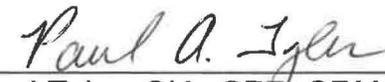


Conflict of Interest/Conflict of Commitment Internal Audit Report
Project # 2019-60
October 8, 2019

Reviewed by:


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This engagement was conducted in accordance with The Institute of Internal Auditors' International Standards for the Professional Practice of Internal Auditing and with Government Auditing Standards.

Executive Summary

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At the request of the UTSA President, Internal Audit conducted an audit of the Conflict of Interest/Conflict of Commitment policies and procedures. Specifically, the objectives were:

- Determine if UTSA has procedures in place to ensure a clear understanding of conflict of interest\conflict of commitment requirements for UTSA faculty and staff.
- Determine if conflict of interest\conflict of commitment management plans for applicable employees are managed and monitored.

Conclusion:

The Offices of the Provost and Senior Vice President for Academic Affairs and the Interim Vice President for Research, Economic Development and Knowledge Enterprise have policies and procedures in place to collect and manage faculty and staff disclosures. They are actively engaging in collaborations to update existing policies and procedures to address oversight of staff disclosures and the evolving compliance environment.

However, gaps were noted in the:

- Timeliness of disclosure review,
- Oversight over institutional officials' disclosures,
- Procedures to ensure completeness of disclosures, and
- Clarity of the Committee on Conflict of Interest responsibilities.

The Associate Vice President for Research Administration and the Senior Vice Provost and Dean of University College are communicating and coordinating to address the gaps and to optimize the control structure by updating existing policies and procedures to ensure the UTSA community has a clear understanding of Conflict of Interest/Conflict of Commitment responsibilities.

Joint Management Action Plans - *Provost and Senior Vice President for Academic Affairs and Senior Vice Provost and Dean of University College and Interim Vice President for Research, Economic Development and Knowledge Enterprise and Associate Vice President for Research Administration*

- Review all Conflict of Interest / Conflict of Commitment disclosures in accordance with the Handbook of Operating Procedure requirements (High).
- Update and Communicate HOP policies on Conflict of Interest / Conflict of Commitment and related procedures/guidance to the UTSA community through various methods including training (High).

Management Action Plans - *Interim Vice President for Research, Economic Development and Knowledge Enterprise and Associate Vice President for Research Administration*

- Create an Institutional COI policy/procedure (High).
- Update Committee on Conflict of Interest responsibilities and actions (Medium).

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Management Action Plans - *Provost and Senior Vice President for Academic Affairs and Senior Vice Provost and Dean of University College*

- Update procedures for all non-tenure track/fixed term faculty who have no significant business or financial interest and no significant outside interests/activities to submit an acknowledgement to that effect and coordinate discussions with University Leadership to develop similar oversight for staff disclosures (Medium).

This audit resulted in three High, two Medium, and no priority findings. A priority finding is defined as “*an issue identified by an internal audit that, if not addressed timely, could directly impact achievement of a strategic or important operational objective of a UT institution or the UT System as a whole.*” Non-priority findings are ranked as High, Medium, or Low, with the level of significance based on an assessment of applicable Qualitative, Operational Control, and Quantitative risk factors and probability of a negative outcome occurring if the risk is not adequately mitigated.

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Background

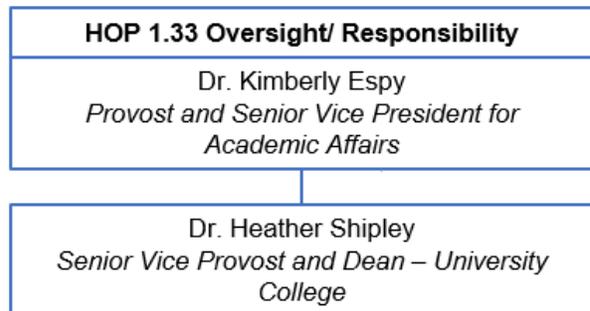
To protect the credibility and reputation of UTSA, to comply with federal and state regulations, and to maintain an environment that promotes high ethical standards, faculty and staff disclose activities and financial interests outside UTSA that could potentially raise concerns about conflicts of interest or conflicts of commitment.

