

Annual AIR Disclosures: Reviewer FAQs

What are some common issues/red flags with disclosures?

- Entering vague answers such as “business interests” or “outside consulting” when asked about the outside activity/interest.
- Answering “Yes” to a question in Part 1 but failing to provide additional details in Part 2.
- Failing to describe how/whether an activity relates to university duties in Part 2. Reviewers need this information to determine whether a potential conflict exists.
- Failing to disclose relevant outside interests/activities. As a reviewer, you are not expected to know the full scope of an employee’s outside activities. However, if you are aware of items the employee has failed to disclose, please return the disclosure for revisions.

Which items should be marked as potential conflicts?

Conflicts of Interest exist when an employee has personal, financial, or professional considerations that could be seen as affecting their professional judgment in exercising any USC duty.

Conflicts of Commitment exist when an employee engages in external activities, either paid or unpaid, that may interfere with their primary commitment to the University.

Relevant USC policies and definitions regarding conflicts are posted [here](#).

What are some examples of potential conflicts?

- An employee has a financial interest (equity, income, etc.) in an outside business related to their area of research.
- An employee has a second job or an outside professional activity that impacts their ability to meet the time commitment required of their USC position.
- An employee has a financial interest in a company that does business with USC. For example, their spouse works for a firm seeking a contract with the employee’s department.
- An employee has an outside financial interest in a company that uses university resources (facilities, equipment, supplies, etc.).
- An employee’s family member works at USC in a role that could potentially overlap with their area of authority/supervision.

This [COI Scenarios](#) document contains additional examples related to potential conflicts.

What steps should be taken with potential conflicts?

A management plan must be implemented to ensure the outside interest/activity does not affect the employee’s university duties. Management plans can utilize a range of strategies to address the conflict, such as:

- Ceasing the outside activity or divestiture of the outside financial interest.
- Recusal from specific university activities/decisions that relate to the outside interest.

- Setting specific parameters/time limitations on the outside activity.
- Disclosing the outside interest to colleagues, collaborators, and relevant research publications.
- Establishing research safeguards to ensure the outside interest does not impact the integrity of the research (third party review, restrictions on data management, etc.).

Does every item disclosed require a management plan?

No. Only items that present a potential conflict of interest or conflict of commitment require a management plan.

Faculty members are expected to be involved in a range of professional activities. Which items should be included in this disclosure?

[ACAF 1.50](#) provides a helpful summary of which activities should be disclosed as outside professional activities (OPA). If faculty members have questions about whether a particular item should be included, they should contact their Department Chair or Dean.

How do I review/approve management plans?

When you return the disclosure to the employee with items marked as potential conflicts, they will be prompted to upload a management plan. Once the disclosure is resubmitted with a management plan, you can review the plan in the “Disclosure Review” tab. See [Reviewer Tip Sheet](#) for additional details. You do not need to sign the management plan, as your approval will be captured digitally in the AIR system.

Once a management plan is approved, should I change my evaluation to “No Potential Conflict”?

No. After the management plan is approved, your evaluation should remain “Potential Conflict of Interest”. The potential conflict still exists, although it is now being managed.

Do management plans need to be resubmitted each year?

Approved management plans carry forward in the AIR system and remain attached to the same entities if they are disclosed in future years. Please review the attached management plan each year. If changes are needed, ask the employee to upload an updated plan with their disclosure.

How do I know if I am finished with my reviews?

Reviewers can access detailed status reports under the “Reports” tab in AIR. You can also search the status of specific employee disclosures under the “Search” tab.

Who should I contact if I have questions during the review process?

- For technical issues with the AIR system: Debbie Kassianos, kassiano@mailbox.sc.edu
- Conflicts/management plans: COI@mailbox.sc.edu
- Faculty policies/OPA: Mary Anne Fitzpatrick, fitzpatm@mailbox.sc.edu
- Research proposals and potential conflicts: Tommy Coggins, tcoggins@mailbox.sc.edu