Vanderbilt University Medical Center

Conflict Disclosure System

User's Guide

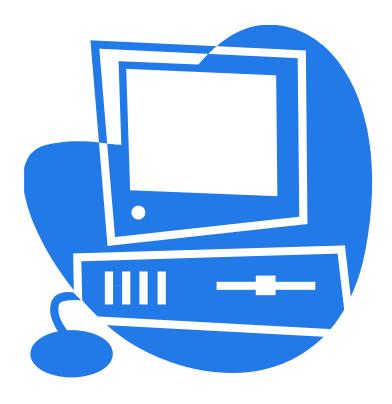


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Document Change History

Version	Date	Change Summary
1.0	03-29-2007	Original version created.
2.0	02-04-2008	Updated with latest release changes.
2.1	02-20-2008	Updated with Christy's edits.
2.2	05-01-2009	Updated with changes for 2.1.5 release.
2.3	05-23-2012	Updated two screenshots for 2.1.9 release – main question and acknowledgement screenshot
2.4	01-11-2013	Changes for 2.2.0 release.
2.5	03-13-2013	Changes for 2.2.1 release.
2.6	02-17-2015	Changes for the 2.4.0 release.
2.7	09-30-2015	Changes for the 3.0 release.

How to Use this Guide

This *Conflict Disclosure System User's Guide* is designed to walk Vanderbilt University Medical Center (VUMC) staff through the process of creating and submitting a conflict of interest disclosure for approval. The guide includes information on creating a disclosure and submitting it for approval, as well as approving a disclosure. A summary of the steps to follow for each process and the corresponding screenshots are provided in each section.

Need Help?

If problems are encountered with the Conflict Disclosure System after following the guidelines in this document or if you have suggestions for improvement, please send an email to the following address: coi.vumc@vumc.org

What is the Conflict Disclosure System?

The Conflict Disclosure System is a web application built specifically for Vanderbilt University Medical Center staff to submit and approve conflict of interest disclosures. Developed initially in 2007, the application allows authorized users to create a disclosure and submit it for approval. It also contains a facility for approvers to review and approve disclosures.

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What is Required to Use the Conflict Disclosure System

The following is needed to use the Conflict Disclosure System:

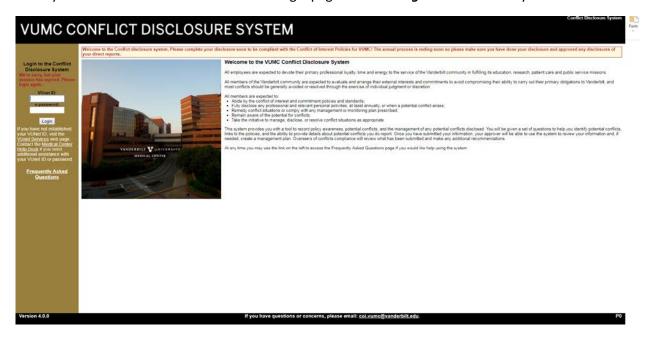
- 1. A VUNET ID and ePassword.
 - ➤ If you have forgotten your ePassword, go to the following website and follow the instructions for recovery: https://jprod.its.vanderbilt.edu/apps1/its-epassword/personInfo.html
 - If you do not have an ePassword, go to the following website and follow the instructions listed: https://iprod.its.vanderbilt.edu/apps4/vumcemployee/
- 2. If you are using a Microsoft Windows based computer, Internet Explorer version 8.0 or higher, Firefox, or Chrome web browser
 - ➤ If there is a problem with your web browser, please contact your LAN manager or local technical support person for assistance.

How Do I Get to the Conflict Disclosure System?

The Conflict Disclosure System's website can be accessed via the following URL:

https://coi.app.vumc.org/coi/

Enter your VUNET ID and ePassword on the login page and click *Login* to access the system.



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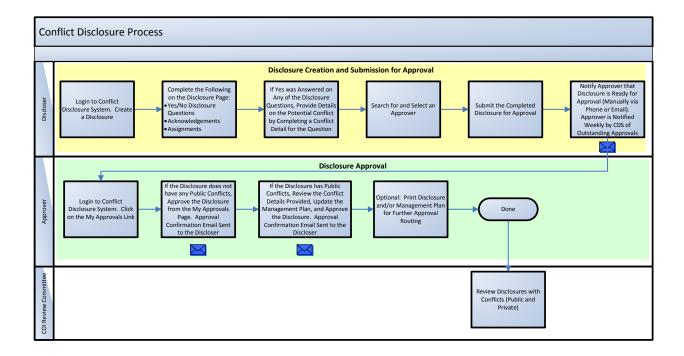
Conflict Disclosure Process Overview

Medical Center staff must complete a disclosure each fiscal year as part of the annual performance evaluation process. If a potential conflict arises during the year, a disclosure can and should be completed as conflicts arise. The Conflict Disclosure System has been created to support this process. Outlined below is a brief summary of the disclosure process the system supports. In addition, a flowchart outlining the process is provided. More details on how to complete each step is provided in the sections that follow.

