

START myDisclosures UEO Reviewer Guide

Guide for Unit Executive Officers and Facilitators/Assistants

This guide provides step-by-step instructions for using START myDisclosures to review Report of Non-University Activity disclosures submitted to you as a Unit Executive Officer (UEO), departmental RNUA facilitator, or a second level reviewer.

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I. Roles

START myDisclosures serves the needs of users who have different roles in the Report of Non-University Activities (RNUA) process.

Disclosers

Disclosers include all academic staff required to complete the RNUA. Disclosers are able to submit, edit, view, delete, print, and save PDF versions of their own disclosures. Lists of disclosers in each department are generated through a Banner query.

Facilitators/Assistants

Facilitators/Assistants are named by the Unit Executive Officer (UEO) and can help streamline the review process for the UEO. Each unit can have more than one facilitator/assistant, and one facilitator/assistant can fill that role for more than one unit. If a unit needs to change the named facilitator(s)/assistant(s), please contact your campus COI office.

Facilitators/Assistants are able to view all disclosures within the unit(s) to which they are assigned. They also have the ability to assign a recommended status to each activity within a disclosure, e.g. activity should be approved or forwarded for further review, and make comments on disclosures. Facilitator/Assistants are also able to return the disclosure for revisions in an effort to get more clarifying information from the discloser.

Reviewer/Approver – Unit Executive Officer (UEO)

UEOs are responsible for managing any potential or actual conflicts of commitment or interest, and their review of each disclosure is required. UEOs can, with or without the assistance of a Facilitator/Assistant, view, assign a status to each activity within a disclosure, comment, attach explanations of management mechanisms, and complete the first level of review.

Reviewer/Approver – Second Level of Review

A second level of review is necessary when the UEO assigns a status of "forward for further review." Reviewers at the second level, e.g. deans, have the ability to view, confirm a UEO's assigned status for a disclosure, return a disclosure to the UEO for further review, comment, and complete the second level of review.

Reviewers at the second level are also able to view all disclosures in the unit(s) they oversee. For example, the dean of a college can view all the disclosures within the college.

A facilitator/assistant may assist a reviewer at the second level.

View/Read Only

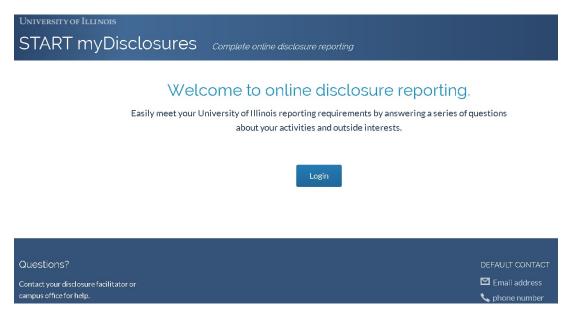
The View/Read Only status can be assigned as needed by a UEO or Reviewer at the Second Level. View/Read Only status allows users to view disclosures within the unit(s) to which they have been assigned. View/Read Only users **cannot** set a status for an activity, return disclosures to disclosers, or approve disclosures.

The table below shows a comparison of roles and functions each role can perform in the application. As noted the UEO/Approve and Assistant have the same access to perform each function except for the final approval of the RNUA review.

	UEO/Approver	Assistant	Read Only
View "checklist"	*	*	•
View disclosures	•		•
Return for changes	*		
Add comments	•		
Set status for activity	*		
Set exemption status	•		
Finalize review			

II. Access START myDisclosures

START myDisclosures is available at https://myresearch.uillinois.edu/myDisclosures/

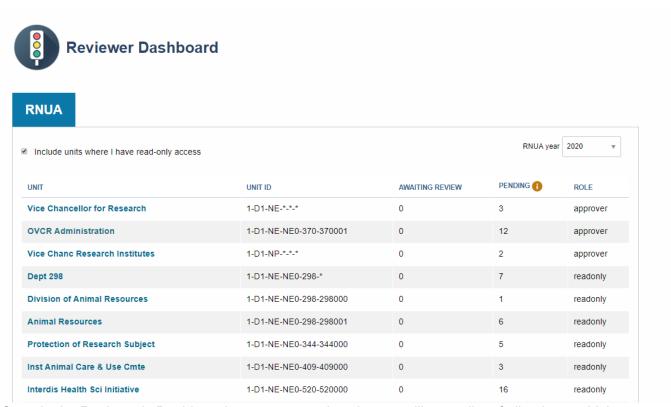


Log on using your NetID and Active Directory (AD) password. The login screen is the same for both disclosers and reviewers.

