

COI Quick Reference Guide



Update Disclosure Profile

The Disclosure Profile is the focal point of the Huron COI system for the discloser. It provides a summary of discloser's interest and everything that was disclosed previously.

Disclosers need to disclose their interests related to their institutional responsibilities. They also need to complete training related to the regulations and their institution's conflict of interest policy.

Update Disclosures

As a discloser you need to record your interests in the Huron COI system. You will receive an e-mail notification when you need to disclose your interests in Huron COI. You can either click the link in the e-mail notification or go to your Disclosure Profile in the Huron COI application to disclose your interest. You can refer the Instruction Center in the Disclosure Profile for the action that you need to take and also the reason for that action.

Note: You need to update your profile if your Disclosure Profile is in the Action Required state.

To update your disclosure profile:

If you do not have anything to disclose, do the following:

1. On the disclosure workspace, click **Edit Disclosure Profile**.
2. After you have completed your COI training in CITI (citiprogram.org), click **Continue** to move to the next page.
3. Select **No** for the question 'Do you have any financial interests and/or outside activities to report?'.
4. Click **Continue** to go to the Complete Disclosure Profile page.
5. Click **Complete Disclosure Profile Update** and click **OK**.

Note: The Discloser Profile moves to No Action Required state.

To disclose your interests, do the following:

1. On the disclosure workspace, click **Edit Disclosure Profile**.
2. After you have completed your COI training in CITI (citiprogram.org), click **Continue** to move to the next page.
3. Select **Yes** for the question 'Do you have any financial interests and/or outside activities to report?'.
4. Click **Add** in the entity disclosures section.
5. Select the Entity, Relation to discloser and Disclosure types. Based on the Disclosure type selected, you get further questions.
6. Answer the questions and click **OK** to add the entity disclosure or click **OK and Add Another** to add another entity disclosure.

7. Click **Continue** to go to the Complete Disclosure Profile page.
6. Click **Complete Disclosure Profile Update** and then click **OK**.
Note: The Disclosure Profile moves to No Action Required state.

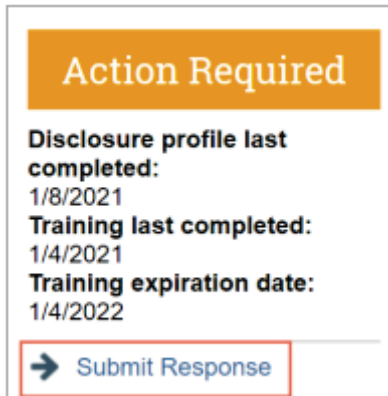
You can view your disclosures by clicking **View** on the Disclosures tab.

Respond 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.

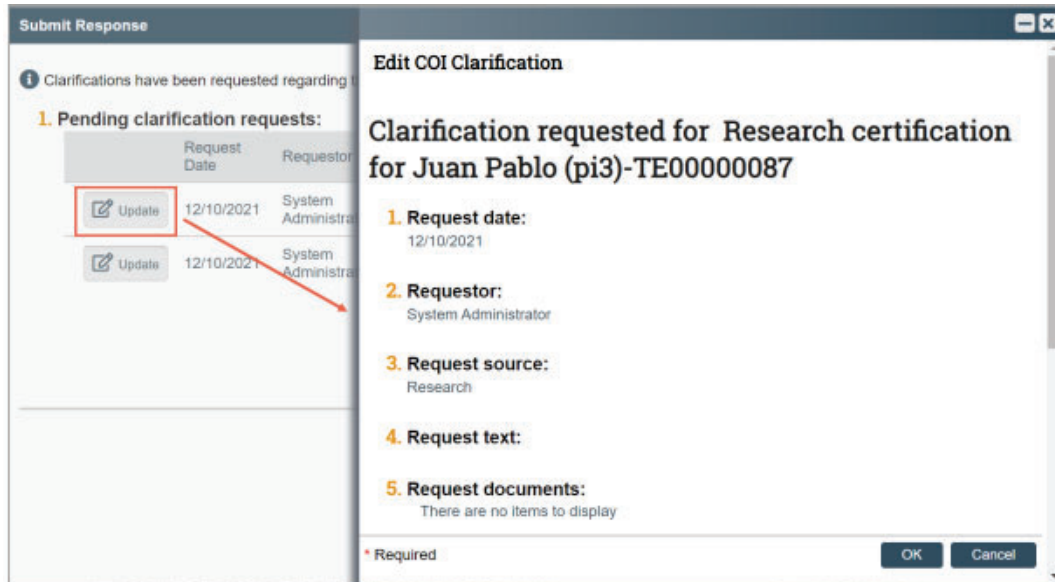
To review the request details and submit your response:

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**.

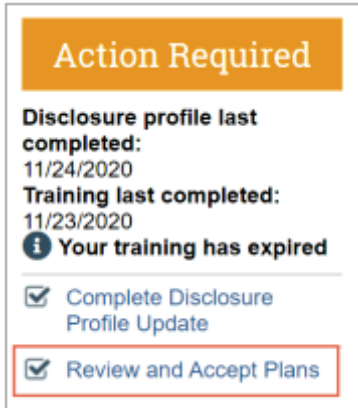
After you have responded to all outstanding clarification requests, your Instruction Center will be updated accordingly. If your disclosure profile is in a No Action Required state, you can log off the system.

Review and Accept Plans

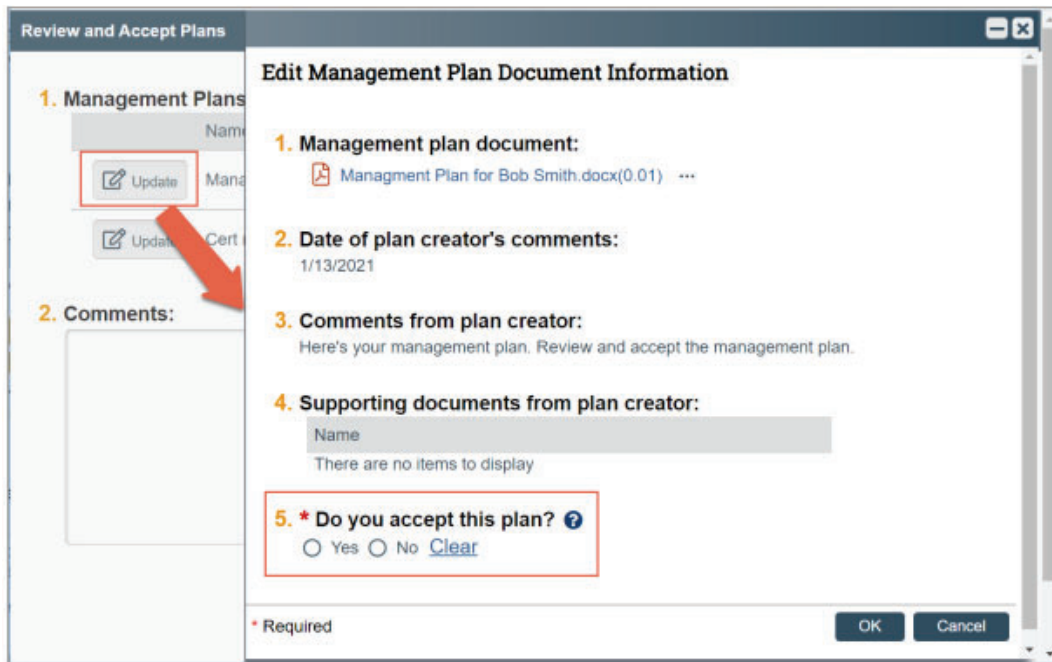
When a management plan is created due to a conflict, it is important that you understand the plan and agree with the steps that have been documented. You will receive a notification when a management plan has been routed for your review. Log on to the system and navigate to your Disclosure Profile to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

To review and accept the management plan:

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



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



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**.