- 1. **Disclosure Creation and Submission for Approval:** VUMC staff are responsible for submitting a disclosure each fiscal year. During the process disclosers complete a disclosure in the Conflict Disclosure System.
 - When completing a disclosure, the main Yes/No questions and acknowledgements must be completed on the main disclosure page. If Yes was answered on any of the main Yes/No questions, then additional details about the potential conflict must be provided by completing a conflict details questionnaire. Note that some questions may be private and not visible by the approver.
 - Once all disclosure questions are answered, an approver is selected on the Select Approver pages. Some department's disclosures are automatically assigned an approver. If the incorrect approver is assigned or no approver is assigned, follow the steps on the Select Approver pages and select the correct approver.
 - The completed disclosure is submitted to the approver for approval. The discloser should notify the approver in person, via email, or by phone that the disclosure is ready for review. In addition, once a week the system will notify the approver about outstanding disclosures that require approval. When the disclosure is submitted for approval, it is no longer editable by the discloser.
- 2. **Disclosure Approval:** when a disclosure is submitted for approval, the approver logs into the Conflict Disclosure System and approves the disclosure through the *My Approvals* page.
 - If the disclosure does not have any public conflicts the disclosure can be approved directly from the *My Approvals* page by selecting the disclosure and clicking the *Approve Selected Disclosure* button. Note that private questions are not visible to the approver and not part of the review/approval process for approvers.
 - ➤ If the disclosure has public conflicts, the approver must review the disclosure details and complete the management plan page for the disclosure. Once the management plan page is created, the disclosure can be approved.
 - The approver also has the option to return a disclosure to the discloser. Upon returning a disclosure, the approver will be required to select a reason for return and has the option to include any

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additional comments as to why it is being returned. The approver should notify the discloser via email or phone that the disclosure has been returned. In addition, the system notifies the discloser that the disclosure has been returned. The return reason and comments are included in the email and the disclosure for reference.



Creating and Submitting Disclosures for Approval

Outlined below are the steps a faculty/staff member follows to create a disclosure in the Conflict Disclosure System and submit it for approval.

- 1. Login to the Conflict Disclosure System. See the <u>How Do I Get to the Conflict Disclosure System</u> section of this document for information on how to access the login page.
- 2. If you have not previously created a disclosure the *My Disclosures* page will be displayed without any disclosures in the list. If a disclosure has been created it will be displayed on the *My Disclosures* page.
- 3. Click the *Create Disclosure* button.

NOTE: VUMC employed faculty should not use this system to complete their COI disclosures. COI disclosures for School of Medicine and School of Nursing Faculty employed by VUMC are handled through the Office of Faculty Affairs.

Note that if you already have a draft or returned disclosure created, then the *Create Disclosure* button will not be displayed on the page. You must complete and submit the disclosure or delete it in order to gain access to the *Create Disclosure* button.

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- 4. If you have previously completed a disclosure you will be prompted to copy information from the last approved disclosure into the new one.
 - Select Yes to copy information from the last approved disclosure to the new disclosure. Answers to the main disclosure questions and disclosure detail questions will be copied into the new disclosure. Acknowledgement, approver, and management plan information will not be copied.
 - > Select **No** to create a blank disclosure into which you will be able to enter your information.
 - Select **Cancel** to stop and return to the **My Disclosure** page.



- 5. The new disclosure is displayed on the page.
- 6. If information was copied from a previous disclosure, the answers to the questions will be defaulted.

 Confirm that the answer to each question is correct and update answers where needed. If no previous disclosure was copied, answer each of the Yes/No disclosure questions at the top of the page. Note that private questions are not visible to approvers.

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Instructions: Mark the appropriate box for EACH question. If your answer to any question is "YES", you must complete the supporting documentation providing details about the potential conflict. Please include activities occurring currently or during the past year, even if they have been disclosed and approved in the past.

- A. Business Relationships and Research Activities
 Are you or a family member involved as an investor, owner, employee, consultant, contractor, or board member with (or entitled to receive royalties from) a business that (a) has a contractual relationship with VUMC, (b) provides goods or services to VUMC, (c) sponsors or is involved in research activities at VUMC, (d) receives referrals from VUMC, or (e) pays royalties directly to you?

 No Ves Circk Here to Provide Details
 Family Members Working Together at Vonderbilt University Medical Center
 Have you been involved in the hiring of a family member, or do you directly or indirectly supervise, review, determine compensation for, assign work to, or are you in a position to support the effort of a member of your family working at VUMC?

 No Ves Circk Here to Provide Details
 Have you do an individual or on behalf of your department) or a family member accepted gratuities, gifts, or special favors from someone (or a company) who is doing business with or proposing to do business with VUMC?

 No Ves Circk Here to Provide Details

 D. Outside Joba/Activities or Other Relationships
 Are you or a family member worder in any other activity or other relationship directly or indirectly involving VUMC that creates a conflict of interest/commitment or the appearance of a conflict of interest/commitment or the appearance of a conflict of interest/commitment or the appearance of a conflict of interest/commitment Policy?