Reviewers and Facilitators have the option to enter the system as a discloser or as a reviewer. To review, choose the "Review My Unit's Disclosures" option.



III. Reviewer Dashboard



Once in the Reviewer's Dashboard, approvers and assistants will see a list of all units to which you have access. Note: Your role is displayed under the name of the unit (e.g. Role: approver, Role: read only).

Units will display in the following order:

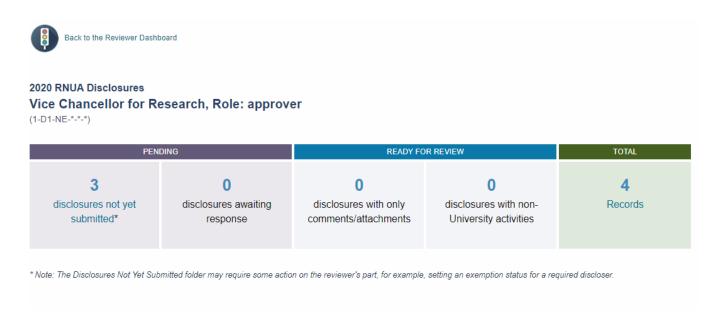
Display Order of Units	
1. All units for which you are a reviewer /	Listed in order by three digit
approver	department; then six digit org code
2. All units for which you are a	
facilitator/assistant	
3. All units for which you have view/read only	
access	

To review disclosures from a unit, click on the name of the unit.

The "Awaiting Review" column shows the number of disclosures that have been submitted and can be reviewed. The "Pending" column shows how many academic staff members need to complete the RNUA. Items in this column may require reviewer action, like setting an exemption status.

IV. Review Unit Disclosures - Organizing Workflow

Once you select a unit to review, you will see the name and Banner organizational code (e.g., 6 digit number under the name of the department). The review process is organized into sections.



Pending status (2 columns on the left) indicates the following:

- Staff members who have not completed their disclosures
 - Reviewers may need to set exemption statuses for staff members in this folder.
- Disclosures that require a response from a user. This could include disclosures returned to
 the submitter for revisions or staff members whose home unit UEO has not completed the
 initial review (if you are the UEO of a department in which a staff member has a secondary
 paid appointment). See below.



Ready for Review (2 center columns) indicates the following:

 Staff members who submitted a disclosure but indicated there were no non-University activities to report but included a comment or attachment with their RNUA

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Staff members who submitted a disclosure with non-University activities report **Total** (1 column on the right) indicates the following:

V. Review Unit Disclosures – Pending Disclosures – Employee Listing / Disclosures Not Yet Submitted

NAME	PAST DISCLOSURES	
Edwards, Melissa (650396202)	8	Create exemption
Gillombardo, Maria (652102617)	8	Create exemption
Key, Susan (658111515)	<u>ම</u>	Create exemption
Lee Drozt, Linda (658311269)	8	Create exemption
Lim, Suge (670505076)	<u>े</u>	Create exemption
Loots, Melanie (658976614)	8	Create exemption
Robinson, Sharee (655831478)	8	Create exemption
Wagenecht, Kraig (653691542)	<u>े</u>	Create exemption
Wolpert, Tyler (669012568)	8	Create exemption

* = Staff who submitted an RNUA while employed in a different org. Reviewers must either review the past disclosure and set an exemption status or request a new disclosure.

Staff members appear on this page when the individual has not yet submitted his/her disclosure. The list is generated from Banner data. The staff member will appear on the home department unit, according to the staff member's appointment in Banner. If the staff member has another paid appointment, once the home department completes its review, the secondary paid appointment will be able to review the staff member's disclosure.

