
Vanderbilt University

Conflict Disclosure System

User's Guide



Table of Contents

Table of Contents	2
Document Change History	2
How to Use this Guide	3
Need Help?	3
What is the Conflict Disclosure System?	3
What is Required to Use the Conflict Disclosure System.....	3
How Do I Get to the Conflict Disclosure System?.....	3
Conflict Disclosure Process Overview.....	4
Creating and Submitting Disclosures for Approval.....	5
Approving Disclosures	14
Acknowledging a Management Plan	20
Other Conflict Disclosure System Functions	21
Returning Disclosures.....	21
Printing a Disclosure	23
Viewing Previous Disclosures.....	23
Viewing Frequently Asked Questions.....	23
Disclosure Status Report	24
Reviewing Disclosures	25

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.

How to Use this Guide

This *Conflict Disclosure System User's Guide* is designed to walk Vanderbilt Medical Center staff and University Central faculty and 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@vanderbilt.edu.

What is the Conflict Disclosure System?

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

What is Required to Use the Conflict Disclosure System

The following is needed to use the Conflict Disclosure System:

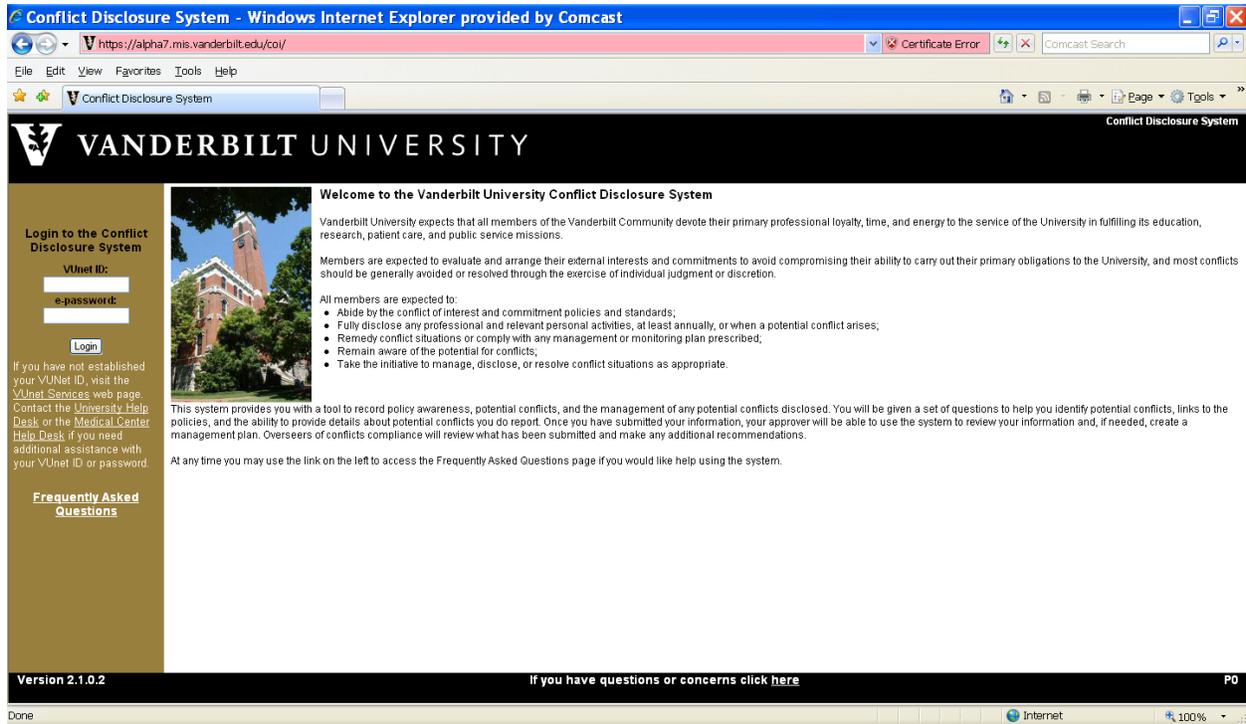
1. A VUNET ID and ePassword.
 - If you have forgotten your ePassword, go to the following website and follow the instructions for recovery:
<https://jprod.its.vanderbilt.edu/apps1/its-epassword/personInfo.html>
 - If you do not have an ePassword, go to the following website and follow the instructions listed:
https://jprod.its.vanderbilt.edu/apps1/its-epassword/create_epassword_help.html
2. If you are using a Microsoft Windows based computer, Internet Explorer version 6.0 or higher, Netscape Navigator version 7 or higher, OR Firefox version 2.0 or higher. Note that if Netscape 6.1 is being used, it is recommended that it be upgraded to the latest version. Problems may result if using Netscape 6.1.
 - The Conflict Disclosure System is optimized for Internet Explorer version 6 running on a Windows platform. Other browsers such as Firefox and Netscape are supported, but it is recommended that Internet Explorer be used with the website.
 - 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://webapp.mis.vanderbilt.edu/coi>

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

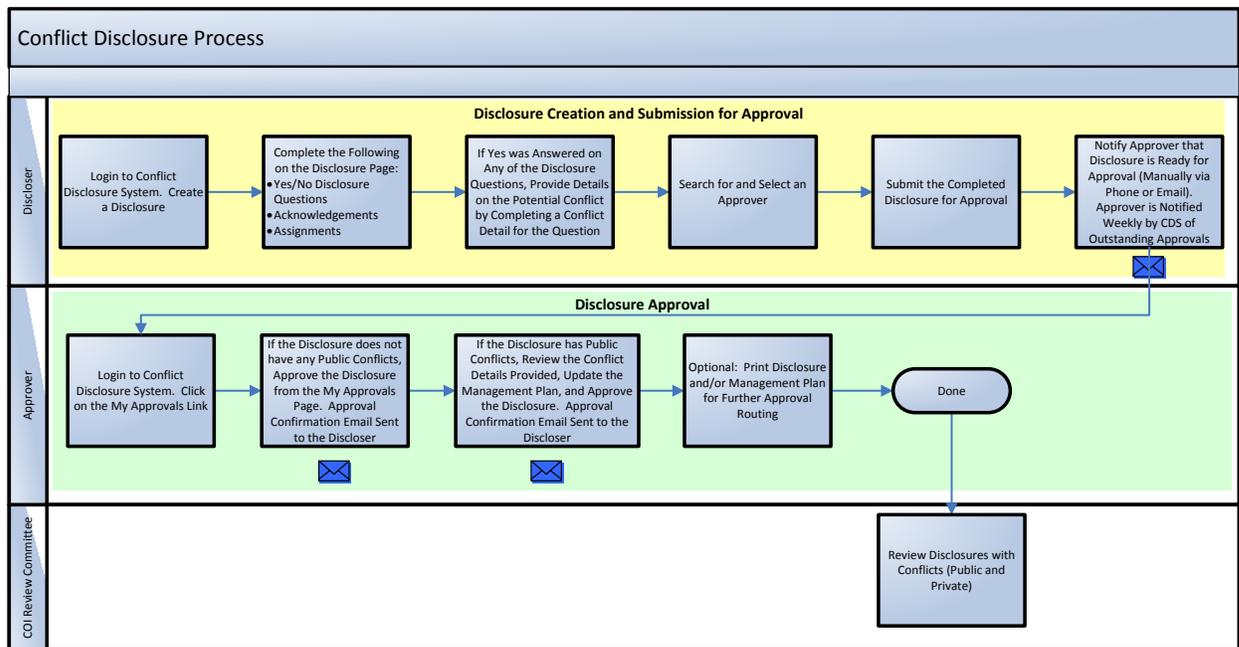


Conflict Disclosure Process Overview

Medical Center staff must complete a disclosure each fiscal year as part of the annual performance evaluation process. All University Central faculty and staff must also complete a disclosure each fiscal year. For all Vanderbilt faculty and staff, 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:** Vanderbilt faculty and 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 additional comments as to why it is being returned. The approver should to 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.



