Baylor University Training for Disclosers

CARA

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

BUPP-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

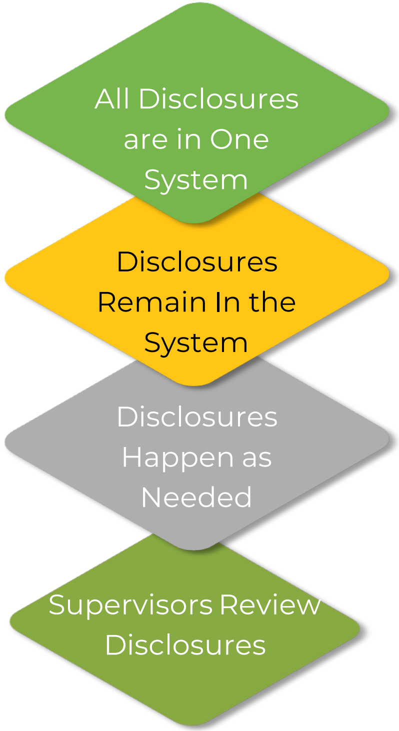
What is CARA?

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.

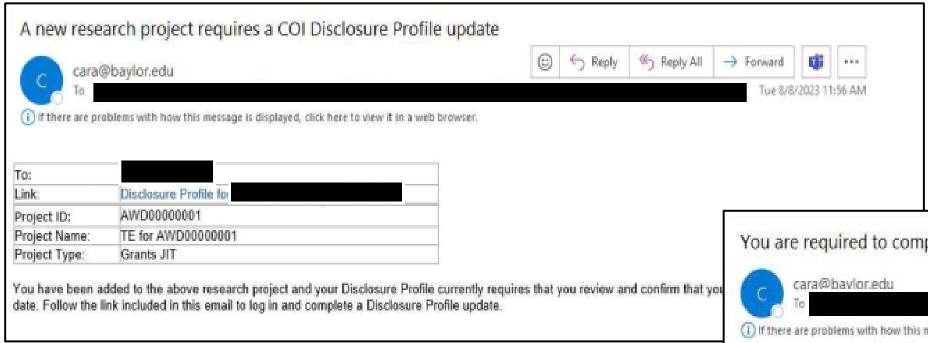
What to Expect: Disclosers



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

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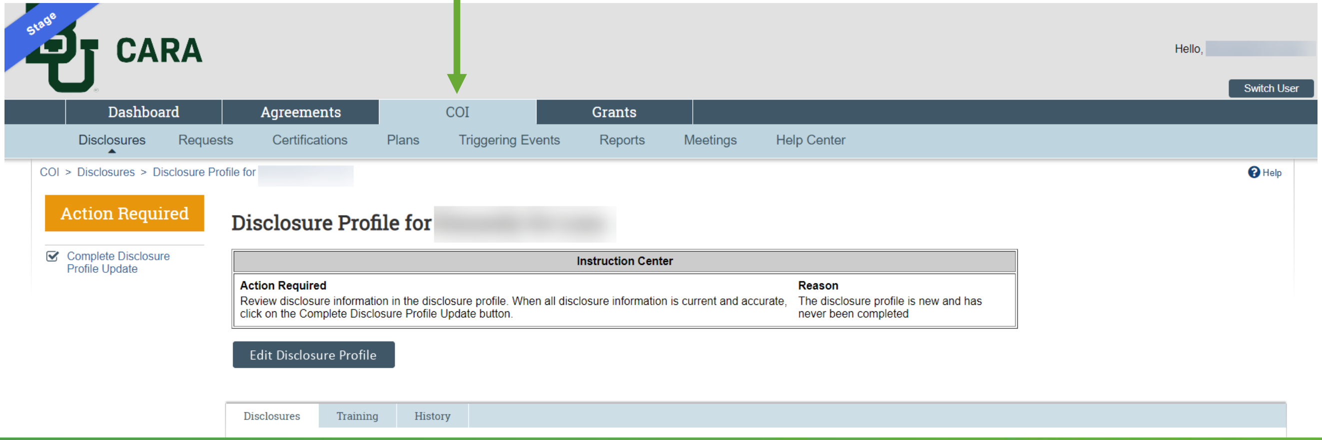
Accessing the System