The UEO/Facilitator/Assistant should follow up with staff members on this list to submit disclosures. The UEO is responsible for assuring all academic staff in the unit completes the RNUA disclosure at least annually and updates the disclosure throughout the year as needed.

A. Creating an Exemption (or Temporary Release from RNUA)

Temporary release from completing the RNUA is explained in the COCI Policy at Section VII. A.

In cases where an academic staff member is unable to complete the annual RNUA due to medical leave or a University-approved unpaid leave, the UEO may grant a temporary release to the academic staff member. The release exempts the academic staff member from completing the RNUA disclosure until he or she returns to work. The UEO cannot grant a temporary release if the academic staff member continues to conduct, administer, or applies for a sponsored project while on leave.



You must select a reason for granting the temporary release to exempt the employee from disclosure.

Reason for exemption: *



[NOTE: The COCI Policy updated in 2018 removed sabbatical as a reason for exemption. An employee on sabbatical may only be exempted from the RNUA is the sabbatical is unpaid.]

Once an exemption status for an employee is set, the disclosure for that employee is considered to be "complete."

Units should work to get disclosures from employees whose exemption statuses no longer apply.

When the UEO creates an exemption (e.g., out of country, unpaid sabbatical, medical or other approved unpaid leave of absence), the UEO must follow up when the staff member returns to work to ensure the RNUA is completed.

B. Recusal

If, as a UEO, you need to recuse yourself from the review of an employee's disclosure because you have a familial or business relationship, please contact the next level of review to inform the dean or vice chancellor of the reason for your recusal; and please contact your campus COI office. The COI Office can route the RNUA to the next level of review or an alternate reviewer at the request of the dean or vice chancellor.

Examples of reasons for recusal:

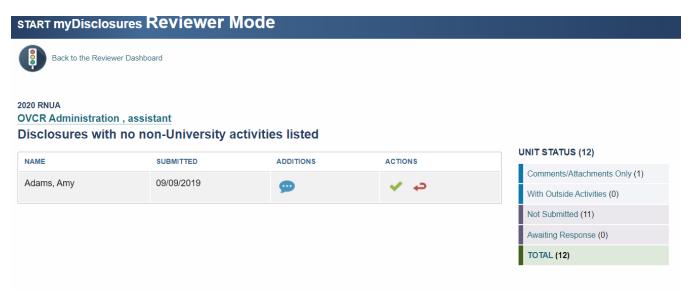
- Employee is the spouse or family member of the UEO.
- Employee is a business partner of the UEO.
- Academic staff member is an employee of or is requesting approval for activities with a company in which the UEO has a financial interest.
- UEO owns the company or has a significant financial interest (greater than \$5,000) in the entity on the employee's disclosure.
- UEO is a fiduciary member of the entity on the employee's disclosure.

VI. Review Unit Disclosures - Ready for Review

START myDisclosures Reviewer Mode Back to the Reviewer Dashboard 2020 RNUA Disclosures OVCR Administration, Role: assistant (1-D1-NE-NE0-370-370001) PENDING READY FOR REVIEW TOTAL 11 0 0 12 disclosures not yet disclosures awaiting disclosures with only disclosures with non-Records submitted* comments / attachments University activities response * Note: The Disclosures Not Yet Submitted folder may require some action on the reviewer's part, for example, setting an exemption status for a required discloser.

The middle section "Ready for Review" sorts disclosures into two categories: disclosures with no non-University activities reported and disclosures with non-University activities reported.

A. Disclosures with no non-University activities reported





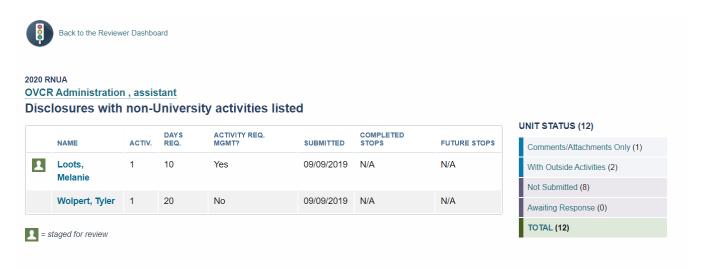
As of AY17, all disclosures with no non-University activities reported will route to the completed folder. The employee will receive an email confirmation that the RNUA has been approved. The UEO is responsible for requesting an employee submit a new disclosure if the UEO is aware that employee has not disclosed an activity that requires reporting.

