

# Reviewers Guide to CAMS Disclosures & Certifications

Office of Compliance and Ethics

# Welcome Reviewers

- Thank you for your commitment to FSU and for assistance in the review process.
- This short presentation will assist you in your understanding of what you will need in your review of reportable Outside Activity (OA) and interests disclosed in FSU's Conflict Administration Management System (CAMS).
- Our goal is to have all FSU employees and board members act with honesty, integrity, and in the best interests of the University when performing their duties, and to abide by the highest ethical standards of research, educational, professional, and fiscal conduct.

# Training Objectives



**The goals of this course are to assist you in:**

- Describing and facilitating the CAMS review process
- Fulfill your role as a CAMS Reviewer
- Identify keys issues
- Navigate the CAMS System
- Locate additional resources

# Conflicts of Interest and Commitment

All employees of public universities are subject to the Florida Code of Ethics—laws which are designed to protect the impartiality and independence of public officials and ensure that they do not use their public position for private gain.



As a state institution and recipient of federal funds, FSU must comply with both state and federal requirements regarding the disclosure and management of conflicts of interest (COI) and commitment.



FSU is committed to conducting university business and activities with integrity and has developed policies and procedures to identify, manage, and, when appropriate, remove potential and actual COI and commitment. FSU's Office of Compliance and Ethics provides oversight and management of this process.

# Conflict of Interest and Commitment Disclosure via CAMS

FSU's UFF-FSU CBA, FSU-BOT GAU CBA, 4-OP-C-7-J2 Outside Employment, and 7A-21 Financial Conflict of Interest Disclosure policies outline the conflict of interest (COI) and commitment disclosure process and requirements at FSU, which complies with state law as well as federal regulations as they pertain to research.



Each academic year potential Outside Activity (OA), employment, and COI disclosure is required of all FSU researchers, faculty, staff, procurement employees, board members, and others.



Through the CAMS disclosure process, FSU officers and employees report OA for review and approval in advance of engaging in the activity.

# Definitions of Inside and Outside Activity

## Inside Activity

Any activity an FSU employee or official does as part of their assigned research, clinical, teaching, or service responsibilities, including University activities that form the basis for supervisory assessment of their University job performance.

## Outside Activity

Any compensated or uncompensated activity (other than Inside Activity) that is related to a discloser's institutional expertise.

## Reportable Outside Activity

Any financial interest or Outside Activity that is required to be disclosed to the University for the purpose of determining a conflict of interest.

**NOTE:** Institutional Expertise includes matters related to a faculty member's institutional responsibilities. See Art. 19.2 of the **UFF-FSU CBA**.

# Definitions of Key Disclosure Terms for Graduate Assistants

**Note:** GAUs should refer to Art. 7 of the **FSU-BOT GAU CBA** for disclosure requirements and definitions of terms.

## Outside Employment or Other Activity

Any private practice, private consulting, additional teaching or research, or other professional activity, whether compensated or uncompensated, which is not part of an employee's assigned University duties, conducted by the employee outside of the employee's University appointment with a non-University entity or entities.

## Additional Employment

Any compensated work within the University that serves as an additional appointment to the employee's primary appointment in the bargaining unit, as defined in Article 1.1 of the FSU-BOT GAU CBA.

# Defining Conflicts of Interest and Commitment

## Conflict of Interest (COI)

- COI means a situation in which regard for a private interest tends to lead to disregard of a public duty/interest.
- A COI in Research refers to situations in which such interests may compromise—or have the appearance of compromising—a researcher's professional judgment or objectivity such that the design, conduct, or reporting of their research is potentially affected.
- A COI depends on the situation, not on the actions or character of the individual.

## Conflict of Commitment (COC)

- A COC is an Outside Activity (OA) that has the potential to hinder a covered individual's ability to carry out their University employment commitments, by occurrence or duration.
- COCs require an examination of the individual's workload and University job responsibilities, and a review of the nature and extent of the proposed OA.
- A COC can constitute a COI in certain circumstances.

