**Conflict of Interest Program 2019**

**Information for Unit Contacts and Approvers**

**Your Role as a Campus/Collegiate/Unit Contact**

* Serve as a liaison between the Conflict of Interest Program and the REPA Filers in your organization
* Identify REPA filers who require special mapping of their REPA for review; e.g., Department head/chair to collegiate approver.
* Identify REPA filers who may be eligible for an exemption (e.g., a P&A lecturer who teaches one class)
* Answer questions for REPA Filers in your organization, such as helping them identify their departmental approver
* Work with REPA Filers in your organization to complete their REPA by the deadline and ensure 100% of the Covered Individuals in your organization complete their REPA.

**How to Access your Compliance Report**

<http://egms.umn.edu/>

* Scroll down and click on **EGMS forms**
* On the Main Menu, scroll down and click on **System Reports**
* Click on the top link for **REPA Reports menu (restricted access)**
* On the EGMS REPA Reports Main Menu, click on **REPA Compliance Report.**
* Click on the link toyour collegeand when the drop down menu for the year appears, click on the current year.

**This is the REPA compliance report for your college.**

This report shows all of the individuals in your college that are required to file a Report of External Professional Activities (REPA**).**

Filers are on the REPA Compliance Report because they fall into one or more of the following categories:

* **HR** – on the list based on their faculty or PA appointment job code.
* **SP** – on the list because the individual was listed as the Principal Investigator or Co-Investigator or Key Personnel on an active award. These qualifications are based on data from the Sponsored Projects Administration database.
* **RS­** – on the list because he or she was listed as Principal Investigator, Co-Investigator, or Student Investigator on a medical or social human participant protocol. These qualifications are based on data from the RSPP database.

Starting in April, this report is updated weekly on Sunday night. Individuals that have been added to the list will be highlighted in yellow. If this individual does not fall within the default mapping for your College, you must request Special Mapping from the Conflict of Interest Program within two weeks of them being added to the Compliance Report.

**Special Mapping**

Special Mapping is used only when an individual’s approval route falls outside of the default mapping that has been designated for your College. There are two levels of approvers as the default:

1. Departmental Approver (which is entered by the filer when completing the REPA) and
2. Collegiate Approver (which is hard-wired into the EMGS system and cannot be changed once the electronic REPA has been started).

Examples of individuals that require Special Mapping are Department Heads (they have no department approver), Deans (they report directly to the Provost) and Collegiate Approvers (because they cannot approve their own REPAs).

**Instructions for Reviewing and Processing REPAs**

**General information**

Each REPA filer has one or two designated approvers who are charged with reviewing REPA disclosures to ensure they are, to the best of their knowledge, complete and accurate.

Timely reviews of REPAs are required to ensure conflicts of interest are identified and managed expeditiously.

These instructions provide you with the means to process REPAs in a timely fashion.

**Designating an Alternate Approver**

Primary approvers are encouraged to designate alternate approvers to review and process REPAs. Since an alternate approver can process only those REPAs submitted after the designation is made, the best practice is to designate alternate approvers before the annual REPA season begins.

* On the EGMS Home Page (http://egms.umn.edu), click on EGMS Forms.
* Log in with your Internet ID and password.
* Click on User Preferences on the Main Menu.
* In the Alternate Approver fields, add the Internet ID of up to four individuals whom you authorize as your alternate to approve REPAs, ROCs (Request for Consultant or Outside Service Agreements), PRFs (Proposal Routing Forms), FNAs (FormsNirvana Access Requests), and MTARFs (Material Transfer Agreement Routing Forms).
* Click the Ok button.
* Note: If the system won’t accept your designation, it may be because the individual is not set up as an approver in the EGMS. If this occurs please contact the Conflict of Interest Program at (612) 626-1462 or repamail@umn.edu.