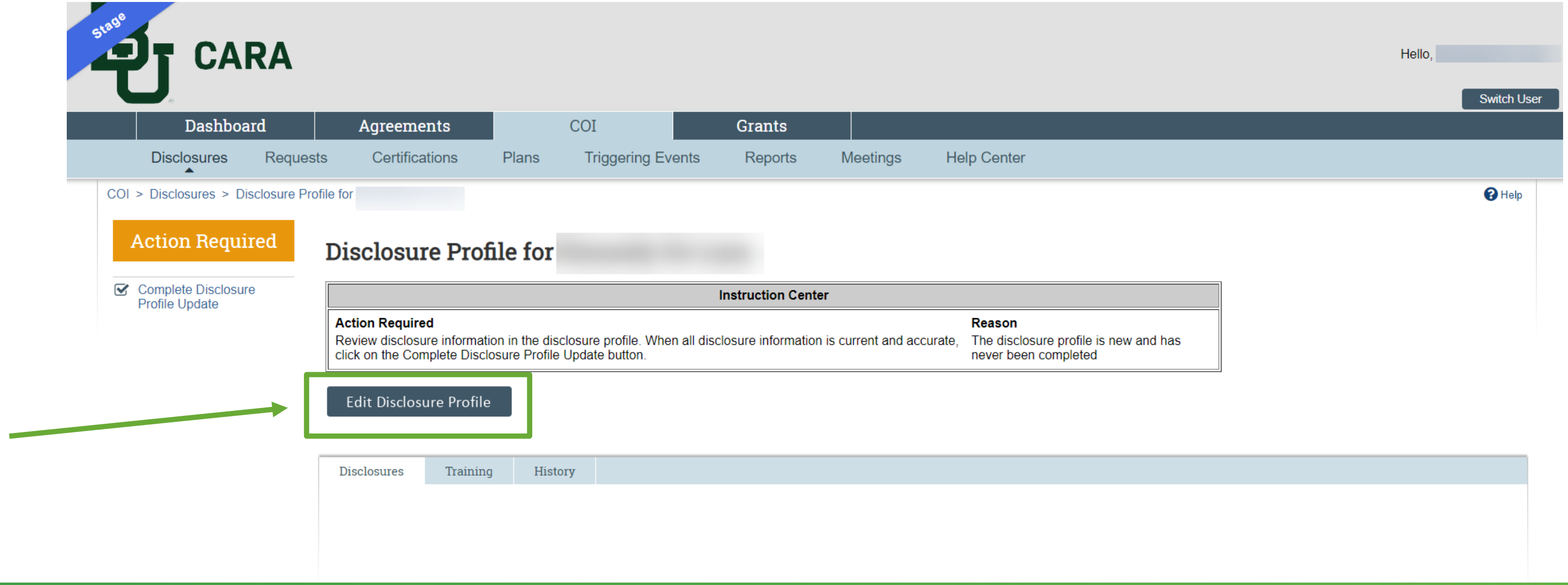
Follow the link you receive in the email to access Baylor's CARA system. Alternatively, you can visit the CARA web site and enter your Baylor ID to log in. Make sure to click the COI tab and then read the directions.

Make sure you click the COI tab to get started.



Disclosure Profile Update

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



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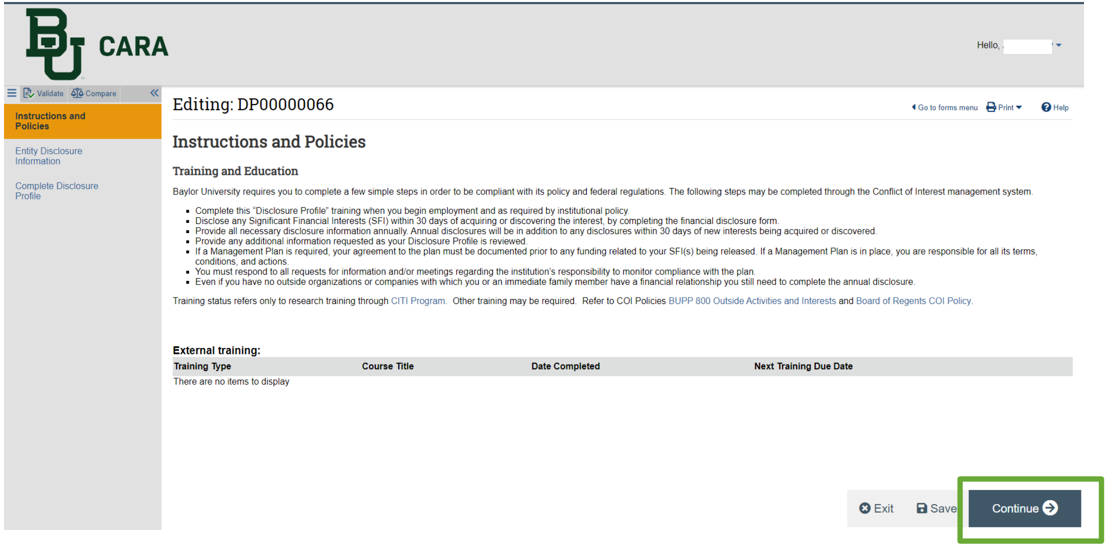
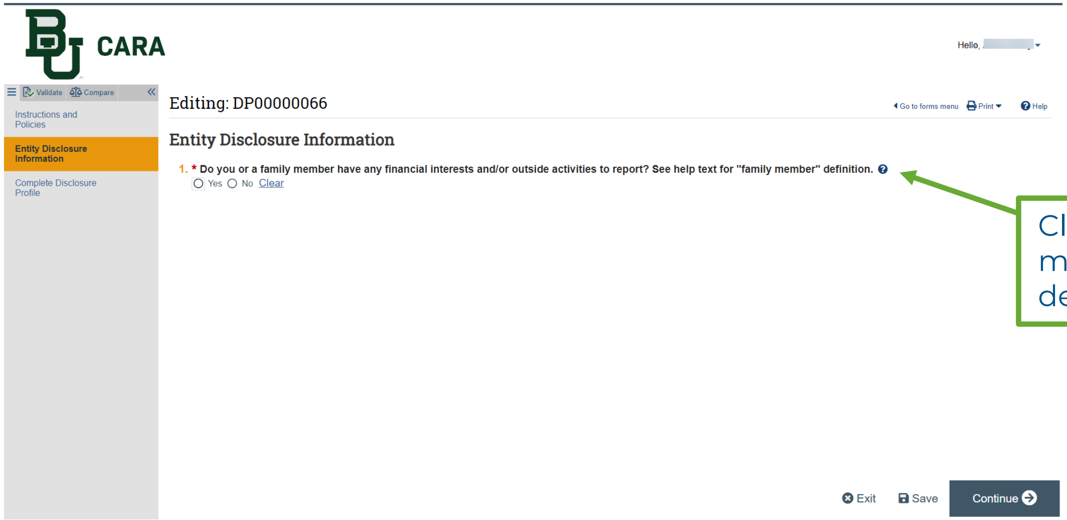
Welcome and Instructions

