

COI FILING PROCESS

SUPERVISOR RESPONSIBILITIES

All forms referenced here are available for download from <http://www.coi.pitt.edu/directive.htm>

A. FACULTY/RESEARCHER FORMS (“regular” & PHS-funded)

Chairs and directors:

1. Ensure that all those who are required to complete this form have submitted a Signature Page by **April 15th**.
2. Review printed *Signature Pages* received from employees.
3. Complete a *Management Reporting Form (MRF)* for each individual who disclosed outside interests, identifying any COIs and explaining how they were managed. (**Note:** Use the same MRF for both Faculty/Researcher Forms.)
4. Complete an *Annual Data Summary Report for University Faculty/Researcher COI Forms*
5. Submit *Signature Pages*, *Management Reporting Forms*, and *Annual Data Summary Report* to deans and regional campus presidents as follows:
 - a. Submit only *Signature Pages* that report outside interests (*Signature Pages* with no reported outside interests should be kept on file in your unit for seven years);
 - b. Submit signed *Management Reporting Forms*;
 - c. Submit the department’s *Annual Data Summary Report for Faculty/Researcher COI Forms*.

Deans and regional campus presidents: submit forms to the provost or senior vice chancellor for the health sciences as follows:

1. Review forms received from chairs or directors; approve or modify any *Management Reporting Forms*, as necessary;
2. Prepare your unit’s (e.g., school or regional campus) *Annual Data Summary Report for Faculty/Researcher COI Forms* (use the same form as in item A.4 above);
3. Submit: *Annual Data Summary Reports*, *Signature Pages*, and *MRFs* received from all departments in your unit and your unit’s *Annual Data Summary Report for Faculty/Researcher COI Forms*;
4. All forms are due by **May 15th**.

B. DESIGNATED ADMINISTRATOR/STAFF FORM

1. Ensure that all those who are required to complete this form have submitted a Signature Page by **April 15th**.
2. Review printed *Signature Pages* received from employees;
3. Develop a COI management plan, as needed. Document the plan and the employee’s agreement to it in the form of a **memorandum** (note: do **not** use the *MRF* referenced above; it is for use only with Faculty/Researcher COI Forms). This memorandum should be kept on file in your unit; it is not forwarded to the next higher supervisor unless s/he requests it.
4. Complete and submit the *Annual Data Summary Report for Designated Administrator/Staff COI Forms* to the next higher reporting authority within your responsibility center, listing the number of disclosures submitted and the number that disclosed outside interests or activities. These forms are due by **May 15th**.
5. Unresolved conflicts must be reported to the provost, senior vice chancellor for the health sciences, or executive vice chancellor by **May 15th**.