

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

**REVISION 47**  
(01/01/19 –12/31/19)

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

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 the employee, contractor, volunteer, or temporary employee becomes aware of any new case where a conflict of interest may exist. 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.

**NOTE** When the 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 the FAA-1446A.

When unsure whether there is a conflict of interest, the situation must be discussed with the FAA supervisor. Management determines when 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.

Every year the previously completed conflict of interest forms must be reviewed during the Managing Accountability and Performance (MAP) evaluation. When there are changes 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, volunteer or temporary employee 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.

**WARNING**

Do not view case information to complete these forms.

The FAA supervisor must complete the following:

- Make a photocopy of each of the forms.
- 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.)

**WARNING**

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](#).

The supervisor must immediately report by email any employee's, contractor's, volunteer's, or temporary employee's report of accidental viewing of case information with a conflict of interest to [DBME HR Operations](#).

When management suspects a potential violation has occurred, the situation must be elevated to DBME HR Operations for investigation.