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Creation of a Triggering Event Prior to UM’s Receipt of a Notice of Grant Award
Terminology Used in UDisclose

- **UDisclose User**: Individuals who can access the UDisclose System. The list of Users include Disclosers, Proxies, and Departmental Administrators. All Users must have an eProst account (see “Request an Account,” page 3).

- **Discloser**: Any individual who submits a list of disclosures to UM through the UDisclose System. The list of Disclosers include Faculty and Investigators (those who are substantially involved in the design, conduct or reporting of projects).

- **Disclosure**: an interest related to a given company or external organization. In UDisclose, disclosures are grouped by company/external organization first, and then broken out by type of interest (i.e. board of directors, consulting, stock).

- **Proxy**: a person designated by a Discloser who is able to add/update disclosures on behalf of the Discloser. The Proxy may add/update the Discloser’s certifications, but only the Discloser may submit them to the system.

- **UDisclose Department Administrator**: an individual who has been assigned administrative oversight for a UM Department/Division/Center Administrative Access. These individuals have read-only access to Triggering Events (projects) and non-confidential information. Administrators who would like to be designated as a Proxy should contact the Office of Disclosures & Relationship Management (DRM) at 305-243-0877.

- **Disclosure Certification**: a submission in UDisclose in which a discloser enters his/her interests/disclosures.
  - **Annual Certification**: Type of disclosure certification, submitted on a yearly basis.
  - **Disclosure updates**: submitted any time a discloser’s interests change during the year. Disclosers can also create this type of certification themselves.
  - **Research Certification**: Type of disclosure certification that is associated with either a funding proposal or IRB study. The research certification is composed of the same pages as the Annual Certification, with the addition of pages related specifically to research. The additional pages are the same, regardless of whether the project is a funding proposal or IRB study.

- **Certification Status**: indicates the status of a research certification. On the Triggering Events page, there are 3 options:
  1. **Draft**, which means that the research certification has not yet been submitted by the discloser
  2. **In process**, which means that it has been submitted but is being reviewed by DRM or is under a management plan
  3. **Reviewed**, which means that the DRM review is complete and the certification has reached its final state of no review required, review complete, or the management/mitigation plan has been satisfied.

- **Triggering Event**: A term referring to a project associated with a funding proposal.
  - A triggering event in UDisclose corresponds to either a “New” or “Competing Renewal” funded award.
  - Triggering events are automatically created in UDisclose when UM receives a Notice of Grant Award (NoGA) or when a request is submitted to open an account “on guarantee.”
  - Contact the DRM to have a Triggering Event manually created in the UDisclose System.
  - Investigators are designated to project teams within UDisclose System.
  - Proxies can designate team members on behalf of PD/PIs.

- **Conflict of Interest (COI)**: An actual or potential interest that could directly and substantially (as determined by the UM COI Committee) affect the design, conduct, or reporting of funded research, or of scholarly and/or educational activities funded under external grants, contracts or cooperative agreements. COIs can be financial (FCOI) or obligatory (OCOI) in nature.
Request an Account

Users must have a University of Miami (UM) Cane ID and eProst account in order to access the UDisclose System.

What do I do?

1. **To be granted access to eProst,** you must be an employee, student, or authorized associate of the University of Miami (UM) or Jackson Health System (JHS).

2. **A valid C Number is required** in order to request an eProst account. See the Cane ID webpage for additional information: [caneidhelp.miami.edu](http://caneidhelp.miami.edu).

   Request a new eProst account using the form at the bottom of the webpage: [eprost.med.miami.edu](http://eprost.med.miami.edu).

   ➢ *It is important that users avoid having duplicate accounts.* For assistance, contact the eProst Help Desk at [eprost@med.miami.edu](mailto:eprost@med.miami.edu) or 305-243-2314.

3. Your request will be forwarded to the Human Subjects Research Office (HSRO) for verification. Once verified, you will receive an email from the eProst Help Desk confirming creation of your account. **New account requests will normally be processed within one business day.**
Designation of Proxy

Any Discloser can designate a Proxy in the UDisclose System. Please note:

- Users* with an active account in UDisclose can be designated as a Proxy for any other user, with no limitation to department or project team.
  * Users who have “Departmental Administrator” level access who would like to be designated as a Proxy should contact the Office of Disclosures & Relationship Management (DRM) at 305-243-0877.

- Once designated by a Discloser, a Proxy has access to all confidential information entered into the UDisclose System by the Discloser.
- A Proxy has access to all certifications (Annual and Research certifications) when designated by a Discloser.
- A Proxy designated by a Project Director (PD) or Principal Investigator (PI) can add members to teams for funded projects (aka “Triggering Events”) within the UDisclose System.

What do I do?

1. From any Disclosure Certification workspace, a Discloser can designate a proxy using the Designate Proxy activity link found in the left menu panel under My Current Actions.

2. When a new Proxy is designated in the UDisclose System, the Proxy will receive an email. By clicking on the “Link” in the email, the Proxy will be directed to the Discloser’s certification workspace in the UDisclose System.

NOTE: A Discloser can designate only one Proxy at a time. However, multiple Disclosers can choose to designate the same Proxy to manage their respective disclosure certifications in the UDisclose System.
Managing Disclosure Certifications

Once designated, the Proxy can contribute to a Discloser’s certifications, but cannot “Submit” certifications into the UDisclose System. Only the Discloser can submit his/her own certifications into the system.

What do I do?

1. From the COI workspace click on COI Submissions.

2. The All Certifications tab lists the Proxy’s certifications as well as those of the Discloser(s) who designated the Proxy.

