

Baylor University Training for Disclosers

Agenda

1. Provide an update to BUPP-800 changes
2. Review email notification
3. Discuss accessing the system
4. Outline how to complete a disclosure profile update

BUPOP-800 Changes

Overview

In the 2024 academic year, Baylor's policy and processes around disclosing and managing outside activities and interests are changing.

Key Drivers for Change

- Disclosing in two systems is burdensome for our faculty
- Review of activities did not systematically include supervisors or other individuals with knowledge of the disclosure's impact
- Appropriate disclosures help Baylor manage its business across missions

Approach

- Summer 2022:**
Assessed Baylor's Approach to Managing Outside Activity and Financial Interests
- 2022 Academic Year:**
Formed faculty and administrator working groups to recommend policy and process changes
- 2023 Academic Year:**
Implementing changes based on working group recommendations

BUPP-800 Outside Activities and Interests

A faculty and staff work group made significant changes to this policy, including:

- Named a broader membership to the Outside Activities and Interests Committee to increase faculty and staff representation
- Increased disclosure reporting and pre-approval thresholds from \$250 to \$5,000
- Established an assumption that faculty are allotted one day per week to spend on outside activities
- Defined activities that do and do not require pre-approval
- Outlined an appeals process if the Outside Activities and Interests Committee does not approve the activity or interest
- Provided clearer definitions
- Established supervisory review of disclosures

What is CARA?

CARA is an electronic solution that allows disclosers and reviewers to easily report and review Outside Activities and Interests.

Each discloser has 1 disclosure profile to maintain for all Outside Activities and Interests.

Reviewers will receive email notifications when an action that requires their review is needed.

What to Expect: Disclosers

All Disclosures
are in One
System



- Internal Audit and Research disclosures are now in the same system and are available for editing as new or changed activities and interests occur.

Disclosures
Remain In the
System



- Once outside activity or financial disclosures are made, they continue to exist in the system and **need to be edited as the activity or interest changes.**

Disclosures
Happen as
Needed



- Everyone is required to disclose annually in September.
- Researchers may be required to disclose new outside activities and interests when new sponsored awards are received, or new IRB protocols are initiated.

Supervisors Review
Disclosures





- The individual's supervisor will review disclosures that exceed thresholds and pre-approval requests before review by Internal Audit or Research Compliance.

Email Notifications

The CARA system will send you email notifications when you need to make a disclosure or provide an update.

A new research project requires a COI Disclosure Profile update

 cara@baylor.edu
To: [Redacted] Tue 8/8/2023 11:56 AM

 If there are problems with how this message is displayed, click here to view it in a web browser.

To:	[Redacted]
Link:	Disclosure Profile fo [Redacted]
Project ID:	AWD00000001
Project Name:	TE for AWD00000001
Project Type:	Grants JIT

You have been added to the above research project and your Disclosure Profile currently requires that you review and confirm that you date. Follow the link included in this email to log in and complete a Disclosure Profile update.

You are required to complete a COI Disclosure Profile update

 cara@baylor.edu
To: [Redacted] Wed 6/28/2023 3:05 AM

 If there are problems with how this message is displayed, click here to view it in a web browser.

To:	[Redacted]
Link:	Disclosure Profile fo [Redacted]
Category:	Faculty and Staff