# What types of Outside Activities are Required to be Reported by Faculty?

## Examples of Reportable Outside Activity:

- ▶ Compensated external work that is related to Institutional Expertise
  - *this includes compensated work required to maintain a clinical license*
- ▶ Uncompensated external work that uses appreciable FSU resources, such as equipment, staff, or students\*
- ▶ Financial support from a foreign government or foreign private entity, other than interest, dividends, or pensions related to personal investments
- ▶ Royalties received from a non-FSU entity that exceed \$5,000 in a calendar year

\*The use of FSU resources must be separately approved.

# Reporting Outside Employment or Other Activity by Graduate Assistants

- Pursuant to Art. 7 of the **FSU-BOT GAU CBA** prior to beginning any outside employment or activity that may be a conflict of interest, a Graduate Assistant (GA) must use CAMS to request pre-approval.
- The report must include, where applicable, the name of the employer or other recipient of services; the funding source; the location where such activity shall be performed; the days and hours involved; and the nature and extent of the activity.

# CAMS Review Process



**Once disclosures are submitted in CAMS, they undergo multiple levels of review which may include:**

- **Level 1 Review:** Level 1 Review is the first level of analysis of the disclosure. It is conducted on a departmental level by the discloser's supervisor, Chair, or appropriate equivalent.
- **Level 2 Review:** If the Level 2 Reviewer approves a disclosure it proceeds to the Level 2 Review which may be conducted by the Dean (or their appropriate equivalent), or Administrators in the Office of Compliance and Ethics, Conflict of Interest Committee, when applicable and depending on the position of the filer.
- **Final Approval:** Conducted by the Final Approver (which can include the Vice President or their designee)

# CAMS Review Process

## Ancillary Review

### Options for Ancillary Review

- Depending on the type of disclosure being made Ancillary Reviewers may also be involved in the review process.
- Ancillary Reviewers may include staff of the Office of Compliance and Ethics, the General Counsel's Office, Deans, the discloser's immediate supervisor, and others.
- At any time during the disclosure review process Level 1, Level 2, as well as Final Approvers may assign additional evaluation responsibilities to an Ancillary Reviewer.
- Some disclosures automatically route to the Office of Compliance and Ethics for analysis and approval.

**NOTE:** Documents related to COI disclosures are public records that are subject to disclosure pursuant to [Chapter 119, Florida Statutes](#).

# Critical Reviewer Information

**When analyzing a request Reviewers must ensure that they have all information necessary to fully evaluate an Outside Activity (OA) or interest, including:**

- Proper disclosure of the person, company, or agency that is the beneficiary of the work – referred to as the “Entity” in CAMS.
- Complete information concerning of the type of disclosure being made (e.g., ownership of a business, consulting work, or a financial interest in a company).
- Full understanding of what the discloser will be doing (e.g., consulting work, board service external to FSU, external appointment/employment, etc.).
- The number of hours per week that the individual estimates will be spent on the OA.
- Whether the individual proposes to utilize university resources, which must be separately approved.

# Reviewer Considerations: Completeness of Disclosure

- Reviewers must ensure that they have all information necessary to effectively evaluate the Outside Activity (OA)/interest disclosed.
- Considerations for Reviewers upon receipt of disclosure include:
  - ✓ Whether the disclosure provides sufficient information to clearly describe the OA or interest.
  - ✓ Whether the Reviewer understands the nature of the OA or interest being disclosed.
  - ✓ Whether the Reviewer has any questions regarding the disclosure.
- Reviewers should communicate with the discloser via CAMS to clarify questions and provide additional information, when needed.

# Requests for Additional Information

**If a Reviewer needs additional information to analyze, understand, or evaluate an Outside Activity (OA) or interest, they may:**

- Use the “Request Clarification” option in CAMS: After the Reviewer types their questions in the text box and clicks “OK” a message will be sent to the discloser regarding the request for clarification and they will be prompted to respond.
- Request an Ancillary Review in CAMS: If a Reviewer would like input from others, they may use the “Manage Ancillary Reviews” activity in CAMS. Instructions on this simple process are available [here](#).

