



BEYOND THE ANNUAL CHECKBOX:

ADOPTING REAL-TIME COI DISCLOSURE



Minimize Risk, Save Money

Continuous COI Disclosure Models

Introduction

What if you discovered a critical conflict of interest had emerged the day after your annual disclosure process closed? For the next 364 days, this undisclosed conflict could influence decisions, damage reputation, and create regulatory exposure without your knowledge. This invisible window of risk isn't theoretical—it's the reality for organizations relying solely on annual disclosure models.

As organizations face growing regulatory scrutiny and compliance demands, the traditional annual disclosure model for conflicts of interest is increasingly insufficient. This whitepaper explores why ethics and compliance professionals should consider transitioning to a continuous disclosure framework, addressing common implementation barriers, highlighting strategic benefits, and outlining the technical requirements for successful adoption. Learn how modern disclosure management solutions can transform COI processes from administrative burdens into valuable risk mitigation tools that provide real-time visibility into potential conflicts.

Section One

Why Organizations Hesitate to Adopt Continuous Disclosure Models

ADMINISTRATIVE BURDEN CONCERNS

THE FEAR

- Enabling continuous disclosures will create an unmanageable review queue, with team members constantly diverted from other important priorities to process ad-hoc submissions. Without proper systems in place, these concerns are valid.
- Without clear campaign deadlines, compliance teams will struggle to track completion rates and follow up with non-responders, potentially leading to lower overall participation.

THE SOLUTION

- Implement a disclosure platform with intelligent workflow automation that automatically routes submissions to appropriate reviewers based on risk level, department, or subject matter. Look for systems that can automatically prioritize high-risk disclosures while streamlining review of routine matters.
- Seek a disclosure system that provides real-time analytics on submission status, automatically generates targeted reminders to specific individuals, and gives compliance teams visibility into disclosure trends and patterns.

TECHNICAL INFRASTRUCTURE LIMITATIONS

THE FEAR

- Existing spreadsheets, email systems, and basic forms used for annual campaigns cannot scale to support year-round disclosure management without creating unsustainable manual processes.
- Legacy systems lack the flexibility to adapt to the dynamic requirements of continuous disclosure workflows and will require expensive customization.

THE SOLUTION

- Implement a purpose-built disclosure management platform designed specifically for continuous operation, with automated workflows, intelligent routing, and built-in analytics that eliminate the need for cobbled-together solutions.
- Select a disclosure platform built on modern architecture with configurable workflows that can be adjusted without coding or specialized technical knowledge. The best solutions offer intuitive admin interfaces that empower compliance teams to make changes themselves.

CULTURAL RESISTANCE

THE FEAR

- Employees accustomed to annual disclosure cycles will resist the perceived additional burden of year-round reporting requirements.
- Regional or departmental leaders will resist standardized continuous disclosure processes that don't account for their unique operational contexts.

THE SOLUTION

- Deploy an intuitive disclosure platform that makes **reporting new conflicts quick and simple—often under 5 minutes**. Emphasize that continuous disclosure actually reduces the annual burden while providing timely guidance.
- Implement a flexible platform that allows for **configurable workflows, question sets, and review paths** that can be tailored to different business units while maintaining consistent core standards.



RESOURCE CONSTRAINTS

THE FEAR:

- Limited compliance staff will be unable to handle the additional workload of managing continuous disclosures alongside existing responsibilities.
- Small compliance teams lack the specialized expertise needed to design, implement, and maintain sophisticated continuous disclosure workflows.

THE SOLUTION:

- Deploy a disclosure platform with intelligent automation that reduces total administrative time. Look for systems that can handle routine disclosures while escalating only high-risk situations that truly require human judgment.
- Implement a disclosure solution that includes pre-built templates, industry-standard configurations, and best-practice workflows developed from cross-industry experience. The right platform should encode compliance expertise into its design, reducing the need for specialized knowledge within your team.

Section Two

Realizing the Full Value of Real-Time COI Management

ENHANCED RISK DETECTION AND MITIGATION

- Traditional annual campaigns can leave organizations vulnerable for extended periods, with new conflicts remaining undisclosed and unmanaged for up to 12 months after they emerge.
- Continuous disclosure frameworks enable near real-time awareness of potential conflicts, allowing compliance teams to promptly implement appropriate mitigation strategies. This early detection capability is particularly valuable in high-risk scenarios such as new vendor relationships, leadership changes, or strategic partnerships where conflicts could significantly impact business decisions or regulatory compliance. This immediate visibility allows organizations to identify potential issues before they escalate into regulatory violations, reputational damage, or compromised decision-making.

IMPROVED DISCLOSURE QUALITY AND ACCURACY

- The human memory is fallible. Annual disclosure processes that ask employees to recall an entire year's worth of potential conflicts inevitably capture less accurate and less complete information than contemporaneous reporting. Details fade, contexts become blurred, and even well-intentioned employees may forget relevant information that should be disclosed.
- Continuous disclosure models leverage the power of immediacy. By enabling employees to report conflicts when they first recognize them—whether due to a new outside activity, financial interest, or relationship—organizations receive more comprehensive and accurate information. This enhanced disclosure quality directly translates to better risk assessment and more appropriate management responses.

STRONGER CULTURE OF TRANSPARENCY

- Continuous disclosure models fundamentally transform how organizations engage with ethics and compliance topics. Rather than treating conflict reporting as an annual administrative exercise, continuous approaches integrate ethical awareness into everyday business activities, normalizing transparency and creating ongoing dialogue about potential conflicts.
- When employees can raise potential conflicts as they emerge—and receive timely guidance in response—ethical considerations become a natural part of decision-making rather than a periodic compliance checkbox. This regular engagement helps employees develop stronger ethical reasoning skills and greater comfort discussing potentially sensitive situations before they become problematic.

MORE EFFICIENT RESOURCE UTILIZATION

- While administrative burden concerns often dominate discussions about continuous disclosure adoption, well-implemented continuous models actually reduce overall workload by distributing disclosure review more evenly throughout the year. Annual campaigns create significant resource challenges, with compliance teams struggling to process hundreds or thousands of disclosures in compressed timeframes.
- For resource-constrained ethics and compliance teams, this workload balancing effect delivers substantial efficiency benefits while simultaneously improving the quality of conflict management outcomes. Rather than hiring additional staff to manage peak disclosure periods, organizations can maintain lean, efficient teams that provide higher-quality conflict guidance throughout the year.

Conclusion

The transition from traditional annual disclosure campaigns to continuous disclosure models represents a significant evolution in conflict of interest management. While implementation challenges exist, the strategic benefits—including reduced risk exposure, improved disclosure quality, enhanced culture, and more efficient resource utilization—make a compelling case for organizations seeking to strengthen their ethics and compliance programs.

Successful implementation requires both the right technology platform and thoughtful change management. By selecting a solution that offers intuitive user interfaces, robust workflow automation, seamless integration capabilities, and powerful analytics, organizations can overcome the traditional barriers to continuous disclosure adoption while minimizing additional administrative burden.

As regulatory scrutiny intensifies across industries and stakeholder expectations for transparency continue to rise, forward-thinking organizations will increasingly recognize that continuous disclosure models represent not just a best practice but a competitive advantage in risk management, reputation protection, and ethical leadership.

The question for ethics and compliance professionals is no longer whether continuous disclosure models offer superior protection, but rather how quickly their organizations can implement the necessary systems and processes to realize these benefits. Those who move decisively toward continuous monitoring will find themselves better positioned to identify, manage, and mitigate conflicts before they escalate into significant risks.