- A conflict of interest (COI) is a significant outside interest or activity of an employee or their immediate family member that could appear to a reasonable person to directly or significantly affect the employee’s performance of their UTSA duties. A COI is generally an issue of financial or personal gain.
- A conflict of commitment (COC) occurs when the time or effort that a UTSA employee spends on an outside activity directly or significantly interferes with the employee’s fulfillment of their UTSA responsibilities.

The Handbook of Operating Procedures (HOP) provides guidance on conflict of interest and conflict of commitment responsibilities at UTSA:

[HOP 1.33 Conflict of Interest, Conflict of Commitment, and Outside Activities](#) requires non-tenure track/fixed-term faculty and covered staff to have prior approval before engaging in outside activities with exceptions such as serving on a federal, state, or local government agency committees or serving on a professional or school board. Covered staff are UTSA employees who are not entitled to overtime pay and employees designated by their vice president as having authority to exercise discretion with regard to the award of contracts or other financial transactions.

A Request for Prior Approval of Outside Activity Form is submitted by the faculty and covered staff on an online portal hosted by UT System. The employee’s supervisor should review, approve or deny the Request for Prior Approval of Outside Activity Form within the UT System online portal. When necessary, a Management Plan is created and monitored by the employee’s supervisor to ensure appropriate oversight.



[HOP 10.04 Conflicts of Interest in Research & Intellectual Property](#) requires the completion of the Disclosure of Financial Interests form at the beginning of each calendar year by researchers. Researchers include tenured and tenure-track faculty, individuals listed on an Institutional Review Board or an Institutional Animal Care and Use Committee protocol, and anyone the Principal Investigator identifies as responsible for the design, conduct, or reporting of the research.

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The Office of Research Integrity reviews the Disclosure of Financial Interests to determine if a potential conflict of interest (COI) exists and to determine if a full review is necessary by the Committee on Conflict of Interest in Research and Intellectual Property (CCOI).

The CCOI will make a recommendation to the Interim Vice President for Research, Economic Development, and Knowledge Enterprise (VPREDKE) for handling the conflict. The VPREDKE may consult with the Provost if necessary to make the final determination in handling the conflict, which may lead to a Management Plan. The Management Plan is created and monitored by the employee's supervisor to ensure appropriate oversight.

HOP 10.04 Oversight/ Responsibility
Dr. Bernard Arulanandam <i>Interim Vice President for Research, Economic Development, and Knowledge Enterprise</i>
Dr. Michelle Stevenson <i>Associate Vice President for Research Administration</i>

Additionally, [HOP 4.31 Conflicts of Interest](#) is under review due to the adoption of HOP 1.33, but is still in effect until officially revised, except to the extent that any provision of the policy is found to be in conflict with HOP 1.33.

Additional UT System guidance on managing conflicts of interest include:

- [UT System Regents Rule 30104: Conflict of Interest, Conflict of Commitment, and Outside Activities](#) states the primary responsibility of employees is to complete duties assigned to one's appointment and states unmanaged conflicts of interest are prohibited.
- [UT System Policy \(UTS\) 175 Disclosure of Significant Financial Interests and Management and Reporting of Financial Conflicts of Interest in Research](#) contains a model policy for disclosure of significant financial interests and management and reporting of financial conflicts of interest in research.
- [UT System Policy \(UTS\) 180 Conflicts of Interest, Conflicts of Commitment, and Outside Activities](#) contains best practices and a framework to address conflicts of interest, conflicts of commitment, and outside activities.
- [UT System Policy \(UTS\) 189 Institutional Conflicts of Interest](#) requires each U.T. institution to adopt a policy to identify, disclose, and manage or eliminate Institutional Conflicts of Interest and requires each institution to create an Institutional Conflicts of Interest Committee.

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Audit Details

Objective: Determine if conflict of interest/conflict of commitment management plans for applicable employees are managed and monitored.

10.04 Disclosure Review

HOP 10.04 Conflicts of Interest in Research & Intellectual Property requires that employees having direct responsibility for the design, conduct, or reporting of Research or Sponsored Activities disclose in the UTSA Research Conflict of Interest Portal qualifying payments, equity interest, fiduciary positions, travel payments, intellectual property rights, and gifts on an annual basis or within 30 days of joining a research project. HOP 10.04 is applicable to:

- Tenured faculty,
- Tenure track faculty,
- Researchers who have Institutional Animal Care and Use Committee (IACUC) protocols, and
- Researchers who have Institutional Review Board (IRB) protocols.