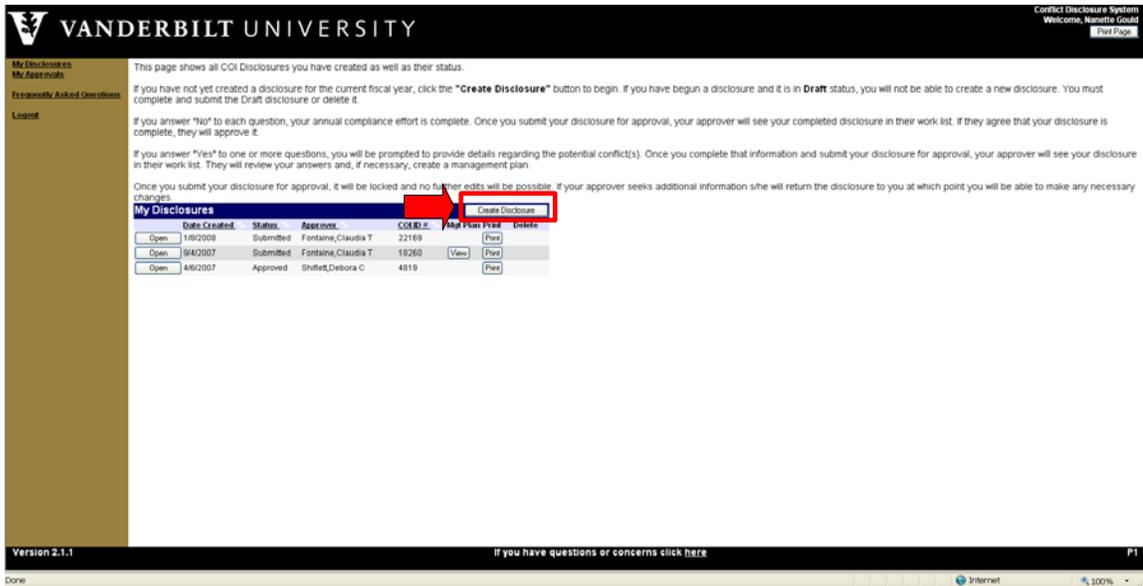
Creating and Submitting Disclosures for Approval

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

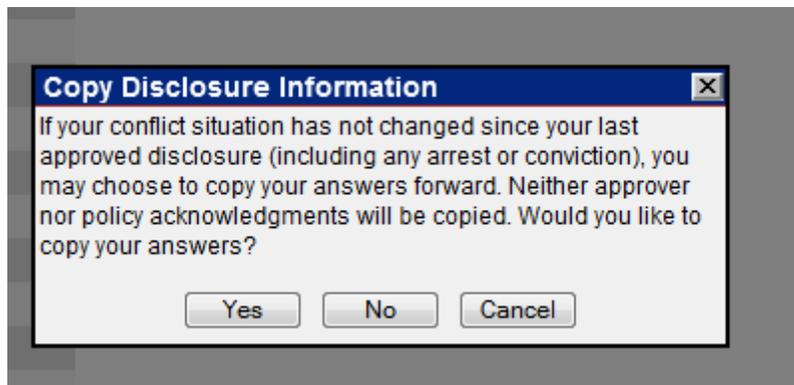
1. Login to the Conflict Disclosure System. See the [How Do I Get to the Conflict Disclosure System](#) section of this document for information on how to access the login page.
2. If you have not previously created a disclosure the **My Disclosures** page will be displayed without any disclosures in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

NOTE: School of Medicine faculty who are not in a department that starts with 106 cannot create a disclosure in the CDS. These users need to create disclosures in the School of Medicine's system.

- 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.



- 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.



- The new disclosure is displayed on the page.
- 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.

Conflict of Interest Disclosure			
Name:	Christy R. Hooper	Job Title:	Asst Vice Chancellor
Employee ID:	0004631	Home Department:	Admin-OCC, RM, BOT
Approver:	Manton D. Newman		
Disclosure Status:	Draft	COI ID:	190473

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 Vanderbilt, (b) provides goods or services to Vanderbilt, (c) sponsors or is involved in research activities at Vanderbilt, (d) receives referrals from Vanderbilt, or (e) pays royalties directly to you (i.e., not through Vanderbilt)? (If travel-related, please see Question H, below.)
 No Yes [Click Here to Provide Details](#)

B. Family Members Working Together at Vanderbilt
Have you been involved in the hiring of a **family member**, or do you directly or indirectly supervise, review, determine compensation for, or **assign work to** a member of your family working at Vanderbilt?
 No Yes [Click Here to Provide Details](#)

C. Gifts for Personal Use
Have you or a family member accepted gratuities, gifts, or special favors from someone who is doing business with or proposing to do business with the University?
 No Yes [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 or indirectly involving Vanderbilt that creates a **conflict of interest/commitment** or the appearance of a conflict of interest/commitment under the Vanderbilt University Conflict of Interest and Commitment Policy?
 No Yes [Click Here to Provide Details](#)

E. Legal Proceedings
(The US Department of Education requires universities to verify their continuing eligibility for participation in federally-funded programs. Particular legal proceedings or **debarment** can affect the University's eligibility for federally-funded programs.)
Have you ever been involved in any fraud, arbitral 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 agency or had a transaction with any such agency terminated for any reason?
 No Yes [Click Here to Provide Details](#)

F. Overlapping Time Commitments
Do you have more than one job at Vanderbilt or activities outside of work with overlapping time commitments with your job at Vanderbilt?
 No Yes [Click Here to Provide Details](#)

G. Healthcare Industry-Sponsored Activities
Have you accepted payments from any Healthcare Industry vendor (i.e. suppliers of pharmaceuticals, medical equipment and devices or medical services)?
 No Yes [Click Here to Provide Details](#)

H. Travel for PHS Funded Individuals Sponsored by Third Parties.
Are you a PHS funded employee who has had travel expenses (including transportation, accommodations, meals and leisure activities) related to your institutional responsibilities and paid by a third party (outside of Vanderbilt) for yourself or a family member for any purpose?
 No Yes [Click Here to Provide Details](#)

- 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 Vanderbilt University [Conflict of Interest Policy](#) and the Policy on Technology and Literary and Artistic Works at [www.vanderbilt.edu/compliance](#), 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.

Standards of Conduct - Annual Review & Disclosure - I acknowledge that I have reviewed Vanderbilt University's [Standards of Conduct](#) and I understand that I am responsible for knowing and following the Standards 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 24-hour anonymous [Confidential Compliance Helpline](#).

Assignments - Check the box to indicate your agreement.

In consideration of my continued employment, I hereby assign all right, title and interest I may now have, or will have in the future, in any patent, copyright or other intellectual property right associated with or contained in any "Invention" or "Technology," as defined by the "Policy on Technology and Literary and Artistic Works" ([www.vanderbilt.edu/compliance](#)), created or authored by me while a faculty/staff member at Vanderbilt University. As further consideration for the assignment of any patent, copyright or other intellectual property right I may now have or will have in any Invention or Technology, and in consideration for my promise to cooperate with Vanderbilt's Center for Technology Transfer and Commercialization ("CTTC"), including signing documents as requested by the CTTC, Vanderbilt agrees to distribute to Assignor a share of any net royalties received from the assigned Invention or Technology, as stated in the "Policy on Technology and Literary and Artistic Works." Assignee: Assistant Vice Chancellor, Center for Technology Transfer and Commercialization.

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

- Click the **Click Here to Provide Details** button to provide more information about the conflict.

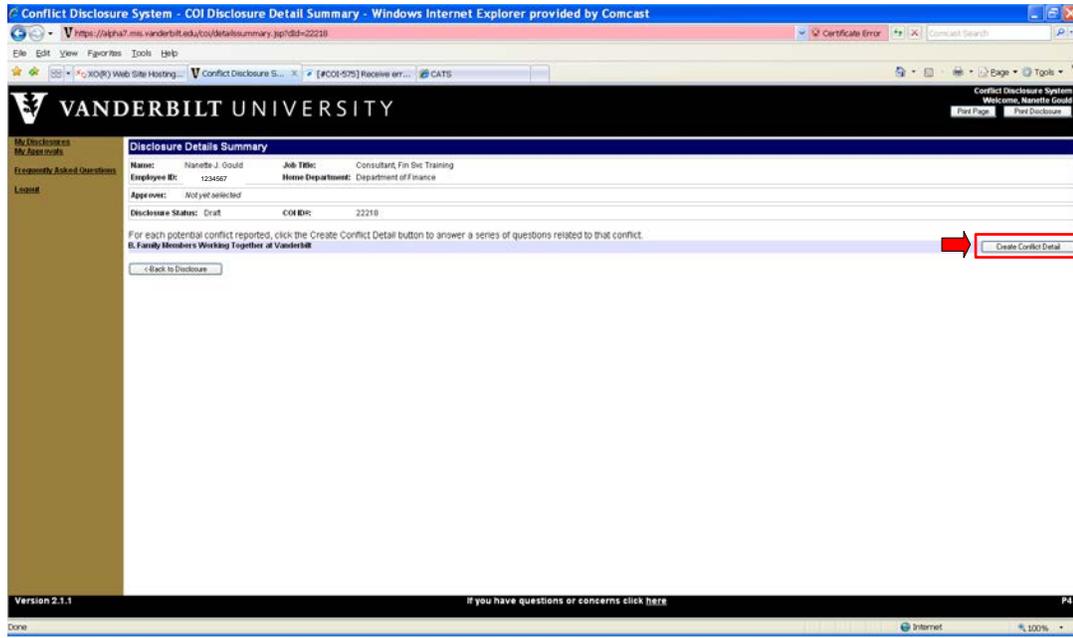
A. Business Relationships and Research Activities
Are you or a **family member** involved as an investor, owner, employee, consultant, contractor, or board member with (or entitled to receive royalties from) a **business** that (a) has a contractual relationship with Vanderbilt, (b) provides goods or services to Vanderbilt, (c) sponsors or is involved in research activities at Vanderbilt, (d) receives referrals from Vanderbilt, or (e) pays royalties directly to you (i.e., not through Vanderbilt)? (If travel-related, please see Question H, below.)
 No Yes [Click Here to Provide Details](#)

