

Financial Conflict of Interest (FCOI) Discloser's Guide

Office of Export Controls, Conflict of Interest, and Responsible Conduct of Research
Division of Research

Introduction

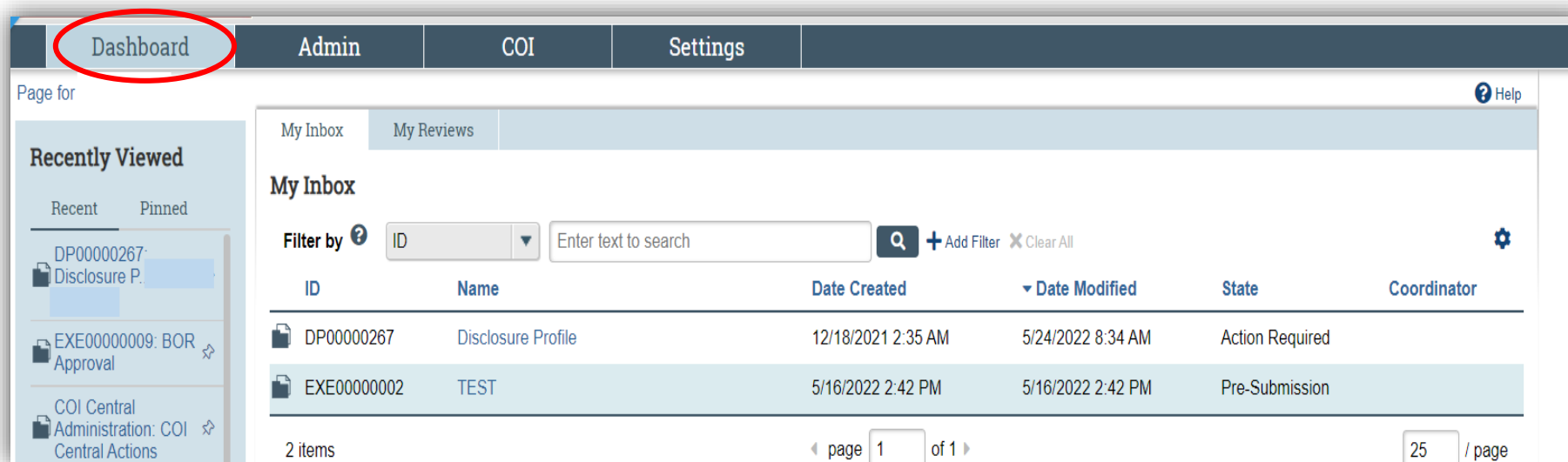
This guide shows how to perform “Discloser” activities in the Huron system to identify potential conflicts and to ensure that actual conflicts are properly managed.

The **Disclosure Profile** is the focal point of the Huron system for the discloser. It provides a summary of a discloser’s interests and other outside activities. The Huron **Disclosure** is replacing both the *Financial Conflicts of Interest* (FCOI) disclosure forms that were previously submitted using the FCOI module in Maestro and the TEES Annual Disclosure Questionnaire (ADQ) that was previously submitted through Laserfiche.

Navigation and Basic Tasks (Dashboard)

To log in, please click [here](https://tamu.huronresearchsuite.com/) or copy and paste the following link in your web browser to log in using your SSO credentials:
<https://tamu.huronresearchsuite.com/>

When you first log in, you will be on your Dashboard, which is the starting point for finding items and performing many basic tasks.



The screenshot shows a web application dashboard. At the top, there is a navigation bar with tabs: **Dashboard** (highlighted with a red circle), **Admin**, **COI**, and **Settings**. Below the navigation bar, the main content area is divided into two sections. On the left, there is a sidebar titled "Recently Viewed" with a "Recent" tab and a "Pinned" tab. It lists three items: "DP00000267: Disclosure P.", "EXE00000009: BOR Approval", and "COI Central Administration: COI Central Actions". On the right, there is a "My Inbox" section with a "My Reviews" tab. It features a search bar with a "Filter by" dropdown set to "ID" and a search input field. Below the search bar is a table with the following data:

ID	Name	Date Created	Date Modified	State	Coordinator
DP00000267	Disclosure Profile	12/18/2021 2:35 AM	5/24/2022 8:34 AM	Action Required	
EXE00000002	TEST	5/16/2022 2:42 PM	5/16/2022 2:42 PM	Pre-Submission	

At the bottom of the table, it says "2 items" and "page 1 of 1". There is also a pagination control showing "25 / page".