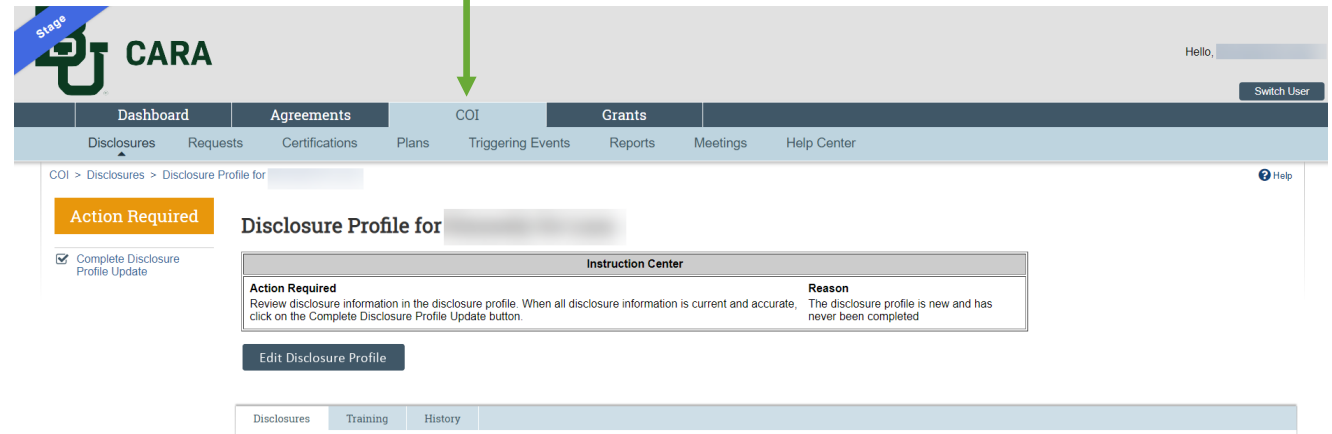
You are required to complete a COI Disclosure Profile update due to the regularly scheduled process that your institution has established to ensure the interests that you have disclosed are complete and accurate. Follow the link included in this email to log in and complete a Disclosure Profile update.

Completing a Disclosure Profile

Accessing the System

Follow the link you receive in the email to access Baylor's CARA system. Alternatively, you can visit the CARA web site and enter your Baylor ID to log in. Make sure to click the COI tab and then read the directions.

Make sure you click the COI tab to get started.



The screenshot displays the CARA system interface. At the top left, there is a blue ribbon with the word "Stage" and the Baylor University logo. The main header area contains the text "CARA" and a user greeting "Hello, [redacted]" with a "Switch User" button. Below the header is a navigation menu with tabs for "Dashboard", "Agreements", "COI", "Grants", "Disclosures", "Requests", "Certifications", "Plans", "Triggering Events", "Reports", "Meetings", and "Help Center". The "COI" tab is highlighted in blue. Below the navigation menu, the breadcrumb trail reads "COI > Disclosures > Disclosure Profile for [redacted]". A yellow box labeled "Action Required" is present. Below it, there is a checkbox labeled "Complete Disclosure Profile Update" which is checked. The main content area is titled "Disclosure Profile for [redacted]" and contains an "Instruction Center" box with the following text:

Action Required	Reason
Review disclosure information in the disclosure profile. When all disclosure information is current and accurate, click on the Complete Disclosure Profile Update button.	The disclosure profile is new and has never been completed

Below the instruction center is an "Edit Disclosure Profile" button. At the bottom of the page, there is a navigation bar with tabs for "Disclosures", "Training", and "History".

Disclosure Profile Update

Select **Edit Disclosure Profile** to enter any outside activities or interests you had during the previous 12-month period.

The screenshot displays the CARA web application interface. At the top left, there is a blue banner with the text "Stage" and the CARA logo. The main navigation bar includes "Dashboard", "Agreements", "COI", "Grants", and "Help Center". Below this, a secondary navigation bar lists "Disclosures", "Requests", "Certifications", "Plans", "Triggering Events", "Reports", and "Meetings". The breadcrumb trail shows "COI > Disclosures > Disclosure Profile for [redacted]".

An orange "Action Required" box is present on the left side. Below it, a checked checkbox is labeled "Complete Disclosure Profile Update".

The main content area is titled "Disclosure Profile for [redacted]". It features an "Instruction Center" box with the following text:

Action Required	Reason
Review disclosure information in the disclosure profile. When all disclosure information is current and accurate, click on the Complete Disclosure Profile Update button.	The disclosure profile is new and has never been completed

Below the instruction center, there is a button labeled "Edit Disclosure Profile", which is highlighted with a green box and a green arrow pointing to it from the left.

At the bottom of the page, there is a green banner with the CARA logo.

Welcome and Instructions

You will arrive at an Instructions and Policies screen, which will prompt you to select **Continue**. Make sure to read the Training and Education section, then select the **Continue** button to proceed to the next screen.

BU CARA Hello, [User Name]

Validating... Compare

Editing: DP00000066 Go to forms menu Print Help

Instructions and Policies

Training and Education

Baylor University requires you to complete a few simple steps in order to be compliant with its policy and federal regulations. The following steps may be completed through the Conflict of Interest management system.