As of AY20, staff members will be able to submit comments or attachments with their disclosures with no-non University activities reported. UEOs must review the comments or attachments and either approve the disclosure or return it for revisions.

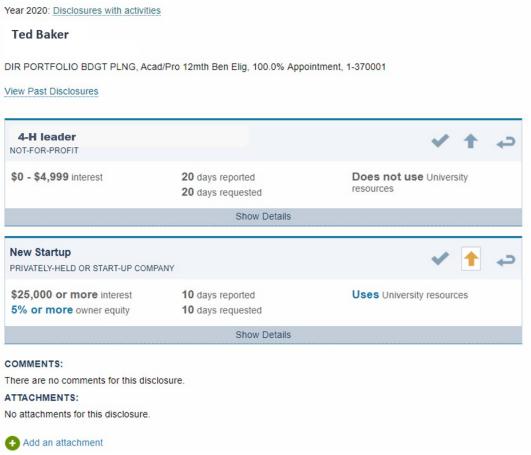
B. Disclosures with non-University Activities Reported

UEO and Facilitators/Assistants will see a list of employees who have disclosures with non-University activities reported. A summary of the number of non-University activities and the aggregate numbers of days requested and days spent is displayed for each employee.

To view the disclosure and complete review, click on each name to see the details.



VII. Review Unit Disclosures - Individual Disclosure



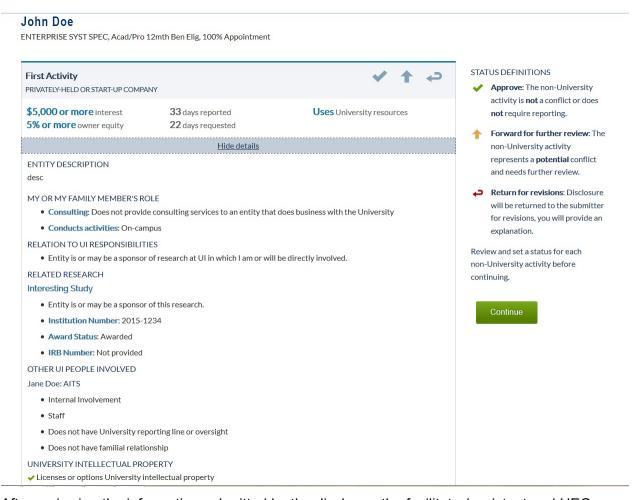
Summary information about the academic staff member's title and appointment appears under the staff member's name.

Summary information for each non-University activity includes:

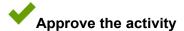
- Level of the financial interest (listed as a range: \$0-4,999, \$5,000-24,999, \$25,000 or more; or equity percentage listed as a range: none, >0-4.9%, 5% or more).
- Number of days reported for previous academic year and number of days requested for current academic year
- Use of University resources
 NOTE: This is means that the employee has answered "yes" to the screening question about use of university resources (which may include but is not limited to space, supplies, equipment, intellectual property, students, or personnel). You will need to expand the details in the disclosure (click on "show details") to find the information specific to the use of University resources.

The summary highlights information in BLUE that represents significance thresholds in the University COCI policy. These should be reviewed carefully for conflicts of commitment or interest.

Each activity listed includes a section to "Show details." Generally, activities that do not reach significance thresholds will have only a brief description about the entity and its products or services. Activities that reach one of the significance thresholds will have more details and should be reviewed by the UEO/Assistant to identify any conflicts of commitment or interests.



After reviewing the information submitted by the discloser, the facilitator/assistant and UEO must select one of three options for each reported activity.



Approval of the activity is appropriate when the activity does not present a potential or actual conflict **or** if the activity does not require reporting. Examples of activities that generally do not require reporting can be found in the COCI policy <u>appendix</u>.