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.



Initial Question

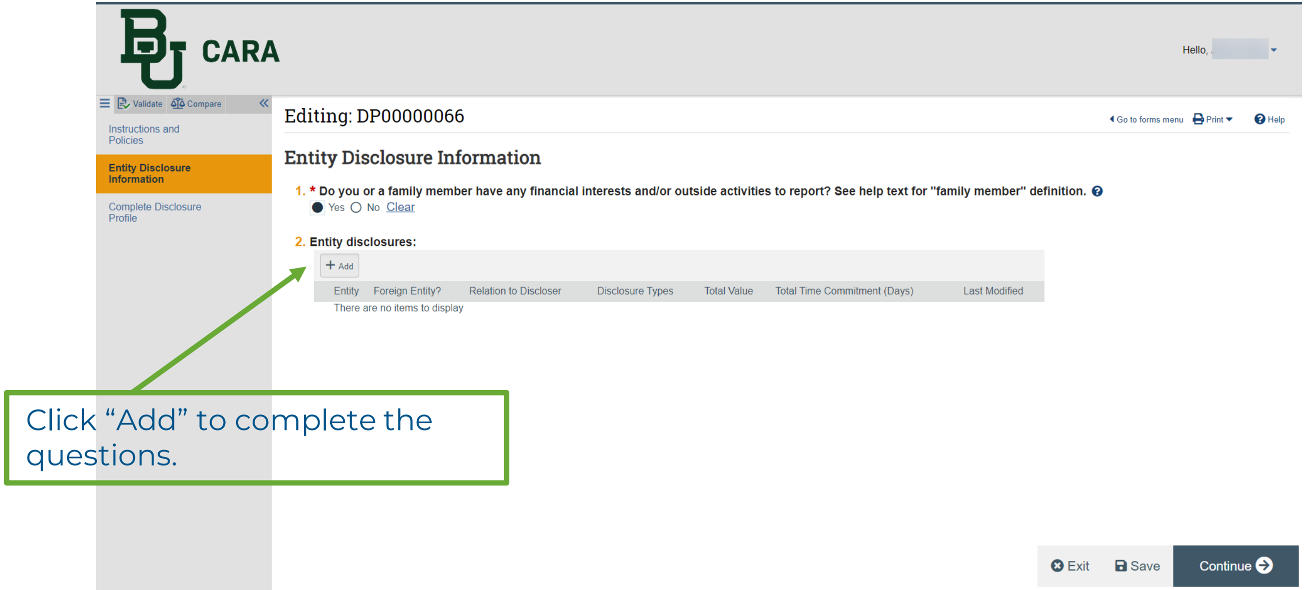
The first question will determine whether you or your family members have any financial interests or outside activities to disclose. Throughout the system, additional information such as definitions of key terms is provided by clicking the blue question mark button.



Click the question mark to view definitions.