 No Ves Circk Here to Provide Details

 E. Legal Proceedings
 The General Services Administration requires organizations to verify their continuing eligibility for participation in federally funded programs. Particular legal proceedings or glebarment can affect VUMC's eligibility for federally funded programs. Please indicate if you have been involved in any fraud, antitrust, civil or criminal proceedings (arrest or conviction) as a defendant (other than a minor traffic offense) or been debarred, suspended, or otherwise excluded by a duly authorized regulatory appeny
 - 7. At the bottom of the page, review the acknowledgements and assignments. Check each one that has been completed. Click on the links provided to view the websites containing the various policies and additional information provided.

Acknowledgments - Check the boxes to acknowledge your understanding of these policies.

- Policy I have reviewed the <u>VUMC Conflict of Interest Policy</u>, and the <u>VUMC Intellectual Property Policy</u>, and I agree to comply with their provisions. The information I have provided is accurate and not false, erroneous, misleading, or incomplete. I will file an updated form if changes occur that may either (a) give rise to a new conflict of interest or commitment or (b) eliminate a conflict previously disclosed.
- Official Disclosure As a member of the VUMC Community, I understand that this online disclosure form is the only authorized means by which I may make, as required by Medical Center policy, disclosures regarding outside activities and financial interests that create or have the appearance of creating conflicts of interest. Although I may elect to seek guidance by other means, I understand that no such action can result in approval of an outside activity or financial interest. I understand that authorized approval for outside activities and financial interests can only be granted through use of the online disclosure tool.
- Code of Conduct Annual Review & Disclosure I acknowledge that I have reviewed VUMC's Code of Conduct and I understand that I am responsible for knowing and following the Code of Conduct, and all relevant laws, rules and regulations
- Confidential Helpline I understand that if I have compliance-related concerns, questions or issues to report, I can call the Confidential 24-Hour Integrity Line @ (866) 783-2287

Assignments - Check the box to indicate your agreement

○ No ○ Yes Click Here to Provide Details

In accordance with the VUMC Intellectual Property Policy, I do hereby assign to Vanderbilt University all right, title and interest I now have or will have in the future in and to any patent, copyright and other intellectual property right covering any invention, software or other Technology created or authored by me while employed at Vanderbilt University Medical Center.

As stated in the VUMC Intellectual Property Policy, subject to the exceptions set forth below, all rights in technology created by VUMC employees (i) with the use of VUMC facilities or funds administered by VUMC, or (ii) which fall within the individual's scope of employment, are granted to Vanderbilt University, all right, title and interest in own water or will have in the future in and to any patent, copyright and other intellectual property right covering any invention, satisfactory or authorized by me while employeed at VUMC. I understand that this assignment does not apply to my rights in and to Literary, all right will be a visual property of the covering and artistic Works (including rights in scholarly books, articles and other publications, artistic, literary, film, tape, musical works and the like), nor does it apply to inventions made under the exceptions set forth in the Technology Policy for consulting and independent research. Vanderbilt University and Vanderbilt University Medical Center assert no ownership of such rights, except to the extent of artistic, literary, film, tape and musical works.

8. If **Yes** was answered on any of the main disclosure questions:

Travel Sponsored by Third Parties

Do you engage in sponsored research in your position at VUMC in which travel is reimbursed or paid by a third party and not funded through VUMC?

- Click the Click Here to Provide Details button to provide more information about the conflict.
- A. Business Relationships and Research Activities
 Are you or a family member involved as an investor, owner, employee, consultant, contractor, or board member with (or entitled to receive royalties from) a business that (a) has a contractual relationship with VUMC, (b) provides goods or services to VUMC, (c) sponsors or is involved in research activities at VUMC, (d) receives referrals from VUMC, or (e) pays royalties directly to you?

 No Wes Click Here to Provide Details

 Family Members Working Together at Vanderbilt University Medical Center
 Have you been involved in the hining of a family member, or do you directly or indirectly supervise, review, determine compensation for, assign work to, or are you in a position to support the effort of a member of your family working at VUMC?

 No Wes Click Here to Provide Details

 C. Gifts for Parsonal Use
 Have you (as an individual or on behalf of your department) or a family member accepted gratuities, gifts, or special favors from someone (or a company) who is doing business with or proposing to do business with VUMC?

 No Wes Click Here to Provide Details

 D. Outside Jobs/Activities or Other Relationships
 Are you or a family member involved in any other activity or other relationship directly involving VUMC that creates a sonflict of interest/commitment or the appearance of a conflict of interest/commitment under the VUMC Conflict of interest and Commitment Policy?

 No Wes Click Here to Provide Details
 - On the Disclosure Details Summary page, click the Create Conflict Detail button.

