



## COI/COC Disclosure Reviewer Checklist

This Checklist is meant as a guide for department, college, and/or other administrative reviewers of COI/COC Disclosures. It does not address all possible concerns in the COI/COC Disclosure review process but can help guide the reviewer on whether clarifying questions should be asked, revisions should be requested, or when a form appears approvable. It is important to note that department/college approval does not mean the disclosure may not require additional steps prior to final approval, including but not limited to the implementation of a management plan, rather it means that the disclosure is accurate and complete to the best of the reviewer's knowledge. Additionally, this also means that the disclosed Outside Professional Activities are approvable at a department/college level.

Please review the [Policies relating to COI/COC Disclosures](#) prior to reviewing disclosures and using the below checklist.

### Instructions for using the Checklist:

1. The Checklist is separated into different sections, corresponding to the COI/COC Disclosure's sections. Answer the questions for each section, as applicable. If a submitter was not required to complete a section, you may skip that section and move onto the next one.
2. Answer each question to the *best of your knowledge* as the submitter's supervisor. Submitters are responsible for answering the COI/COC Disclosure accurately and completely and if you are aware of something that should be disclosed, you should bring this to the attention of the submitter.
3. If you answer "no" to one or more questions, clarifications and revisions may be needed. If you answer "yes" to all applicable sections, the form may be approvable.
4. The [red underlined words](#) are links to resources and guidance topics provided throughout this Checklist for reference to additional information.
5. As you are using this checklist and/or reviewing a disclosure, we strongly recommend you reference our [Training information](#). This provides guidance and specific information on what is expected to be disclosed or not.
6. If you have any questions or concerns, please feel free to reach out to UNL COI Staff at [unlcoi@unl.edu](mailto:unlcoi@unl.edu)



### Reviewer Checklist:

Yes	No	Overview Questions
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|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Are the questions answered accurately?<br>Make sure to check... <ul style="list-style-type: none"><li>○ The correct Primary Department is selected</li><li>○ 4.f. President, Chancellor, Provost/Vice President/Vice Chancellor, Vice Provost, Associate/Assistant Vice Chancellor, Associate/Assistant Vice President, <b>Dean, Chair, Director</b>, Athletic Director, Head Coach or <b>equivalent</b> is selected as applicable.</li></ul> |
| <input type="checkbox"/> | <input type="checkbox"/> | Does the submitter answer correctly <a href="#">PHS/DOE</a> funding questions? <ul style="list-style-type: none"><li>○ Please note Question 6 refers to current funding, a submitted proposal, or plans to submit a proposal to PHS and/or DOE funding agencies.</li></ul>  |

Yes	No	Institutional Conflicts of Interest (ICOI)
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- \*Please see our guidance on [ICoIs](#)
- Complete this section if the submitter is director level or above.
- If the submitter is director level or above, they should have selected 4.f. on the Overview Questions and complete the ICOI questions. If they have not selected 4.f., please request revisions.
  - If no, please skip this section (leave blank).
- |                          |                          |  |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Are the questions answered accurately? |
|--------------------------|--------------------------|--|

Yes	No	Financial Conflicts of Interest (FCOI)
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- \*Please see our guidance [COI/COC Best Practices](#), [Management Plans & Oversight Agreements](#), & [COI Review & Management Process](#)
- Complete this section if the submitter has equity/ownership in an outside entity AND/OR they have received remuneration from an outside entity in the last twelve (12) months.
- If the submitter has equity/ownership in an outside entity and/or has received remuneration from an outside entity in the last 12 months, they should have selected “yes” to question 9 in the Overview Questions and should have an entry in this section, the FCOI section, for each outside entity.



- If you believe the submitter has equity/ownership in an outside entity and/or has received remuneration from an outside entity in the last 12 months but they answered “no” to question 9, please follow up with the submitter and request revisions.
  - If no, please skip this section (leave blank)
- Are the questions answered accurately?
- Do you understand what is being disclosed?
  - If you do not understand what is being disclosed, you should clarify questions with the submitter. Please add clarifying comments to the submitter’s disclosure via the “Files” or messaging tool. It is important to note that the submitter is able to see what files are uploaded and what messages are sent.
- If [students/postdocs/trainees](#) are involved with the outside entity (or entities), do you understand how they are involved and is their involvement appropriate?