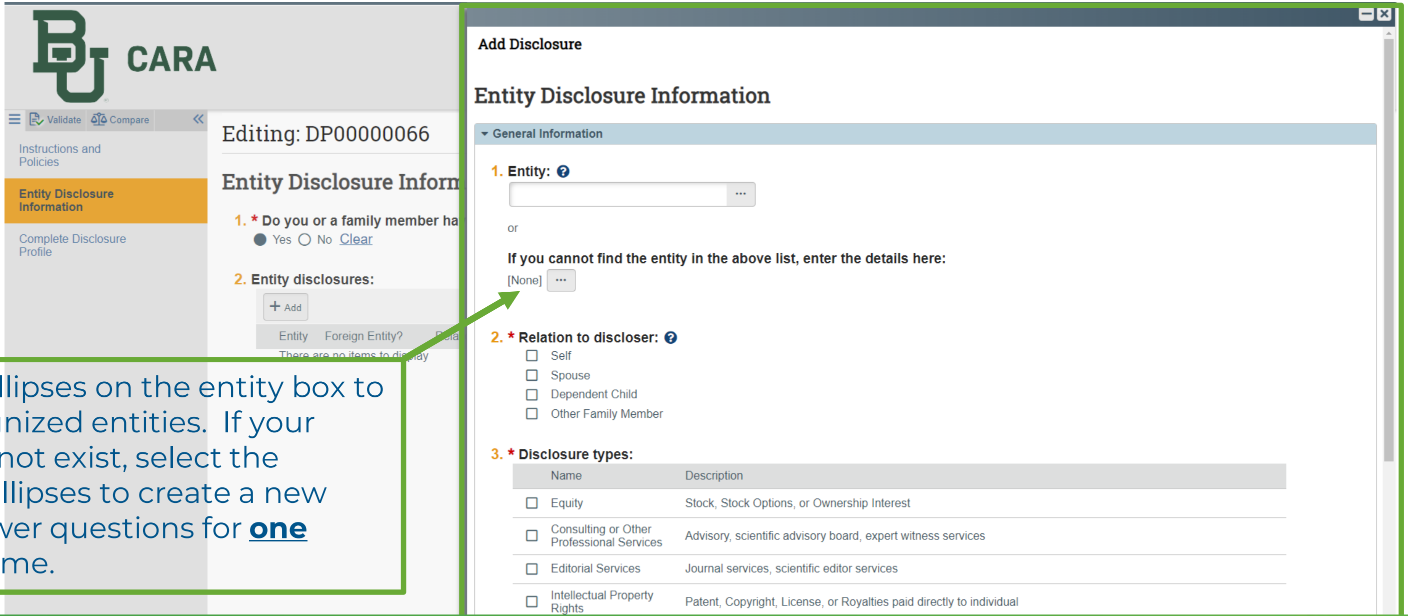
Complete the Questions

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.



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.



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.

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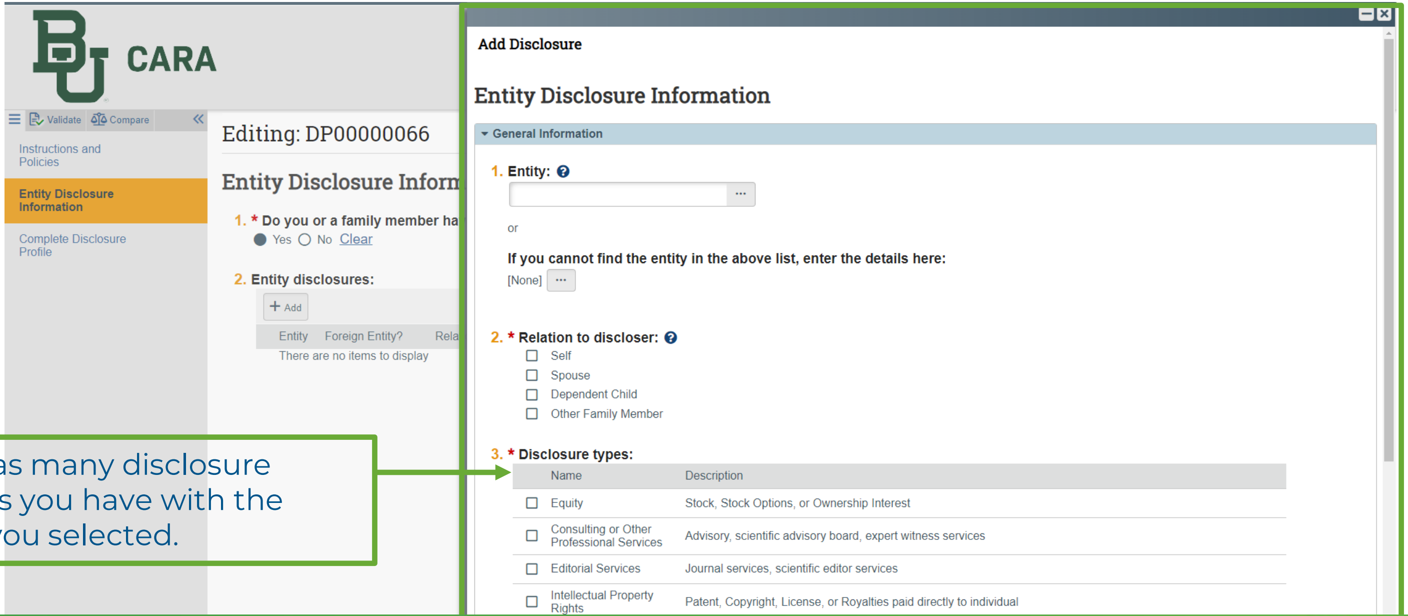
Select Disclosure Types