B. Family Members Working Together at Vanderbilt
Have you been involved in the hiring of a **family member**, or do you directly or indirectly supervise, review, determine compensation for, or **assign work to** a member of your family working at Vanderbilt?
 No Yes [Click Here to Provide Details](#)

C. Gifts for Personal Use
Have you or a family member accepted gratuities, gifts, or special favors from someone who is doing business with or proposing to do business with the University?
 No Yes [Click Here to Provide Details](#)

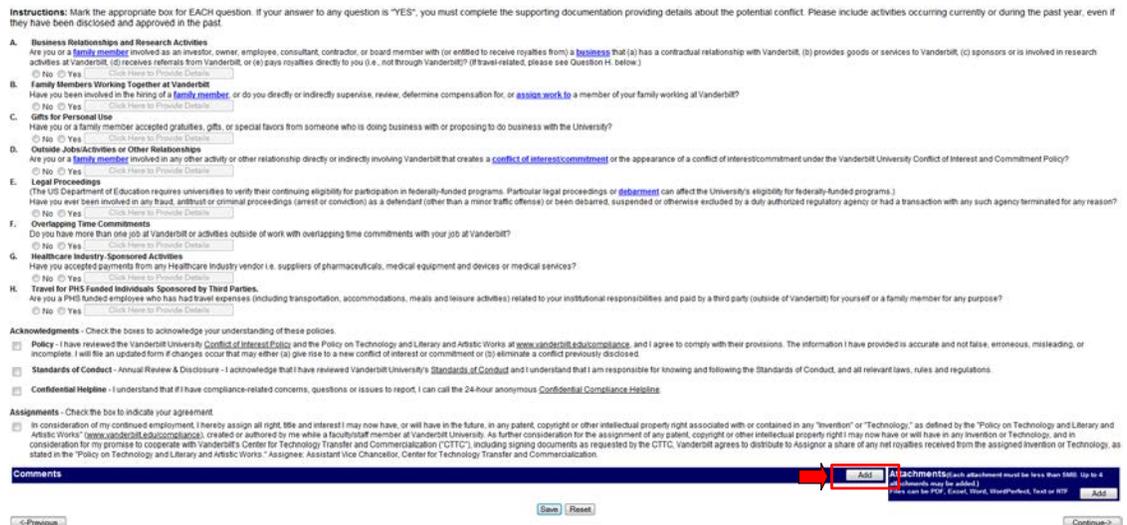
D. Outside Jobs/Activities or Other Relationships
Are you or a **family member** involved in any other activity or other relationship directly or indirectly involving Vanderbilt that creates a **conflict of interest/commitment** or the appearance of a conflict of interest/commitment under the Vanderbilt University Conflict of Interest and Commitment Policy?
 No Yes [Click Here to Provide Details](#)

- On the **Disclosure Details Summary** page, click the **Create Conflict Detail** button.

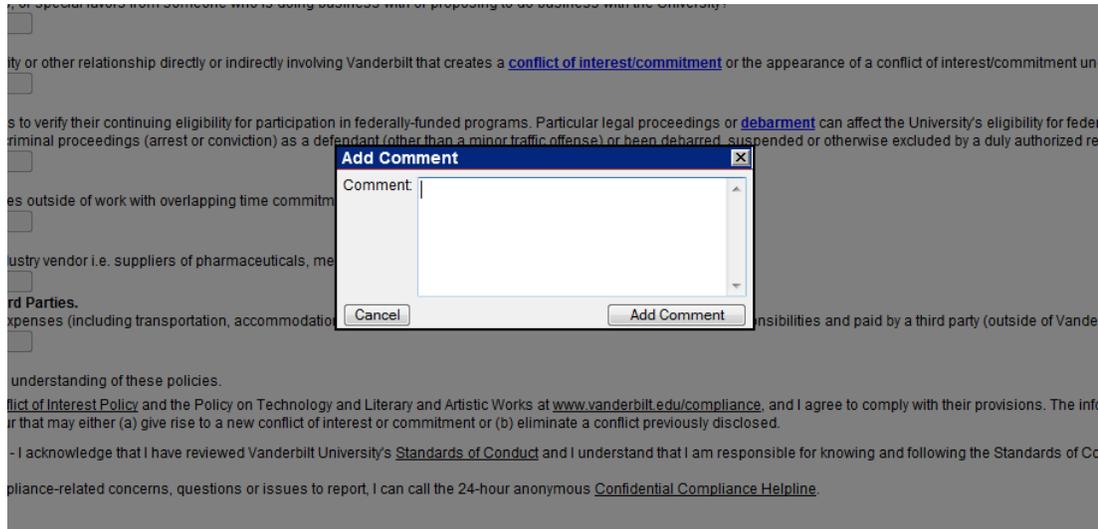


- Complete all of the information on the **Disclosure Details** page and click the **Back to Details Summary** button to return to the **Disclosure Details Summary** page. If additional detail records need to be provided, use the **Create Conflict Detail** button to create the records. Note that any 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.

9. On the main disclosure page, the **Comments** section can be used to provide information that is not covered in one of the questions. Click the **Add** button in the **Comment** section to add a comment.



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

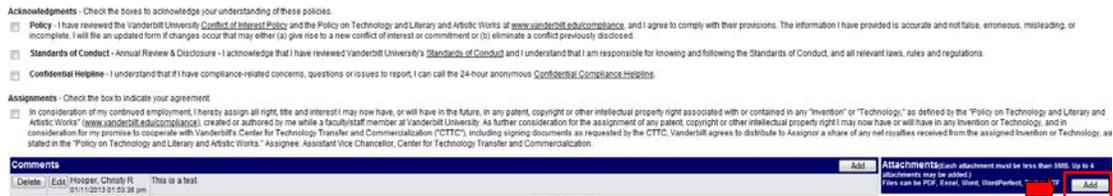


- The comment will be added to the **Comments** section of the page. The comment can be changed or removed by clicking the **Edit** or **Delete** button, respectively.



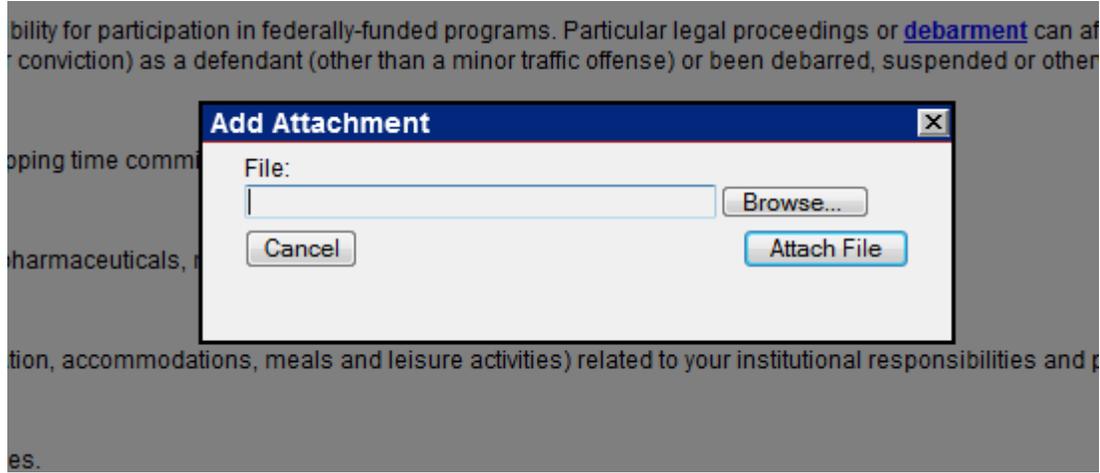
10. On the main disclosure page, the **Attachments** section can be used to provide files (Word documents, Excel spreadsheets, etc) of additional information to your approver or to COI administration. Some example attachments are: the management plan that is already in place, documents explaining what 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.