Forwarding the activity for review is required when the activity presents a potential or actual conflict with the employee's responsibilities to the University.

When this status is selected, a statement of explanation detailing the conflict and proposed management mechanisms is **required**. The UEO statement of explanation may be attached (PDF preferred) or entered in the comments section. For assistance with this statement, please contact your University COI office.

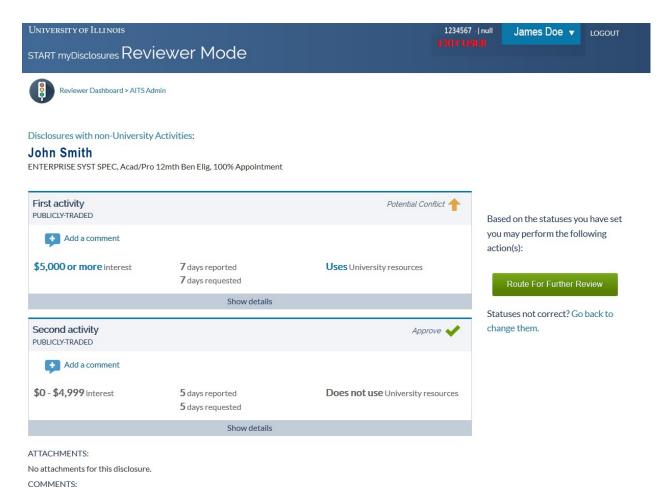
Selection and confirmation of this status by the UEO will automatically route the disclosure to the academic staff member's second level of review.



A disclosure can be returned for revisions when either the department needs more information to evaluate the activity or if the UEO disapproves the activity.

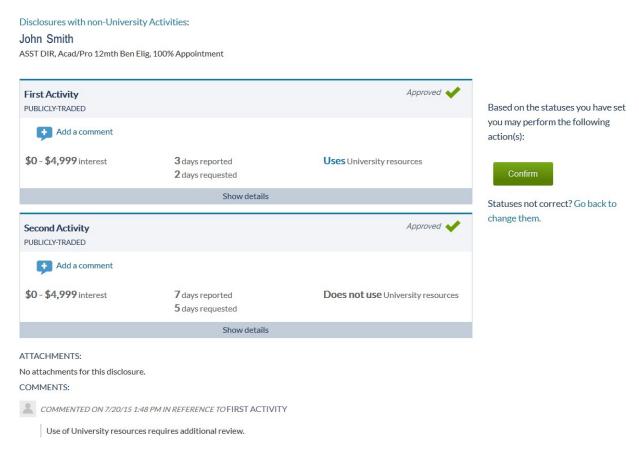
When this status is selected, a statement detailing what information is requested or why the activity is disapproved is **required**.

Returning a disclosure for revisions returns the disclosure to the "Pending" status. Once the employee makes the required revisions, the disclosure will appear in the "Ready for Review" section. The application will send you an automated email notifying you that there is a disclosure pending your review.



The facilitator/assistant can set a recommended status for each activity before the UEO completes his or her review, and facilitators/assistants can also return a disclosure for revisions.

Once the UEO reviews the disclosures, he or she will either confirm the recommended status by clicking the green "Confirm" button or change the status for each activity.