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



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

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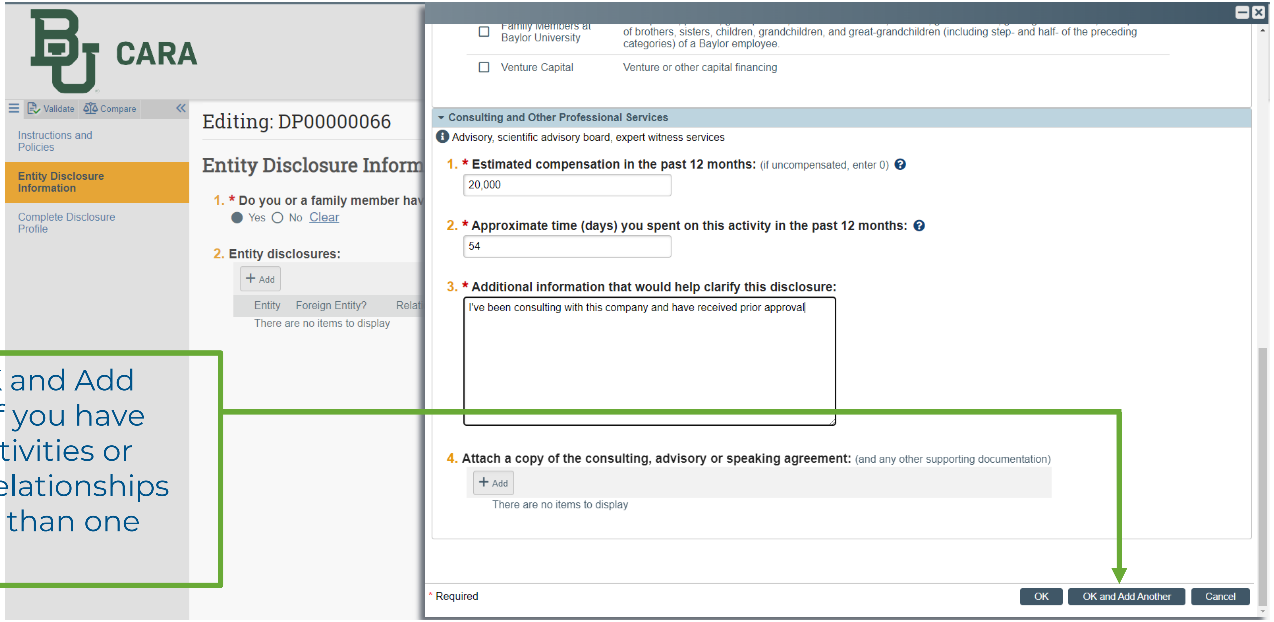
Complete the Disclosure

