Navigating MyDisclosures for Pitt Primary Supervisors

Instructions for Reviewing Disclosure Forms

MyDisclosures is a new electronic disclosure system that is designed to simplify and modernize conflict disclosure for Pitt and UPMC personnel, including disclosure of conflicts of commitment and financial conflicts of interest (COI). It conforms with Pitt’s Conflict of Interest Policy for Research, federal funding requirements, UPMC policies (for UPMC personnel), and other relevant Pitt policies.

Pitt policy RI01 requires “each disclosure [to] be reviewed by the submitter’s supervisor for conflict of commitment and to determine if the [discloser]’s outside interests give rise to any conflicts of interest that have not yet been managed.” MyDisclosures enables supervisors to review disclosure forms completely electronically. Disclosers will no longer need to print and submit paper forms for your review, and supervisors are no longer required to complete Management Reporting Form.

NOTE: You only need to complete reviews in MyDisclosures for Pitt and dual employees you supervise. UPMC-only faculty and staff reviews will be addressed by UPMC through a separate review process.

This document will provide you with the basic tools to review and respond to disclosures submitted by personnel you oversee. For information about what constitutes a conflict and how to identify unmanaged conflicts of interest, visit the COI website for help guides and FAQs.

### Need help?

For technical support, including assistance with log-in and form access, contact the Pitt IT Help Desk at (412) 624-HELP (4357).

### MyDisclosures Navigation Key

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<td><img src="image" alt="Exit" /></td>
<td>Leave the page and return to main workspace</td>
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<tr>
<td>*</td>
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<td><img src="image" alt="Hide/Show Errors" /></td>
<td>Identify missing required information. Incomplete pages will be listed at the bottom of the page.</td>
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Types of Supervisor Review

Primary Supervisor

You should be identified as the primary supervisor for all personnel for whom you complete an annual performance review. The primary supervisor is automatically listed on each discloser’s form. If the incorrect primary supervisor is listed for a discloser, either you or the discloser can identify the correct primary supervisor. An individual’s annual disclosure requirement will not be fulfilled until the primary supervisor’s review is submitted.

Primary supervisors will receive automatic email notifications:
» Weekly, if annual disclosure forms are awaiting their review;
» When a discloser they supervise submits changes to a disclosure form;
» When they are identified and reassigned as the primary supervisor for a discloser; and
» When the COI Office responds to a request for assistance

Secondary Supervisor

If a discloser has another supervisor that should review their disclosure form, they should list that person as their secondary supervisor. For example, if the discloser works in one of Pitt’s centers or institutes, such as the Aging Institute or Hillman Cancer Center, the discloser may need to list the director of the center as their secondary supervisor. You or the discloser can add a secondary supervisor, as necessary. Not all disclosers will have a secondary supervisor. For those that do, the secondary supervisor’s review must be submitted before the primary supervisor submits their review.

Secondary supervisors will receive an automatic email notification when:
» They are identified as the secondary supervisor for a discloser; and
» A primary supervisor notifies them that a disclosure is awaiting their review
Login

- Click the link in the email you received or go to www.mydisclosures.pitt.edu

- Click on either Pitt Passport or UPMC to access the form. Choose the institution you are employed by for your log in. If you are dually employed, you may use either.

- If you have trouble with your login, contact the Pitt IT Technology Help Desk 24/7 at 412-642-HELP (4357).

My Inbox Tab

When you log in to MyDisclosures, you will be taken to your Inbox. Your Inbox contains your own annual disclosure and the disclosures of anyone you supervise (as primary or secondary reviewer) who reported outside interests. For instructions on how to complete your disclosure form, visit the COI Office website.

Forms to Review

If any disclosers you supervise report outside interests, their disclosure forms will appear in your Inbox. You need to individually review each form in your Inbox.

Disclosers who do not report any outside interests will not appear in your Inbox. The system is designed to allow batch review of these under the Disclosures tab.
The **Disclosures** tab is next to the **My Inbox** tab at the top of the page. When you click on the **Disclosures** tab, you will see a list of all disclosers who report to you that are required to complete a disclosure form.

**Form Submission Status & Status Definitions**
To determine whether a discloser has submitted their form, check the **Status** column to the right of their name.

**Draft** - All disclosers who have not yet submitted their form

**Department Review** – Pitt or dual (Pitt-UPMC) employees who submitted their disclosure and reported at least one outside interest. These are the individuals who appear in your **Inbox** for individual review.

**No Interests Disclosed** – Pitt or dual employees who submitted their disclosure and reported no outside interests. These are the individuals who appear in your **Disclosures** tab for batch or individual review.