To find key items

From your Dashboard, you will see:

My Inbox: Items that require you to take action.

My Reviews: Items assigned to you to review if you are a reviewer. These are a subset of the items in “My Inbox”.

Recently Viewed:

Recent: The last several items you viewed. Scroll through this list to find an item you worked on recently.

Pinned: You can pin the items in the Recently Viewed section for quick and easy access. This is where those pinned items are listed.

Personalize Table: You can alter the tables displayed on the dashboard by using the Personalize Table gear icon.

Dashboard | Admin | COI | Settings

Page for

My Inbox | My Reviews

Recently Viewed

Recent | Pinned

DP00000267: Disclosure P.

EXE00000009: BOR Approval

COI Central Administration: COI Central Actions

My Inbox

Filter by ID ID Enter text to search + Add Filter X Clear All

ID	Name	Date Created	Date Modified	State	Coordinator
DP00000267	Disclosure Profile	12/18/2021 2:35 AM	5/24/2022 8:34 AM	Action Required	
EXE00000002	TEST	5/16/2022 2:42 PM	5/16/2022 2:42 PM	Pre-Submission	

2 items

page 1 of 1

25 / page

Search + Add Filter

Date Modified State Coordinator

Personalize Table

Displayed Fields

Field	Order
<input checked="" type="checkbox"/> getIconAsLink	↑ ↓
<input checked="" type="checkbox"/> ID	↑ ↓
<input checked="" type="checkbox"/> Name	↑ ↓
<input checked="" type="checkbox"/> Date Created	↑ ↓
<input checked="" type="checkbox"/> Date Modified	↑ ↓
<input checked="" type="checkbox"/> State	↑ ↓
<input checked="" type="checkbox"/> Coordinator	↑ ↓