The Office of Research Integrity reviews each Disclosure Form and convenes the Committee on the Conflicts of Interest in Research and Intellectual Property (CCOI) if necessary. HOP 10.04 Researchers with significant financial interests related to their responsibilities are reviewed by the CCOI to determine if a management plan is appropriate to mitigate a disclosed conflict.

UTSA Human Resources indicates that UTSA had 1,194 Faculty Positions, of which 51% were Tenured or Tenure Track Faculty, and 2,679 Staff as of the end of August 2019.

As of July 2019, the UTSA Research Conflict of Interest Portal Report indicated that 1,119 faculty made 1,287 submissions for FY19. The vast majority of these had no conflicts to disclose. 91 of the 1,119 employees made 106 disclosures of potential financial conflicts of interest. Of the 106 disclosures:

- 1 management plan was created,
- 67 were reviewed and no management plans were required (45% of the 67 were reviewed within 30 days), and
- 38 were pending a final determination. 82% of the 38 disclosures had been outstanding for more than 90 days. As of the conclusion of the audit, the 38 disclosures have been reviewed by the Office of Research Integrity.

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Undisclosed Outside Activities

HOP 10.04 requires disclosure for “fiduciary positions in a for-profit or nonprofit entity, including a position as a member of the board of directors, an officer, or other executive or management position, for which the Researcher received any form of remuneration or reimbursement for expenses’.

A sample of employees presumed to require 10.04 disclosure were reviewed for such fiduciary responsibilities and compared to 10.04 disclosures made to ensure completeness. No issues were noted.

1.33 Disclosure Review

HOP 1.33 Conflict of Interest, Conflict of Commitment, and Outside Activities requires that all researchers not required to report under HOP 10.04 and staff having authority to exercise discretion with regard to the award of contracts or other financial transactions timely disclose through the UT System Outside Activity Portal outside activities, outside board service, gifts, and substantial interests in a business entity. Submitted disclosures are automatically e-mailed to an employee’s authorized approver.

Supervisors, Department Chairs, Deans, the Provost, and the President are empowered to act as approval authorities and specify if a disclosure is acceptable or if a management plan is required. All disapprovals are required to be in writing and provided within 20 business days of the submitted disclosure. All disclosures are considered approved after this period if not disapproved. Unmanaged conflicts of interest are prohibited.

As of July 2019, the UT System Outside Activity Portal indicated that 268 employees made 298 submissions for FY19. 65 of the 268 employees made 89 disclosures of potential conflicts in FY19. Of the 89 disclosures:

- 2 managements plan were created,
- 61 had been reviewed and no management plans were required (all but 1 were within the 20 day window), and
- 26 are pending a final determination. The 26 disclosures pending a final determination are all past the 20 business day approval window per HOP 1.33.

The key difference between the UTSA Research Conflict of Interest Portal (UTSA Portal) and the UT System Outside Activity Portal (UT System Portal) is that the UTSA Portal is subjected to oversight and review by the Office of Research

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Integrity. The UT System Portal is not overseen by one central office, but relies on distributed management review that provides automatic presumed disclosure acceptance if management does not comment on the disclosure.

The Associate Vice President for Research Administration and the Senior Vice Provost and Dean of University College are currently discussing the possibility of merging the required disclosure into the UTSA Portal for better oversight and control.

Observation #1:	Conflict of Interest and Conflict of Commitment disclosures are not reviewed timely.
High Risk Level:	A high risk exists that significant business or financial interests and/or significant outside interests/activities will occur without management oversight.
Management's Action Plan:	<p>The current UTSA disclosure portal is being revised to abandon the UT System portal and improve access and control of data while implementing automated features such as email reminders and escalation notifications. The current goal is to have new employees disclose in the UTSA Portal beginning in February 2020. All employees will disclose as part of the Annual Compliance Training that occurs in October.</p> <p>The Senior Vice Provost and Dean of University College plans to lead discussions and collaborations with University Leadership to determine responsible parties for monitoring staff disclosures for completeness and timeliness.</p> <p>In addition, in conjunction with the Joint Task Force for the Consolidated Security of Intellectual Assets, the HOP policies are being reviewed and updated to clearly articulate disclosure responsibilities of all employees. The intended action is to update compliance training so that every employee is directed to the UTSA portal to disclose any significant business or financial interest and/or significant outside interests/activities and acknowledge understanding of the policy. Reporting the status of disclosures to supervisors, Deans, and Vice Presidents will be discussed as part of the updates. Guidance is being developed for employees and for reviewers, such as department chairs and supervisors.</p>

