Navigating MyDisclosures Instructions for Pitt Secondary Supervisors Reviewing Disclosure Forms

MyDisclosures is the University's electronic conflict disclosure system. It conforms with the University's Conflict of Interest Policy for Research, federal funding requirements, UPMC policies (for UPMC disclosers), and other relevant University policies.

Pitt policy RI01 requires review by the discloser's supervisor to identify any potential conflicts of commitment or unmanaged conflicts of interest. *My*Disclosures enables supervisors to review disclosure forms electronically.

This document will provide you with the basic tools to review conflict disclosure forms as the Secondary Supervisor. For information about what to look for when reviewing disclosure forms, please visit the COI website for help guides, training and more information.

Need Assistance?

For help guides, FAQs and information about disclosures, please visit the COI Website.

If you need further assistance, please contact MyDisclosures support@pitt.edu.

MyDisclosures Navigation Tips

• • • • • • • • • • • • • • • • • • • •	Displays a pop-up window with help text
Save	Saves information
Continue »	
€ Exit	Leave the page and return to main workspace
*	Required Field
→ Jump To ▼	Click the down arrow to view a specific page
▲ Hide/Show Errors	Identify missing required information. Incomplete pages will be listed at the bottom of the page.

Types of Supervisor Review

Primary Supervisor

For Faculty – The Primary Supervisor is the Department Chair, Division Chief or equivalent faculty supervisor who completes their annual performance evaluation

For Staff – The Primary Supervisor is the person who completes their annual performance evaluation.

Primary supervisors will receive automatic email notifications weekly if annual disclosure forms are awaiting their review.

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. 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.

All supervisors <u>must</u> have a Pitt appointment or affiliation. UPMC-only employees cannot be listed as Primary or Secondary Supervisor on a discloser's form.

Form Status

Draft - Disclosure that has not yet been submitted

No Interests Disclosed – Pitt or dual employee's disclosure with no outside interests reported; submitted by the discloser and awaiting Pitt supervisor review

Department Review – Pitt or dual employee's disclosure with outside interests reported; submitted by discloser and awaiting Pitt supervisor review

Review Complete – Pitt or dual employee's disclosure that has been approved by supervisor

Submitted – UPMC-only employee's submitted disclosure; does not require supervisor review in MyDisclosures

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 to log in. If you are dually employed, you may use either.*

If you have trouble with your login:

Pitt employees should contact the Pitt 24/7 IT Help Desk at (412) 642-HELP (4357).

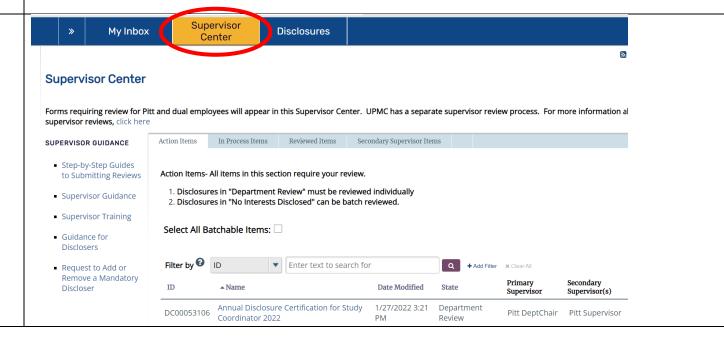
UPMC Employees should contact the UPMC Help Desk at (412) 647-HELP (4357).

Navigating to the Supervisor Center

When you log in to *My*Disclosures, you will land at your **Inbox**. Your **Inbox** is where you will find your own annual disclosure form to complete. For instructions on how to complete your disclosure form, <u>visit the COI website</u>.

To review disclosure forms on which you are listed as a supervisor, click on the **Supervisor Center** tab at the top of the page. All forms requiring your review will appear in the Supervisor Center.





Supervisor Center

The Supervisor Center contains all forms requiring your review. Four tabs are available for you.

Action Items

All disclosure forms requiring your attention as Primary or Secondary Supervisor will be listed in the **Action Items** tab of the Supervisor Center.

