Conflict of Interest Web System

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Process Overview

The Conflict of Interest web system is a new way to obtain and maintain information about potential financial conflicts of interest for Oregon State University faculty. The following is an overview of the process:

- The **System Administrator** will activate a college in the database to initiate the process.
- The **Compliance Officer** will work with **Department Head(s) or the Dean** in that college to insure that the list of faculty required to complete the conflict of interest declaration is accurate and that we have email addresses to communicate with those faculty.
- **Faculty** will be notified via email that they need to complete a conflict of interest declaration.
- **Faculty** must respond to questions and affirm that they have read the conflict of interest policy before submitting their declaration.
- **Department Head(s)** review submitted declarations and comment as needed.
- The **Dean** will review the declarations where there is a potential conflict for the College and comment as needed.
- The **Compliance Officer** will review all submitted declarations and comment as needed. Some declarations may be selected by the Compliance Officer for review by the COI Committee.
- The **Compliance Officer** will communicate will all parties and coordinate information as needed.
- The **Conflict of Interest Committee** will review declarations as determined by the Compliance Officer.
- The status of a declaration is available to view at any point in the process on the web site.
- Anyone who does not complete a declaration will be notified via email and the **Compliance Officer** will work with the **Department Head** to ensure the declaration is completed.
- Declarations expire after one year. **Faculty** will be notified that they need to submit another declaration and a previous declaration can be copied and submitted again for ease of use.

Additional information about how to use the web site is described in the following sections.
All Users

Contact information

Conflict of Interest
Office of Research Integrity
312 Kerr Administration Building
Corvallis, Oregon 97331-2140
Telephone: 541-737-2681 Fax: 541-737-9041
E-mail: coi@oregonstate.edu

Logging in with ONID

The ONID username and password is a campus wide sign-on that can be used by all OSU employees. If you need assistance logging in, contact the OSU Computer Helpdesk (541) 737-3474. If you don’t know your username or password, go to: https://secure.onid.oregonstate.edu/cgi-bin/chpw?type.want_auth

Security

The Conflict of Interest web system is a secure web site. Only individuals authorized to review your information will have read only access to your declaration(s). Persons authorized to review your information include your Department Head, your Dean, or their delegates, Research Integrity Office personnel, Faculty Conflict of Interest Committee members, and the System Administrator.

Navigation menu

The navigation menu on the left hand side of the screen in this application displays menu items for Home, Declaration, My Profile, Help, and Logout for all users. Different users will have additional options depending upon their role in the university.

Help

Help provides links to the various university policies that are pertinent to the financial conflict of interest concerns and frequently asked questions. If you have questions, we ask that you refer to help prior to contacting the Office of Research Integrity.

Updated: 4/15/2009
**Faculty**

The purpose of the Faculty user role in this system is for faculty to submit and maintain their conflict of interest declarations. After logging in with the ONID username and password, a “Financial Conflict of Interest Overview” screen appears, you can either select [Continue] or [Do not show this again].

You can only maintain one draft at a time of a conflict of interest declaration. Once submitted, declarations are reviewed by the Department Head, Dean (or their delegates), and Compliance Officer. Declarations with a significant conflict will also be reviewed by the Conflict of Interest Committee.

**My profile**

My user profile contains the information that the application uses to enable us to contact you. Please review the information in “My Profile” prior to submitting your declaration and update your email address and telephone number as needed.

**My draft declaration**

**Create a new declaration**

1. To start the conflict of interest declaration process, from the home page choose the link “Create a new declaration”.
2. Complete screening questions to the best of your ability and knowledge. The highlighted and underlined text pieces are hot links to definitions for those terms.
3. If you are interrupted or need to delay completing the form for any reason, you can save your draft and continue working on it later.
4. Choose “Continue and Save” when you have completed the screening questions. Verify that you have read the Conflict of Interest Policy by checking a box on the “Submit” tab.

**Edit draft**

To revise a draft declaration that has not yet been submitted, go to “My Draft Declaration” and select “Edit declaration draft”. Please note that you cannot revise a declaration once it has been submitted.

