

Navigating HSC COI Disclosure System

Guidance for Completing Annual eDisclosure





HSC's COI eDisclosure is an online system for simple and effective submission, tracking and management of Conflict of Interest disclosures.

This document provides you with step-by-step guidance to complete your annual Conflict of Interest eDisclosure using the GRAMs COI System managed by UNT.

Need Assistance?

For information and guidance on HSC's conflict of interest rules, please visit the COI website
If you need further assistance, please contact Compliance@unthsc.edu

Navigation Key for HSC COI eDisclosure System

| | |
|---|---|
|  Exit | The exit button will return you to the home page of your COI dashboard. |
|  Action Required | Action is needed to fulfill annual disclosure requirement |
|  Help | Displays a pop up window with help text |
|  Your training has expired | Researchers are required to complete COI training in Citi when this notice appears on their dashboard |

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Frequently Asked Questions

1. Who must complete the Annual COI Disclosure Form?

| Roles | Requirements |
|---|--|
| Staff | HSC Conflict of Interest eDisclosure Form |
| Anyone engaged in research with HSC. In addition, all HSC personnel, including but not limited to, administrators, faculty, staff, post-doctoral fellows, students, interns, residents, collaborators, subcontractors or consultants whose institutional responsibilities include the design, conduct or reporting of Research, funded, unfunded or proposed for funding. | Research Conflict of Interest Training and HSC Conflict of Interest eDisclosure Form |

2. Why do I need to file a COI disclosure?

HSC expects all members of the University community to ensure that conflicts of interest and conflicts of commitment are reported in one's annual COI disclosure, and subsequently reviewed and appropriately managed, if necessary. Having a COI disclosure on record ensures that you are in compliance with federal, state, and University requirements.

3. Who has access to the information I submit in the COI System?

Within the University, the information provided in your disclosure is confidential and is only used for the purposes of administering the policy by the Conflict of Interest Committee and other University offices with oversight responsibilities, as

appropriate. Under certain circumstances, the University is required to make personal financial information publicly available to comply with federal and state law.

4. When do I need to complete my COI Disclosure?

At HSC, COI disclosures are required annually in order to adhere to University regulations. If your circumstances change, you must file a revised COI disclosure within 30 days of the change to notify the University accordingly. New employees must file a COI disclosure within 30 days of their start date. COI disclosure periods run from **September 1st to October 1st** of each year.

5. What information do I need to disclose on my COI disclosure?

Your COI eDisclosure form will provide detailed guidance on what kinds of circumstances you should disclose. You can also find this information on HSC's Compliance webpage for Conflict of Interest.

Completing your annual COI eDisclosure

Your position(s) at HSC requires you to record your interests in the COI system. You will receive an e-mail notification when you need to disclose your interests in the COI system. You can either click the link in the e-mail notification or go to your **Disclosure Profile** in the COI application to disclose your interest.

Note: When your **Disclosure Profile** is in the Action Required state, it means that it is time to update your Disclosure even if you have nothing to disclose.



To disclose your interests, do the following:

1. Navigate to [HSC's COI eDisclosure](#), enter your EUID and Computer Password.
2. Your annual disclosure will be available in your **inbox**. Click on the disclosure to open and review your form.

3. On the disclosure workspace, click **Edit Disclosure Profile**.
 - 3.5 **For Researchers and Individuals involved in Research**, your position(s) require you to complete Research Conflict of Interest training in Citi. After you have completed your COI training in CITI (citiprogram.org), click **Continue** to move to the next page.
4. If you have something to disclose, select **Yes** for the question 'Do you have any financial interests and/or outside activities to report?'.
 3. Click **Add** in the entity disclosures section.
 4. Select the Entity, Relation to discloser and Disclosure types. Based on the Disclosure type selected, you get further questions.
 5. Answer the questions and click **OK** to add the entity disclosure or click **OK and Add Another** to add another entity disclosure.
 6. Click **Continue** to go to the Complete Disclosure Profile page.
 7. Click **Complete Disclosure Profile Update** and then click **OK**.

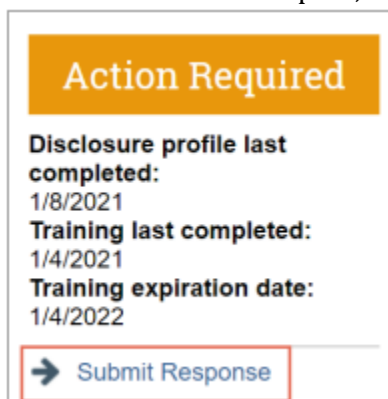
You can view your disclosures by clicking **View** on the Disclosures tab.

