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.
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.
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.