Options

Place the paging bar at: Bottom

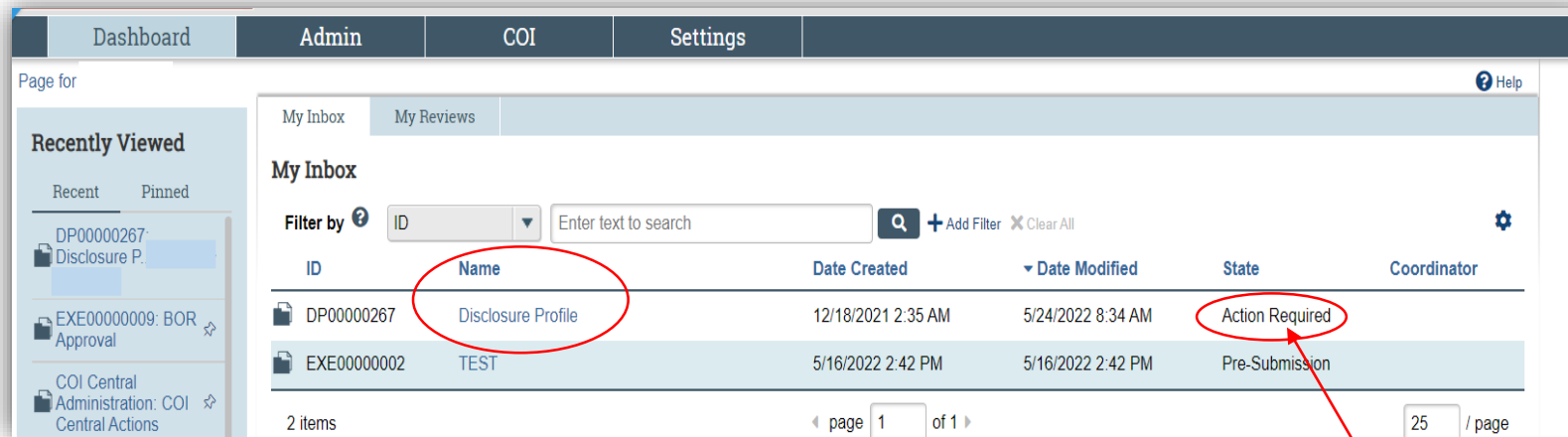
Enable Auto-Refresh: ☐

Refresh Data Every: 60 seconds

Export to CSV

How to Update your Disclosure Profile

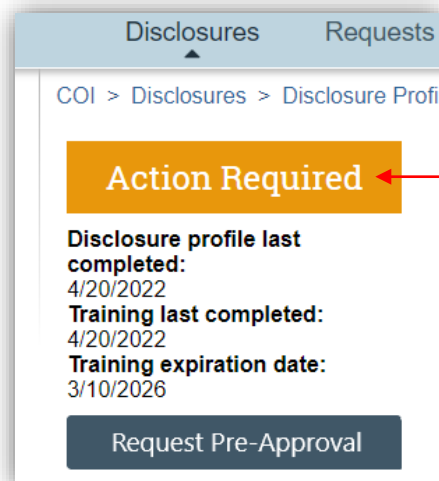
1. On your Dashboard, click on the **Disclosure Profile** task to access the disclosure profile form.



The screenshot shows a dashboard with tabs for Dashboard, Admin, COI, and Settings. On the left, there's a 'Recently Viewed' sidebar. The main area is titled 'My Inbox' and contains a table of disclosure profiles. The table has columns for ID, Name, Date Created, Date Modified, State, and Coordinator. Two items are listed: 'DP00000267' with Name 'Disclosure Profile' and 'EXE00000002' with Name 'TEST'. The 'State' for 'DP00000267' is 'Action Required', which is circled in red. A red arrow points from this state to the 'Action Required' state in the next screenshot.

ID	Name	Date Created	Date Modified	State	Coordinator
DP00000267	Disclosure Profile	12/18/2021 2:35 AM	5/24/2022 8:34 AM	Action Required	
EXE00000002	TEST	5/16/2022 2:42 PM	5/16/2022 2:42 PM	Pre-Submission	

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



The screenshot shows the 'Disclosure Profile' form. At the top, there's a navigation bar with 'Disclosures' and 'Requests'. Below it, the breadcrumb is 'COI > Disclosures > Disclosure Profile'. A large orange banner at the top of the form says 'Action Required'. Below this, there's a section with the following text: 'Disclosure profile last completed: 4/20/2022', 'Training last completed: 4/20/2022', and 'Training expiration date: 3/10/2026'. At the bottom, there's a button labeled 'Request Pre-Approval'. A red arrow points from the 'Action Required' state in the previous screenshot to this banner.

The **Disclosure Profile** is the focal point of the Huron 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 and complete training related to the regulations and the institution's conflict of interest policy per ***System Regulation 15.01.03***.

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

**No Action
Required**

Disclosure profile last
completed:
5/25/2022
Training last completed:
4/20/2022
Training expiration date:
3/10/2026

Disclosure Profile for

Instruction Center	
Action Required	Reason
No actions need to be taken at this time	Discloser's disclosure profile is up-to-date and requires no action

Edit Disclosure Profile

2. On the disclosure workspace, click **Edit Disclosure Profile**.

1. After you have completed the required **2111716 - Financial Conflict of Interest** training course through TrainTraq (or if you have completed it in the last 4 years) **select the check box** for '*I certify that I have read and understood the education materials presented to me*' on the Instructions and Policies page.
2. Click **Continue** to move to the next page.

Editing: DP00013070 Go to forms menu Print Help

Instructions and Policies

Training and Education

Texas A&M System requires you to complete a few simple steps in order to be compliant with its policy and federal regulations. Please complete the following steps:

- Disclose any Significant Financial Interests (SFI) and/or other outside activities within 30 days of acquiring or discovering the interest, by completing the disclosure form.
- Provide all necessary disclosure information annually. Annual disclosures will be in addition to any disclosures within 30 days of new interests being acquired or discovered.
- Provide any additional information requested as your Disclosure Profile is reviewed.