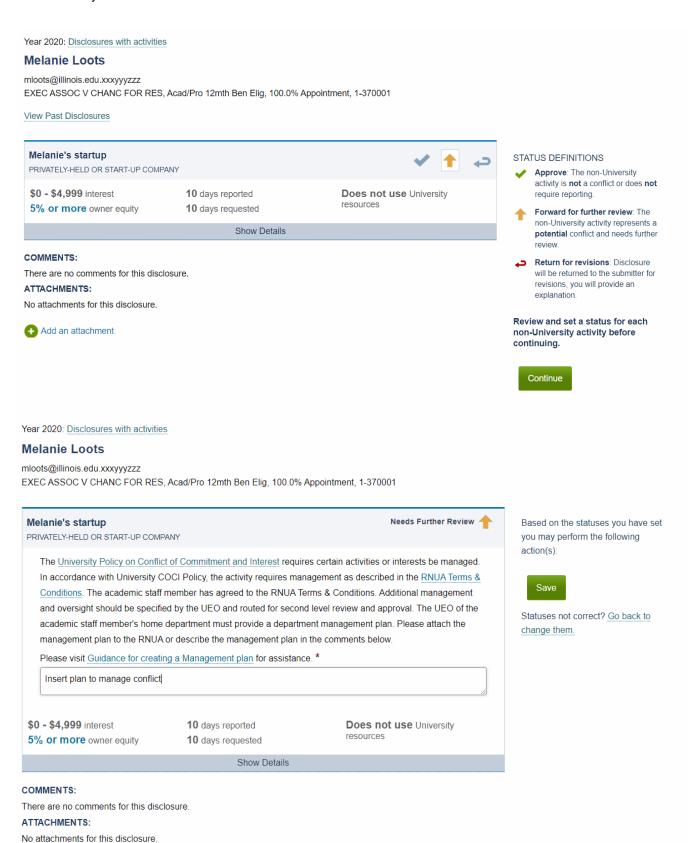
Facilitators/assistants and UEOs are able to make comments on the disclosure or add attachments (PDF preferred). The name of the person who made comments and date/time comment was made will be visible to all users (academic staff, UEO, assistants, read only).

Auto-settings for Review Status

Starting with AY20, when an activity meets a "significance threshold," the system sets the status to "forward for further review." An activity is significant if meets the financial significance thresholds¹, represents 5% or more equity, it involves University persons, involves University resources, including IP, is related to a staff member's University activities, requires more than one day per week of time. If the UEO agrees that the activity requires management, they will include a plan for managing the conflict with the disclosure.

¹ In the absence of other applicable regulations, financial interests greater than \$5,000 will be considered significant.

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If the UEO believes that the activity does not require management, they can select the approve status. The system will prompt the UEO to include an explanation for why the activity does not require management.

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View Past Disclosures



STATUS DEFINITIONS

- Approve: The non-University activity is not a conflict or does not require reporting.
- Forward for further review: The non-University activity represents a potential conflict and needs further review.
- Return for revisions: Disclosure will be returned to the submitter for revisions, you will provide an explanation.

Review and set a status for each non-University activity before continuing.



Year 2020: Disclosures with activities

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Add an attachment

EXEC ASSOC V CHANC FOR RES, Acad/Pro 12mth Ben Elig, 100.0% Appointment, 1-370001



Based on the statuses you have set you may perform the following action(s):



Statuses not correct? Go back to change them.

COMMENTS:

There are no comments for this disclosure.

ATTACHMENTS:

No attachments for this disclosure.

VIII. Reviewing Unit Disclosures - Completed Review

Once the UEO has confirmed the status for each activity in a disclosure, the disclosure will move to the "Total" section. Any disclosures within the "Total" section that require a second level of review will automatically route to the second level reviewer.

The application allows the academic staff member to track where his/her disclosure is in the review process and will note when review is complete or pending second level of review.

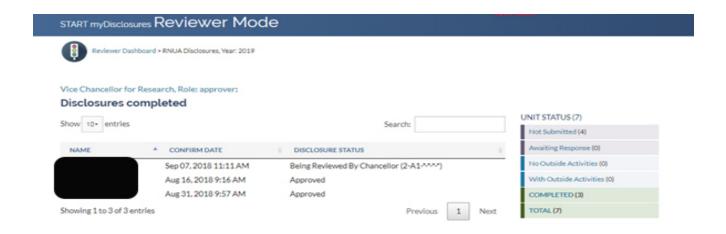
If the UEO completes a review but needs to make changes to the disclosure, please contact your campus COI office as soon as possible.

2020 RNUA Disclosures OVCR Administration , Role: assistant (1-D1-NE-NE0-370-370001)

PENDING		READY FOR REVIEW		TOTAL
8 disclosures not yet submitted*	O disclosures awaiting response	disclosures with only comments / attachments	disclosures with non- University activities	12 Records

^{*} Note: The Disclosures Not Yet Submitted folder may require some action on the reviewer's part, for example, setting an exemption status for a required discloser.