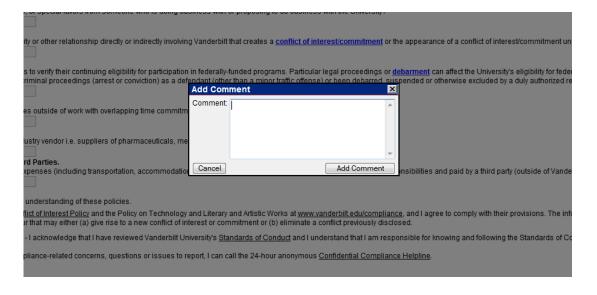


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- Complete all of the information on the *Disclosure Details* page and click the *Back to Details*Summary button to return to the *Disclosure Details Summary* page. If additional detail records need to be provided, use the *Create Conflict Detail* button to create the records. Note that any information related to private questions are not visible to the approver. Use the *Back to Disclosure* button to return to the main disclosure page and continue with the submission process.
- On the main disclosure page, the *Comments* section can be used to provide information that is not covered in one of the guestions. Click the *Add* button in the *Comment* section to add a comment.

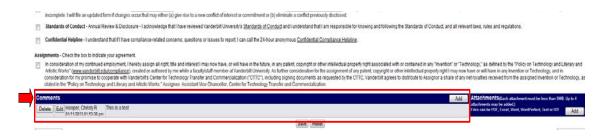
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As	signments. Check the box to indicate your agreement. In accordance with the VVMC Intellectual Property Policy, I do hereby assign to Vanderbill University all right, Site and interest I now have or will have in the Nuive in and to any patent, copyright and other intellectual property right covering any invention, software or other Technology, created or authorizing the and interest I now have or will have in the Nuive in and to any patent, copyright and other intellectual property right covering any invention, software or other Technology, created or authorizing the and interest. Made all Centure.
ш	Confidential Heightine - I understand that if I have compliance related concerns, questions or issues to report, I can call the Confidential 24-Hour Integrity Line @ (066) 703-2007.
- 111	Code of Conduct - Annual Review & Disclosure - I acknowledge that I have reviewed \UMD'S Code of Conduct and I understand that I am responsible for knowing and following the Code of Conduct, and all relevant laws rules and regulations.
B	Official Deletwer - As a member of the YUMC Community, I understand that it as office deletwer and a second of the property of
E	Policy - This in reviewed the SUND Control previously decided from it changes occur that may either (a) give rise to a new conflict of interest or committed or (b) eliminate a conflict previously decided a social previously decided. Policy - This in reviewed the SUND Control previously decided.
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H.	© to © the Continue to Provide Cheek Continue to Provide Cheek Che
G.	Have you accepted payments from any Healthcare Industry vendor i.e. suppliers of pharmaceuticals, medical equipment and devices or medical sensities?
F.	Overtageing Time Commitments O you have more than one pich at VAMC or set vides outside of work with overlapping time commitments with your job at VAMC? O to G Vive (Cach Hern is Provide Details)
5	conviction) as a definition of the real or internal forthers) or been debarred, subperied of orderwise exclused by a Guly subforcible regulatory agency or had a transaction with any such agency terminates for any reason. This is private question. This approver will not be able to view any part of this question.
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D.	Overside Subdevictoriries or Other Relationships Are you or a fairing relationships Are you or a fairing relationship and the strategies of the relationship of the relationship of the relationship of the species or other relationship of the relat
C.	Gifts for Personal Use Flow page (as an individual or on behalf of your department) or a family member accepted gratuities, gifts, or special favors from someone (or a company) who is doing business with or proposing to do business with VUMC? The C 'yes (Commission or on behalf of your department) or a family member accepted gratuities, gifts, or special favors from someone (or a company) who is doing business with or proposing to do business with VUMC?
B,	Family Members Working Together at Vanderbilt University Medical Center How po Use in Journal of the Property And to Section of the Section
A	Basiness Relationships and Research Activities Are you or a furnity member invented or an investor owner, employer, consultant, confector, or board member with (or entitled to receive repailes from) a fundamental field (a) fine a contextual relationship with \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
	Structions. Not appropriate tox for EALH question. If your artises to June 2 feet and the potential conflict. Please include activities occurring currently or during the past your, even if they have been discosed and proved in the past.

Enter the comment in the popup provided and click Add Comment.



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> The comment will be added to the *Comments* section of the page. The comment can be changed or removed by clicking the *Edit* or *Delete* button, respectively.

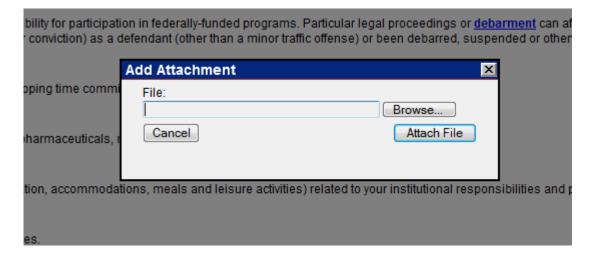


- 10. On the main disclosure page, the *Attachments* section can be used to provide files (Word documents, Excel spreadsheets, etc) of additional information to your approver or to COI administration. Some example attachments are: the management plan that is already in place, documents explaining what the outside business does, any relevant contracts or business agreements, documents authorizing engagement in activity, etc.
- 11. Click the Add button in the Attachments section to add an attachment.