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	<p>HOP 4.31 content will be incorporated into HOP 1.33 as appropriate and HOP 4.31 will then be removed.</p> <p>Until all reporting occurs in one portal, a report from the UT System COI disclosure portal will be generated every quarter and Academic Affairs will send reminders to supervisors of faculty to review and approve/deny COC submitted. The Senior Vice Provost and Dean of University College is in the process of reviewing disclosures that are pending a final determination in the UT System Portal.</p> <p>The Office of Research Integrity is in the process of reviewing disclosures that are pending a final determination in the UTSA Research Portal. A new Administrative Analyst has been hired to ensure timely review of COI disclosures for tenured and tenure track faculty going forward.</p>
<p>Responsible Person:</p>	<p>HOP 10.04:</p> <ul style="list-style-type: none"> ➤ Dr. Bernard Arulanandam, Interim Vice President for Research, Economic Development and Knowledge Enterprise ➤ Dr. Michelle Stevenson, Associate Vice President for Research Administration <p>HOP 1.33 :</p> <ul style="list-style-type: none"> ➤ Dr. Kimberly Espy, Provost and Vice President for Academic Affairs ➤ Dr. Heather Shipley, Senior Vice Provost and Dean of University College
<p>Implementation Dates:</p>	<p>October 1, 2019 – Complete review of existing HOP 10.04 pending disclosures</p> <p>November 30, 2019 – Complete review of existing HOP 1.33 pending disclosures and conduct quarterly reviews of HOP 1.33 reports</p> <p>February 29, 2020 - All new employees will disclosure in the UTSA Portal</p> <p>October 31, 2020 – All employees will disclose in the UTSA Portal</p>

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Objective: Determine if UTSA has procedures in place to ensure a clear understanding of conflict of interest\conflict of commitment requirements for UTSA faculty and staff.

Outdated HOP Policies and related Guidance and Training

Three Handbook of Operating Procedures provide policies on conflict of interest and conflict of commitment responsibilities at UTSA. The date of the last update of each is:

UTSA Policies	
HOP 1.33 Conflict of Interest, Conflict of Commitment, and Outside Activities	May 2016
HOP 10.04 Conflicts of Interest in Research & Intellectual Property	September 2013
HOP 4.31 Conflicts of Interest	April 2008

Four UT System Policies provide guidance on conflict of interest and conflict of commitment responsibilities at each UT System institution. The date of the last update of each is:

UT System Policies	
UT System Regents Rule 30104: Conflict of Interest, Conflict of Commitment, and Outside Activities	November 2018
UTS 175 Disclosure of Significant Financial Interests and Management and Reporting of Financial Conflicts of Interest in Research	June 2010
UTS 180 Conflicts of Interest, Conflicts of Commitment, and Outside Activities	March 2018
UTS 189 Institutional Conflicts of Interest	May 2019

Guidance and procedures for Conflict of Interest and Conflict of Commitment are communicated by the Institutional Compliance and Risk Services (OICRS) and the Office of Research Integrity (ORI).

OICRS guidance on HOP 1.33 Conflicts of Interest, Conflict of Commitment, and Outside Activities is emailed by OICRS to all

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faculty that do not submit under HOP 10.04 and to select staff annually. The OICRS website includes training, Q&A and a Quick Reference Table.

The ORI Conflict of Interest Portal for Researchers states, “ All UTSA Tenured / Tenure Track faculty members and UTSA researchers are required to file a disclosure of financial interests annually and update the disclosure within thirty days as new, reportable Significant Financial Interests are obtained and/or identified. The Office of Research Integrity has procedures, forms, regulations/guidelines, and frequently asked questions to assist researchers in understanding obligations and responsibilities.

