

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

REVISION 49
(01/01/21 – 12/31/21)

All employees (temporary or permanent), contractors and volunteers must report all cases with which they have a potential [conflict of interest](#).

A Conflict of Interest/Confidentiality Statement (FAA-1446A) form and Conflict of Interest Case Information (FAA-1447A) form must be completed when one or more of the following occurs:

- Upon hire
- When the employee, contractor, or volunteer becomes aware of any new case(s) where a conflict of interest exists

List the information for all cases that have a conflict of interest in the FAA-1447A form. Additional FAA-1447A forms may be used when additional space is required.

NOTE When the employee, contractor, or volunteer states that they do not know of any cases with a conflict of interest, the appropriate section must be completed on the FAA-1446A form.

When unsure whether there is a conflict of interest, the situation must be reviewed with FAA management. When management determines that a conflict of interest exists, document the case information on the FAA-1447A form.

Every year the previously completed conflict of interest forms must be reviewed by the staff and management during the Managing Accountability and Performance (MAP) evaluation. When reporting a change to the forms or the previous forms are not available, complete and submit new conflict of interest forms.

NOTE When it is learned that there is an additional case with a conflict of interest, the employee, contractor, or volunteer must immediately complete and submit the FAA-1446A form along with the FAA-1447A form to their supervisor. Do not wait until the annual MAP evaluation. Do not view case information to complete these forms.

The FAA supervisor must complete the following:

- Make a photocopy of each of the forms.

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- Retain the photocopy in the employee's file.
- Provide the employee with a signed photocopy of each form.
- Forward the originals to [DBME HR Operations](#) for appropriate routing.

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

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

Supervisor must immediately report to [HR Business Partners](#) when any of the following occurs:

- An employee, contractor, or volunteer reports accidental viewing of case information with a conflict of interest.
- Management suspects a potential violation has occurred.

B Conflict of Interest – Supervisor Reporting Responsibility

[REVISION 48](#)

(01/01/20 - 12/31/20)

At least once per year, at the same time during the Managing Accountability and Performance (MAP) evaluation, the supervisor must complete the following:

- Review the conflict of interest policy and procedures with each employee, contractor, volunteer, or temporary employee.
- Request written approval from the Region Program Manager (RPM) when an employee, contractor, volunteer, or temporary employee is to act as an authorized representative for a participant's case.
- Review the previously completed Conflict of Interest/Confidentiality Statement (FAA-1446A) form and the Conflict of Interest Case Information (FAA-1447A) form. When there are changes or the previous forms are not available, have the employee, contractor, volunteer, or temporary employee complete and submit new conflict of interest forms.
- Ensure that any cases with a conflict of interest, discovered during the year, are included on the forms.
- Make a photocopy of each of the forms.
- Retain a photocopy of each form in the employee's file.

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- Provide the employee with a signed photocopy of each form.
- Forward the originals to [DBME HR Operations](#) for appropriate routing.
- Destroy copies of the previously completed FAA-1446A and FAA-1447A forms.
- Document the Performance Plan Acknowledgement that conflict of interest policy, procedures, and forms were reviewed. Do not upload the completed forms into the MAP system.

ARCHIVED (Valid until 07/17/23)