Yes	No	<b>Outside Activities Questions</b>
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Complete this section if the submitter has outside professional activities.

- If they have outside professional activities, they should have selected “yes” to Question 10 in the Overview Questions and should complete the Outside Professional Activities section.
  - If you believe they have outside professional activities, but they answered “no” to Question 10, please follow up with the submitter and request revisions.
  - If no, please skip this section (leave blank).
- Are the activities approvable at a Department/College Level (e.g., does it require a reasonable amount of time/working hours or are there any concerns?)
- Do the activity/activities fall within [Board of Regents \(BoR\) Outside Activities policy?](#) (i.e., the outside professional activities require an average of less than 2 working days per month (in total) and/or the employee is not being retained to provide professional services outside UNL for more than 2 years)
- Does the activity [use University Resources](#) as appropriate (with proper rental or other agreements in place)?
- If [students/postdocs/trainees](#) are involved, do you understand how they are involved and is their involvement appropriate?

Yes	No	<b>Reimbursed or Sponsored Travel Questions</b>
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Complete this section if the submitter has reported any reimbursed or sponsored travel.



- Travel that is funded by UNL or falls under a UNL OSP project does NOT need to be reported. If the disclosed travel is funded by UNL or falls under a UNL OSP project, please request revisions to remove the travel entry (or the portion of the travel so supported).
  - Travel that is funded by a U.S. governmental agency or a U.S.-based institution of higher education does NOT need to be reported. If the disclosed travel is supported/funded by either type, please request revisions to remove the travel entry (or the portion of the travel so supported).
  - If the submitter does not report any reimbursed or sponsored travel, please skip this section (leave blank)
- Are questions answered accurately?
- Does the submitter only report sponsored/reimbursed travel from outside entities (e.g. not UNL, or a UNL-supported activity)?

Yes	No	<b>Activities with Foreign Entities</b> *Please see our guidance on <a href="#">Foreign Influence/Talent Programs</a> & <a href="#">Transparency in Research</a>
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Complete this section if the submitter reports current or pending activities with foreign entities and/or any involvement with a foreign talent recruitment program.

- If you believe the submitter may have activity to report in this section but does not, please follow up with the submitter and request revisions as applicable.
  - If the submitter does not need to complete this section, please skip (leave blank)
- \*NOTE: Foreign research collaborations that are covered as part of a UNL-related activity or research project (like an OSP, IRB, IACUC, etc... project), or otherwise directly involve UNL (like a UNL executed memorandum of understanding (MOU)) do NOT need to be reported in this section as these activities would be considered part of an employee's institutional responsibilities.
- Are questions answered accurately?
- Are the activities normal, expected activities?
- Does the submitter only report activities with foreign entities that are not already covered under a UNL OSP project or other UNL process (e.g., a UNL executed MOU with the foreign entity)?



- If there is a contract/MOU/agreement, etc...signed by the employee in their personal capacity, should it actually fall within University policies, including direct University involvement?

### Things to Keep in Mind:

#### Reportable New Information Form (RNIF)

- RNIFs are ONLY used when an individual has failed to disclose an activity, or has failed to receive pre-approval for an activity, within 30 days of submitting their COI/COC Annual Disclosure.
  - o Review the form for any indication of it being accidentally started, or if there is no new *reportable* information being disclosed that was not included in the individual's previous COI/COC Annual Disclosure (including a Change Request form).
- If the RNIF was started inadvertently or no new information is being reported:
  - 1) Reach out to the individual for confirmation that the form was initiated in error and/or the form does not disclose any new *reportable* information.
  - 2) Upload confirmation email to the Files section of the disclosure.
  - 3) Add a comment to the general comments section of the form indicating the form's inadvertent creation.
  - 4) Reach out to RCS COI Staff regarding the form's inadvertent creation, and they will administratively close the form.

If you have any comments or items clarified you'd like to document/notify RCS or Administrative Reviewers of, please use the "Files" or comments tool in NuRamp. Just remember that the submitter is able to see your comments. If you'd like to comment in private, please email RCS or Administrative Reviewers directly.