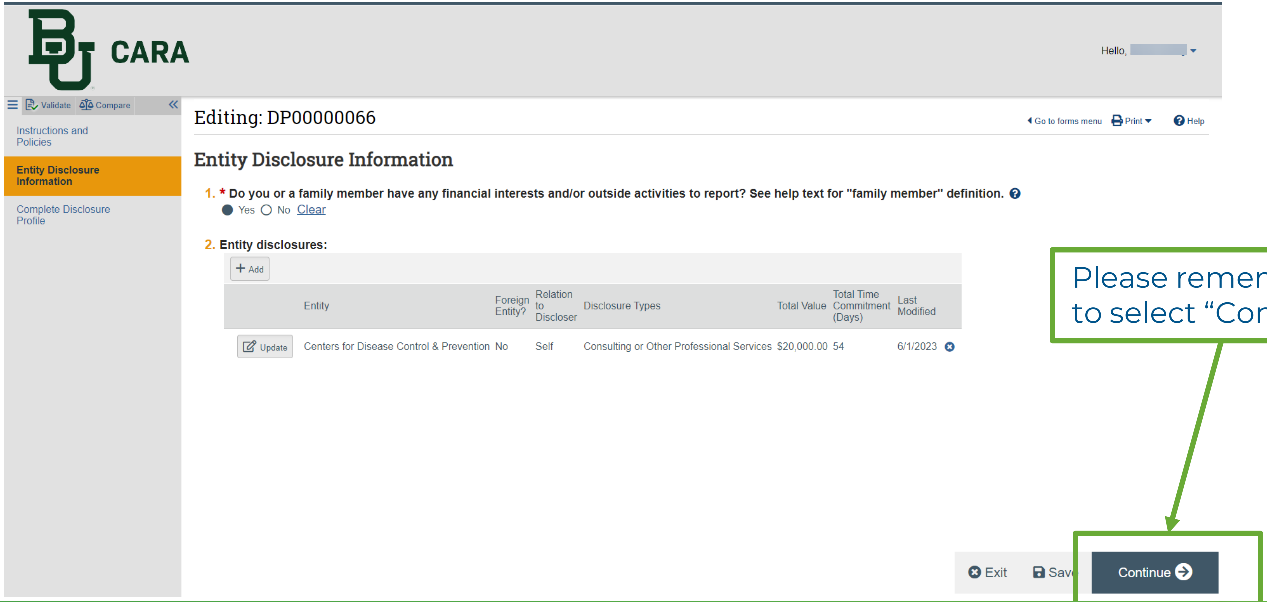
Select **OK and Add Another** if you have outside activities or financial relationships with more than one entity. If not, select **OK**.



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

Save and Continue

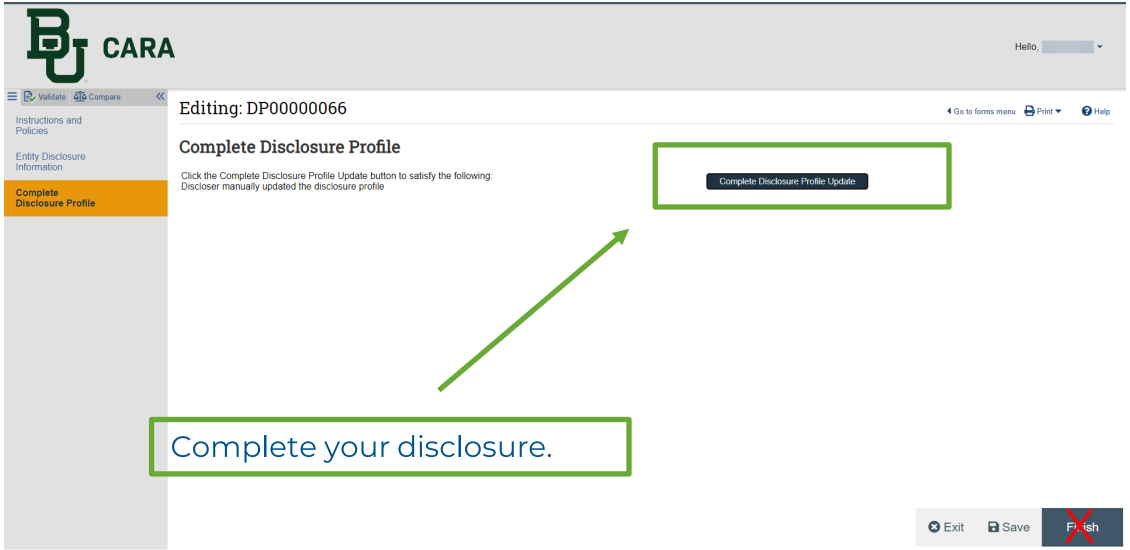
Review your disclosures and confirm you have disclosed outside activities and financial interests that occurred over the last 12 months. Once your disclosure is complete, select **Continue**.



Please remember to select “Continue”.