# Reviewer Considerations: Conflicts of Commitment

When analyzing disclosures Reviewers must consider the individual's FSU position responsibilities to ensure no conflict exists including:

- ✓ The individual's current FSU workload, job responsibilities, scheduled time at work, evaluations, etc.
- ✓ The extent to which the discloser's Inside Activities may give rise to a conflict with the proposed OA or interest.
- ✓ Whether there is a significant time commitment concerning the disclosed OA.
- ✓ Whether the OA or interest will hinder the discloser's ability to continue to perform their FSU job responsibilities.



# Time Commitment Analysis

**Time Commitment:** Reviewers should consider whether the discloser's total time commitment concerning all disclosed Outside Activities (OA) and interests appears reasonable and compatible with their FSU job responsibilities.

- Identify if the discloser is a full time or part time employee or appointed board member
- Identify the total number of hours per week the discloser intends to spend on the OA/interest\*
- Consider the discloser's time commitment needed to meet all FSU responsibilities\*\*

\* If a discloser will have significant time commitments for an OA/interest, a reduction in FTEs may be warranted.

\*\*If the discloser is not already adequately meeting their FSU job duties, or there are concerns that the OA/interest will create performance issues, these are legitimate reasons for Reviewers to disapprove an OA/interest.

# Conflict of Commitment Example

For example, a faculty member with three 3-credit hour courses and research lab supervision responsibilities requests approval for an Outside Activity (OA) involving teaching responsibilities at another university located in Maryland.

- In response to a Request for Clarification submitted to the discloser via CAMS, the faculty member indicates that the proposed OA would require 3 days per week of their time for 7 weeks during the semester.
- In the course of your review, you discover that recent performance evaluations indicate that the faculty member has been struggling to meet their current FSU job responsibilities.
- Based upon the foregoing information, the Reviewer has legitimate grounds to disapprove the OA or to make the approval of the OA conditional.

# Reviewer Considerations: Influence

- Reviewers should consider whether the disclosed OA/interest might inappropriately influence the discloser in their FSU role in any way (e.g., purchasing decisions, research integrity, contracting authority, etc.).
- Considerations regarding influence may include:
  - ✓ Whether the disclosed entity does business with FSU (via supplier contracts, vendor agreements, etc.)
  - ✓ Whether the discloser has authority involving purchasing decisions at FSU which may impact the entity disclosed.
  - ✓ Does the discloser interact with the entity in their FSU capacity position that could be influenced by the OA/interest disclosed.
  - ✓ **Concerns that an OA/interest might inappropriately influence a discloser in their FSU role may be implicative of a Conflict of Interest which is a legitimate reason to disapprove an activity.**



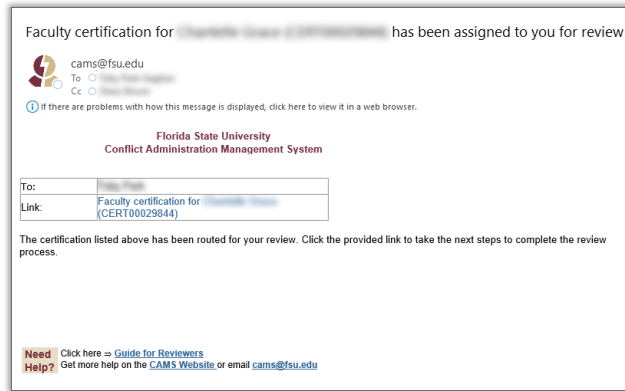
# Quick CAMS Reviewer Guide

The following instructions will walk you through the basics of how to use CAMS as a Reviewer