In Progress

All disclosure forms awaiting action by the discloser or a response from the COI Division will appear under this tab.

Reviewed Items

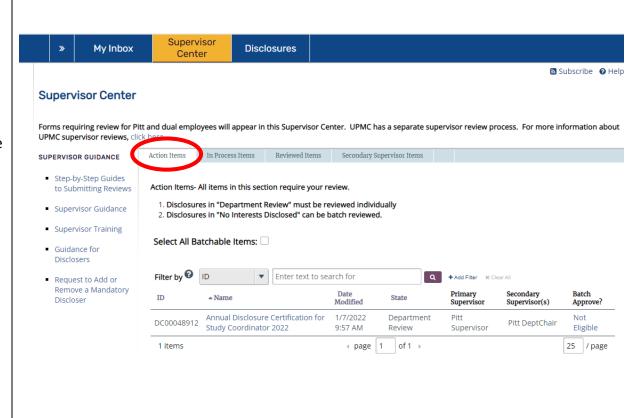
All disclosure forms you approved will appear under this tab.

Secondary Supervisor Items

All disclosure forms on which you are listed as Secondary Supervisor that are in 1) No Interests Disclosed status or 2) Review Complete status. You *do not* need to take any action with the forms in this tab.

Additional Supervisor Resources

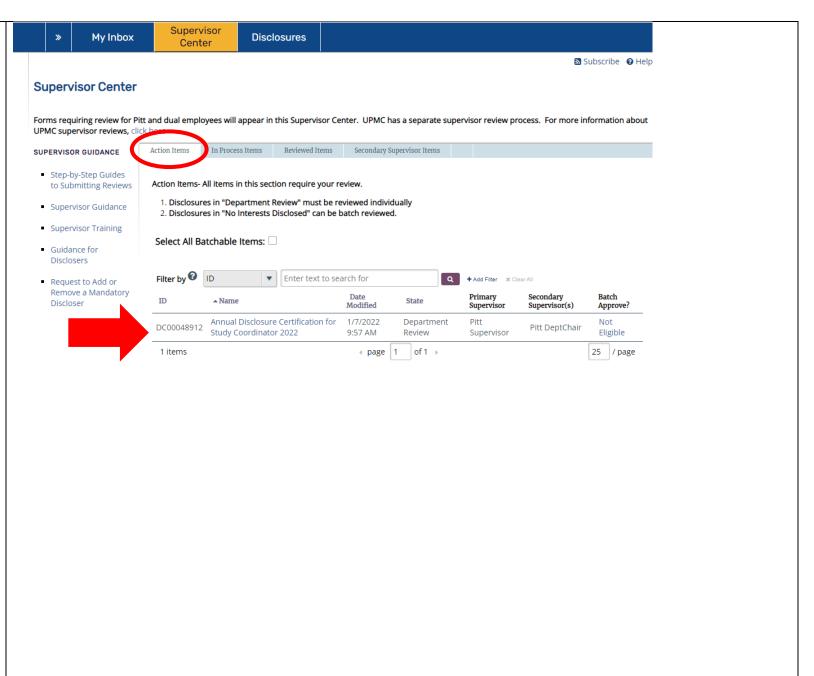
Links to help guides and resources are in the menu on the left.



Secondary Supervisor Review

Secondary Supervisors must review disclosure forms for Pitt or dual employees who reported at least one outside interest. The forms will appear in the **Supervisor Center** in the **Action Items** tab. Click on the form you want to review from the list.

Note: Your Secondary Supervisor review *must* be submitted before the Primary Supervisor can submit their review. Primary Supervisors who try to submit their review before an assigned Secondary Supervisor has submitted their review will receive an error message.



