TO: Deans, Directors, Department Chairs, and Regional Campus Presidents

FROM: Rob A. Rutenbar, Senior Vice Chancellor for Research
      Arthur G. Ramicone, Senior Vice Chancellor and Chief Financial Officer

DATE: March 1, 2018

SUBJECT: Annual Conflict of Interest Disclosures: April 16th deadline—action required

Managing potential conflicts of interest (COI)—especially those of a financial nature—is critical for ensuring the integrity of a university’s research, scholarship, instruction, evaluation, and administrative functions. To ensure that its reputation and research programs are not compromised by even an appearance of inattention to this matter, the University of Pittsburgh has established policies consistent with federal regulations that require the reporting and management of the potential conflicts of interest of its faculty, investigators, administrators, and staff.

Disclosure by University employees, students, and consultants of financial, personal, or professional relationships that may give rise to an actual or perceived COI is at the heart of the University of Pittsburgh’s COI policies and is a prerequisite for determining whether a conflict, once recognized, can be managed or reduced, or, if necessary, eliminated. The University’s COI policies assure confidentiality to encourage full disclosure of potential conflicts without unduly intruding on the privacy of University personnel, students, or their families.

COI disclosures must be completed electronically using the University’s Conflict of Interest Superform system (https://coi.hs.pitt.edu). University personnel with appointments at UPMC/UPP should instead use the joint questionnaire available in My HUB (https://myhub.upmc.com) to fulfill their University and UPMC COI reporting requirements. The joint questionnaire can be accessed through the COI link in the “My Profile” section under the Human Resources tab in My HUB. Individuals should select the “UPMC Pitt Joint Form” and then answer the subsequent questions to indicate which University form(s) they need to complete. After submitting their responses, users will be directed to log into HSConnect to generate their University forms and print them for signature. Individuals in your unit must return their signed forms to you by April 16, 2018.

You are responsible for determining which individuals in your unit must complete one or more of the following COI disclosure forms, or for establishing a process by which such individuals are identified. Please remind these individuals that, in addition to this annual filing requirement, they must update their COI disclosures throughout the year if they accrue new outside interests.

Some individuals must complete both a Faculty/Researcher (Public Health Service or “regular”) form and a Designated Administrator/Staff form. Deans, department chairs, directors, and regional campus presidents must complete a Designated Administrator/Staff form, whether or not they file one of the Faculty/Researcher forms.
University of Pittsburgh Faculty/Researcher Form*
This form must be completed by all faculty members, as well as others in any position, including students and staff, who direct or can materially influence, or who are responsible for the design, conduct, or reporting of research that is not funded by any operating division of the Public Health Service (which includes the National Institutes of Health). A complete list of the operating divisions within the Public Health Service (PHS) can be found at http://www.coi.pitt.edu/PHS/index.htm.

University of Pittsburgh Faculty/Researcher (PHS Funded) Form*
This form must be completed by all individuals, regardless of title or position, who participate in the design, conduct, or reporting of research that is funded by a Public Health Service (PHS) operating division.

*Individuals will complete either a PHS Faculty/Researcher form or a “regular” Faculty/Researcher form, based on whether or not they are engaged in PHS-funded research or are planning to submit funding proposals to any operating division of the PHS. They should not complete both forms.

University of Pittsburgh Designated Administrator/Staff Form
This form must be completed by individuals who are full-time or part-time University administrators classified as Administrator IV or above and those of other classifications who are in a position to make, direct, or materially influence University business decisions (such as those who have significant input over the selection of outside vendors or providers of services).

Outside Consultants who are engaged to work on University research projects must complete the disclosure form embedded in University Policy 11-01-04 Conflict of Interest Policy and Procedure for Consultants (http://www.cfo.pitt.edu/policies/policy/11/11-01-04.html) at the time of appointment, annually thereafter, and at any time during the year if they accrue new outside interests. It is the responsibility of University employees overseeing the work of consultants to ensure that consultants comply with this policy.

A copy of this memorandum, links to the Superform and My HUB disclosure systems, and other related information, such as step-by-step guides to completing the University’s COI disclosure forms, information on the COI-related responsibilities of faculty members, researchers, students, staff, administrators, consultants, and supervisors, and contact information for assistance, are available on the COI Web site located at http://www.coi.pitt.edu/directive.htm.

If you have questions, please visit the COI Web site at http://www.coi.pitt.edu/, or call the COI Office at 412-383-1735.

Thank you for your cooperation and continued attention to this important matter.

cc: George A. Huber, JD, MSIE, MSSM
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