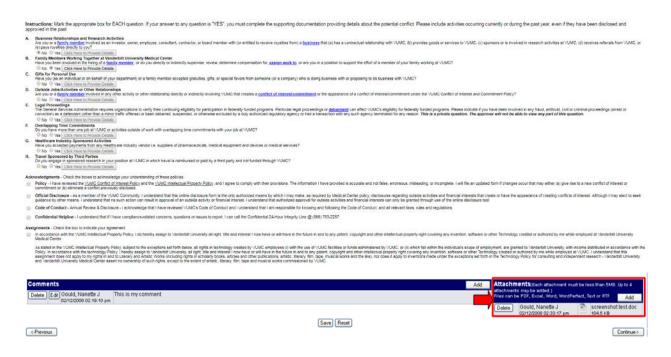


- In the *Add Attachment* window, click the *Browse* button to search for the file attachment on your local computer. Select the file and click *Open*. Click *Attach File* on the *Add Attachment* screen to add the attachment to the disclosure. Note the following about adding file attachments:
 - The following file types can be added to a disclosure: PDF, Word, Excel, Text files, WordPerfect, or Rich Text files.
 - A maximum of 4 attachments can be added to a disclosure.
 - Each attachment must be less than 5 MB in size.

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The attachment will be added to the **Attachment** section of the disclosure. The attachment can be removed by clicking the **Delete** button. The attachment can be viewed by clicking on the filename or on the icon to the left of the filename.



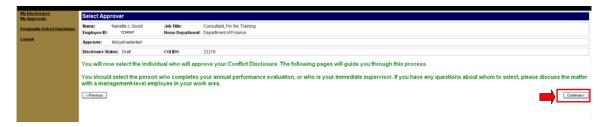
- 12. Once the questions on the main disclosure page are completed and conflict details provided (if required), then an approver must be selected. Click the *Continue* button at the bottom of the main disclosure page to continue to the *Select Approver* pages.
- 13. The Select Approver pages are used to search for and select your approver from a list of active faculty/staff members. Some COI approvers are defaulted based on the discloser's department. If your approver has been assigned based on your department, the approver will be listed on the first Select Approver page. If the approver is correct, click Continue, otherwise click the here link to go to the search

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for approver pages. If the approver is not defaulted based on your department, continue to the next step.



14. Review the instructions on the first Select Approver page and click *Continue*.



- 15. Enter the last name of the approver in the *Last Name* field and click the *Search* button to search for the person.
 - If you are not sure how to spell your approver's name, you can enter part of the approver's last name. For example, enter a last name of 'jone' and a first name of 'ja' would return a list of all people with a last name starting with 'jone' and a first name starting with 'ja'.
 - > The % symbol can be used as a wildcard.



If too many search results are returned, enter the first initial of the person's first name and click **Search.**



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16. A list of active faculty/staff that meets the search criteria will be listed. Click the **Select** button next to your approver's name.



17. The selected approver's name will be populated on the next page. If the approver is correct, click *Continue*, otherwise click the *here* link to go back to the search for approver pages.



18. The *Submit Disclosure* page is displayed when you click *Continue* from the *Select Approver* pages. All information must be completed before the disclosure can be submitted for approval. Any missing information will be listed on the *Submit Disclosure* page along with a *Go to Page* button that can be clicked to go directly to the page where the required information is missing. The information that is missing on the page will have an exclamation mark () next to it. Complete any missing information and navigate back to the *Submit Disclosure* page using the *Submit Disclosure* button at the bottom of the page.



19. When all information is completed, click the *Submit* button on the *Submit Disclosure* page to make the disclosure available for approval by the approver. The approver should be notified in person or via phone or email that the disclosure is ready for approval. In addition, once a week the system will notify the

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approver about outstanding disclosures that require approval. When the disclosure is submitted, it is no longer editable by the discloser.



Approving Disclosures

Outlined below are the steps an approver follows to review and approve a disclosure that has been submitted for approval in the Conflict Disclosure System.

- 1. Login to the Conflict Disclosure System. See the <u>How Do I Get to the Conflict Disclosure System</u> section of this document for information on how to access the login page.
- 2. Click on the *My Approvals* link to access a list of disclosures that have been assigned to you as an approver.
- 3. The My Approvals page lists all disclosures that have been assigned to you for approval. The list can be filtered by Status and/or by Submitted Date. Click the Submitted option next to Filter by Status to display disclosures that are ready for approval.
 - > Outlined below are all *Filter by Status* options along with their definitions:
 - **All** lists all disclosures assigned to the approver regardless of status.
 - **Submitted** lists all disclosures that are ready to be approved by you, the approver.
 - Returned lists all disclosures that you, the approver, have returned to the discloser for more
 information. These disclosures cannot be approved until the discloser resubmits them for
 approval.
 - Submitted or Returned lists all disclosures that are assigned to you and are in a submitted or returned status.
 - Approved lists all disclosures that have been approved by you, the approver.
 - Mgt Plans Awaiting Confirmation lists disclosures that the COI committee has reviewed and
 determined that a management plan is needed, and are waiting for the approver to agree to and
 acknowledge that the management plan has been implemented.