3. The Status column displays which certifications are pending action, indicated by a “Draft” status.

4. When a certification remains in Draft status, the UDisclose System will send email reminders to the Discloser and the designated Proxy.

5. Within the email, clicking on the “Link” will direct the Proxy to the Discloser’s certification workspace in the UDisclose System.

6. From the Disclosure Certification workspace, click on the Edit button, found in the left menu panel under My Current Actions to create/edit the certification.

7. Enter the information on each smart form page, then click Continue to move to the next page.
8. On the Assurance and Certification page, in order to avoid creating an error in the system, **do not** check the box that states “My disclosures are up-to-date and accurate” and do not click Finish.

9. Rather, click **Save** and **Exit** (in the top green toolbar) and notify the Discloser to log in and submit the Certification.
Changes to Certifications

The Office of Disclosures & Relationship Management (DRM) may request changes to a certification during the review process.

Responding to a change request

1. A Certification status of “Response Pending” indicates that the DRM has requested additional information and/or changes to the certification. The UDisclose System sends a notification to the Discloser and designated Proxy via email.

2. By clicking on the “Link” located on the reference (RE:) line of the notification, the Proxy will be redirected to the Discloser’s certification workspace in the UDisclose System.

3. Within the Disclosure Certification workspace, review the History tab (3.1) to determine the required additional information, and then click on the Edit button to revise the disclosure. Enter the information on the appropriate smart form page and click Continue to navigate through the smart form.

4. The Discloser must access the certification and click the Submit Changes link on the left tool bar to submit the Certification in the UDisclose System.
PD/PI/Proxy Process for Adding or Removing Project Team Members

This process must be completed by the Project Director/Principal Investigator (PD/PI) or his/her Proxy when there is a New or Competing Renewal generated in UDisclose. When there is a Supplement or Non-Competing Renewal, the PD/PI and Proxy will be reminded to update the team members on the project.

- For Human Subject Research (HSR) studies, team members are designated in the eProst (IRB7) system. Please contact the HSR Office Help Desk at eprost@med.miami.edu or 305-243-2314 for assistance.

What do I do?

1. A Proxy (or a PD/PI) can access projects using the Triggering Event link found in the upper left tool bar in the UDisclose System.

2. In addition, every time a new project is created in the UDisclose System, the PD/PI and Proxy will receive an email. By clicking on the “Project Title” link located on the reference (RE:) line, the Proxy will be redirected to the correct Triggering Event workspace in the UDisclose System.

3. Once directed to the Triggering Event workspace, the Proxy will click the Update Team Members link under My Current Actions.

4. The Proxy will add or remove team members (only investigators with substantial responsibility for the design, conduct or reporting) using the Add and Delete (4.1) buttons.

Check the box at the bottom of the page (4.2) only if the PD/PI is the sole investigator working on the project.

The PD/PI should not be included as a team member on the project.
### Process for Adding or Removing Project Team Members (cont)

<table>
<thead>
<tr>
<th><strong>What do I do?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>5. The PD/PI/Proxy may search for their team members by entering the first few letters of each person’s last name, and then selecting the appropriate investigator by department or division to ensure selection of the correct investigator.</td>
</tr>
<tr>
<td>It is not necessary to know a team member’s C-Number to add him/her to a project.</td>
</tr>
<tr>
<td>6. A Research Certification will be created for each newly added team member, and the system will send an email notification to each person with a link to his/her Research Certification for the project.</td>
</tr>
</tbody>
</table>
Checking the Status of a Project, or of the Team Members on a Project

The Proxy can check the status of a project from the “Triggering Events” list.

What do I do?

1. From the COI workspace click on **Triggering Events** to view and select your desired triggering event.

2. **NOTE:** the status of triggering events will always be listed as “draft” in the “status bar.”

3. You can check the certification status of the team members in the **Personnel** section of the triggering events page.

   The certification status will display “draft,” “in process,” or “reviewed.”

<table>
<thead>
<tr>
<th>Certification Status</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Draft</td>
<td>Individual needs to complete the certification</td>
</tr>
<tr>
<td>In Process</td>
<td>Certification under review</td>
</tr>
<tr>
<td></td>
<td>Under management plan</td>
</tr>
<tr>
<td>Reviewed</td>
<td>Review complete</td>
</tr>
<tr>
<td></td>
<td>Management plan satisfied</td>
</tr>
</tbody>
</table>
Creation of a Triggering Event Prior to UM’s Receipt of a Notice of Grant Award

Triggering Events are automatically created in UDisclose when the Office of Research Administration (ORA) indicates within the InfoEd System that a Notice of Grant Award (NoGA) has been received, or a request is submitted to open an account “on guarantee.” There may be times when a PI wishes to begin the project certification process early before the project is listed in the system. Should this occur, the PI or proxy can contact the Office of Disclosures & Relationship Management (DRM) with the InfoEd number, title, PI name, submission type and additional documentation related to the project. Once requested, a Triggering Event will be manually created, the PI assigned, and a notification sent via email. Following this, the PI can then log into UDisclose and designate project team members. The DRM can be contacted at DRM@miami.edu or 305-243-0877.

UM cannot permit funds associated with incoming awards to be dispersed prior to review of the outside interests held by team members on the project. Therefore, team members must be designated, must complete the disclosure process, and their disclosures reviewed and managed (if necessary) in the UDisclose System prior to disbursement of funds associated with incoming awards. Funds spent prior to clearance will not be reimbursed.