Reviewer Tip Sheet: Navigating and Reviewing Disclosures in the AIR System
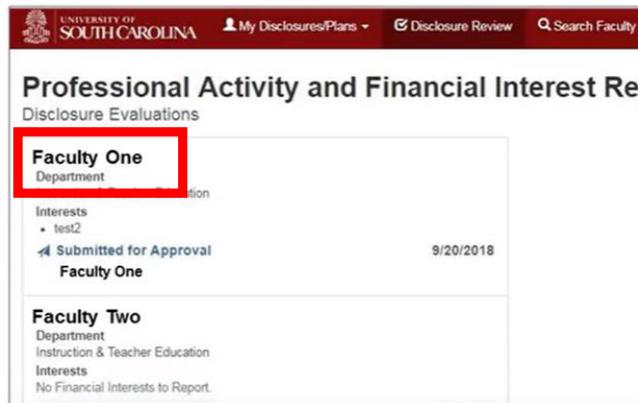
1.) Login to the AIR System with your Network ID and Password

2.) Click on the **Disclosure Review** tab to access disclosures you need to review

3) Disclosures pending your review will be listed on the left-hand side of the screen. Click the employee's name to open the disclosure.

4) Review the employee's disclosure information on the right side of the screen. Select one of three options:

- **Disclosure Incomplete:** Select this option if you feel the disclosure needs additional details for you to be able to determine whether a potential conflict exists. For example, if the disclosure lists an outside activity (e.g., paid consulting) but does not provide enough context for your review (e.g., nature of the consulting work, time commitment, whether the consulting relates to university duties)— selecting "disclosure incomplete" is the appropriate option.

  Reviewers are NOT expected to know about all potential issues employees should be disclosing. However, in cases where you are aware of a relevant item (e.g. a financial interest the employee disclosed in previous years but forgot to include this year)— please confirm with the employee and select "disclosure incomplete" as needed.

- **No Potential Conflict:** Select this option if you feel the activities and interests listed do not present a potential conflict with the employee's duties at University of South Carolina.

- **Potential Conflict of Interest:** Select this option if the employee has financial, professional, or personal considerations that may affect (or have the appearance of affecting) their university duties. For examples, please review the scenarios and resources posted at: https://tinyurl.com/usc-coi.

After selecting your evaluation option, enter any comments to the employee as needed.

For example: "Please provide additional details on whether your spouse's business has any overlap with your duties at USC".
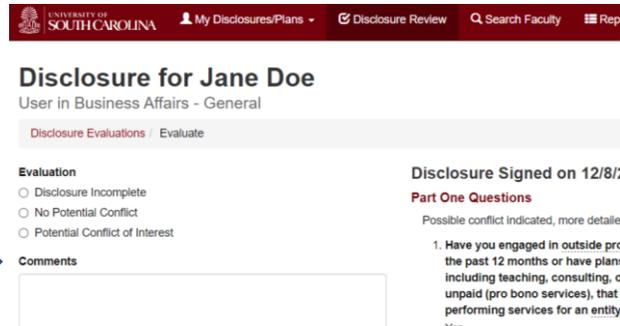
5. If you select "Potential Conflict of Interest", the employee will need to create a management plan for each entity that has a potential conflict.
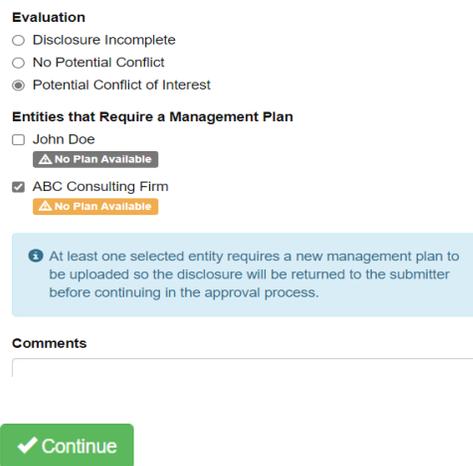
Under the "Entities that Require a Management Plan" section, check the box next to each entity requiring a management plan. You can select multiple entities if needed.

Enter comments as needed

Then click the green "Continue" button

6. The disclosure has now been returned to the employee for revisions and/or management plan upload. The employee will receive an auto-notice to login to AIR and make the requested changes.

- **Please note**: If you have asked the employee to develop and upload a management plan, please communicate with them during this process so they are aware of your expectations as they draft the management plan.

Once the employee re-submits their disclosure or uploads their management plan, you will receive an auto-notice that you have a pending disclosure in AIR awaiting your review.

7. Review the re-submitted disclosure or uploaded management plan.

From the **Disclosure Review** tab, click anywhere in the employee's profile box to review the re-submitted disclosure or management plan.

Click the "Potential Conflict of Interest" button to open the list of interests.

Evaluation
○ Disclosure Incomplete
○ No Potential Conflict
◉ Potential Conflict of Interest

Entities that Require a Management Plan
☐ John Doe
⚠ No Plan Available

☑ ABC Consulting Firm
✔ View Uploaded Plan
☐ Revision Required

Then click the green "View Uploaded Plan" button to review the management plan.

If you require revisions to the management plan, click the "Revision Required" box, enter any comments, and click "continue".

If you are satisfied with the management plan, check the confirmation box noting you agree with all elements of the management plan(s)

☑ ABC Consulting Firm
✔ View Uploaded Plan
☐ Revision Required

☑ I have reviewed and agree with all of the elements in each management plan from each of the selected entities.

Comments

Click the green "Continue" button to move the disclosure forward in the review process

✔ Continue

Reminder: All disclosures with a management plan <u>must</u> be marked as "Potential Conflict of Interest". <u>Do not change your rating</u> to "No Potential Conflict" once you approve the management plan. The potential conflict still exists so the disclosure remains marked as "Potential Conflict of Interest".

---

8. If the disclosure you reviewed has a potential conflict of interest, it will now be routed to the next level reviewer. The review and approval paths in AIR are:

- Faculty disclosure → Department Chair → Dean
- Staff disclosure → Unit Approver → Dean/VP → HR Official

Note: If a staff member discloses no items in their submission, the report is auto approved (no review). Office of Research Compliance (ORC) also reviews disclosures related to research proposals.

Resources and Support:

- AIR System (technical issues, routing problems, etc.): ProfAct@mailbox.sc.edu
- Faculty questions: COI@mailbox.sc.edu or Mary Anne Fitzpatrick (fitzpatm@mailbox.sc.edu)
- Staff questions: COI@mailbox.sc.edu or Melissa Arnold (marnold@mailbox.sc.edu)
- Research-related questions: Lisa Johnson (lisaj@mailbox.sc.edu)
- University of South Carolina COI Webpage: https://tinyurl.com/usc-coi