required)

- The employee had no actual or perceived conflict of interest.
- The employee has an actual, perceived, or possible conflict of interest, and a conflict management plan will be adopted by the University and the affected individual as warranted to manage, reduce or eliminate the conflict.

Developing a Mitigation Plan:

Upon review, if you determine that a direct report has an actual, perceived, or possible conflict of interest, you are responsible for providing a conflict mitigation plan to manage, reduce, or eliminate the conflict.

You should review the disclosure form with your direct report and fully understand the potential conflict.

Wherever possible, the manager will adopt a plan to manage, reduce or eliminate the conflict and will work with the impacted individual to ensure implementation of the plan. As their manager, you will need to provide a summary of the actions that will mitigate the conflict. The mitigation plan should take into consideration the specific circumstances and necessary actions to address a conflict on an ongoing basis. The written conflict mitigation plan will be reviewed by Internal Audit, and if appropriate, it will be adopted.

Please note that there may be some situations where a mitigation plan is not appropriate.

In addition, employees have an affirmative obligation to disclose any actual or potential Conflict of Interest as circumstances arise, and at least annually.

If you have any questions relating to the development of a mitigation plan, please feel free to contact Internal Audit (internalaudit@stevens.edu). In addition, the Internal Audit team will host office hours on Tuesdays from 3:00 – 4:00 pm and Thursdays from 11:00 am – 12:00 pm. Please feel free to set up a consultation by sending an email to internalaudit@stevens.edu.



Examples of Potential Conflicts:

The following are examples of potential conflicts that would warrant evaluation for conflicts.

- A staff member is to take part in the selection of a supplier from a number of bidders. One of the bidding companies is operated by the staff member's family member.
- A faculty member is offered a position on a scientific board of a company that has research contracts with the faculty member's department.
- A staff member serves as a director of an organization that does business with the University.
- A staff member works part-time for a company outside of traditional work hours with no connection to the University.
- Faculty member is the founder of a start-up company that sponsors research at Stevens.
- Employee supervises Family/Household member.
- Employee invests in privately held outside entities of their subordinates or students.
- Employee's spouse is employed by a Stevens vendor.
- Faculty member and Family/Household member are both employed by Stevens.
- Employee volunteer work requires excessive commitment of time.

Where to Go for Help

If you have any questions regarding the policy or disclosure form, please do not hesitate to contact Internal Audit (internalaudit@stevens.edu). In addition, the Internal Audit team will host office hours on Tuesdays from 3:00 – 4:00 pm and Thursdays from 11:00 am – 12:00 pm. Please feel free to set up a consultation by sending an email to internalaudit@stevens.edu.