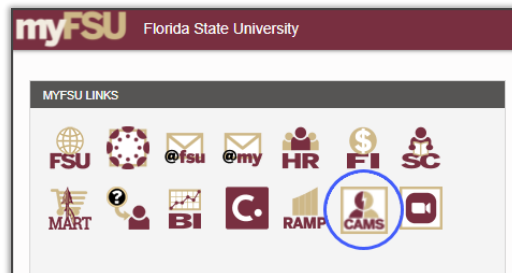
FSU

# Completing Reviews in CAMS

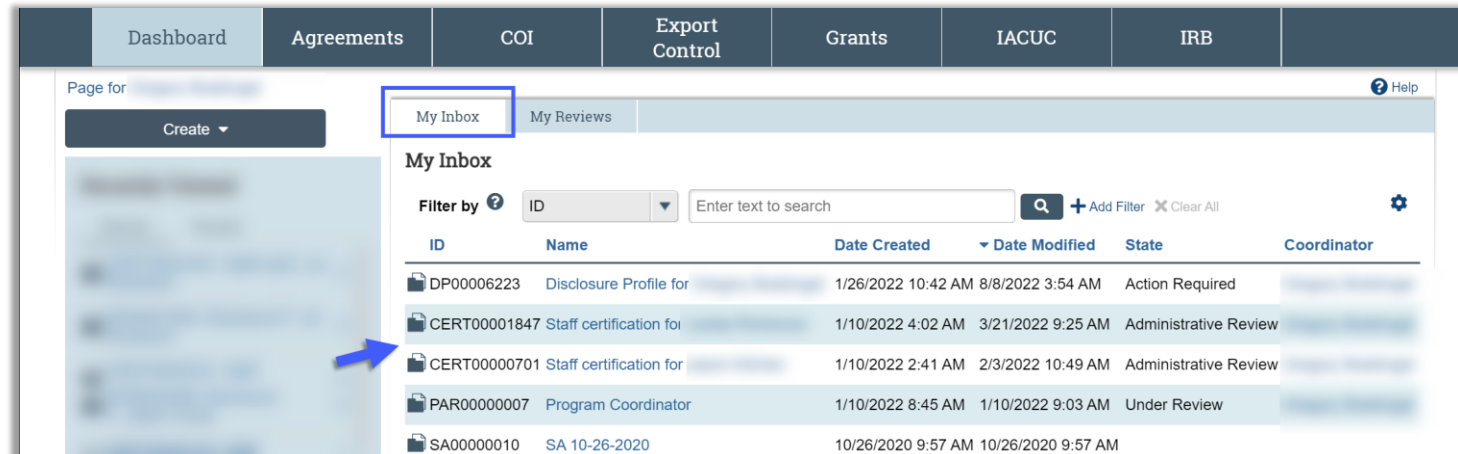
- CAMS will send an email each time you are assigned a review. The notification will include a hyperlink to open the Disclosure Certification (CERT) or Pre-Approval Request (PAR) requiring review directly.



- CAMS can also be accessed via the myFSU portal. This will open your Dashboard Inbox listing all assigned reviews.



**NOTE:** Your Inbox may also list research projects from RAMP.



# Completing Reviews in CAMS

- Click “Review Certification” to open the employee’s disclosure(s).

Dashboard | Agreements | COI | Export Control | Grants | IACUC | IRB

Disclosures | Requests | Certifications | Plans | Triggering Events | Reports | Meetings | Help Center

COI > Certifications > Staff certification for [redacted]

**Administrative Review**

Certification created date: 1/10/2022 4:02 AM  
Profile last submitted date: 3/21/2022  
Training expiration date: 2/4/2023

Next Steps

**Review Certification**

Submit Administrative Review  
Request Clarifications  
Route To Department  
Assign Reviewer  
Manage Ancillary Reviews  
Add Comment

CERT00001847: Staff certification for [redacted]

Certification type: Staff  
Review type: Distributed Review  
Assigned reviewer: [redacted]

Discloser: [redacted]  
Discloser's department: Natl High Magnetic Field Lab  
Has significant financial interest: Yes

Awaiting Profile Update → Administrative Review → Review Complete  
Clarification Requested

History | Snapshots

Filter by: Activity | Enter text to search | + Add Filter | X Clear All

| Activity        | Author     | Activity Date     |
|-----------------|------------|-------------------|
| Profile Updated | [redacted] | 3/21/2022 9:25 AM |

- As you review, use the check boxes on the right to indicate your review of each section. Click “View” to see more detail about each disclosure for an entity.

