Disclosers' Guide
Directions for Initiating the Report of Non-University Activities (RNUA) using START
myDisclosures
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Intro

Access START myDisclosures at myresearch.uillinois.edu/myDisclosures/

START myDisclosures is the online application to perform the following processes for compliance with the University Policy on Conflict of Commitment and Interest:
- Academic Staff submit the Report of Non-University Activities (RNUA)
- Unit Executive Officers review and manage RNUA disclosures
- Investigators submit the Sponsor Specific – Significant Financial Interest disclosures
- Investigators manage Sponsor Specific Financial Conflicts of Interest (FCOI)
- Unit Executive Officers review Sponsor Specific FCOI Management Plans
- Investigators or business managers submit FCOI Checklists
- Investigator or business managers track investigator FCOI training

PLEASE NOTE

1. These directions only apply to completion of the electronic RNUA.
2. START myDisclosures is also used for investigators that need to complete a Sponsor Specific Disclosure. This is a separate disclosure from the RNUA but is completed on the same online application tool. You may complete your RNUA and Sponsor Specific Significant Financial Interest disclosure at the same time.
   a. If you do not see the Sponsor Specific Questionnaire as an option to complete on the right side of the screen, then you may need to revise the screening questions regarding your status on the left side of the screen. Click “Update your information” and answer “yes” to screening question #2.
3. There are three possible paths for completing the RNUA:
   a. Staff with nothing to disclose
   b. Staff with activities to disclose that do not meet the significance threshold
   c. Staff with activities that meet the significance threshold or use university resources
4. The system is designed to collect information from academic staff so that University administrators can assess whether the non-University activities or financial interests present conflicts of commitment or interest.
Welcome / Login

- Logon using your NetID and Active Directory (AD) password.
  - You must have a NetID to access the online disclosure application.
  - If you do NOT have a NetID, but think you need access, please contact your human resources department.
  - The login screen is the same for both disclosers and reviewers.
  - Reviewers/Facilitators will be presented with the options to either use the disclosure site (to submit a disclosure) or the reviewer site (to review departments you administer).
- The START myDisclosure application uses your personal identification information and employee appointment information obtained from Banner. If your information is not correct, you must contact your human resources department.

Password Assistance
If you need assistance with your password try resetting your Active Directory password:
- Urbana: https://go.illinois.edu/password
- Chicago: http://password.accc.uic.edu
- Springfield: http://www.uis.edu/informationtechnologyservices/techsupport/reset/

If you have tried resetting your password and are still having problems logging in, please contact your campus help desk:
- Urbana campus: Contact the Technology Services Help Desk at (217) 244-7000 or consult@illinois.edu
- Chicago campus: Contact ACCC at (312) 413-0003 or consult@uic.edu
- Springfield campus: Contact Information Technology Services at (217) 206-6000 or techsupport@uis.edu
Technical Issues
If you experience technical issues with the START myDisclosures application visit https://answers.uillinois.edu/ua, or contact AITS Service Desk at 217-333-3102 or 312-996-4806.
• The system must first determine which disclosures (e.g., Report of Non-University Activities (RNUA), sponsor specific disclosure, or nepotism disclosures) you are required to complete.

• To access the application and start completing your disclosure, click the button located on the center of the screen that says “Determine my requirements.”
Determine reporting requirements

1. Which of the following best describes your employment status at the University (if you are unsure, please check your Notification of Appointment)?

   - Academic Staff/Academic Professional/Faculty/Postdoctoral Associate
   - All other division (e.g., counseling, library, etc.)
   - Other

   Notes to the above:
   - Unpaid appointment, including unpaid internships or student assistant (no compensation)
   - Civil Service
   - Student/medical fellowship
   - Academic staff/professor help
   - Non-University affiliate

2. Are you an investigator or key researcher whose pending or existing award, including one under a cost-sharing agreement that is sponsored by an organization that applies the 2011 Public Health Service (PHS) Regulations or Financial Conflict of Interest (FCOI) rules, check yes if you have federal or nonfederal funding from an organization that applies the PHS rules.

   - No / Not applicable
   - Yes

3. Are you an investigator or key researcher whose pending or existing award, including one under a cost-sharing agreement, that is sponsored by an organization that applies the National Science Foundation (NSF) rules for financial conflicts of interest?

   - No / Not applicable
   - Yes

4. At present, are you and any member of your immediate family paid on the same sponsored research award?

   - No / Not applicable
   - Yes

- Answer the four status screening questions and click the “Submit” button at the bottom of the screen. You may need to scroll down to see all of the information on the screen.
- Based on your answers to the initial questions, the system will summarize your reporting requirements – the disclosures you are required to make – on the next screen.
• On the left side of the screen are the status screening questions. On the right side of the screen, you will access the disclosure questionnaires. Depending on how you answered the screening questions, you may be provided with the following disclosure options:
  o Report of Non-University Activities
  o Sponsor Specific – Investigator disclosures for significant financial interests
  o Nepotism Disclosure [Note: you will be directed to complete a paper form available on your campus COI Office website.]