Observation #2:	UTSA’s Handbook of Operating Procedures on conflict of interest and conflict of commitment have not been updated to reflect current UT System requirements and contain outdated links. Therefore, existing Conflicts of Interest/Conflicts of Commitment guidance and procedures and training are also outdated.
High Risk Level:	A high risk exists that faculty or staff would inaccurately understand applicable policy or guidance and fail to appropriately disclose significant business or financial interest and/or significant outside interests/activities.
Management’s Action Plan:	<p>HOP 10.04 and 1.33 are being reviewed and updated to better capture COI/COC and the intended action is to update compliance training so that every employee is directed to the UTSA portal to disclose any significant business or financial interest and/or significant outside interests/activities and acknowledge understanding of the policy. Reporting the status of disclosures to supervisors, Deans, and Vice Presidents will be discussed as part of the updates.</p> <p>Additionally, the Senior Vice Provost and Dean of University College plans to lead discussions and collaborations with University Leadership to determine responsible parties for monitoring staff disclosures for completeness and timeliness.</p> <p>A Task Force of three faculty senate members, two Associate Deans for Research, and the Chair of the Committee on Conflicts of Interest is currently revising the policies to clarify disclosure requirements, the disclosure process, and the review</p>

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	<p>process. The revisions are scheduled to be forwarded to the Faculty Senate in Fall 2019 and to the HOP Committee thereafter. The Task Force will revise the Disclosure Form for both HOP 1.33 and 10.04. The new Disclosure Form is scheduled to be available for the January 2020 disclosure period.</p> <p>Additionally, the Office of Research Integrity has a new staff member that started on August 12, 2019 who will be responsible for monitoring and updating weblinks for the HOP 10.04 policy.</p> <p>HOP 4.31 content will be incorporated into HOP 1.33 as appropriate and HOP 4.31 will then be removed.</p> <p>Guidance reflecting the HOP changes is being developed for employees and for reviewers, such as department chairs and supervisors.</p>
<p>Responsible Persons:</p>	<p>HOP 10.04:</p> <ul style="list-style-type: none"> ➤ Dr. Bernard Arulanandam, Interim Vice President for Research, Economic Development and Knowledge Enterprise ➤ Dr. Michelle Stevenson, Associate Vice President for Research Administration <p>HOP 1.33 :</p> <ul style="list-style-type: none"> ➤ Dr. Kimberly Espy, Provost and Vice President for Academic Affairs ➤ Dr. Heather Shipley, Senior Vice Provost and Dean of University College
<p>Implementation Date:</p>	<p>December 31, 2019</p>

Institutional Conflicts of Interest

UTS 189 Institutional Conflicts of Interest states that each UT institution shall adopt a policy to identify, disclose, and manage or eliminate Institutional Conflicts of Interest (ICOI) and states that each institution should create an ICOI committee with sufficient authority to advise on the identification, disclosure, and management or elimination of all facets of ICOIs. A Model ICOI Policy is included in UTS 189.

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Examples of officials that should be included in each institutions ICOI policy is also included in UTS 189 and at minimum should include executive officers of each institution. The Interim Vice President for Research Economic Development and Knowledge Enterprise is working with the Associate Vice President for Research Administration to develop a policy for the President, Vice Presidents and Deans.

As of July 2019, eight of UTSA's Vice Presidents and Deans had not made disclosures under either HOP 10.04 or HOP 1.33. As of the conclusion of the audit, the Vice Presidents and Deans who have not disclosed have been reminded to disclose.

Observation #3:	An Institutional Conflicts of Interest Policy and an Institutional Conflicts of Interest Committee does not exist.
High Risk Level:	A high risk exists that undisclosed and unmitigated conflicts of interest by institutional leadership may affect the reputation and the goals of the institution.
Management's Action Plan:	A HOP for Institutional Conflicts of Interest has been drafted and delivered to the HOP Committee for stakeholder review.
Responsible Person:	<ul style="list-style-type: none"> ➤ Dr. Bernard Arulanandam, Interim Vice President for Research, Economic Development and Knowledge Enterprise ➤ Dr. Michelle Stevenson, Associate Vice President for Research Administration
Implementation Date:	April 30, 2020

Acknowledgment of no significant business or financial interest and/or significant outside interests/ activities

HOP 10.04 requires all tenure and tenure track faculty to disclose their significant business or financial interests. The Office of Research Integrity monitors disclosures to ensure all tenure and tenure track faculty have disclosed annually. Additionally, the Institutional Animal Care and Use Committee (IACUC) and the Institutional Review Board (IRB) protocols require a disclosure prior to approval.