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Use the Filter by Submitted Date option to further narrow the My Approvals list. Enter a From and End Date and click the Filter button to search for disclosures with a submitted date between the From and End dates entered.



- 4. The process to approve a disclosure differs depending on whether the disclosure has a potential conflict or not. The *Has Conflicts* column of the *My Approvals* page provides information on whether a disclosure has a potential conflict or not. If the *Has Conflicts* column contains a *No* for the disclosure go to step #5 below for information on how to approve the disclosure from the *My Approvals* page. If the *Has Conflicts* column contains a *Yes* for the disclosure go to step #6 below for information on how to approve the disclosure from the *Management Plan* page.
- 5. A disclosure that does not have any potential conflicts can be approved directly from the *My Approvals* page. Each disclosure without potential conflicts has a *No* in the *Has Conflicts* column and also has a checkbox next to the name of the discloser. Click the checkbox next to the discloser name and click the *Approve Selected Disclosure* button at the bottom of the page.



When prompted click **OK** to approve the disclosure. Alternately, click **Cancel** to stop the process.



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- The *My Approvals* page is displayed. Click on the *All* filter to confirm that the selected disclosure's status was changed to *Approved*. A message indicating that the disclosure has been approved will be displayed. At this point, the disclosure is approved and the process is completed.
- NOTE: You can approve multiple submitted disclosures without potential conflicts at once by clicking the checkbox next to each name and clicking the *Approve Selected Disclosure* button. You can also automatically select all submitted disclosures without potential conflicts on the page by clicking the checkbox next to the *Name* column heading on the page.



6. If a disclosure has potential conflicts, the approver must review the disclosure details, fill out the management plan page for the potential conflict(s), and approve the disclosure from the *Management Plan* page. The disclosure cannot be approved from the *My Approvals* page. Click on the name of the faculty/staff member to open the disclosure.



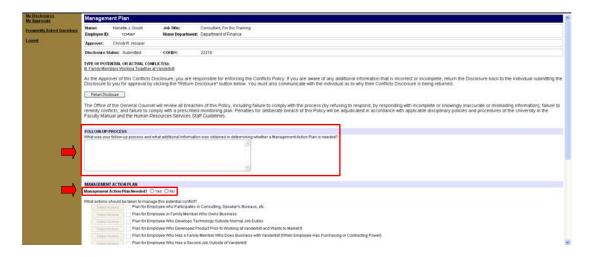
- ➤ On the main disclosure page, review the questions with a **Yes** answer.
- The *Comments* section can be used to provide information about the potential conflict that is not covered in one of the questions. Review any comments that have been added by the discloser. The approver can also add comments by clicking the *Add* button in the *Comment* section. The ability to edit or delete a comment you have added is also provided.
- The **Attachments** section can be used to provide files (Word documents, Excel spreadsheets, etc) of additional information about the potential conflict to your approver or to COI administration. Some example attachments are: the management plan that is already in place, documents explaining what the outside business does, any relevant contracts or business agreements, documents authorizing

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- engagement in activity, etc. Review any attachments that have been added by the discloser. The approver can also add attachments by clicking the *Add* button in the *Attachments* section. The ability to delete an attachment you have added is also provided.
- Click the Continue button at the bottom of the main disclosure page to open the Disclosure Details Summary. Alternately, click the Click Here to View Details button under a question with a Yes answer to access the summary page.
- On the *Disclosure Details Summary* page, click the *Open* button next to the disclosure details record and review the details provided by the discloser about the potential conflict. Click the *Back to Details Summary* page button at the bottom of the *Disclosure Details* to return to the *Disclosure Details Summary* page. Complete these steps for each disclosure detail record that was provided.
- After all detail information provided by the discloser has been reviewed, click the Continue to Management Plan button at the bottom of the Disclosure Details Summary page.



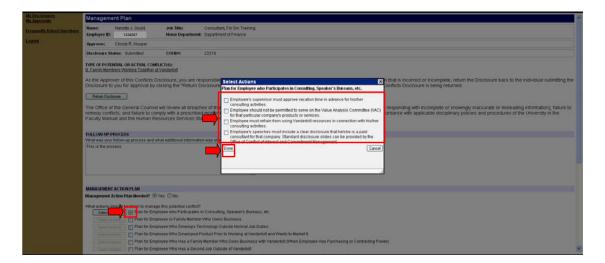
On the Management Plan page, complete the Follow Up Process field and select whether a management action plan is needed in the Management Action Plan Needed field.



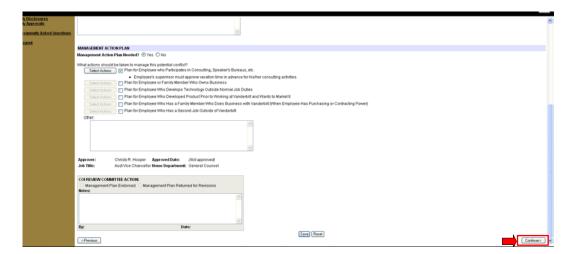
If Yes is answered on the Management Plan Needed question, select the management plans and actions to be followed under "What actions should be taken to manage this potential conflict?"
Click the checkbox next to the plan you want to select. You will be presented with the Select Actions popup where you can select the actions that will be followed to manage the conflict. Select all applicable actions and click Done on the Select Actions popup. Select additional plans and actions if

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needed. Note that you can change the actions that were selected by clicking the *Select Actions* button next to the selected plan. You can deselect a plan by un-checking the checkbox next to the plan.