Even if you have no significant financial interests or any outside activities to disclose, you still need to complete the annual disclosure.

Required Training (applicable to Investigators pursuant to System Regulation 15.01.03 Financial Conflicts of Interest in Sponsored Research only):

All investigators who are responsible for designing, conducting, or reporting on externally sponsored research or research activities must complete training on financial conflicts of interest at least once every 4 years. Employees will receive automatic notifications with a link to the training. The training is currently available through the A&M System's Single Sign On system (TrainTraq Course 2111716).

Exit Save **Continue**

- If you **do not** have anything to disclose:

1. Please check no to question #1 and proceed with the remaining questions.
2. Click **Continue** to go to the TAMU Additional Info section.

The screenshot shows a web application interface for editing a form titled "Editing: DP00006096". On the left is a sidebar menu with four items: "Instructions and Policies", "Entity Disclosure Information", "TAMU Additional Info" (which is highlighted in orange and has a red arrow pointing to it), and "Complete Disclosure Profile". The main content area is titled "TAMU Additional Info" and contains five numbered questions, each with radio button options for "Yes" and "No", and a "Clear" link. The questions are:

1. * With regard to System Policy 33.04, related to Use of System Resources, do you confirm that you DO NOT engage in any practices that may be deemed as an improper use of system resources (equipment, vehicles, procurement cards, funds, etc.) which could lead to increased costs and risks to the system, particularly from operational, regulatory, and reputational standpoints.
☐ Yes ☐ No [Clear](#)
2. * With regard to System Regulation 07.05.01, related to Consensual Relationships, do you maintain an amorous, romantic, and/or sexual relationship that, although consensual, may create actual or perceived ethical, discriminatory, and/or harassing situation disruptive to TAMUS?
☐ Yes ☐ No [Clear](#)
3. * I understand that my commitment to sponsored projects may equal 100% only if my entire TAMUS activities during the pay period can be allocated to sponsored projects. I confirm that if I engaged in administrative, teaching and/or other duties (to include writing new or competing grant proposals, or serving on a university committee) in addition to sponsored projects, I will not allocate 100% time to sponsored projects.
☐ Yes ☐ No [Clear](#)
4. * With regard to System Policy 24.01.06, related to Campus Programs for Minors, do you ever work with minors (labs, tours, camps, etc.) excluding TAMU students?
☐ Yes ☐ No [Clear](#)
5. * Do you currently receive, or within the preceding twelve months

At the bottom right of the form, there are three buttons: "Exit", "Save", and "Continue". The "Continue" button is circled in red and has a right-pointing arrow icon next to the text.

3. After you have responded to all the additional questions, please click the **Complete Disclosure Profile Update** button and carefully read the certifications before clicking OK.

The left screenshot shows the 'Complete Disclosure Profile' page. The header includes the Texas A&M University logo and navigation links: 'Validate', 'Compare', and 'Instructions and Policies'. The main content area displays 'Editing: DP00000267' and 'Complete Disclosure Profile'. Below this, it states: 'Click the Complete Disclosure Profile Update button to satisfy the following: Discloser manually updated the disclosure profile'. A red circle highlights the 'Complete Disclosure Profile Update' button.

The right screenshot shows the 'Complete Disclosure Profile Update' page. The header includes the Texas A&M University logo and navigation links: 'Validate', 'Compare', and 'Instructions and Policies'. The main content area displays 'Editing: DP00000267' and 'Complete Disclosure Profile'. Below this, it states: 'Click the Complete Disclosure Profile Update button to satisfy the following: Discloser manually updated the disclosure profile'. A red circle highlights the 'OK' button.

Note: The status of your Disclosure Profile moves to **No Action Required**.



