Navigating MyDisclosures for Pitt Secondary Supervisors

Instructions for Reviewing Disclosure Forms

MyDisclosures is a new electronic 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 (Pitt-UPMC) 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 disclosure forms 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

<table>
<thead>
<tr>
<th>Icon</th>
<th>Description</th>
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<tbody>
<tr>
<td><img src="Image" alt="Question Mark" /></td>
<td>Displays a pop-up window with help text</td>
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<tr>
<td><img src="Image" alt="Save" /> or <img src="Image" alt="Continue" /></td>
<td>Saves information</td>
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<tr>
<td><img src="Image" alt="Exit" /></td>
<td>Leave the page and return to main workspace</td>
</tr>
<tr>
<td><img src="Image" alt="Required Field" /></td>
<td>Required Field</td>
</tr>
<tr>
<td><img src="Image" alt="Jump To" /></td>
<td>Click the down arrow to view a specific page</td>
</tr>
<tr>
<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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</tbody>
</table>
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, you or the discloser can identify a different 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
» The discloser’s primary supervisor sends a notification
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 a 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 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.
**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 **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. 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 Disclosures 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 using the Send Notification to Reviewers 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. 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. Click OK on the bottom right of the window to proceed.
Secondary Supervisor Review

How to review disclosure forms as a secondary supervisor

Disclosure forms for Pitt or dual (Pitt-UPMC) employees who reported at least one outside interest will appear in your Inbox. Click on the form you want to review from the list.

**Note that your secondary supervisor review must be submitted before the primary supervisor can submit theirs.** Primary supervisors who try to submit their review before an assigned secondary supervisor has submitted their review will receive an error message.

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](https://coi.pitt.edu) 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.

Verify that the information the discloser reported is correct. The discloser’s answers to the questions on this page determine what questions appear on the discloser’s form.

If the discloser’s responses to the questions on this page are incorrect, you should not accept the disclosure when you submit your secondary review (see instructions below).

Annual Certification for Maricela Simms (PI88) : Institutional Responsibilities

1. * Identify your employer(s) and where you do research (check ALL that apply): 📣
   - PITT Faculty or Researcher
   - PITT Administrative Role
   - UPMC

2. Your supervisor who will approve this disclosure: 📣
   - Pitt4 Supervisor4

   If this is not the supervisor who completes your annual performance review, select the appropriate supervisor by clicking the button below.

3. Please select your secondary supervisor(s), If applicable:
   To search for an individual start by typing the first name followed by the last name or last name, first name: 📣

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Employer / Department</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pitt15</td>
<td>Supervisor15</td>
<td>Huron Consulting, Inc.</td>
</tr>
</tbody>
</table>

4. * Regarding funding from the Public Health Service (PHS):
   - Do you currently conduct research funded by PHS? ☑
   - Have you submitted an application to an agency of the PHS that is pending for review or funding? ☑
   - In the next 12 months, do you anticipate conducting PHS-funded research?
   - Yes ☐ No ☑
**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 previous page. At the bottom, 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 review 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** disclosers and disclosers who are only **Pitt Administrators** have a zero-dollar disclosure threshold and are required to report all amounts they earn.

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

- Ensure that the discloser had prior approval from their primary supervisor 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 your Secondary 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 the primary supervisor, if desired. For example: “Disclosure accepted”, “Discloser needs to add UPMC affiliation” or “Discloser needs to report on-going activity with Company X”
4. Attach any related documents, if desired

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