MyDisclosures

Training for Supervisors
Goals

• Understand criteria for supervisor review
  • What information should be disclosed
  • Identifying conflicts of commitment
  • Identifying conflicts of interest

• Understand how to navigate to the Supervisor Center in MyDisclosures
About MyDisclosures

- University's electronic disclosure system
- Single form for Pitt and UPMC disclosures
- Includes disclosure and supervisor review
- Disclosure forms are due on April 15th
- Supervisor reviews are due on June 15th
Supervisor Review Requirement

- Pitt policy RI 01 requires supervisor review for all disclosure forms
- Identify conflicts of commitment
- Identify unmanaged conflicts of interest
Who is the Supervisor?

- **Primary Supervisor**
  - **Faculty** – Department Chair, Division Chief or equivalent faculty supervisor from the discloser’s department who completes their annual performance evaluation
  - **Staff** – The person who completes their annual performance evaluation

- **Secondary Supervisor**
  Another person who reviews the disclosure in addition to the Primary Supervisor (e.g.: Director of a Center or Institute)

- **Must have a Pitt appointment or affiliation**
Supervisor Review Criteria
What is reported?

• Activities, interests and relationships outside the scope of the discloser's institutional responsibilities
  • Services for entities other than the University, UPP, UPMC or the VA of Pittsburgh Healthcare System
  • Related or perceived to be related to their institutional responsibilities
  • Related to Pitt’s educational, research, service or other missions, including services offered by Pitt; or
  • May otherwise present or be perceived to present a conflict of interest or conflict of commitment with their institutional responsibilities

• Includes paid and unpaid activities
• Includes all outside entities, whether for-profit or not
• Includes activities, interests and relationships within the last 12 months and reasonably expected within the next 12 months
What is a Conflict of Commitment?

• Outside interests, relationships or activities that have a reasonable potential to compete or interfere with
  • (i) Pitt’s educational, research or service missions, or
  • (ii) the discloser’s ability or willingness to perform the full range of their institutional responsibilities

• Examples of potential conflicts of commitment
  • Individual is using more time for outside activities than is permitted by the Outside Employment policy
    • Faculty may use up to one day per week of their University time for outside activities
    • Staff may not use University time for outside activities
  • Performance of Pitt responsibilities declines because of outside activities
  • Using Pitt resources for outside activities more than incidentally
Supervisor Review

Conflicts of Commitment

• Does the discloser accurately report all outside activities, interests and relationships?
• Did you approve of all outside activities?
• Is the discloser’s use of university time for outside activities appropriate?
• Is the discloser’s use of Pitt resources for their outside activities limited to Incidental Use?
Addressing Conflicts of Commitment

• If you find that a discloser’s outside activities create a conflict of commitment, please consult with the Dean of your school or head of your responsibility center to determine an appropriate management strategy.

• Performance of outside activities is subject to supervisor approval. You do not need to approve an outside activity that creates a conflict of commitment.
What is a Conflict of Interest?

An outside activity, interest or relationship that could actually or potentially influence, bias or compromise

(i) how the discloser performs their institutional responsibilities;
(ii) the design, conduct, or reporting of Pitt research; or
(iii) result in personal gain for the discloser or a member of their immediate family at the expense of the University.

Examples of potential conflicts of interest

• Discloser consults for a company that sponsors research in their laboratory
• Discloser conducts research that evaluates or develops a product or other intellectual property owned by a company with which they have a relationship
Supervisor Review

Conflicts of Interest

• Does the discloser conduct research at Pitt that is related to their outside activities?

• Conflict management plans are required for
  • Interests exceeding $10,000 in a 12-month period
  • Equity in a non-publicly traded company
  • Management, officer or board of directors positions
  • Relationships with University Licensed Start-up Companies
Does the discloser have a Conflict Management Plan?

Does the discloser conduct research that relates to this outside activity?
Supervisor Review
Conflicts of Interest

Did the discloser comply with applicable policies and procedures for consulting activities?

Pitt-only employees:  https://www.coi.pitt.edu/outside-activities/outside-activities-consulting

Dual Pitt-UPMC employees:
Contact COI_Consulting@upmc.edu
Addressing Conflicts of Interest

- Send to COI Division through MyDisclosures
- COID will develop a management plan, as necessary
Foreign Engagement

• Does the discloser report any relationships with or support from foreign government entities, foreign institutes of higher education or foreign government-owned companies?