Disclosure Profile Update

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



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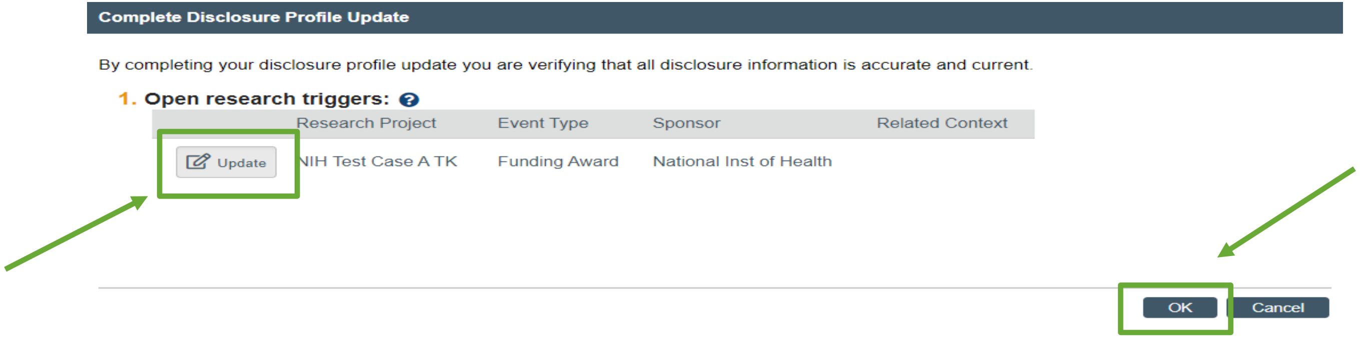
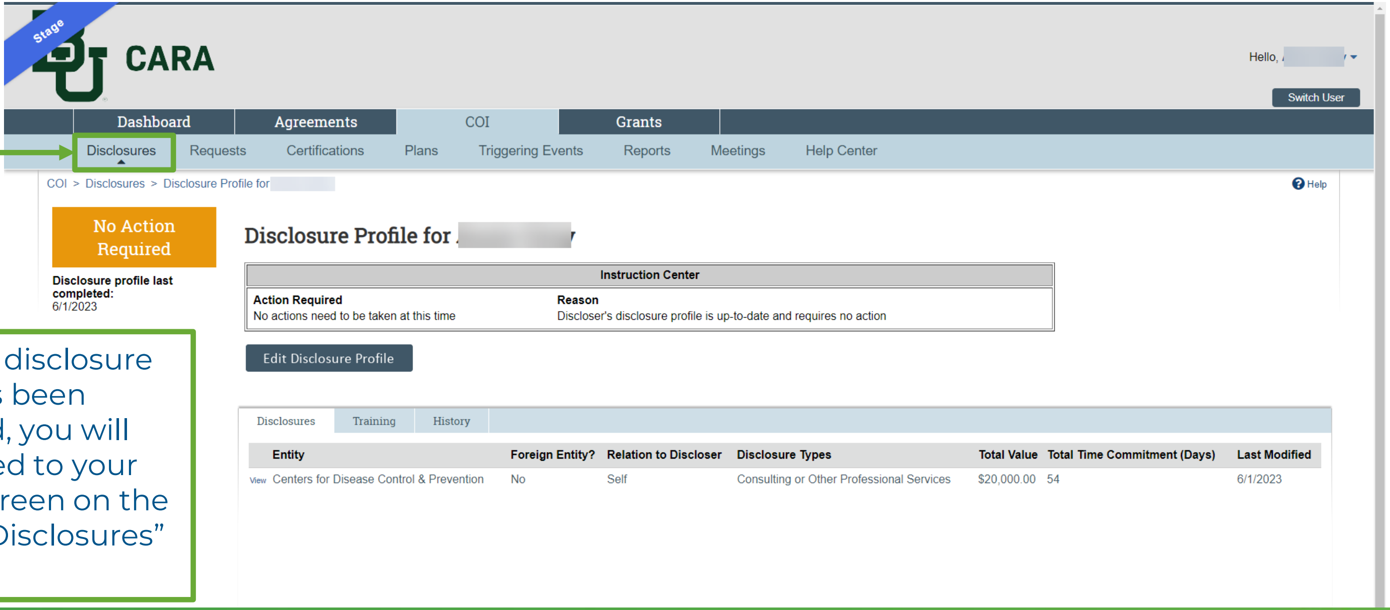
Associated Research Activities

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.