Click on the Total folder to see the date confirmed and the disclosure status. If the RNUA was forwarded for further review, it will be noted in the disclosure status. RNUA will route to any secondary appointments before routing to the second level reviewer. Click on the name of the employee to open the completed disclosure.



IX. Second Level of Review

Activities that present an actual or a perceived a conflict of commitment or interest with an employee's University responsibilities must receive a second level of review. These activities are identified by the UEO (first level of review).

Disclosures forwarded for second level of review will automatically appear in the second level reviewer's workflow. The second level reviewer has a folder on the reviewer's dashboard in which all units that report within that college or administrative office will appear together. Since disclosures will appear from multiple departments, the disclosures will be sorted by the home department organizational code, then alphabetically by the staff member's last name.

When a disclosure is forwarded for second level of review, begin the review by clicking the employee's name. The disclosure will appear with a status of needs further review and an explanation from the UEO will appear below.

As a second level reviewer, you must select one of two options for each activity that is forwarded for your review:

- 1) **Approve**: I have reviewed the monitoring plan and the management mechanisms are sufficient to manage the conflict.
- 2) Return for revisions: Disclosure will be returned to the first level of review. You must provide an explanation to describe the revisions requested. Return to the first level reviewer / UEO for revisions.

Returning a disclosure is appropriate if you would like additional information or if you do not believe the management mechanisms are sufficient or the activity should not be allowed.

A facilitator/assistant to the second level reviewer may set the status and add explanations, but final confirmation to approve the disclosure must be done by the second level UEO.

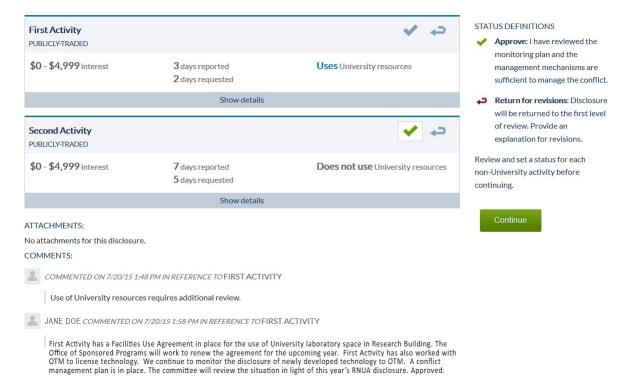
The second level reviewer must act on all disclosures so that there are no employees/disclosures with a "Pending" status. If you complete a second level of review but need to make revisions to the review, you may **revoke the approval**.

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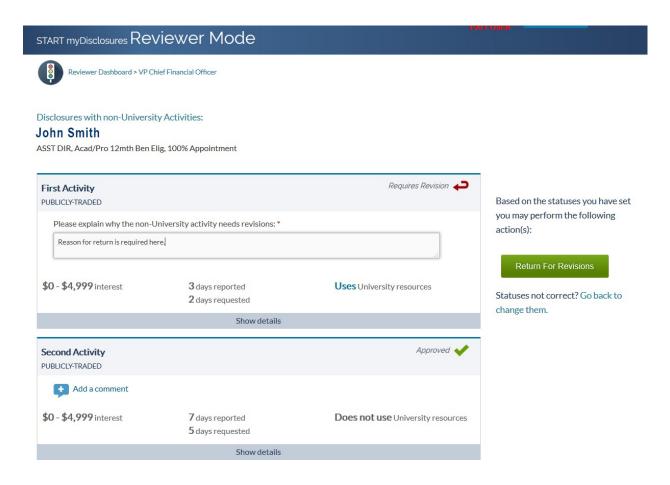
Disclosures with non-University Activities:

John Smith

ASST DIR, Acad/Pro 12mth Ben Elig, 100% Appointment



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If the second level reviewer UEO returns the disclosure to the first level reviewer UEO for revisions, an explanation for why revisions are necessary is required. You may use the comments or provide the explanation as an attachment.

Disclosures that are returned for revisions will appear in your "Pending" section.

Once the UEO or academic staff member makes the required revisions, the disclosure will automatically route to your "Ready for Review" section. The application will send you an automated email notifying you that there is a disclosure pending your review.