Reviewing Forms with Interests Disclosed

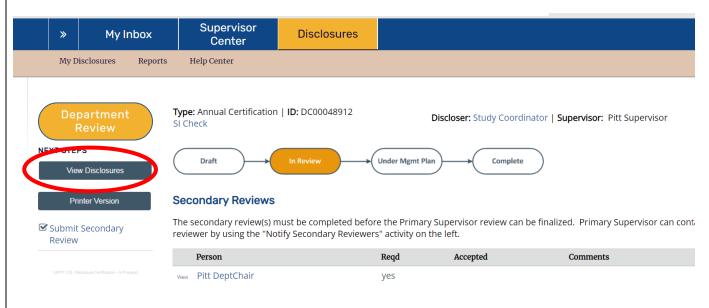
When you click on a form, you will be taken to a summary page that includes a menu with actions you can take, the name of the discloser's Primary Supervisor, and a summary of outside interests the discloser reported.

The summary page includes a status of each interest on the discloser's form:

- "Review Complete" means the interest was reported by the discloser and reviewed and approved by the supervisor
- "Under Modification" means the interest was reported by the discloser and is awaiting review by the supervisor; the entry will remain in this status until the supervisor approves the disclosure, at which time it will change to "Review Complete"
- "Pending Removal" means the discloser has removed the interest from the form; the entry will remain on the form and in this status until the supervisor approves the disclosure, at which time it will be removed from the form

To view all details reported on the form, click

View Disclosures in 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.**

Annual Certification for Study Coordinator: Institutional Responsibilities

1. * Identify your affiliations with Pitt and/or UPMC: (check ALL that apply)

I am a PITT Faculty or Researcher.

- Full-time faculty (≥ 50% FTE)
- Part-time or adjunct faculty who are identified by their supervisors as mandatory disclosers;
 - Any individual (faculty, staff or trainee) who is INDEPENDENTLY responsible for the design, conduct or reporting of Pitt research.

I am a PITT Administrator.

- Administrators and staff members whose positions are classified at Administrator IV and above;
- Individuals in a position to make, direct or materially influence University business decisions; or
 - Pitt employees with significant input over the selection of outside vendors or service providers

I am a UPMC employee or researcher.

What to Disclose

The next page of the discloser's form summarizes what they are required 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

Annual Certification for Discloser: What to Disclose

Completing this Certification satisfies the disclosure requirements of the University of Pittsburgh's (Pitt) policies governing conflicts of interest. You must disclose any interests or relationships that give rise to an actual or potential conflict of interest, so they can be evaluated and, if necessary, managed.

You must disclose any ownership interest or business relationship with an entity that you know does business with Pitt.

If you know that a member of your family has benefited financially, or will likely benefit financially, from a particular transaction with Pitt, you must disclose those interests. Include interests held by your spouse or domestic partner, children, siblings, and parents, including in-laws and step-relatives.

However, you are not required to disclose:

- Salary, reimbursements, bonuses, or incentives from the University of Pittsburgh, UPMC, UPMC physician entities, or the Veterans' Administration Pittsburgh Healthcare System;
- Income from and ownership interests in investment vehicles, such as mutual funds and retirement accounts, in which you do not directly control the investment decisions:
- Ownership of any publicly traded company (i.e.: companies with stock that is listed on any recognized stock exchange), where
 the amount of your ownership interest is less than 5% of the total stock of the company

What is the relevant time period for disclosures?

You should disclose the interests and relationships you had during the last 12 months, and those that you reasonably anticipate having in the next 12 months.

You must submit a Certification annually, even if you do not have any changes or new interests to report. Pitt policy requires that you update your Certification within 30 days of acquiring or discovering a new reportable interest or relationship. You can access and update your form at any time during the year.

If you are removing all outside interests from your form, you must keep "Yes" selected on this page and click "Continue". You will be taken to the Disclosure Details page where you can remove the entries using the "X" next to the interest. Once you remove the interest, use the "Back" button to return to this page and change your answer below to "No".