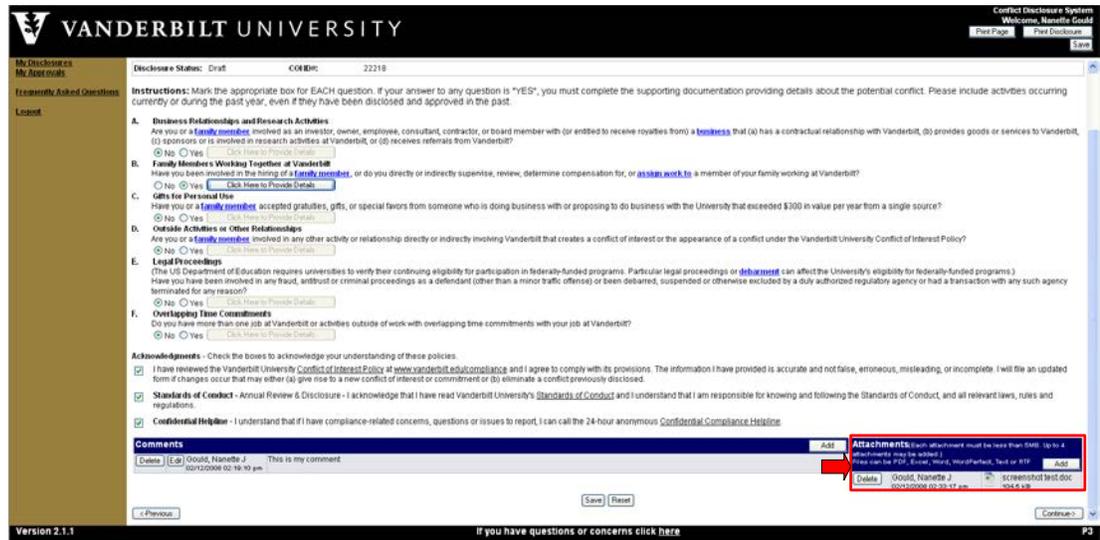


- In the **Add Attachment** window, click the **Browse** button to search for the file attachment on your local computer. Select the file and click **Open**. Click **Attach File** on the **Add Attachment** screen to add the attachment to the disclosure. Note the following about adding file attachments:

- 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.

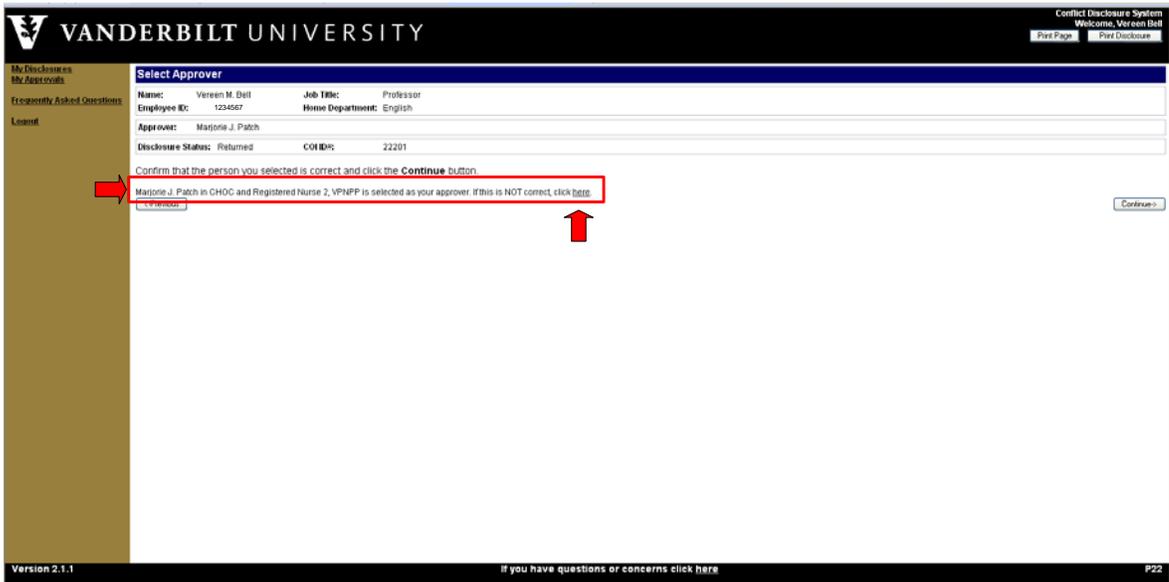


- The attachment will be added to the **Attachment** section of the disclosure. The attachment can be removed by clicking the **Delete** button. The attachment can be viewed by clicking on the filename or on the icon to the left of the filename.

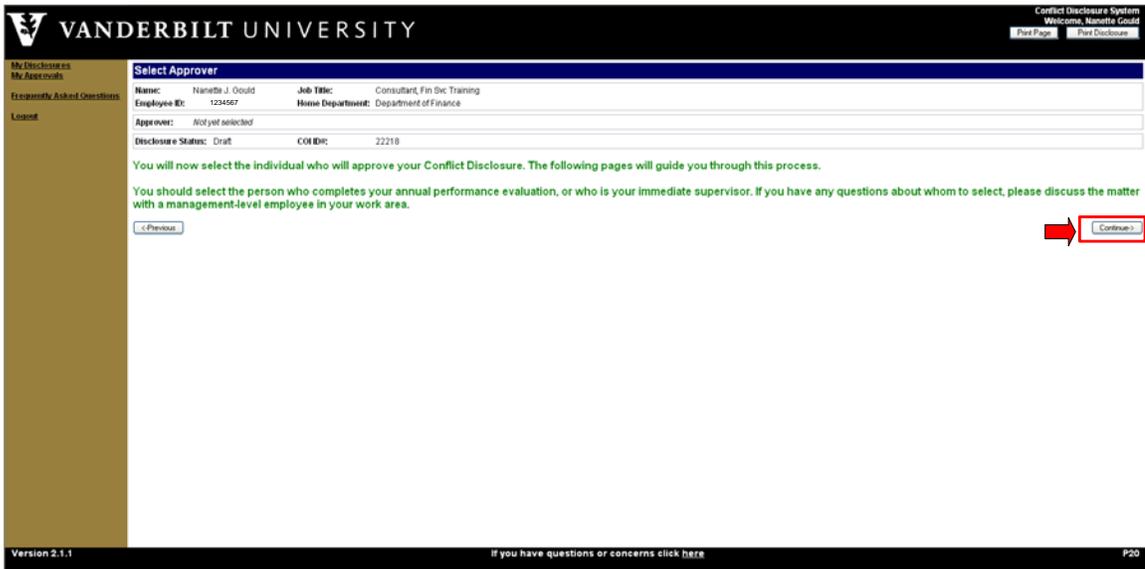


12. Once the questions on the main disclosure page are completed and conflict details provided (if required), then an approver must be selected. Click the **Continue** button at the bottom of the main disclosure page to continue to the **Select Approver** pages.
13. The **Select Approver** pages are 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

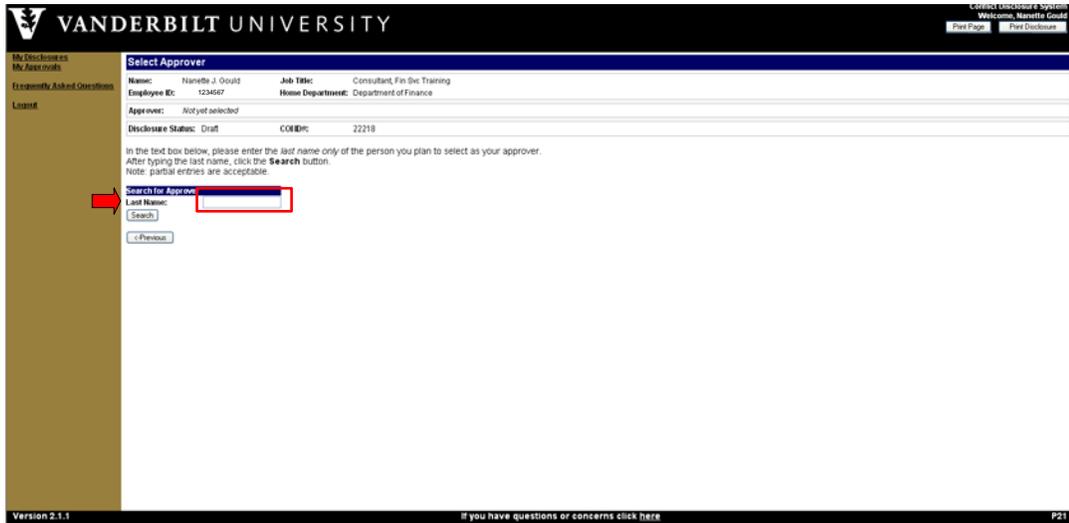
approver is correct, click **Continue**, otherwise click the **here** link to go to the search for approver pages. If the approver is not defaulted based on your department, continue to the next step.