**Reviewing and Processing REPAs**

* On the EGMS Home Page (<http://egms.umn.edu>), click on EGMS Forms.
* Log in with your Internet ID and password.
* Click on OK/Deny Requests on the Main Menu. If you are an Alternate Approver, click on Alternate Approver OK/Deny Requests on the Main Menu. The forms awaiting your review are listed on the screen.

NOTE: EGMS provides an option for Approvers to batch approve in a single step all REPAs containing “no” responses to all 5 general questions, and REPAs containing “yes” responses to general questions 4 and/or 5. For instructions on batch approval, see the section below titled “**Batch Approving Multiple REPAs.”**

* To review an individual REPA, click on its Request Number hyperlink in the left-hand column.
* Review the REPA information for completeness and accuracy.
* If not complete and accurate, return the REPA. Follow up with the covered individual if you believe the information reported may not be complete or accurate. To return the REPA to the Preparer for changes:
* Explain in the Comments box the reason for returning the form, and ask that the preparer resubmit the form with the requested changes.
* Click the **Return Request** button to return the unapproved REPA to its Preparer.
* The Preparer will receive an email notice that the REPA has been returned.
* If complete and accurate, process the REPA.
* Refer to the COI Program.
* Mandatory. If the filer reported financial or business interests (i.e., answered “yes” to general question 2 or 3), the **OK Request** button will not appear and the REPA must be referred to the Conflict of Interest Program for review. To refer a REPA, click the **Refer REPA** button.
* Discretionary. An approver may decide to refer a REPA that reports external activities in response to Question 1, or sponsored travel in response to the subquestion for general question 5. To refer a REPA, click the **Refer REPA** button.
* The COI Program will approve the REPA once it is determined that the filer has no conflict or, in the event of a conflict, a conflict management plan has been approved and executed. When the REPA is approved the filer and the Collegiate level approver will receive an email notice.
* Approve the REPA. If the filer has no reported financial or business interest (i.e., has not answered “yes” to general question 2 or 3) you may approve the REPA.
* Click the **OK Request** button to attach your electronic approval signature.
* The filer will receive an email message stating that you have approved the form. If the form has another Approver listed in the routing path, that Approver will receive an email notice that this REPA is pending review. If you are the Collegiate level approver, the REPA will be finally approved.

**Batch Approving Multiple REPAs**

On the EGMS Home Page (http://egms.umn.edu), click on EGMS Forms.

* Log in with your Internet ID and password.
* Click “Make a Request” on the Main Menu.
* Click the 'REPABATCH-Batch Approval of REPA forms' line. If you do not have 'REPABATCH' as an option, contact the Conflict of Interest Program at (612) 626-1462 or repamail@umn.edu.
* Click the Make Request button.
* Select the primary approver or alternate approver radio button. Click Continue REPABATCH.
* EGMS assembles a list of the REPAs which contain no reported external professional activities, financial interests, business interests, or comments left by the preparer.
* Check that none of the forms on the batch list is from an individual you believe has external professional activities, financial interests, or business interests to report (i.e., an individual who may have mistakenly answered "no" to one or more general questions).
* If you wish to defer approval of a particular REPA form on the batch list until later, click the Process later button next to that form.
* Click the Submit Request button. Your electronic approval signature is attached to those forms for which 'OK' was indicated. Forms marked as 'Process later' can be reviewed and processed at another time.

 **Managing e-mail notifications regarding REPAs awaiting your review**

Primary approvers can choose to receive an email notice when a REPA has been forwarded for review:

* On the EGMS Home Page (http://egms.umn.edu), click on EGMS Forms.
* Log in with your Internet ID and password.
* Click on User Preferences on the Main Menu.
* Click the Yes or No radio button to receive or disable e-mail notifications.
* Click the Ok button.

Alternate Approvers: Alternate Approvers do not receive e-mail notification of REPAs waiting for review. As an Alternate Approver, you must monitor whether forms are waiting for your review. If you see a REPA form on your list as an Alternate Approver, do not review and approve the form unless you are asked to do so by the Approver, as the Approver may have more than one designated Alternate Approver.

