Conflict of Interest (COI) Disclosure Guidance for Supervisors

Purpose

This guidance helps supervisors and principals determine when to request a Conflict of Interest (COI) disclosure. Timely disclosure promotes transparency, protects employees, and ensures decisions are made fairly and objectively.

Definition

A conflict of interest occurs when an employee's personal, financial, or outside interests could influence—or appear to influence—their professional responsibilities.

When to Request a COI Disclosure

• Hiring, promotion, supervision, or evaluation involving family or close relationships.

• Outside employment, consulting, or side businesses that may conflict with duties.

• Financial interests in vendors, contractors, or partners.

• Participation in procurement, purchasing, or contract decisions.

• Acceptance or offer of gifts, meals, travel, or incentives.

• Use of organizational time, resources, or confidential information for personal gain.

• External board or leadership roles that interact with the organization.

• Any situation where impartiality could reasonably be questioned.

Supervisor Responsibilities

Request disclosure early, promote transparency, consult HR or compliance when needed, and document and manage any disclosed conflicts appropriately.

Best Practice

When in doubt, disclose.

Routine Disclosure Triggers

Onboarding, annually, when job duties change, or before participating in hiring or procurement decisions.

Important Note

Submitting a COI disclosure does not imply wrongdoing. It enables the organization to assess risks and implement safeguards.