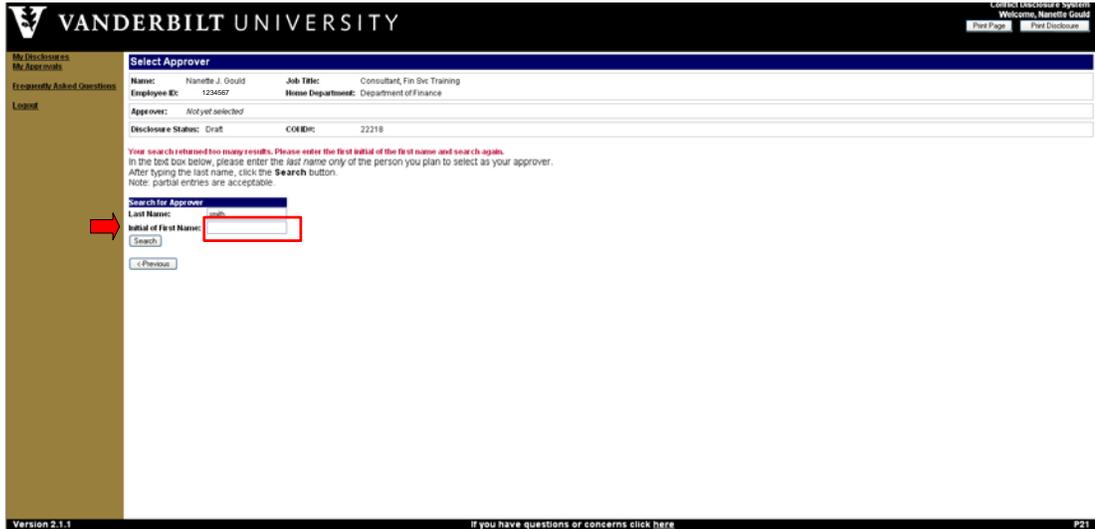
14. Review the instructions on the first Select Approver page and click **Continue**.



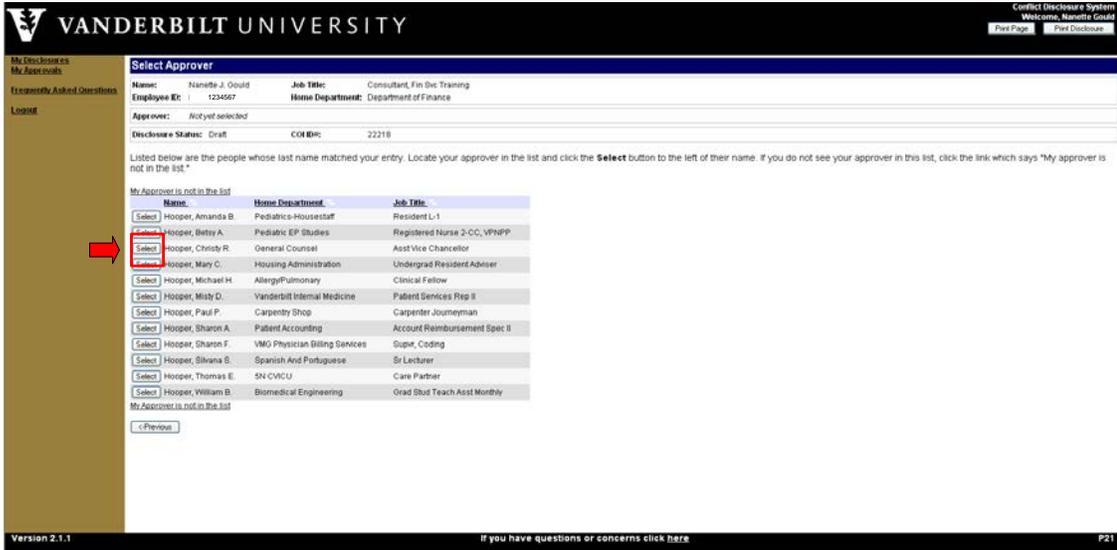
15. Enter the last name of the approver in the **Last Name** field and click the **Search** button to search for the person.
- If you are not sure how to spell your approver's name, you can enter part of the approver's last name. For example, enter a last name of 'jone' and a first name of 'ja' would 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.



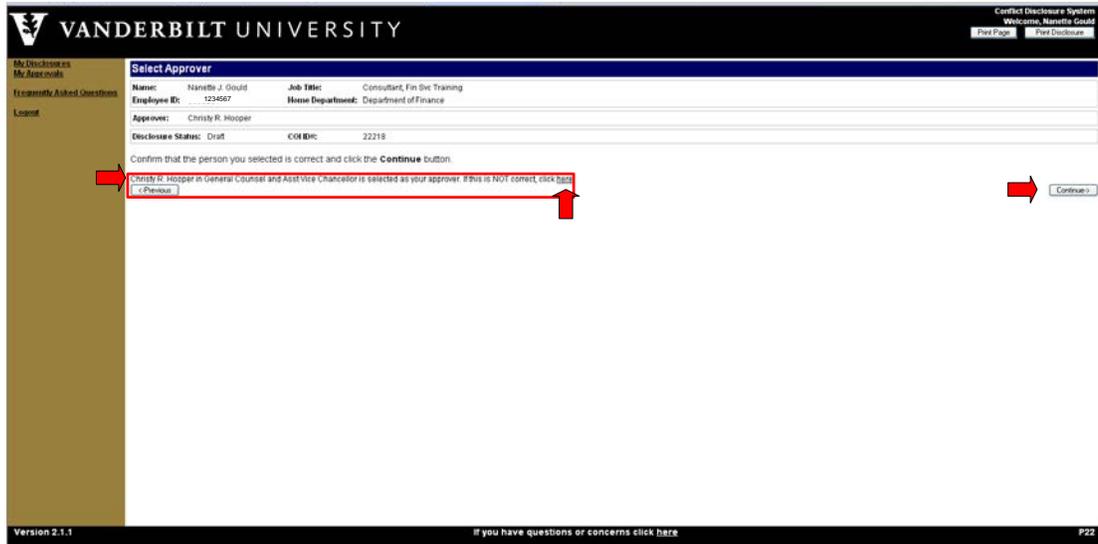
- If too many search results are returned, enter the first initial of the person's first name and click **Search**.