HOP 1.33 does not currently have a requirement for non-tenure track/fixed term faculty who do not disclose under HOP 10.04 and staff to acknowledge that they have no significant business or financial interest or significant outside interest/activities.

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Rather, the guidance states that if an employee does not have any activities that require disclosure or approval, they do not have to access the UT System Portal.

Annual Compliance Training facilitated by the Office of Institutional Compliance and Risk Services requires UTSA employees to attest that they have read HOP 4.31 and to acknowledge that they have read and agree to abide by the requirements under the Conflicts of Interest policy. The training does not require employees to acknowledge that they have no significant business or financial interest or significant outside interest/activities. Additionally, the training references HOP 4.31 instead of HOP 1.33.

Observation #4:	Non-tenure track/fixed term faculty who do not disclose under HOP 10.04 and all staff who have no significant business or financial interest and no significant outside interests/activities do not submit an acknowledgment to that effect.
Medium Risk Level:	A medium risk exists that conflicts could occur and either not be disclosed or be accepted outside of management's awareness.
Management's Action Plan:	<p>The Senior Vice Provost and Dean of University College is exploring the option of having faculty who do not disclose under HOP 10.04 explicitly certify that they have no significant business or financial interests and no significant outside interests/activities, if applicable, as part of the Annual Compliance Training.</p> <p>Additionally, the Senior Vice Provost and Dean of University College plans to lead discussions and collaborations with University Leadership to determine responsible parties for monitoring staff disclosures for completeness and timeliness. Discussions will include determining an appropriate mechanism to provide similar oversight as the 10.04 CCOI, whether it be a committee or monitoring tools for supervisors of faculty not covered under 10.04 and for staff.</p> <p>References to HOP 4.31 in training will be removed.</p>
Responsible Person:	<ul style="list-style-type: none"> ➤ Dr. Kimberly Espy, Provost and Vice President for Academic Affairs ➤ Dr. Heather Shipley, Senior Vice Provost and Dean of University College

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Implementation Date:	<ul style="list-style-type: none"> ➤ Guidance and monitoring procedures for staff disclosures - April 30, 2020 ➤ All employees acknowledge COI/COC awareness as part of Annual Compliance Training – October 31, 2020
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Committee on Conflict of Interest	<p>Per HOP 10.04, the Committee on Conflict of Interest in Research and Intellectual Property (CCOI):</p> <ul style="list-style-type: none"> ➤ Reviews significant financial interest disclosures, ➤ Advises on management plans, ➤ Monitors adherence to management plans, and ➤ Performs reviews and recommendations on other conflicts of interest as requested by the Provost or the Interim Vice President for Research, Economic Development and Knowledge Enterprise. <p>Additionally, the CCOI website states that the CCOI is charged with:</p> <ul style="list-style-type: none"> ➤ Promoting research objectivity by eliminating or minimizing potential conflicts of interest. ➤ Developing campus-wide conflict of interest policies and procedures to identify, manage, and monitor possible conflicts of interest related to research and intellectual property. ➤ Developing education and training programs related to conflict of interest in research and intellectual property for the University community. <p>The CCOI Chairman stated that the CCOI does not develop training or education programs. The published committee roster is not current. The FY17 committee members are posted online.</p> <p>The CCOI includes a non-voting member from the Office of Research Integrity, a member from every college, a member from the UTSA Institutional Review Board, a representative of the Vice President for Community Services, and a community member not affiliated with the University.</p>
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Observation #5:	The Committee on Conflict of Interest website includes incorrect and out of date information.
Medium Risk Level:	A medium risk exists that Committee on Conflict of Interest members would be unaware of their responsibilities for oversight

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	of Conflict of Interest guidance and determinations for tenure and tenure track faculty.
Management's Action Plan:	The current CCOI membership roster has been updated and other updates to the website will be made. The Task Force on COI is advisory to development of training and education materials, particularly as it relates to faculty. The CCOI also contains a representative from the Office of Commercialization and Innovation. The VPCS representative has been replaced with a representative from the Institute for Economic Development.
Responsible Person:	<ul style="list-style-type: none">➤ Dr. Bernard Arulanandam, Interim Vice President for Research, Economic Development and Knowledge Enterprise➤ Dr. Michelle Stevenson, Associate Vice President for Research Administration
Implementation Date:	October 31, 2019