- * Do you have any outside interests, activities, or relationships, foreign or domestic, to report?
 Yes O No Clear
- 2. * Does an immediate family member have a relationship with an outside entity, foreign or domestic, that relates to your institutional responsibilities?
 O Yes No Clear

Reviewing Disclosure Details

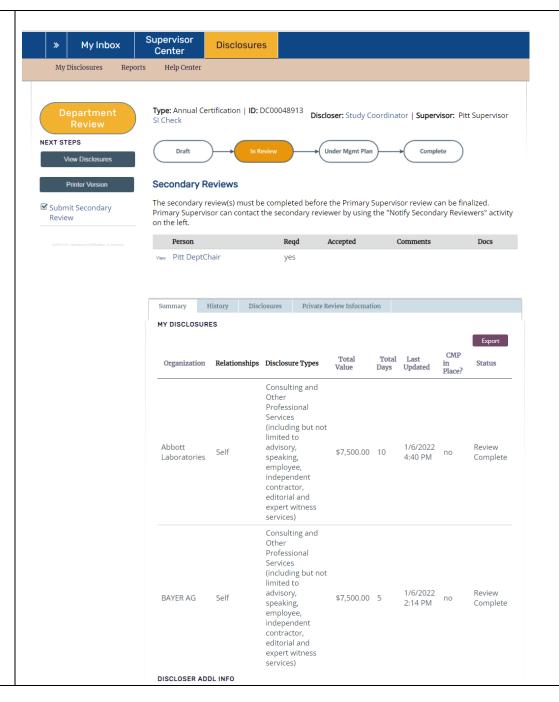
After the *What to Disclose* page, you will be shown a summary of the discloser's outside interests. Click *View Disclosures* in the menu on the left to see each page of the discloser's form. Use the **Back** and **Continue** buttons at the top or bottom of your screen to advance or return to pages on the disclosure form.

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.

For all reported outside activities:

- Ensure that the activities do not give rise to an unmanaged conflict of interest this means that the discloser's outside interests should not compromise their judgment, bias the nature or direction of scholarly research, influence their decisions or behaviors with respect to University activities or result in personal gain for the discloser or a member of their immediate family to the detriment of the University or in ways prohibited by University policy.
- Ensure that the disclosed interests do not give rise to a conflict of commitment – this means that the discloser's activities must not interfere or compete with the University's educational, research or service mission

<u>Visit the COI website</u> for more information about identifying unmanaged conflicts.



Submitting a Secondary Supervisor Review

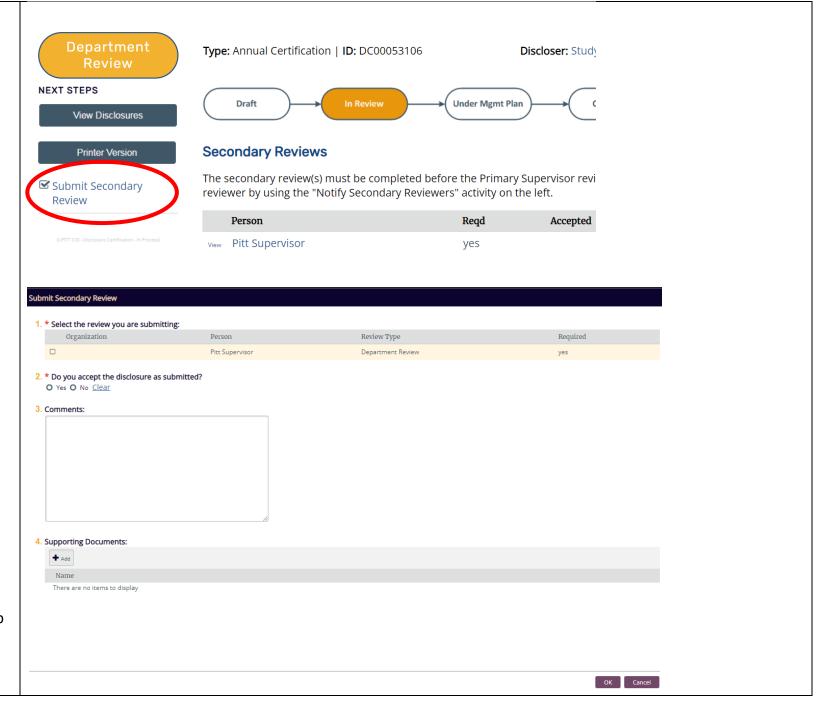
To submit your Secondary Supervisor review, select **Submit Secondary Review** from the menu on the left of the discloser's summary page.