• Ensure the discloser reported all activities to funding agencies as required
  • Information is available on the Office of Sponsored Programs webpage

• Office of Trade Compliance is available to assist with Export Controls issues

• Innovation Institute is available to advise on intellectual property questions
Reminders

• Disclosure forms must be kept up-to-date throughout the year
• Disclosers should update their form within 30 days of discovering or acquiring a new outside interest, relationship or activity
• Disclosers must report outside activities related to animal and human subject research in related ARO and PittPro submissions
Navigating MyDisclosures for Supervisor Review
Step-by-step guides
https://www.coi.pitt.edu/mydisclosures/user-guidance

User Guidance

Discloser Guidance
- User Guide to Update Your Disclosure
- User Guide to Submit Your Annual Disclosure
  - Instructional Video

Supervisor Guidance
- User Guide for Primary Supervisor
- User Guide for Secondary Supervisor
- User Guide for the Preparing Correspondence State
# Form Status

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<th>Status</th>
<th>Description</th>
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<tbody>
<tr>
<td>Draft</td>
<td>Discloser has not yet submitted their form</td>
</tr>
<tr>
<td>No Interests Disclosed</td>
<td>Discloser submitted their form and reported no interests; Awaiting supervisor review</td>
</tr>
<tr>
<td>Department Review</td>
<td>Discloser submitted their form and reported outside interests; Awaiting supervisor review</td>
</tr>
<tr>
<td>Review Complete</td>
<td>Discloser submitted their form and the supervisor submitted their review</td>
</tr>
<tr>
<td>Submitted</td>
<td>UPMC-Only Discloser submitted their form</td>
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Supervisor Center

Forms requiring review for Pitt and dual employees will appear in this Supervisor Center. UPMC has a separate supervisor review process. For more information about UPMC supervisor review processes, please see the UPMC website.

**Action Items**

All items in this section require your review.

1. Disclosures in "Department Review" must be reviewed individually.
2. Disclosures in "No Interests Disclosed" can be batch reviewed.

**Select All Batchable Items:**

Filter by:

<table>
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<tr>
<th>ID</th>
<th>Name</th>
<th>Date Modified</th>
<th>State</th>
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<tbody>
<tr>
<td>DC00053109</td>
<td>Annual Disclosure Certification for Study Coordinator 2022</td>
<td>2/17/2022 1:08 PM</td>
<td>Department Review</td>
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</table>

**1 Items**
Forms requiring review for Pitt and dual employees will appear in this Supervisor Center. UPMC has a separate supervisor review process. For more information about UPMC supervisor review, please contact the UPMC compliance department.

**SUPERVISOR GUIDANCE**

- Step-by-Step Guides to Submitting Reviews
- Supervisor Guidance
- Supervisor Training
- Guidance for Disclosers
- Request to Add or Remove a Mandatory Discloser

**Action Items**

- Action Items - All items in this section require your review.
  1. Disclosures in "Department Review" must be reviewed individually
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**Select All Batchable Items:**

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1 items
Requesting Changes to a Form

Type: Annual Certification | ID: DC00053106

Secondary Reviews

The secondary review(s) must be completed before the Primary Supervisor review can be finalized. Primary Supervisor can contact the secondary reviewer by using the following information:

<table>
<thead>
<tr>
<th>Person</th>
<th>Regd</th>
<th>Accepted</th>
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<tbody>
<tr>
<td>Pitt Supervisor</td>
<td>yes</td>
<td>yes</td>
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Summary

Your COI disclosure has been submitted and is currently under review.

Management plan:
Snapshot:
Date submitted: 1/27/2022
Needs review: Yes
Submitting Review or Requesting Assistance

Department Review

NEXT STEPS
- View Disclosures
- Print Version

☑ Record and Complete Department Review

Secondary Reviews

Type: Annual Certification | ID: DC00053106

Draft → In Review

Record and Complete Department Review

Please record your review of the disclosure certification and your conclusion. If you believe the disclosure should have a conflict management plan for one or more outside interest, select "Request Assistance from COI Office". If you want the discloser to make changes to their form, do not use this option. Instead click Cancel below and choose "Supervisor Requests Changes from Discloser" from the menu on the left.

Department Determination:
- Approve
- Approve with Comments
- Request Assistance from COI Office

Related Attachments:
- Name
  - There are no items to display.

Your COI disclosure has been submitted and is in management plan.

University of Pittsburgh
Resources
www.coi.pitt.edu/mydisclosures

• Step-by-step guides
• What to Disclose
  • Should I Disclose table
• Training for Disclosers and Administrators
Need Assistance?

mydisclosures_support@pitt.edu