**How Do I View or Print My REPA?**

You can review and print a REPA as soon as the form is submitted. Note that printing a REPA requires Adobe Acrobat Reader software.

To view a submitted REPA:

1. Go to <http://egms.umn.edu/> and click on “EGMS Forms” near the bottom right corner.
2. If prompted, log in with your Internet ID and password.
3. Click on “Status of Requests” on the Main Menu.
4. A list of your previously submitted EGMS Requests will appear. Select the hyperlink for the form you wish to view.

To print a submitted REPA:

1. Follow the above instructions to access the REPA you wish to print.
2. Scroll down three-fourths of the way down the page and click the “View/Print Acrobat PDF” button.

**How Do I Access My Returned REPA?**

If your departmental or collegiate approver returned your REPA to you to make changes, you should have received an automated e-mail with a link to follow to the returned REPA. If you did not receive an e-mail, to access the form manually:

1. Follow the instructions above to view the submitted REPA.
2. After you access the returned REPA, click on the “History” button in the top left corner of the page. That button will take you to the comments your approver left when he or she returned the REPA to you.
3. If your approver left comments for you, make the changes your approver requested and scroll down to click “Re-Submit Request.”
4. If your approver did not leave comments for you, contact that approver directly to find out why the REPA was returned to you.

**Conflicts of Interest Policies**

**Board of Regents Policies**

* **Board of Regents Policy:**[**Individual Conflicts of Interest**](https://regents.umn.edu/sites/regents.umn.edu/files/policies/Individual_COI.pdf)
* **Board of Regents Policy:**[**Institutional Conflict of Interest**](http://regents.umn.edu/sites/regents.umn.edu/files/policies/Institutional_COI.pdf)

**Administrative Policies**

(Related procedures are listed below each policy.)

* **Administrative Policy:**[**Individual Conflicts of Interest**](http://www.policy.umn.edu/Policies/Operations/Compliance/CONFLICTINTEREST.html) **and Standards Governing Relationships with Business Entities**
* [Reporting External Relationships and Business and Financial Interests](http://www.policy.umn.edu/Policies/Operations/Compliance/CONFLICTINTEREST_PROC01.html)
* [Evaluating Reports of Business and Financial Interests and Managing Individual Conflicts of Interest](http://www.policy.umn.edu/Policies/Operations/Compliance/CONFLICTINTEREST_PROC02.html)
* **Administrative Policy:**[**Institutional Conflict of Interest**](http://policy.umn.edu/Policies/Operations/Compliance/INSTITUTIONALCONFLICT.html)
* [Reviewing and Managing Potential Institutional Conflicts of Interest](http://policy.umn.edu/Policies/Operations/Compliance/INSTITUTIONALCONFLICT_PROC01.html)

**Related Policies**

**Board of Regents Policies**

* **Board of Regents Policy:**[**Outside Consulting and Other Commitments**](http://regents.umn.edu/sites/regents.umn.edu/files/policies/Outside_Consulting.pdf)

**Administrative Policies**

* **Administrative Policy:**[**Outside Consulting and Other Commitments**](http://www.policy.umn.edu/Policies/Operations/Compliance/OUTSIDECONSULTING.html)
* [Outside Consulting and Other Commitments by Faculty and Academic Professional and Administrative (P and A) Staff](http://www.policy.umn.edu/Policies/Operations/Compliance/OUTSIDECONSULTING_PROC01.html)
* [Outside Consulting and Commitments by Intercollegiate Athletics Staff](http://www.policy.umn.edu/Policies/Operations/Compliance/OUTSIDECONSULTING_PROC02.html)

**Website Links**

###### Conflict of Interest Program

<https://coi.umn.edu/>

Conflict of Interest Training (new in 2018; required every 4 years)*:* click “COI Education” on website

**COI Contact Information**

For REPA assistance, contact the REPA Helpline at (612) 626-1462, or send an email to repamail@umn.edu.

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