**No Review Required** – UPMC-only employees
The UPMC COI Office will notify you and provide instructions on how to review forms for UPMC-only personnel. You **do not** need to review forms in **MyDisclosures** for individuals who are only employed by UPMC.
Reassign Primary Supervisor

Each discloser’s primary supervisor will be prepopulated for them in the system. In the unlikely event that you are incorrectly listed as the primary supervisor for a discloser, you or the discloser can identify the correct primary supervisor. You may return the form to the discloser for correction by indicating that you Disapprove of the form (see below) or you can identify the correct primary supervisor yourself by using the Reassign Primary Supervisor function.

To identify a different person as a discloser’s primary supervisor, first click on the discloser’s form from the list under the Disclosures tab. You will be taken to a summary page for that discloser. Select Reassign Primary Supervisor from the menu on the left.
When you select this option, a new window will open. First, select the name of the correct primary supervisor from the drop-down menu under question 1. Then add any additional comments, if desired.

Click OK at the bottom of the window to finalize the reassignment of the discloser’s primary supervisor. After you click OK the discloser’s form will be removed from your Inbox and Disclosures tabs.

Reviewing Forms with No Interests Disclosed

If a discloser reports no outside interests on their disclosure form, it will appear under your Disclosures tab with a status listed as No Interests Disclosed. If you have no concerns, you can batch review all forms without interests disclosed.

To approve all disclosure forms listed as No Interests Disclosed, click Batch-Approve Certifications in “No Interests Disclosed” State in the menu on the left side of the page under the Disclosures tab.

After clicking this option, a new window will open. You will see a list of all disclosers for whom you are
listed as the Primary Supervisor and who did not report any outside interests on their form. To mass approve the forms for all disclosers on your list, click OK at the bottom right of the screen.

Once you click OK, the status of all forms on the list will change from No Interests Disclosed to Review Complete. This may take several minutes, depending on the number of disclosures in your list. Once a discloser’s form is in the Review Complete state, their annual disclosure requirement is fulfilled.

**Problems with “No Interests Disclosed” Forms**

*Return to Department Review*

If you believe that a discloser made a mistake and does, in fact, have outside activities to report, you must return the form to the discloser using the Return to Department Review function.

From the list under your Disclosures tab, select the form of the individual whose disclosure requires corrections. You will be taken to a summary page with a menu on the left.
To send a form back to a discloser, click **Send to my Inbox – further review required.** A new window will open, and you will see a comment box. You do not need to add any comments. Click **OK** on the bottom right of the window to proceed.

Once you click **OK**, the form will be routed back to the Department Review state. From there, follow the instructions below on how to **Disapprove** of a disclosure form using the **Record and Complete Department Review** action *(see below)*.
Reviewing Outside Interests
How to review disclosure forms with outside interests reported

Disclosure forms for Pitt or dual employees who reported at least one outside interest will appear in your Inbox and under the Disclosures tab. They are listed as Department Review state.

Click on the form you want to review from your list.

When you click on a discloser’s form, you will be taken to a summary page that includes (1) a menu with actions you can take, (2) the name of the discloser’s secondary supervisor, if any, and (3) a summary of outside interests the discloser reported.

Review the summary of disclosures to identify any unmanaged conflicts of interest or commitment. Visit the COI Office website for resources on how to identify unmanaged conflicts.

If, after reviewing the summary, you are comfortable submitting an approval, click Record and Complete Department Review in the menu of actions on the left side of the page. Follow the instructions below on how to submit your Department Review.
To review all of the details of a disclosure, click **View Disclosures** at the top of the menu on the left.

**Institutional Responsibilities**

On the first page of the form, disclosers are required to identify their institutional affiliations, verify and identify their supervisor(s), and indicate whether they receive funding from a PHS agency for their research.

The discloser’s answers to the questions on this page determine what questions appear on the discloser’s form. **Verify that the information the discloser reported is correct.** If the discloser’s responses to the questions on this page are incorrect, return the form to the discloser by selecting the **Disapprove** option in your response (see below).
**What to Disclose**

The next page of the discloser's form summarizes what they are required to report, which is based on their responses on the page. At the bottom of the page, the discloser indicates whether they have any outside interests to report.

In general, disclosers must report any outside activities, interests, and relationships, regardless of dollar value, that they or a member of their immediate family have, that:

- Might be reasonably perceived to be related to their institutional responsibilities;
- Relate to the University's educational, research, service, or other missions, including services offered by the University; or
- May otherwise create a conflict of interest or commitment, or the perception of such a conflict, with their duties to the University.

At the end of their form, depending on whether a discloser is employed by Pitt, UPMC or both institutions, the discloser will answer questions specific to Pitt and UPMC.
Reviewing Disclosure Details

After the **What to Disclose** page, you will be shown a summary of the discloser’s outside interests. Review the summary on the page or click **View** to the left of the interest to see more details about the disclosure.