**Delete draft**

To delete a draft declaration that has not yet been submitted, go to “My Draft Declaration” and choose “Delete draft”. Please note that you cannot delete a declaration once it has been submitted.

**Review/Print**

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HOW TO USE THE CONFLICT OF INTEREST WEB SYSTEM

To review or print a draft declaration that has not yet been submitted, go to “My Draft Declaration” and choose “Review/Print”.

Submit

Once you have completed the screening questions you will be asked to verify that you have read the Conflict of Interest Policy by checking a box on the “Submit” tab. By checking this box and selecting <Submit>, the document becomes locked and can no longer be edited. If you need to change any responses to the screening questions, you will need to submit a new declaration.

My submitted declaration

Current declaration

Once a declaration has been submitted, you can view it by choosing “Current Declaration” to view your conflict of interest declaration statement. The declaration status and any comments from reviewers will be shown at the top of the screen.

View submitted

This menu options displays the same as details as listed in “Current Declaration” above.

Status

The status of the submitted declaration will be displayed. Possible status options are: pending department head review, pending dean review, and pending compliance officer review. If you are a Department Head, the Department Head level review will be skipped and only the Dean will review your declaration.

Print declaration

This menu options creates a printable version of the current declaration.

Create a draft from previous submission

You can copy a previously submitted declaration to create a new declaration by choosing “Create a draft from a previous submission”.

History

Once you have submitted more than one declaration, a new menu item called “History” will appear and the dates of previously submitted declarations are listed.

Review process

Once you have submitted your declaration, it goes through a series of reviews with your Department Head/Chair, Dean and the Office of Research Integrity. In addition, if there is a potential
significant financial conflict of interest, a faculty-based Conflict of Interest Committee will review the
document and make recommendations about an appropriate management plan.
If your Department Head, your Dean, or the Compliance Officer makes any comments on your declaration, you must review and update the declaration as needed and re-submit.

Automated notifications

The system is set up to provide a number of automated notifications that are sent to the email address provided in “My profile”.

Missing conflict of interest declaration

Faculty will receive an email notification that they need to complete a conflict of interest declaration. Reminders will be sent every 30 days. Your Department Head/Chair will also receive these notices.

Annual renewal notification

Per the University policy of annual disclosure, 30 days before you COI declaration expires (university policy states that you must complete the form annually), you will be notified that the form needs to be updated. If you don’t resubmit an updated form 15 days prior to the expiration date, you will receive a second notification.

Declaration expired

If your declaration expires, you and your Department Head/Chair will receive monthly notices requesting that you complete the declaration.

Annual renewal

You will be asked to review, update and resubmit your COI declaration on an annual basis. There are two ways you can do this:

Create a draft from a previous submission

You can copy a previously submitted declaration to create a new declaration by choosing “Create a draft from previous submission”. This is useful if little has changed since you submitted your previous declaration.

Create a new declaration

If your activities have recently changed, then you should create a new declaration from a blank declaration. Please note that anytime there are changes to your conflict of interest status, you should submit a new declaration, regardless of whether it needs to be renewed.
HOW TO USE THE CONFLICT OF INTEREST WEB SYSTEM

Department Head

A Department Head will have the same functionality as Faculty (please review Faculty section), except that only the Dean (or their delegate) and Compliance Officer will review a Department Head’s declaration. Before the Department Head begins reviewing declarations, it is important to address any outstanding issues listed in “Warnings” section. Additional features as follows are available to the Department Head:

My profile

My user profile contains the information that the application uses to enable us to contact you. Please review the information in “My Profile” prior to submitting your declaration and update your email address and telephone number as needed.