X. Revoke Action

An approval may be revoked by the UEO or the Assistant at the first and second level of review.

The revoke function allows reviewers to modify a previously set status. This is appropriate in three scenarios:

- 1. When an exemption status no longer applies;
- 2. When approval of an activity is no longer appropriate; or
- 3. When an activity's status was set as "approved" but it should have been set as "forward for further review."

A. Revoke Exemption Status

To revoke an exemption status:

- 1. Navigate to the discloser's org.
- 2. Click on the "Completed" Folder.
- 3. Search for the discloser and click on his or her name.
- 4. Click Revoke Exemption and Confirm.
- 5. The discloser will now appear in the "Pending, disclosures not submitted" folder.

RNUA Disclosures, Year: 2018 OVCR Administration , Role: assistant

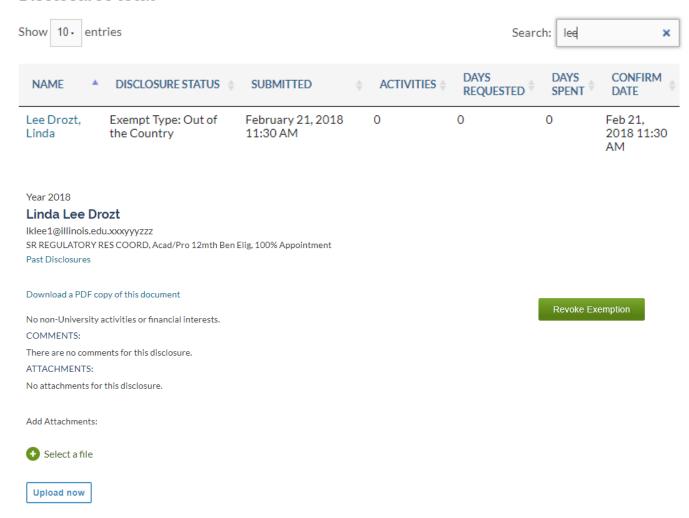
(1-D1-NE-NE0-370-370001)

PEN	DING	READY FO	PR REVIEW	COMPLETED
O disclosures not submitted	O disclosures awaiting response	disclosures with no non- University activities reported	disclosures with non- University activities	14 COMPLETED

Total Disclosures: 14 (processing time may vary)

OVCR Administration, Role: assistant:

Disclosures total



B. Revoke Approval

To revoke approval:

- 1. Navigate to the discloser's org.
- 2. Click on the "Completed" folder, and select the discloser's name.
- 3. Select the "Revoke approval" status, and click the green "Revoke Approval" button.
- 4. Enter a comment describing why approval is being revoked, and click the green "Confirm Revoke Approval" button.
- 5. The disclosure will now appear in the "Ready for Review" folder. Reviewers can return the disclosure to the discloser or set the activity status as "Forward for Further Review."

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Year 2018

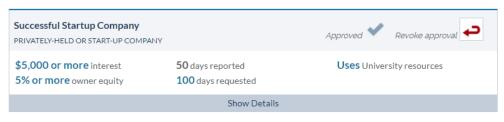
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SR REGULATORY RES COORD, Acad/Pro 12mth Ben Elig, 100% Appointment

Past Disclosures

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Revoke approval and return disclosure to employee's home org.

Revoke Approval

COMMENTS:

There are no comments for this disclosure.

ATTACHMENTS:

No attachments for this disclosure.

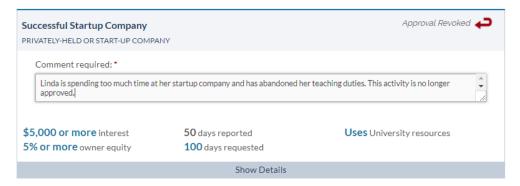
Disclosures with non-University activities:

Year 2018

Linda Lee Drozt

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SR REGULATORY RES COORD, Acad/Pro 12mth Ben Elig, 100% Appointment



Confirm Revoke Approval

Cancel action? Go back to change.

COMMENTS:

ATTACHMENTS:

No attachments for this disclosure.