Compare current state of version:  
1.1 Transition to Administrative Review  
with  
1.0 Transition to No Review Required  
1/12/2022 4:06:48 PM  
Changes found on 2 steps:  
Disclosure Profile Information  
Entity Disclosure Information  
Pre-Approval Requests

**Entity Disclosure Information**

1. Discloser has information to disclose regarding entities:  
☒ Yes ☐ No

2. Entity disclosures:

| Entity     | Foreign Entity? | Relation to Discloser | Disclosure Types                          | Total Value | Total Time Commitment (Days) | Date Created | Last Modified |
|------------|-----------------|-----------------------|-------------------------------------------|-------------|------------------------------|--------------|---------------|
| [redacted] | No              | Self                  | Consulting or Other Professional Services | \$10        | 10                           | 7/25/2022    | 7/25/2022     |

hidden → visible

Differences

Added:

Above section has been reviewed: ☒

# Completing Reviews in CAMS

## Level 1 (Department) Reviewers:

- Assign to Level 2 Reviewer **with a comment** of your evaluation.

The screenshot shows the 'Under Review' section for a Faculty certification (CERT00032579). It includes fields for 'Certification created date', 'Profile last submitted date', 'Training expiration date', 'Certification type', 'Assigned reviewer', 'Current review stage', and 'Review stage'. A 'Next Steps' section contains buttons for 'Review Certification', 'Submit Review', 'Request Clarifications', 'Assign Reviewer', 'Manage Ancillary Reviews', 'Add Comment', and 'Withdraw'. A blue box with an arrow points to the 'Assign Reviewer' button, with the text 'Click to assign next reviewer'. A red box with a star and the text 'Do not submit a review' is also present. Below the 'Next Steps' is a 'History' table with columns for 'Activity', 'Author', and 'Activity Date'.

- In the Assign Reviewer window, click the ellipses [...] and select the next reviewer from the list, add a comment to indicate your approval and provide appropriate notes for the next reviewer, then click "OK."

The screenshot shows the 'Assign Reviewer' window. It has two main sections: '1. \* Assigned reviewer:' and '2. Comments:'. A blue box with an arrow points to the ellipsis [...] next to the 'Assigned reviewer' field, with the text 'Click to open list'. The 'Comments' section has a red box with the text 'Add a comment here to assist the next reviewer'. The 'Select Person' section on the right has a 'Filter by' dropdown set to 'Last' and a list of people with columns for 'Last', 'First', 'Organization', and 'Preferred Email'. The list shows three people, with the first one selected. 'OK' and 'Cancel' buttons are at the bottom.

## Level 2 (Dean) Reviewers:

- Click **"Submit Review"** to finalize the Certification.

**Faculty Certifications** which require further review can be sent to VP FDA using the Assign Reviewer process.

All **Staff Certifications** will automatically be sent to FSU HR for final approval after Level 2 Review is submitted.

The screenshot shows the 'Under Review' section for a Staff certification (CERT0003523). It includes fields for 'Certification created date', 'Profile last submitted date', 'Training expiration date', 'Certification type', 'Assigned reviewer', 'Current review stage', and 'Review stage'. A 'Next Steps' section contains buttons for 'Review Certification', 'Submit Review', 'Request Clarifications', 'Return for Review', 'Assign Reviewer', 'Manage Ancillary Reviews', and 'Add Comment'. A blue box with an arrow points to the 'Submit Review' button. To the right of the 'Next Steps' is a 'History' table with columns for 'Activity', 'Author', and 'Activity Date'. Below the 'History' table is a 'Filter by' dropdown set to 'Activity'.

1. \* Do you recommend additional action,   
 ☐ Yes ☒ No
2. Comments:   
 Testing Serial Review routing to HR
3. Supporting documents:   
 Name   
 There are no items to display

# Contact

For questions about non-research COI disclosures and Outside Activity:



*Office of Compliance and Ethics*  
[compliance@fsu.edu](mailto:compliance@fsu.edu)

For questions about CAMS:



*CAMS Helpdesk*  
[cams@fsu.edu](mailto:cams@fsu.edu)