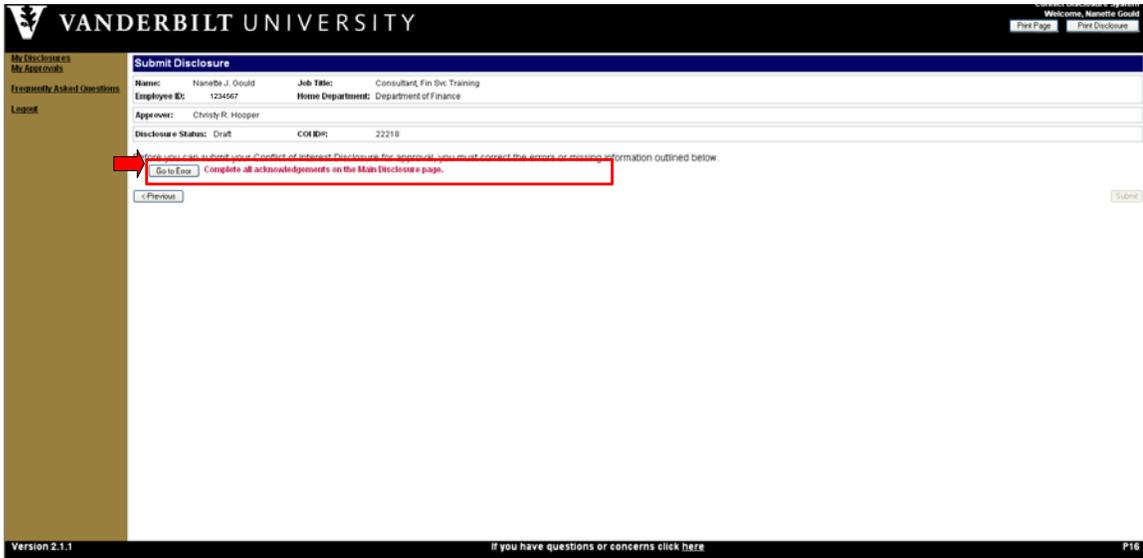
16. A list of active faculty/staff that meets the search criteria will be listed. Click the **Select** button next to your approver's name.



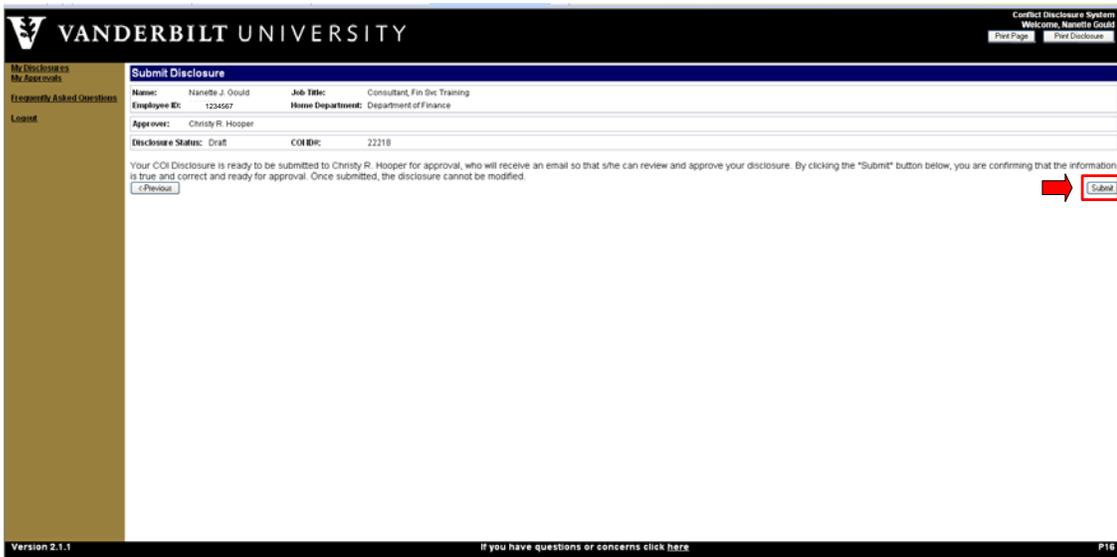
17. The selected approver's name will be populated on the next page. If the approver is correct, click **Continue**, otherwise click the **here** link to go back to the search for approver pages.



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.



- 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 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 [How Do I Get to the Conflict Disclosure System](#) 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.
 - 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.

My Approvals

You can filter your list by status by clicking a radio button on the Filter By Status line. To remove the filter, click the radio button "All"

Filter by Status: All Submitted or Returned Submitted Returned Approved Mgt Plans Awaiting Confirmation

Filter by Submitted Date: From To

(Enter dates in mm/dd/yyyy format)

Name	Job Title	Home Department	Date Submitted	Has Conflicts	Status	COI ID #	Mgt Plan	Print
Mindingall, Joi M.	Mgr, Program	General Counsel	10/27/2008	Yes	Approved	47474	<input type="button" value="View"/>	<input type="button" value="Print"/>
Mindingall, Joi M.	Mgr, Program	General Counsel	10/27/2008	Yes	Approved	47470	<input type="button" value="View"/>	<input type="button" value="Print"/>
Mindingall, Joi M.	Mgr, Program	General Counsel	1/11/2008	Yes	Approved	22302	<input type="button" value="View"/>	<input type="button" value="Print"/>

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.



- 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.

My Approvals

You can filter your list by status by clicking a radio button on the **Filter By Status** line. To remove the filter, click the radio button "All".

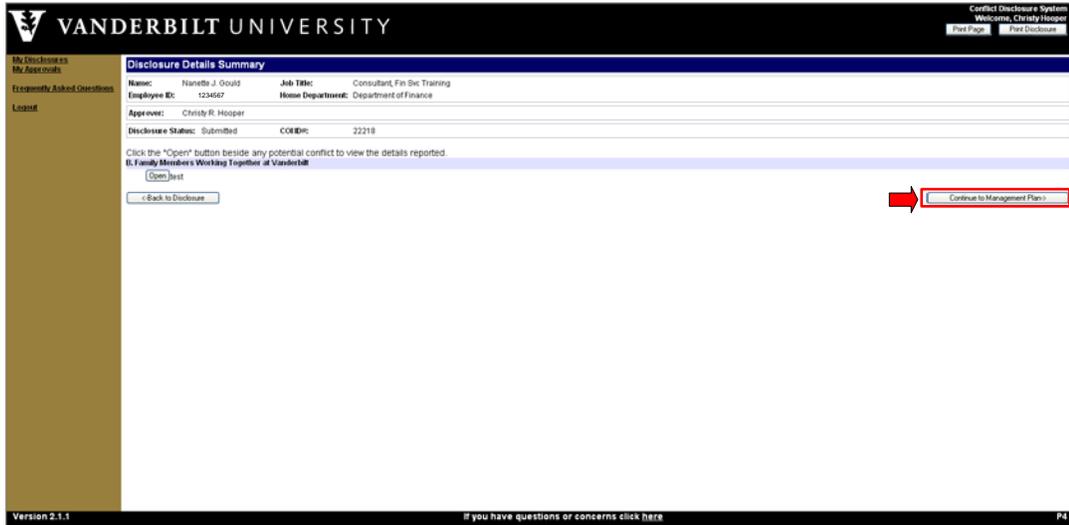
Filter by Status: All Submitted or Returned Submitted Returned Approved Mgt Plans Awaiting Confirmation

Filter by Submitted Date: From To

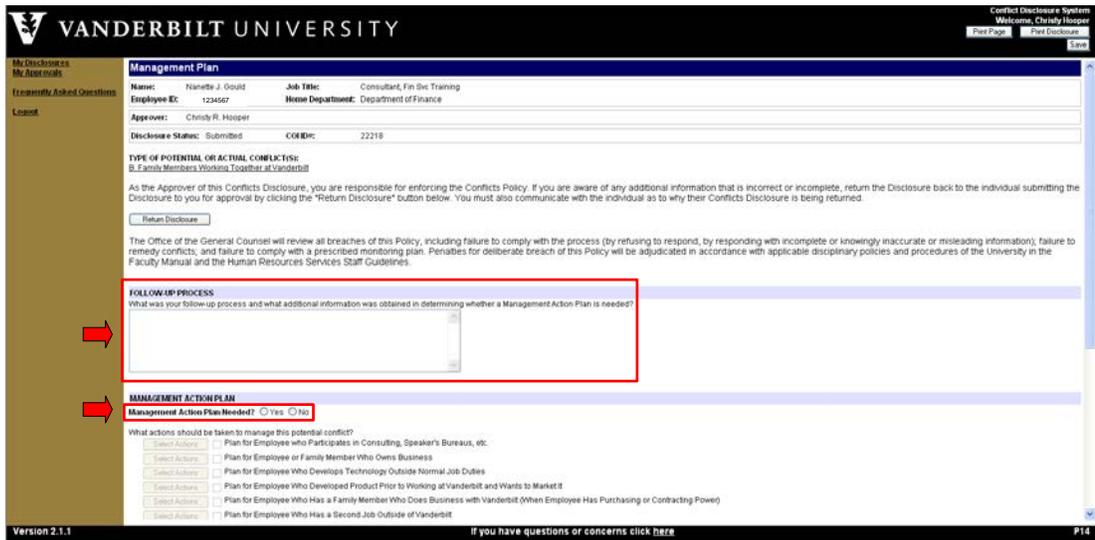
(Enter dates in mm/dd/yyyy format)