- If none of the standard plans apply or if you believe the conflict may not be manageable, then enter the management plan information in the *Other* field at the bottom of the management plan page. You can also use this field to include additional information about the plan.
- After all information is completed on the *Management Plan* page, click the *Continue* button at the bottom of the page to continue to the *Approve Disclosure* page.



All management plan information must be completed before the disclosure can be approved. Any missing information will be listed on the *Approve Disclosure* page, along with a *Go to Page* button that can be clicked to go directly to the *Management Plan* page where the required information is missing. The information that is missing on the page will have an exclamation mark () next to it. Complete any missing information and navigate back to the *Approve Disclosure* page.

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When all information is completed, click the *Approve* button on the *Approve Disclosure* page to approve the disclosure and complete the process. When the disclosure is approved, the approver no longer has the ability to edit the disclosure. An email is sent to the discloser notifying him/her that the disclosure has been approved.



Acknowledging a Management Plan

After the approver has created a management plan or determined that a management plan is not necessary, the COI Committee will review the disclosure and any action taken by the approver. After the COI Committee completes the review, an email will be sent out to both the discloser and the approver requiring each of them to review the management plan. Please note that the COI Committee may determine that a management plan is necessary even when the approver does not, or the COI Committee may determine that additional information needs to be added to the management plan. After review of the management plan, the approver should discuss the management plan with the discloser to ensure understanding of all requirements of the management plan. After this discussion, the approver should go into the Conflict Disclosure System and acknowledge that the management plan is in place. Follow the steps below to acknowledgement a management plan once the notification is received.

- 1. Login to the Conflict Disclosure System. See the <u>How Do I Get to the Conflict Disclosure System</u> section of this document for information on how to access the login page.
- 2. Click on the *My Approvals* link to access a list of your disclosures.
- Select the Mgt Plans Awaiting Confirmation filter to list disclosures that are awaiting management plan acknowledgement. Click on the View button in the Mgt Plan column to go directly to the Management Plan for the disclosure.

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4. Review information in the *COI Review Committee Action* and associated management plan. Click the acknowledgement at the bottom of the page under the *COI Review Committee Action* box to acknowledge the plan.



Other Conflict Disclosure System Functions

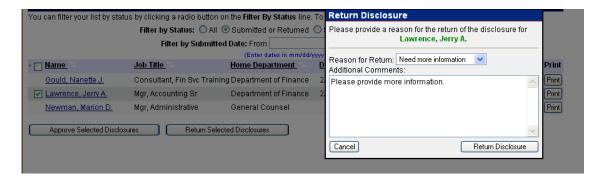
Returning Disclosures

The Conflict Disclosure System provides approvers the option to return a disclosure to a faculty/staff member if, for example, additional information needs to be provided, a potential conflict that has been referenced is not a conflict, or if the incorrect approver was selected. Follow the steps below to return a disclosure.

1. The process to return a disclosure differs depending on whether the disclosure has a potential conflict or not. The *Has Conflicts* column of the *My Approvals* page provides information on whether a disclosure has a potential conflict or not. If the *Has Conflicts* column contains a *No* for the disclosure go to step #2 below for information on how to return the disclosure from the *My Approvals* page. If the *Has Conflicts* column contains a *Yes* for the disclosure go to step #3 below for information on how to return the disclosure from the *Management Plan* page.

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2. A disclosure that does <u>not</u> have any potential conflicts can be returned directly from the *My Approvals* page. Click the checkbox next to the discloser name and click the *Return Selected Disclosure* button at the bottom of the page. When prompted, select a reason for the disclosure being returned and enter any additional comments in the *Additional Comments* field that is provided. Click the *Return Disclosure* button in the popup to return the disclosure. Alternately, click *Cancel* to stop the process.



3. A disclosure that does have potential conflicts can be returned from the *Management Plan* page. Click on the name of the staff member to open the disclosure. Click the *View Management Plan* button at the bottom of the main disclosure page to open the *Management Plan* page. Click the *Return Disclosure* button at the top of the *Management Plan* page. When prompted, select a reason for the disclosure being returned and enter any additional comments in the *Additional Comments* field that is provided. Click the *Return Disclosure* button in the popup to return the disclosure. Alternately, click *Cancel* to stop the process.



- 4. Once the *Return Disclosure* button is clicked, the *My Approvals* page is displayed. The selected disclosure's status will be changed to *Returned*. At this point, an email is sent to the discloser notifying him/her of the return along with the return reason and comments. The disclosure is returned and the discloser can edit the disclosure as needed.
 - Note that if the reason for return is incorrect approver selected, the current approver will be cleared out and the disclosure will no longer Appear on the current approver's My Approvals page.