Responding to a Clarification Request

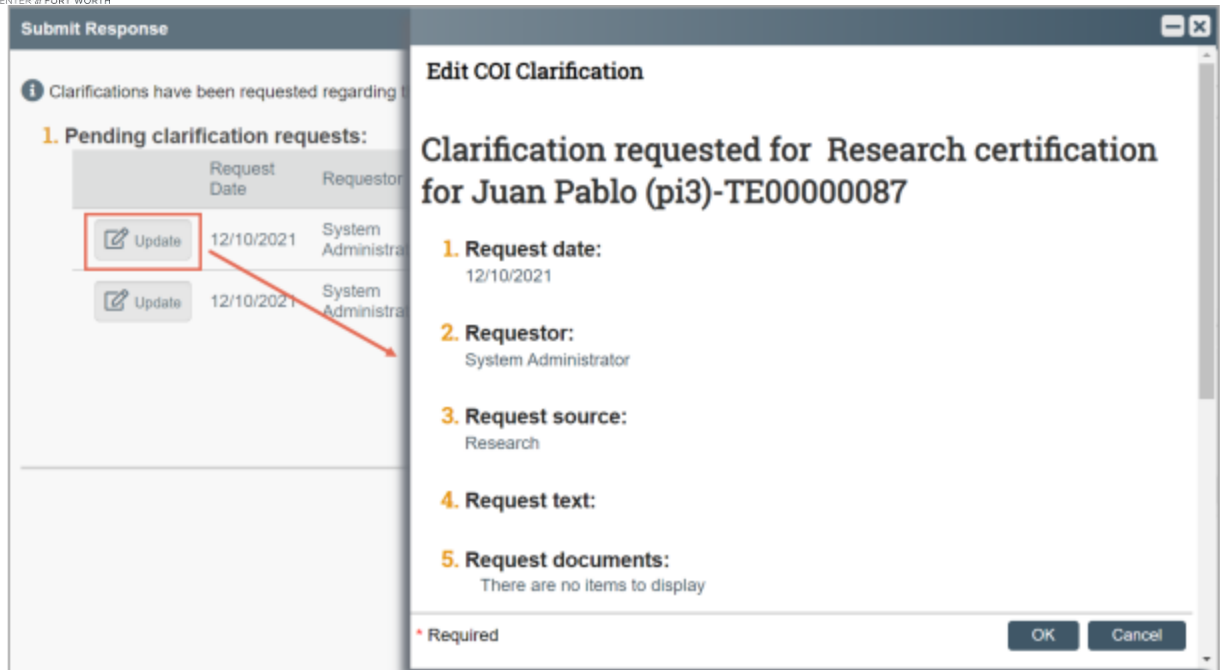
If a reviewer has questions or requires you to provide additional information about disclosure profile or preapproval request, you will receive an e-mail notification indicating this. Review the request details and then respond to the request. Depending on the request, you may need to update your disclosure profile. Log on to the system and navigate to your disclosure profile to respond to this request.

To review the request details and submit your response:

1. On the disclosure workspace, click **Submit Response**.



2. Click **Update** on the request you are responding to.
Note: There may be multiple clarification requests outstanding at the same time.



3. In the Request text field, review the request sent by the reviewer.
4. Review any attached documents.
5. In the Response text field, type your response to the reviewer and click **OK**. You can also attach documents that explain your response.
 - Note:** If you responded to the reviewer's request in a document, you can add the document in the Response documents field.
6. Click **OK**.

After you have responded to all outstanding clarification requests, your Instruction Center will be updated accordingly. If your disclosure profile is in a No Action Required state, you can log off the system.

Review and Accept Management Plans

When a management plan is created due to a conflict, it is important that you understand the plan and agree with the steps that have been documented. You will receive a notification when a management plan has been routed for your review. Log on to the system and navigate to your Disclosure Profile to complete the review.

To review and accept the management plan:

1. On the disclosure workspace, click **Review and Accept Plans**.

Action Required

Disclosure profile last completed:
11/24/2020

Training last completed:
11/23/2020

ⓘ Your training has expired

Complete Disclosure Profile Update

Review and Accept Plans

2. Click **Update** next to the management plan that you want to review.
Note: There may be multiple management plans to review.

Review and Accept Plans

1. Management Plans

Name

Update

Update

2. Comments:

Edit Management Plan Document Information

1. Management plan document:

Management Plan for Bob Smith.docx(0.01) ...

2. Date of plan creator's comments:

1/13/2021

3. Comments from plan creator:

Here's your management plan. Review and accept the management plan.

4. Supporting documents from plan creator:

Name

There are no items to display

5. * Do you accept this plan? ⓘ

Yes No [Clear](#)

* Required

OK Cancel

3. Click the management plan document to review the details of the management plan.
4. Select **Yes** to accept the management plan. Alternatively, select **No** if you need to clarify the details of the management plan or suggest edits to it.
Note: If you select No, then you need to provide a reason for not accepting the management plan. You can also upload documents to indicate the reason.
5. Click **OK**.