Delegation of authorities

The conflict of interest web system allows you to delegate your authority to other user(s). This person can be outside of your department but the individual does need to be either a professorial or professional faculty member (i.e., you cannot delegate your authorities to a classified staff member.) If you decide to delegate your authorities, you need to be aware that you are delegating ALL of your authorities. To delegate your authority:

1. Go to “My Profile”
2. In the “Roles:” section, after the listing “Department Head/Chair/Director” (Unit Name) choose “See Delegates >>”.
3. Choose “Designate new”
4. Enter a name and press Search
5. Choose the delegate by clicking on the appropriate individual’s name

You can also remove the delegated authorities. The procedure is similar to assigning a delegate; however, once you click on the “See Delegates >>” hot link, there is a [delete] link following the names of those to whom you have delegated authority.

Email Frequency

You can specify how often you would like notifications regarding declarations.

Warnings

Missing email addresses

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Faculty data is pulled from the Banner system nightly to populate this web database; however, some information such as email addresses may be missing. Email addresses for all faculty need to be obtained for the email notification system to work. To update the email addresses:

1. Go to “Warnings” and choose “Missing Email Addresses”
2. Select the user’s name to open their profile
3. Type in the email address and select Save

**Multiple assignments**

Faculty that is affiliated with multiple org codes will appear under the Warnings in the “Multiple Assignments” section. To select a primary department for the faculty’s affiliation, select their name, indicate the appropriate assignment and select the Submit button.

**User management**

**User list**

To view the faculty assigned to your department, choose the “User List” and then select the College and Department. Be sure the “User Status” in the search menu is set to “Active”.

**User not required to complete declaration**

If you do not want certain faculty to have to complete a declaration (e.g. advisors, administrative staff, etc.) then select their name to display their profile, choose “Edit”, and select “Do not require this user is not required to complete a declaration” and save.

**Faculty declarations**

**All Faculty Declarations**

A list of all faculty who are under your review along with their declaration status.

**My Pending Reviews**

These are declarations that have been submitted that are queued for your review. To review submitted declarations:

1. Choose “Pending Reviews”
2. Declarations where the respondents have indicated “No” to all of the screening questions (“No conflict”) can be quickly approved by checking the box(es) to the left of the listed declarations and selecting the “Approve all selected declarations”
3. Declarations where the respondents have indicated “Yes” to some or all of the screening questions will need to be reviewed individually. Select the link to that declaration (click on their name) and the declaration will display.
4. Review the declaration and indicate a response

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a. Additional comments (visible to all) or private comments (visible only to other reviewers) are available
b. Select “Based on the activity reported, the above information is correct and complete to the best of my knowledge” and **Submit** to approve

**Missing Declarations**

Missing declarations show Faculty in your department that have not filled out a declaration. Automatic notifications are sent to faculty needing to complete their declaration.

**Expired Declarations**

Expired declarations show faculty in your department or college that have expired declarations. Declarations must be updated annually from the date they are approved. Automatic notifications are sent to faculty needing to complete a new declaration.

**Expiring within 30 days**

For faculty whose declarations are about to expire, a list of faculty assigned to your department will be displayed in the **“Expiring within 30 days”** section. Automatic notifications are sent to faculty needing to complete a new declaration.

**Certified**

Once a declaration has been submitted, the status of the declaration can be determined by looking at the **“Complete”** section. All submitted declarations for the department are listed as well as the status. Expired declarations will appear with a pink highlight.

**Management Plans**

If a declaration has been designated with the status “A conflict of interest exists that may warrant further review” then a management plan is recommended. Management plan declarations are available in **“Management Plan”** section. Additional development in this area will be available in the future.

**Printable reports**

The Department Head has access to a **“Summary of Department”** report that shows the number of declarations certified, pending, awaiting review, missing, expiring, exempt faculty and the conflict level.
Dean

A Dean will have the same functionality as described in the Faculty and Department Head sections. Please carefully review both of those sections to gain an understanding of how the system works.

Review process

Pending reviews will not appear to the Dean until they are approved by the Department Head. If no conflict is declared or identified then review by the Dean is unnecessary (“skipped”). The Dean can delegate their authority as previously described in the Department Head section.

Printable reports

In addition to the “Summary of Department” reports for the college, the Dean has access to a “Summary of College” report that shows the number of declarations certified, pending, awaiting review, missing, expiring, exempt faculty and the conflict level.