<input type="checkbox"/>	Name	Job Title	Home Department	Date Submitted	Has Conflicts	Status	COI ID #	Mgt Plan	Print
<input type="checkbox"/>	Cooper, Alison R.	Mgr, Program	General Counsel	1/11/2013	No	Submitted	190474		<input type="button" value="Print"/>
<input checked="" type="checkbox"/>	Prewitt, Terry W.	Legal Asst	General Counsel	1/11/2013	Yes	Submitted	190475		<input type="button" value="Print"/>

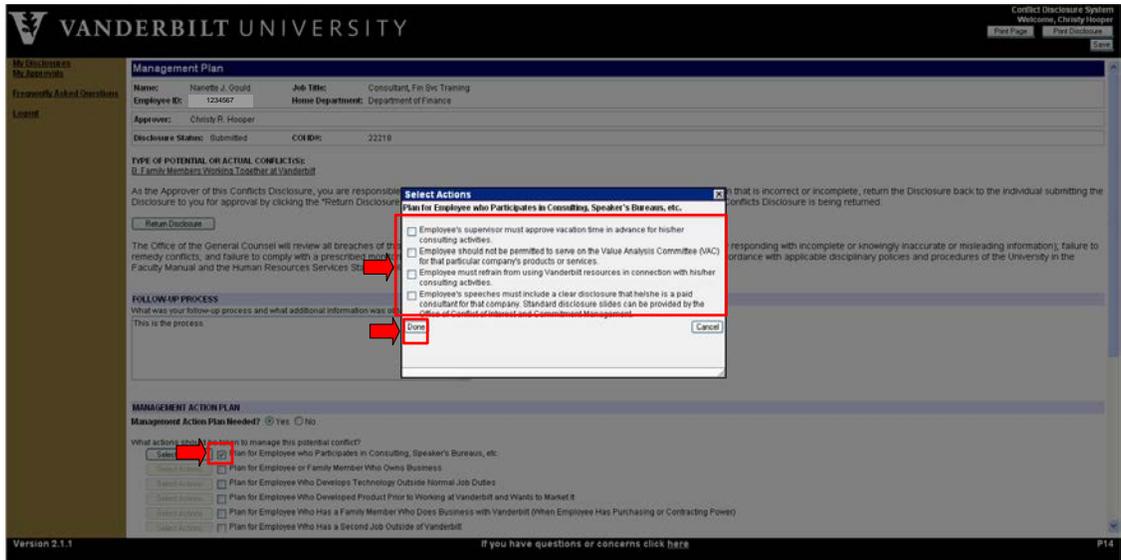
- On the main disclosure page, review the questions with a **Yes** answer.
- The **Comments** section can be used to provide information about the potential conflict that is not covered in one of the questions. Review any comments that have been added by the discloser. The approver can also add comments 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 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.



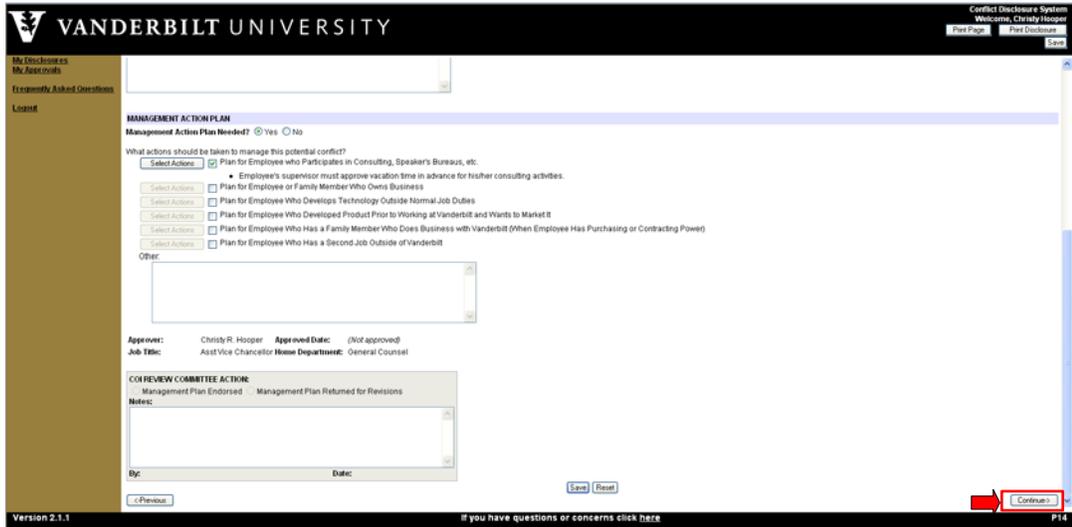
- On the **Management Plan** page, complete the **Follow Up Process** field and select whether a management action plan is needed in the **Management Action Plan Needed** field.



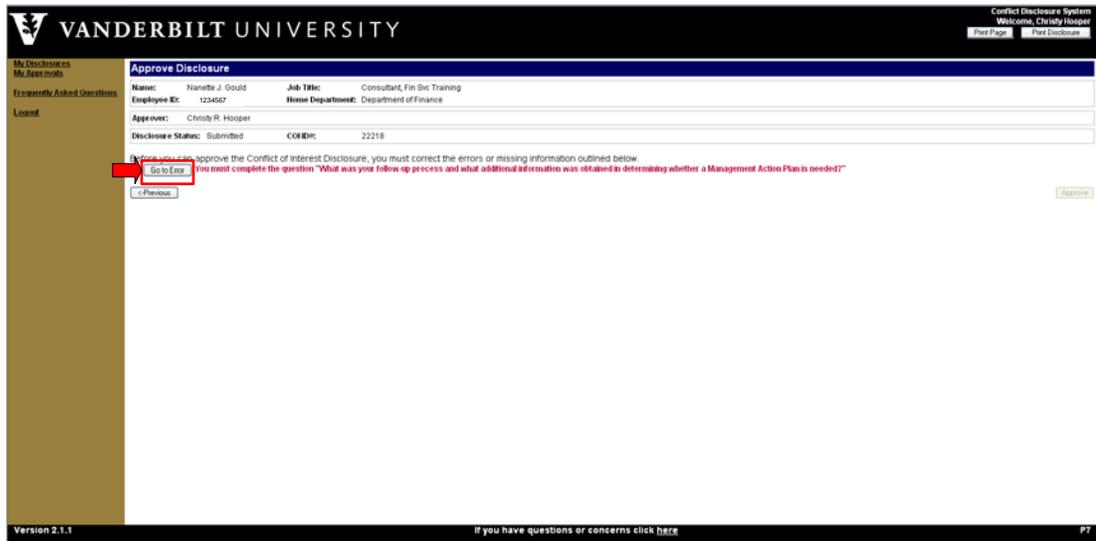
- If **Yes** is answered on the **Management Plan Needed** question, select the management plans and actions to be followed under “**What actions should be taken to manage this potential conflict?**” Click the checkbox next to the plan you want to select. You will be presented with the **Select Actions** 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 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.



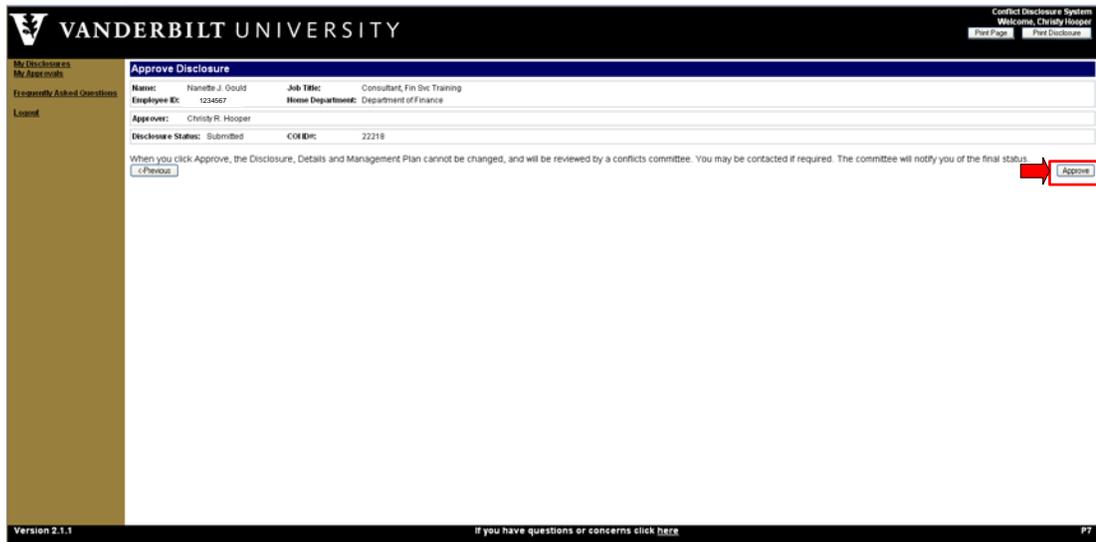
- If none of the standard plans apply or if you believe the conflict may not be manageable, then enter the management plan information in the **Other** field at the bottom of the management plan page. You can also use this field to include additional information about the plan.
- After all information 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.