Not all disclosers will be required to report the financial value of their interest. The disclosure threshold depends on the discloser’s institutional affiliations, roles and PHS funding:

- **Pitt only faculty or researchers** receiving PHS funding are required to disclose amounts over $5,000 received in 12-month period
- **Pitt only faculty or researchers not receiving PHS funding** are required to disclose amounts over $10,000 received in a 12-month period
- **Dually employed** (Pitt-UPMC) disclosers and disclosers who are only **Pitt Administrators** have a zero-dollar threshold and are required to report all amounts they earn.

Use the **Back** and **Continue** buttons at the top or bottom of your screen to advance or return to pages on the disclosure form.
**For all reported outside activities:**

- Ensure that you gave the discloser prior approval to engage in the activity;
- Ensure that the activities do not give rise to an unmanaged conflict of interest;
- Ensure that the disclosed interests do not give rise to a conflict of commitment

For more information on how to identify potential conflicts of interest and conflicts of commitment, visit [the COI webpage](#).

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### Submitting a Review

**Record and Complete Department Review**

After reviewing a disclosure form, you must electronically submit your review. Select **Record and Complete Department Review** from the menu on the discloser’s summary page.
After you select this option, a new window will open. Indicate your disposition of the form.

» If you approve of the disclosure and no changes are required, select Approve.
» If you accept the disclosure, but want to add comments for the discloser, select Approve with Comment.
» If you do not approve the disclosure and it requires correcting before you approve, select Disapprove.
» If you discover an unmanaged conflict of interest, please contact the COI Office by selecting Request Assistance from COI Office.

If you select Approve with Comment, Disapprove or Request Assistance from COI Office, an additional mandatory text box for your comments will appear. Explain the reason for selecting the option you did in the space provided.

After selecting your chosen option, click at OK the bottom right of the screen to proceed.

If you select Approve with Comment, Disapprove or Request Assistance from COI Office:

After clicking OK you will return to the discloser’s summary page. Your menu of options for the discloser will have changed. Click the new option Prepare and Send Correspondence.
When you click this option, a new window will open with a draft of the email that will be sent to the discloser. You can revise the email and add comments, if desired.
Once you are satisfied that all of the necessary information is included in the email, scroll down to the bottom of the page.

Under **Correspondence Options** indicate whether you are ready to submit your review to the discloser or if you want to save and return to the activity later.

Once you select the **Complete** option and click **OK**, the form will be routed back to the discloser.

If you **Approve** or **Approve with Comment**, no additional action is necessary. Once you submit your approval, the discloser’s annual disclosure obligation is fulfilled.

If you **Disapprove**, the discloser will be required to make the necessary changes to their form and resubmit it to you for review. Once the form is resubmitted, review the form again and submit your new determination.

If you **Request Assistance from the COI Office**, someone from the COI Office will respond to your inquiry. The discloser will not be notified that you have requested assistance from the COI Office. After the COI Office has reviewed and provided any support or feedback, you must still submit your review of the discloser’s form by **Approving**, **Approving with Comment** or **Disapproving**.
Once your review of the discloser’s form has been submitted, the form status will change to **Review Complete**. The discloser’s annual disclosure requirement is fulfilled only when their form is in the **Review Complete** state.

**Notifying Secondary Supervisors**

*If a secondary supervisor is listed, their review must be submitted before you can submit yours.* Primary supervisors who try to submit their review before an assigned secondary supervisor has submitted their review will receive an error message.

You can determine whether a secondary supervisor has submitted their review by checking the **Accepted** column in the secondary supervisor information on the discloser’s summary page. If it says **Yes**, then the secondary supervisor’s review is complete.

If you are a primary supervisor and you are awaiting a secondary supervisor’s review, you can manually notify the secondary supervisor that you require their response by selecting **Notify Secondary Reviewers** from the menu on the left.
Once you click this option, a new window will open. First, click the box under question 1. Next, enter a message to the secondary reviewer under question 2. To send the notification to the secondary reviewer, click OK at the bottom of the window.

Note that secondary supervisors are not automatically notified when a discloser submits changes to their form. **Outside of the annual disclosure period, you should always use this feature to notify the secondary supervisor that their review is required.**

**Adding Secondary Supervisors**

The system does not automatically list a discloser’s secondary supervisor. If a discloser has a secondary supervisor, they must add them to their form manually. Primary supervisors are also able to add a secondary supervisor for a discloser.

If you review a form and identify a discloser who requires a secondary supervisor review, but the secondary supervisor is not listed on the discloser’s form, you may either return the form to the discloser by **Disapproving** of their form or add a secondary supervisor yourself.
To add a secondary supervisor, select **Manage Secondary Reviews** from the menu on the left.

After you select this option, a new window will open. Click **Add**.

Another new window will open.
1. Select the name of the secondary supervisor from the drop-down menu;
2. Select **Department Review** from the menu;
3. Select **Yes** in response to “Is a response required?”

Click **OK** at the bottom right of the window to assign the person you identified as the discloser’s secondary supervisor.