Completed Disclosure

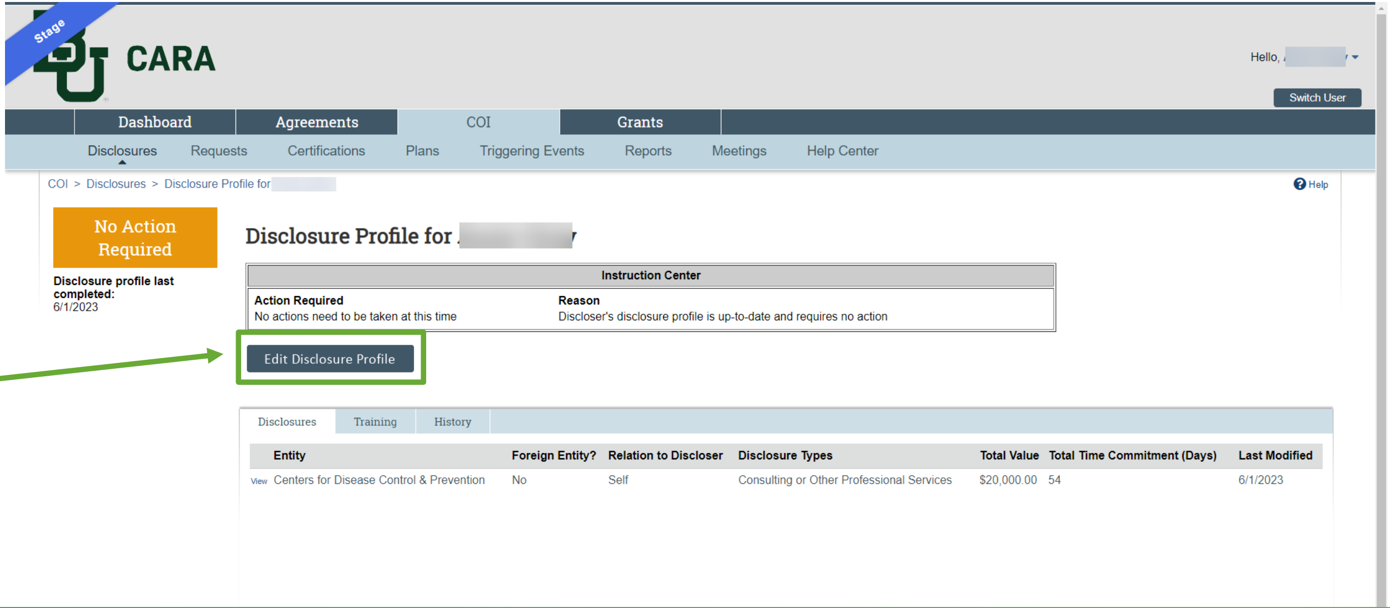
You will see that your disclosure profile has been updated. The details from the questions you answered are reflected in your COI **Disclosures** screen.



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**.



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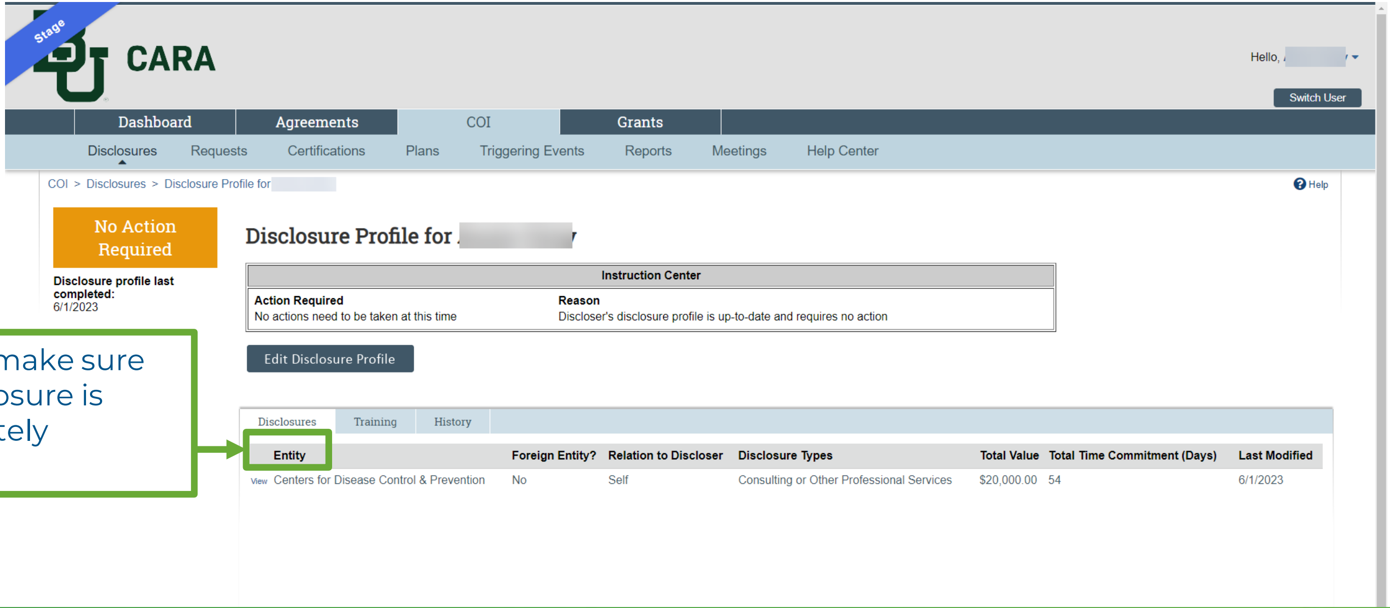
Completed Disclosure

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



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.

You have successfully completed your COI Disclosure Profile Update

cara@baylor.edu
To [redacted]

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

To:	[redacted]
Link:	Disclosure Profile for [redacted] (DP00000064)

Thank you for completing an update of your COI Disclosure Profile. As a reminder, you can always review your interests and make updates as needed. To do so, click the link provided in this email.

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!

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