After clicking the **Submit Secondary Review** option, a new window will open.

- 1. Check the box under Question 1;
- 2. Under Question 2, indicate whether the submission is acceptable or not;
- 3. Under Question 3, add any comments you have. For example: "Discloser needs to add UPMC affiliation" or "Discloser needs to report on-going activity with Company X"

Click **OK** at the bottom right of the window to submit your secondary review.

Once your review of the discloser's form has been submitted, the form status will remain in the **Department Review** state under your **Action Items** tab until the Primary Supervisor submits their review. Once the discloser's Primary Supervisor submits their review, the form status will change to **Review Complete** and will move to the **Secondary Supervisor Items** tab of your **Supervisor Center.**



Reviewing Forms with No Interests Disclosed

If a discloser reports no outside interests on their disclosure form, it will appear under your **Secondary Supervisor Items** tab with a status listed as **No Interests Disclosed**.

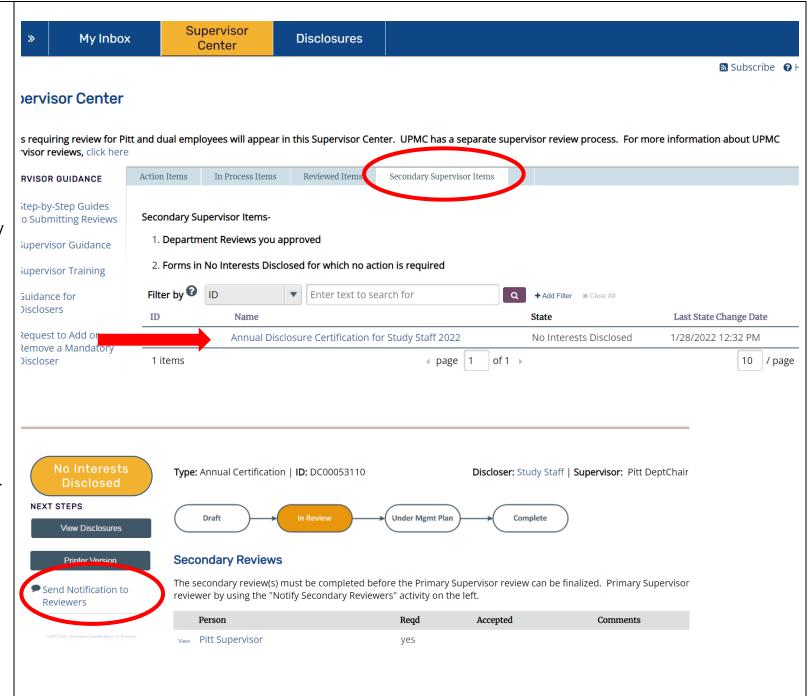
If you have no concerns, you do not need to take any action.

Note: Only Primary Supervisors can batch review forms with no interests disclosed. Secondary Supervisors *do not* have the ability to batch approve forms on which they are listed as Secondary Supervisor. If you are both a Primary and a Secondary Supervisor, please note that when you click "Batch- Approve Certifications in "No Interests Disclosed State" from your **Action Items** tab, it will only apply to forms for which you are listed as the Primary Supervisor.

Problems with "No Interests Disclosed" Forms

If you believe that a discloser made a mistake and does, in fact, have outside activities to report, you should report this to the discloser's Primary Supervisor.

From the list under your **Secondary Supervisor Items** 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. Click **Send Notification to Reviewers**.



A new window will open, and you will see a **comment box**. Write your message to the discloser's Primary Supervisor and explain the issue with the discloser's form. Your comments will not be visible to the discloser.

Click **OK** on the bottom right of the window to note your concerns on the form for the Primary Supervisor. They can address any concerns with the discloser through their review.