- 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 [How Do I Get to the Conflict Disclosure System](#) 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.
3. 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.

My Approvals

You can filter your list by status by clicking a radio button on the **Filter By Status** line. To remove the filter, click the radio button "All".

Filter by Status: All Submitted or Returned Submitted Returned Mgt Plans Awaiting Confirmation

Filter by Submitted Date: From To

(Enter dates in mm/dd/yyyy format)

Name	Job Title	Home Department	Date Submitted	Has Conflicts	Status	COI ID #	Mgt Plan	Print
Mindingall, Joi M.	Mgr, Program	General Counsel	10/27/2008	Yes	Approved	47	<input type="button" value="View"/>	<input type="button" value="Print"/>
Mindingall, Joi M.	Mgr, Program	General Counsel	10/27/2008	Yes	Approved	47470	<input type="button" value="View"/>	<input type="button" value="Print"/>
Mindingall, Joi M.	Mgr, Program	General Counsel	1/11/2008	Yes	Approved	22302	<input type="button" value="View"/>	<input type="button" value="Print"/>

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.

COI REVIEW COMMITTEE ACTION:

Follow Mgmt Action Plan Above Follow Mgmt Action Plan Below

Notes:

Jane Doe is a Therapist. She disclosed some sort of conflict from several years ago. Follow the management plan above.

By: Christy R. Hooper Date: 1/14/2013

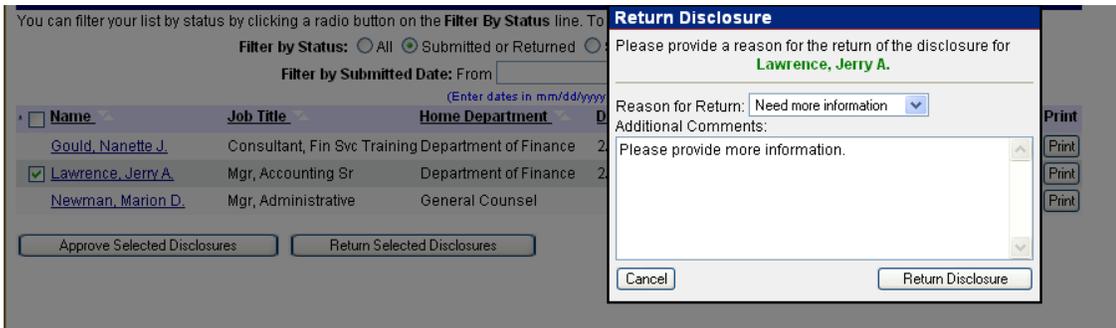
Approver Only: Check this box if you agree with the management plan and can acknowledge that the plan is in place.

Other Conflict Disclosure System Functions

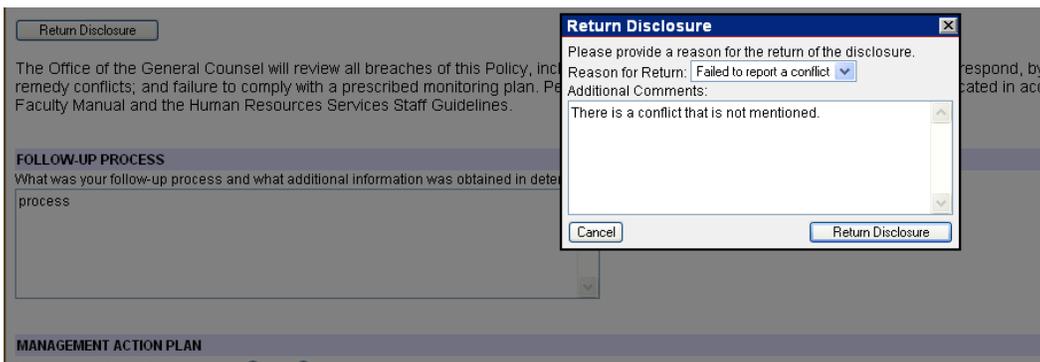
Returning Disclosures

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.
2. A disclosure that does not 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 faculty/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.
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.
2. 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.

My Approvals

You can filter your list by status by clicking a radio button on the **Filter By Status** line. To remove the filter, click the radio button "All".

Filter by Status: All Submitted or Returned Submitted Returned Approved Mgt Plans Awaiting Confirmation

Filter by Submitted Date: From To

(Enter dates in mm/dd/yyyy format)

<input type="checkbox"/>	Name	Job Title	Home Department	Date Submitted	Has Conflicts	Status	COI ID #	Mgt Plan	Print
<input type="checkbox"/>	Cooper, Alison R.	Mgr, Program	General Counsel	1/11/2013	No	Submitted	190474		<input type="button" value="Print"/>
<input type="checkbox"/>	Prewitt, Terry W.	Legal Asst	General Counsel	1/11/2013	Yes	Submitted	190475		<input type="button" value="Print"/>

Viewing Previous Disclosures

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

1. 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.
2. 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

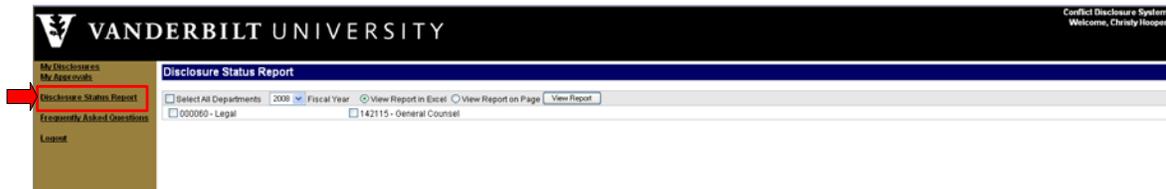
A list of frequently asked questions can be viewed by clicking the **Frequently Asked Questions** link on the left side of the navigation pane.

Disclosure Status Report

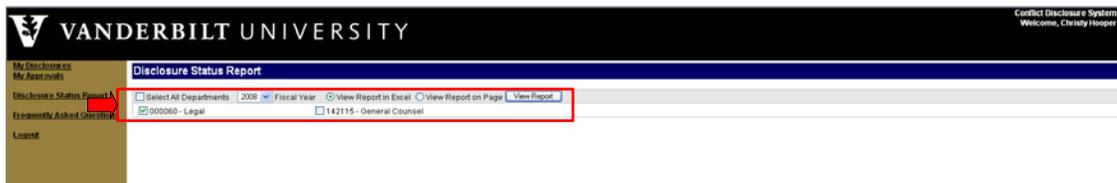
Users who have been assigned as department approvers or reviewer in the Conflict Disclosure System have a **Disclosure Status Report** that can be used to view the disclosure status of their assigned department's faculty/staff for a given fiscal year. The disclosure status report lists all active people 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.
5. 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.



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.



Employee Id	Name	Dept Num.	Home Department	Job Code	Job Title	Status	Created Date	Approver	Approved Date
1234567	Albrecht, Virginia S.	142115	General Counsel	4011	Administrative Asst II	(No Disclosure)			
1234567	Avery, Lori A.	142115	General Counsel	4260	Legal Asst	(No Disclosure)			
1234567	Beach, Jeanette J.	142115	General Counsel	4260	Legal Asst	(No Disclosure)			
1234567	Brandon, Nora A.	142115	General Counsel	3365	Paralegal	(No Disclosure)			
1234567	Callison, John C.	142115	General Counsel	3005	Attorney	(No Disclosure)			
1234567	Davis, Kevin R.	142115	General Counsel	3005	Attorney	(No Disclosure)			

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 [How Do I Get to the Conflict Disclosure System](#) 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.
 - **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.