- Complete this "Disclosure Profile" training when you begin employment and as required by institutional policy.
- Disclose any Significant Financial Interests (SFI) within 30 days of acquiring or discovering the interest, by completing the financial 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.
- If a Management Plan is required, your agreement to the plan must be documented prior to any funding related to your SFI(s) being released. If a Management Plan is in place, you are responsible for all its terms, conditions, and actions.
- You must respond to all requests for information and/or meetings regarding the institution's responsibility to monitor compliance with the plan.
- Even if you have no outside organizations or companies with which you or an immediate family member have a financial relationship you still need to complete the annual disclosure.

Training status refers only to research training through CITI Program. Other training may be required. Refer to COI Policies BUPP 800 Outside Activities and Interests and Board of Regents COI Policy.

External training:

Training Type	Course Title	Date Completed	Next Training Due Date
There are no items to display			

Exit Save Continue

Initial Question

The first question will determine whether you or your family members have any financial interests or outside activities to disclose. Throughout the system, additional information such as definitions of key terms is provided by clicking the blue question mark button.

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Entity Disclosure Information

1. * Do you or a family member have any financial interests and/or outside activities to report? See help text for "family member" definition. ?

Yes No

Click the question mark to view definitions.

Exit Save Continue

Complete the Questions

If you answer **Yes** you will be prompted to make disclosures about your and your family members' outside activities and interests. Click **Add** to begin the process.

The screenshot shows the CARA web application interface. The header includes the BU CARA logo and a user greeting. The main content area is titled 'Editing: DP00000066' and 'Entity Disclosure Information'. It contains two questions:

- 1. * Do you or a family member have any financial interests and/or outside activities to report? See help text for "family member" definition.** This question has radio buttons for 'Yes' (selected) and 'No', and a 'Clear' link.
- 2. Entity disclosures:** This section features a '+ Add' button and a table with the following columns: Entity, Foreign Entity?, Relation to Discloser, Disclosure Types, Total Value, Total Time Commitment (Days), and Last Modified. Below the table, it states 'There are no items to display'.

A green arrow points from a callout box to the '+ Add' button. The callout box contains the text: 'Click "Add" to complete the questions.'

At the bottom right of the form, there are three buttons: 'Exit', 'Save', and 'Continue'.

Slide-Out Box

A slide-out box will appear for you to disclose any outside activities or interests you have with entities other than Baylor. Red asterisks indicate required questions.

Baylor CARA

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Entity Disclosure Information

1. * Do you or a family member have any outside activities or interests with entities other than Baylor?
 Yes No [Clear](#)

2. Entity disclosures:

[+ Add](#)

Entity Foreign Entity? [Add](#)

There are no items to display

Add Disclosure

Entity Disclosure Information

General Information

1. * Entity:

or

If you cannot find the entity in the above list, enter the details here:
[None] [...](#)

2. * Relation to discloser: [?](#)

Self
 Spouse
 Dependent Child
 Other Family Member

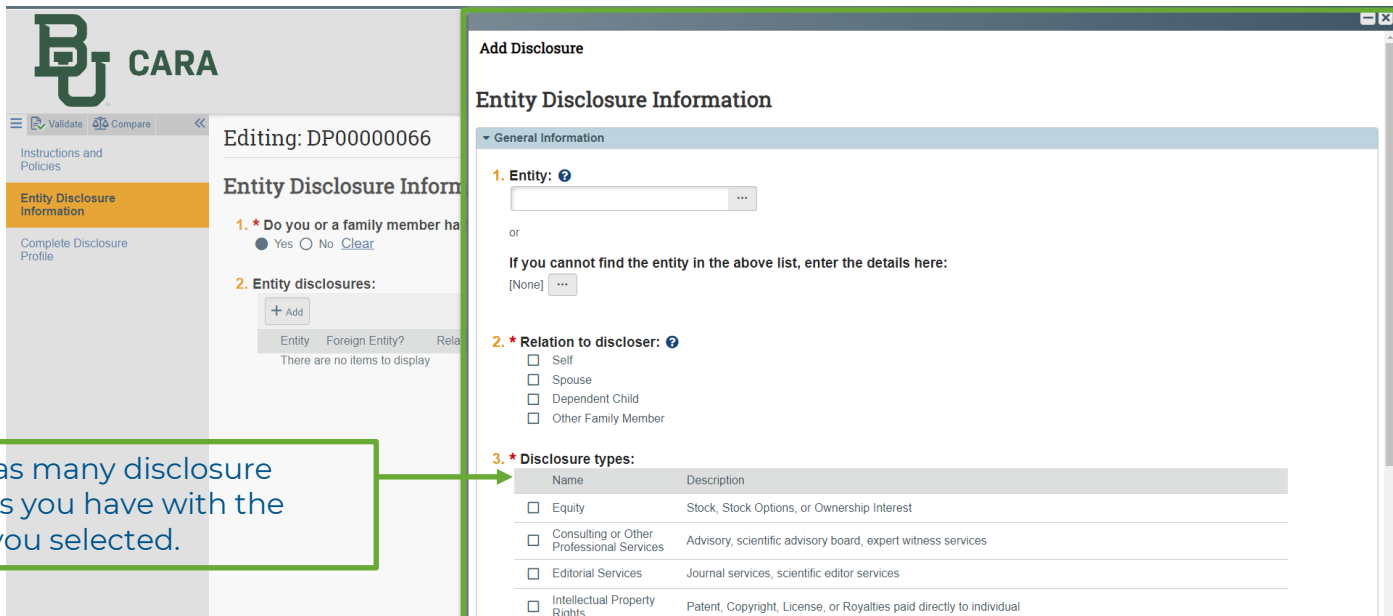
3. * Disclosure types:

Name	Description
<input type="checkbox"/> Equity	Stock, Stock Options, or Ownership Interest
<input type="checkbox"/> Consulting or Other Professional Services	Advisory, scientific advisory board, expert witness services
<input type="checkbox"/> Editorial Services	Journal services, scientific editor services
<input type="checkbox"/> Intellectual Property Rights	Patent, Copyright, License, or Royalties paid directly to individual

Select the ellipses on the entity box to select recognized entities. If your entity does not exist, select the secondary ellipses to create a new entity. Answer questions for **one** entity at a time.

Select Disclosure Types

Once you select an entity, select all the individuals who have a relationship with that entity and select all the disclosure types that apply.



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Entity Disclosure Information

1. * Do you or a family member have a relationship with this entity?
 Yes No [Clear](#)

2. Entity disclosures:
[+ Add](#)

Entity	Foreign Entity?	Relationship
There are no items to display		

Add Disclosure

Entity Disclosure Information

General Information

1. * Entity:

or

If you cannot find the entity in the above list, enter the details here:
[None]

2. * Relation to discloser: Self
 Spouse
 Dependent Child
 Other Family Member

3. * Disclosure types:

Name	Description
<input type="checkbox"/> Equity	Stock, Stock Options, or Ownership Interest
<input type="checkbox"/> Consulting or Other Professional Services	Advisory, scientific advisory board, expert witness services
<input type="checkbox"/> Editorial Services	Journal services, scientific editor services
<input type="checkbox"/> Intellectual Property Rights	Patent, Copyright, License, or Royalties paid directly to individual

Select as many disclosure types as you have with the entity you selected.

Complete the Disclosure

Select **OK and Add Another** if you have outside activities or financial relationships with more than one entity. If not, select **OK**.

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Entity Disclosure Information

1. * Do you or a family member have any of the following relationships with any entity? [Clear](#)

2. Entity disclosures:

+ Add

Entity	Foreign Entity?	Relationship
There are no items to display		

3. * Additional information that would help clarify this disclosure:

I've been consulting with this company and have received prior approval

4. Attach a copy of the consulting, advisory or speaking agreement: (and any other supporting documentation)

+ Add

There are no items to display

Required

OK OK and Add Another Cancel

Select "OK and Add Another" if you have outside activities or financial relationships with more than one entity.

Save and Continue

Review your disclosures and confirm you have disclosed outside activities and financial interests that occurred over the last 12 months. Once your disclosure is complete, select **Continue**.

Bj CARA Hello, [User Name]

Validating Compare

Editing: DP00000066 Go to forms menu Print Help

Instructions and Policies

Entity Disclosure Information

Complete Disclosure Profile

Entity Disclosure Information

1. * Do you or a family member have any financial interests and/or outside activities to report? See help text for "family member" definition. [?](#)

Yes No [Clear](#)

2. Entity disclosures:

[+ Add](#)

Entity	Foreign Entity?	Relation to Discloser	Disclosure Types	Total Value	Total Time Commitment (Days)	Last Modified
Centers for Disease Control & Prevention	No	Self	Consulting or Other Professional Services	\$20,000.00	54	6/1/2023 ?

