Navigating MyDisclosures

Instructions for Pitt Secondary Supervisors Reviewing Disclosure Forms

MyDisclosures is an electronic conflict 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 disclosers), 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 electronically.

This document will provide you with the basic tools to review and respond to disclosures submitted by personnel you oversee. 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@pitt.edu.

**MyDisclosures Navigation Tips**

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Types of Supervisor Review

**Primary Supervisor**
An individual’s annual disclosure requirement will not be fulfilled until the primary supervisor’s review is submitted. You should be identified as the primary supervisor for all personnel for whom you complete an annual performance review. The primary supervisor should be 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.

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 disclose; and
- When the COI Division 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

**Form Submission 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; you may batch approve items with this status

**Department Review** – Pitt or dual employee’s disclosure with outside interests reported; submitted by discloser and awaiting Pitt supervisor review; these forms must be reviewed individually

**Review Complete** – Pitt or dual employee’s disclosure that is approved by supervisor

**No Review Required** – 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 MyDisclosures, 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, visit the COI website.

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

**Action Items**
All disclosure forms requiring your will be listed in the Action Items tab of the Supervisor Center. All forms on which you are listed as a Primary Supervisor will appear here. You will also see all forms on which you are listed as Secondary Supervisor and on which the discloser reported interests.

**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 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
How to review disclosure forms with interests disclosed as a secondary supervisor

Disclosure forms for Pitt or dual (Pitt-UPMC) employees who reported at least one outside interest will appear in your 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.

Disclosure forms for Pitt or dual employees who reported at least one outside interest will appear in the Supervisor Center in the Action Items tab. They will be listed in the Department Review status.
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.

If, after reviewing the disclosure summary, you are comfortable submitting an approval, click **Submit Secondary Review** in the menu on the left (see further instructions below).

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. 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.

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.

Definitions

- A “conflict of interest” or “potential conflict of interest” exists when a non-University financial interest, relationship or activity could actually influence, bias or compromise, or appear to influence, bias or compromise, (i) how you perform your institutional responsibilities, (ii) the nature, direction or results of your research, or (iii) result in personal gain for you or a member of your immediate family at the expense of the University.
- A “conflict of commitment” exists when your outside interests, relationships or activities have a reasonable potential to compete or interfere with (i) the University’s educational, research or service missions, or (ii) your ability or willingness to perform the full range of your institutional responsibilities at the University.
- “Immediate family” includes your spouse, registered domestic partner, dependents, and any other members of your household.
- “Institutional responsibilities” are your professional responsibilities to the University, including but not limited to research, teaching, leadership, professional practice, membership on institutional committees or panels (e.g., Institutional Review Board, Data Safety Monitoring Committee), and administrative activities.

What am I required to disclose?
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.

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

Visit the COI website 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 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.

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**.

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*MyDisclosures User Guide for Secondary Supervisors*
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. Click OK on the bottom right of the window to proceed.