No Action
Required

- **If you *do* have something to disclose:**

(Note: Individuals involved in research may see additional questions related to SFI)

1. If you have any outside activities to disclose, please check yes to question #1 and skip to question #3. You will be directed to the applicable entity disclosure type in #2 based on your responses to all questions beginning with #3.
2. After responding to all the questions, please go back to questions #2 and Click **Add** in the entity disclosures section.
3. To add an entity, you have three options:

- **Type the name** of the entity in the box and automatically the entity options will appear.

1. Entity: ?

ID	Name	Category	Parent Organization
Abbott Laboratories	Abbott Laboratories	Sponsor	
Abbott Laboratories Services Corp	Abbott Laboratories Services Corp	Sponsor	

- **Click on the browse button** to add the entity from a pre-populated list of organizations.

General Information

1. Entity: ?

- If you cannot find the entity in the list of organizations, you can add it by clicking on the other browse button.

1. Entity: ?

 ...

or

If you cannot find the entity in the above list, enter the details here:

[None] ...

4. Proceed answering the remaining questions and click **OK** to add the entity disclosure or click **OK and Add Another** to add another entity disclosure.
5. Click **Continue** to proceed to the next section (TAMU Additional Info).
6. Answer the TAMU Additional Info questionnaire and click **Continue** to go to the Complete Disclosure Profile page.
7. **IMPORTANT!!** Click **Complete Disclosure Profile Update** and carefully read the certifications before clicking OK.

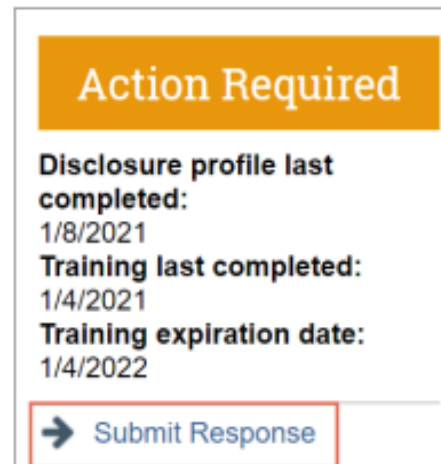
Research Project	Event Type	Sponsor	Related Context
test	IRB Submission	ABC Inc test	Acme International

Note: Once your Disclosure Profile has been completed/updated, the disclosure status moves to No Action Required.

How to Respond to a Clarification Request

If a reviewer has questions or requires you to provide additional information about your disclosure profile or pre-approval 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** or your **Pre-Approval Request**. Log in to the Huron system and navigate to your disclosure profile to respond to the clarification request.

1. On the disclosure workspace, click Submit Response.



2. Click **Update** next to the request you are responding to.

Note: There may be multiple clarification requests outstanding at the same time.

Submit Response

Clarifications have been requested regarding t

1. Pending clarification requests:

	Request Date	Requestor
Update	12/10/2021	System Administrator
Update	12/10/2021	System Administrator

Edit COI Clarification

Clarification requested for Research certification for Juan Pablo (pi3)-TE00000087

1. Request date:
12/10/2021

2. Requestor:
System Administrator

3. Request source:
Research

4. Request text:

5. Request documents:
There are no items to display

* Required

OK Cancel

3. Then click **OK**

4. In the **Request** text field, review the request sent by the reviewer.
5. Review any attached documents.
6. 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.

7. 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.

To view your Disclosure history

From the disclosure profile workspace (under the COI tab), click the **History** tab.

The screenshot shows the 'Disclosure Profile for [Name]' workspace. The 'COI' tab is selected in the top navigation bar. The 'Disclosures' sub-tab is also selected. An 'Action Required' banner indicates the profile needs to be updated. The 'History' tab is highlighted with a red box, and a red arrow points to it from the text above. Below the tabs, there is a filter section and a table of activities.

Activity	Author	Activity Date
Disclosure Profile Update Completed	[User]	2/3/2022 7:03 AM
Changes Tracked	[User]	2/3/2022 7:03 AM
Disclosure Profile Update Completed	[User]	1/24/2022 4:51 PM
Changes Tracked	[User]	1/24/2022 4:51 PM

The History tab lists the activities performed on a disclosure profile including any comments, attachments added, or disclosure profile updates.