[Update](#)

[Exit](#) [Save](#) [Continue](#)

Please remember to select "Continue".

Disclosure Profile Update

Complete your disclosure. Do not select **Finish** unless you plan to log off and return later.

The screenshot displays the CARA web application interface. At the top left is the BU CARA logo. The header shows 'Hello, [user]' and 'Editing: DP0000066'. The sidebar on the left contains navigation links: 'Validate', 'Compare', 'Instructions and Policies', 'Entity Disclosure Information', and 'Complete Disclosure Profile' (highlighted in orange). The main content area is titled 'Complete Disclosure Profile' and contains the instruction: 'Click the Complete Disclosure Profile Update button to satisfy the following: Discloser manually updated the disclosure profile'. A green box highlights the 'Complete Disclosure Profile Update' button. A green arrow points from a text box containing 'Complete your disclosure.' to this button. At the bottom right, there are buttons for 'Exit', 'Save', and 'Finish' (with a red X over it).

Associated Research Activities

If you are associated with a research activity, you will see the research project information listed here. You can update the research activity, or select “OK” to continue.

Complete Disclosure Profile Update

By completing your disclosure profile update you are verifying that all disclosure information is accurate and current.

1. Open research triggers: ⓘ

Research Project	Event Type	Sponsor	Related Context
NIH Test Case A TK	Funding Award	National Inst of Health	

Update

OK Cancel

Completed Disclosure

You will see that your disclosure profile has been updated. The details from the questions you answered are reflected in your COI **Disclosures** screen.

The screenshot shows the CARA web application interface. The top navigation bar includes 'Dashboard', 'Agreements', 'COI', 'Grants', and 'Help Center'. The 'COI' section is expanded to show 'Disclosures', 'Requests', 'Certifications', 'Plans', 'Triggering Events', 'Reports', and 'Meetings'. The 'Disclosures' link is highlighted with a green box. Below the navigation, a breadcrumb trail reads 'COI > Disclosures > Disclosure Profile for [redacted]'. A yellow box with the text 'No Action Required' is prominently displayed. Below this, a message states 'Disclosure profile last completed: 6/1/2023'. An 'Instruction Center' box contains the following information:

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

An 'Edit Disclosure Profile' button is located below the instruction center. At the bottom, a table lists the disclosure details:

Entity	Foreign Entity?	Relation to Discloser	Disclosure Types	Total Value	Total Time Commitment (Days)	Last Modified
Centers for Disease Control & Prevention	No	Self	Consulting or Other Professional Services	\$20,000.00	54	6/1/2023

After your disclosure profile has been submitted, you will be returned to your "home" screen on the primary "Disclosures" page.

Completed Disclosure

If you need to edit your entry or make an additional entry, select **Edit Disclosure Profile**.

The screenshot shows the CARA system interface. At the top left, there is a blue banner with the text "Stage" and the CARA logo. The main navigation bar includes "Dashboard", "Agreements", "COI", "Grants", "Disclosures", "Requests", "Certifications", "Plans", "Triggering Events", "Reports", "Meetings", and "Help Center". The "COI" tab is currently selected. Below the navigation bar, the breadcrumb trail reads "COI > Disclosures > Disclosure Profile for [redacted]".

On the left side, there is an orange box with the text "No Action Required". Below it, a message states "Disclosure profile last completed: 6/1/2023".

The main content area is titled "Disclosure Profile for [redacted]". It contains an "Instruction Center" section with two columns: "Action Required" and "Reason". The "Action Required" column states "No actions need to be taken at this time". The "Reason" column states "Discloser's disclosure profile is up-to-date and requires no action". Below this section is a button labeled "Edit Disclosure Profile", which is highlighted with a green box and a green arrow pointing to it from the left.

At the bottom, there is a table with the following columns: "Entity", "Foreign Entity?", "Relation to Discloser", "Disclosure Types", "Total Value", "Total Time Commitment (Days)", and "Last Modified". The table contains one row of data:

Entity	Foreign Entity?	Relation to Discloser	Disclosure Types	Total Value	Total Time Commitment (Days)	Last Modified
Centers for Disease Control & Prevention	No	Self	Consulting or Other Professional Services	\$20,000.00	54	6/1/2023

Completed Disclosure

You should check the Entity section of your disclosure profile to make sure your disclosure was correctly captured.