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5. The discloser updates the disclosure as needed and submits the disclosure for approval again.

Printing a Disclosure

The Conflict Disclosure System provides options to print a disclosure page or the entire disclosure.

- 1. A *Print Page* button is in the upper right corner of each disclosure page and can be used to print the current disclosure page.
- A *Print Disclosure* button is in the upper right corner of each disclosure page and can be used to print the
 entire disclosure. The *Print* button on the *My Disclosures* and *My Approvals* pages can also be used to
 print the entire disclosure.

Sorting My Disclosures and My Approvals Listings

The *My Disclosures* and *My Approvals* pages provide users the option to sort the lists by any of the column headers. Click on the column header label to sort the list in ascending order by the column contents. Click the column header label again to sort the contents in descending order.



Viewing Previous Disclosures

The Conflict Disclosure System provides disclosers and approvers the ability to view disclosures that have been previously submitted or approved.

- A discloser can view a previously submitted disclosure by clicking the *Open* button next to the disclosure from the *My Disclosures* page. A management plan can be viewed by clicking the *View* button next to the disclosure. The *View* button will only be displayed if the disclosure has a management plan.
- An approver can view approved or returned disclosures by clicking on the name of the faculty/staff member from the *My Approvals* page.

Viewing Frequently Asked Questions

A list of frequently asked questions can be viewed by clicking the *Frequently Asked Questions* link on the left side of the navigation pane.

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Disclosure Status Report

Users who have been assigned as department approvers or reviewer in the Conflict Disclosure System have a *Disclosure Status Report* that can be used to view the disclosure status of their assigned department's faculty/staff for a given fiscal year. The disclosure status report lists all active people in the selected department(s) who are required to complete a disclosure in the Conflict Disclosure System. For each person listed, if an approved disclosure is found for the selected fiscal year, information about that disclosure is displayed. The report is intended to help approvers and reviewers identify people who still need to complete a disclosure for a given fiscal year.

If you have been set up as a department approver or reviewer in the Conflict Disclosure System, follow the steps below to run the *Disclosure Status Report*.

1. Login to the Conflict Disclosure System and click on the *Disclosure Status Report* link on the left side of the navigation pane.

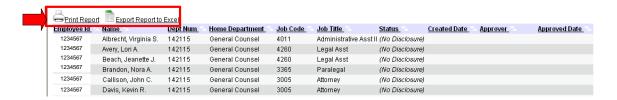


- 2. The *Disclosure Status Report* page will appear and all departments for which you are assigned as an approver or reviewer will be listed on the page.
- 3. Select the department(s) for which you want to run the report. Select the checkbox next to the departments you want to report on. Alternately, you can use the *Select All Departments* checkbox at the top of the page to select all departments.
- 4. Select the *Fiscal Year* to report on from the *Fiscal Year* dropdown.
- Select where to send the report output. You can view the report in Excel by selecting *View Report in Excel*. Alternately, the output can be displayed in a browser window by selecting *View Report on Page*.
- 6. Complete the selections and click the *View Report* button.

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7. If *View Report on Page* was selected, the report will be displayed in a new browser window. From here you can print the report by clicking the *Print Report* link. The report can be exported to Excel by clicking the *Export Report to Excel* link. Note that you can also sort the results by clicking on the column header link for the column that you want to sort by.



8. If *View Report in Excel* was selected, the report will be displayed in Excel in a new browser window. From here you can click *File – Save As* on the menu bar to save it locally as an Excel spreadsheet.

Reviewing Disclosures

Users who have been set up as reviewers may be provided access to view details of disclosures for his/her department. Outlined below are the steps a reviewer follows to view the details of disclosures for his/her department(s).

- 1. Login to the Conflict Disclosure System. See the <u>How Do I Get to the Conflict Disclosure System</u> section of this document for information on how to access the login page.
- 2. Click on the *Review Disclosures* link to access a list of disclosures for departments in which you are assigned as a reviewer.
- 3. The *Review Disclosures* page lists all disclosures for departments in which you are a reviewer. The list can be filtered by *Status* and/or by *Submitted Date*.
 - Outlined below are all Filter by Status options along with their definitions:
 - All lists all disclosures regardless of status.
 - Submitted lists all disclosures that are ready to be approved.
 - Returned lists all disclosures that have been returned to the discloser for more information.
 - Submitted or Returned lists all disclosures that are in a submitted or returned status.

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- Approved lists all disclosures that have been approved.
- Mgt Plans Awaiting Confirmation lists disclosures that the COI committee has reviewed and
 determined that a management plan is needed, and are waiting for the approver to agree to and
 acknowledge that the management plan has been implemented.
- > Use the *Filter by Submitted Date* option to further narrow the *Review Disclosures* list. Enter a *From* and *End Date* and click the *Filter* button to search for disclosures with a submitted date between the From and End dates entered.
- > Click on the Name of the faculty/staff member to view the disclosure details. You can also print the disclosure if needed.

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