

A Conflict of Interest – Employee, Contractor, Volunteer, Temporary Employee Reporting Responsibilities

REVISION 31
(08/01/14 - 09/30/14)

All employees, contractors, volunteers or temporary employees must report all cases with a potential [conflict of interest](#) to their Supervisor or FAA Office Manager (LOM).

All employees, contractors, volunteers or temporary employees must complete a Conflict of Interest/Confidentiality Statement (FAA-1446A) form and Conflict of Interest Case Information (FAA-1447A) form upon hire and immediately when a change becomes known. Case information for all cases that have a conflict of interest must be listed on the Conflict of Interest Case Information (FAA-1447A) form. Multiple FAA-1447A forms may be needed.

When unsure whether there is a conflict of interest, the situation must be discussed with a supervisor. Management will determine whether there is a conflict of interest. When a conflict of interest is determined, the case information must be documented on the Conflict of Interest Case Information (FAA-1447A) form.

On odd years (2015, 2017, etc.) new Conflict of Interest forms must be completed and submitted during the Managing Accountability and Performance System (MAP) annual performance evaluation.

On even years (2014, 2016, etc.) the previously completed Conflict of Interest forms must be reviewed and updated during the annual performance evaluation (MAP). The employee must complete the following:

- When there are changes or the previous forms are not available, then complete and submit new Conflict of Interest forms.
- When there are NO changes, then complete the following on each Conflict of Interest Case Information (FAA-1447A) form:

Initial each name that is listed.

Write “No changes”, sign, and date the end of the form.

Return the form to their supervisor so that it can be put into their employee file.

NOTE Do not send a copy of forms with ‘no change’ to the Personnel Liaison.

WARNING

Do not view case information to complete these forms. When needed, the Personnel Liaison must complete any necessary research to provide the AZTECS case numbers and place their initials next to the case numbers they have inserted.

NOTE When an employee, contractor, volunteer or temporary employee states that they do not know of any cases with a conflict of interest, the employee, contractor, volunteer or temporary employee must complete the appropriate section of an FAA-1446A form, top section of the FAA-1447A form, and write the word NONE on the case information section of the FAA-1447A form.

When it is learned that there is an additional case that has a conflict of interest, the employee, contractor, volunteer or temporary employee must immediately complete and submit a FAA-1446A form along with the FAA-1447A form to their Supervisor. They should not wait until the annual MAP review.

The FAA office must complete the following:

- Make a photocopy of each of the forms.
- Retain the photocopy in the Supervisor's employee file.
- Forward the originals to the Personnel Liaison for appropriate routing.
- Provide the employee with a signed copy of each form.

(See [Conflict of Interest – Supervisor Reporting Responsibility](#) for additional instructions.)

WARNING

All AZTECS and [OnBase\(g\)](#) inquiries are recorded. Actions that display on a case in which there may be a conflict of interest could be considered [suspicious or potentially fraudulent activity](#).

Employees, contractors, volunteers or temporary employees must immediately report by email any accidental viewing of case information of a case that has a conflict of interest to their Supervisor, RPM or Section Manager.

When management suspects a potential violation has occurred, the situation will be elevated to upper management for investigation.