The screenshot shows the CARA web application interface. At the top, there is a navigation bar with the CARA logo and a 'Stage' indicator. Below the navigation bar, there are tabs for 'Dashboard', 'Agreements', 'COI', 'Grants', and 'Help Center'. The 'COI' tab is selected, and the sub-menu includes 'Disclosures', 'Requests', 'Certifications', 'Plans', 'Triggering Events', 'Reports', 'Meetings', and 'Help Center'. The breadcrumb trail shows 'COI > Disclosures > Disclosure Profile for [redacted]'. A blue box with the text 'No Action Required' is present, along with a note: 'Disclosure profile last completed: 6/1/2023'. Below this, there is an 'Instruction Center' box with the following text:

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

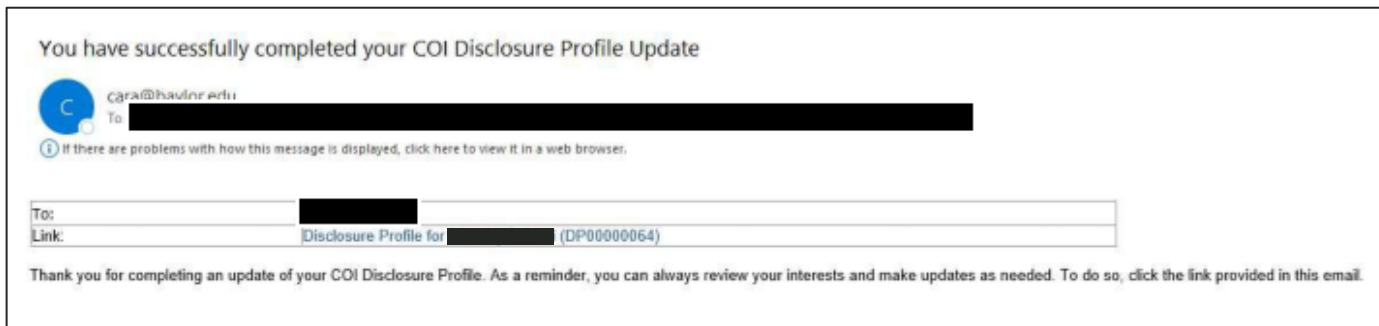
An 'Edit Disclosure Profile' button is located below the instruction center. At the bottom, there is a table with tabs for 'Disclosures', 'Training', and 'History'. The 'Entity' tab is selected and highlighted with a green box. The table contains the following data:

Entity	Foreign Entity?	Relation to Discloser	Disclosure Types	Total Value	Total Time Commitment (Days)	Last Modified
View Centers for Disease Control & Prevention	No	Self	Consulting or Other Professional Services	\$20,000.00	54	6/1/2023

Check to make sure your disclosure is appropriately reflected.

Email Notification

The discloser will receive an email notification indicating that they have successfully completed their disclosure. The discloser's supervisor will also receive a notification indicating that the discloser's submission is complete.



What to Expect: Faculty & Staff

If a time or financial threshold is exceeded, faculty and staff disclosures will be reviewed by the individual's supervisor, and then by Internal Audit.

For Faculty & Staff

- Your disclosure will be reviewed by your supervisor.
- Your disclosure will then route to Internal Audit.
- Internal Audit will determine if your disclosure needs to be reviewed by the Outside Activities & Interests Committee (OAIC).
- If so, the OAIC will make a determination during its regular monthly meeting.
- If the OAIC determines a management plan is necessary, Internal Audit will work with your supervisor and other appropriate individuals to develop a management plan.

What to Expect: Researchers

If a time or financial threshold is exceeded, research disclosures will be reviewed by the discloser's supervisor and then by Research Compliance:

For Researchers

- Your disclosure will be reviewed by your supervisor.
- Your disclosure will then route to Research Compliance.
- Research Compliance will determine if your disclosure is related to your upcoming or ongoing research awards.
- Research Compliance will notify Internal Audit if they think your disclosure needs to be reviewed by the Outside Activities & Interests Committee (OAIC).
- If so, the OAIC will make a determination during its regular monthly meeting.
- If the OAIC determines a management plan is necessary, Research Compliance will work with your supervisor and other appropriate individuals to develop a management plan.

Questions?

Thank you!

CARA