• Check to see if your status information on the left is correct.
• If not, click the “Update my information” button on the left side of the screen.
• If your status information is correct, click on the “Start new RNUA Disclosure” on the right side of the screen to begin.
Retrospective Time Reporting (for academic staff with 50% or more appointment)

• If you previously completed a Report on Non-University Activities (RNUA), state law requires that you report the amount of time you actually spent on the approved activities.
• If you previously completed the RNUA and report activities, the first page you will see when you start your new RNUA is the “Checking retrospective time” page.
• You must indicate the actual days spent on the activities that were previously approved during the last reporting period.
• You must report the aggregate number of days spent during the last academic year (AY20 = August 16, 2019 to August 15, 2020).
• Enter the number of days in the text box on the right side of the table. Then click on the “Save and Continue” button.
• If your appointment is less than 50%, then you will not see this page.
Guidelines: Report of Non-University Activities

This disclosure satisfies the requirements of the University Policy on Conflicts of Commitment and Interest (COC) which requires you to disclose all income-producing non-University activities. You are also required to disclose activities of you or your immediate family (including unpaid) which may present a conflict of commitment or conflict of interest to your University responsibilities. Depending on your disclosed non-University activities and interests, you may be required to manage or eliminate any conflicts of commitment or interest.

Additional resources and contact information can be found here.

For physicians/dentists, this disclosure is meant to capture your disclosure for certain payments from industry that are reportable under the Physician Payments Sunshine Act. If you are a physician, please indicate below.

- What is a conflict of commitment or conflict of interest?
- What interests and commitments should be disclosed?
- What are examples of activities that do not need to be reported?
- What time period does this disclosure capture?
- What if I don't have any activity to disclose now, but I do later during the reporting period?
- What is a physician?
- What is Organizational Conflict of Interest?

Non-University Activities

Do you have any activities or financial interests to disclose? (see policy and guidelines above) *

Your non-University activities and financial interests, and those of your immediate family members, include but are not limited to:

- Teaching or Instruction
- Appointments or Affiliations (even if unpaid)
- Research or Extension
- Consulting
- Foreign appointments or affiliations, including talent or recruitment programs
- Financial interests with an entity that does business with the University or Hospital
- Involves University faculty, employees, or students
- Uses of University resources or facilities
- Any other financial interests, commitment, or activities (even if unpaid)

- No
- Yes

Are you a physician? *

- No
- Yes
The system will display “Guidelines: Report of Non-University Activities Disclosure.” You are advised to review the guidelines before answering the questions below.
Answer “Yes” or “No” to each of the questions. Refer to the above guidelines and RNUA FAQs for assistance.
Click “Save and Continue.” The application will use your response to administer additional questions as necessary.
Following your response, you will be identified as:
  o Having nothing to disclose.
  o Having activities that require you to provide more information.

NOTE: If you are no longer continuing to engage in your previously approved non-University activities, you do NOT need to report it going forward. Your retrospective time has been provided on the previous page and satisfies the state law requirements.
If you previously disclosed activities on your RNUA, you will be given the option to select your previously entered non-University activities. You have the option to select all or select only those that you want to carry forward or select none.

If you make a mistake by selecting none, you will be able to return to this page from the List of Non-University Activities page and be able to add the selected activities at a later time.
RNUA / Activities to Report: List Non-University Activities

- Because you indicated on the RNUA screening question that you have a non-University activity that requires reporting, you must enter one or more activities separately.
  - Please be sure to enter each activity with an entity (e.g. company, organization, self) separately.
  - You may enter as many non-University activities as needed.
- Click “New Activity.”
- Activities that you selected to carry forward from your previously entered activities, will automatically appear in the list of your non-University activities.
  - The completion status for the previously entered activities is always “No” when initially transferred.
  - You must use the “Edit” function in the Action column to edit each of your previously entered activities.
    - You must answer questions about procurement. (Will the entity do business with the University?)
    - Select appropriate option for the level of financial interest range.
    - You must add the Prospective time you request for the previously entered non-University activities. Prospective time is the amount of time you expect to spend on this activity for the academic year (AY20 = August 16, 2019 to August 15, 2020).
    - You must also answer the questions on your / your family’s role with the Entity if that information was not previously provided.
    - Update your disclosure as needed.
• If you made a mistake of adding an activity you do not want to report, use the “Delete” function under the Action column for each activity you need to remove.
• If you decide that you have no activities to report, but made a mistake by adding a new or carrying forward a previously entered activity, then you must use the “Delete” function under the Action column to delete the activities. Once you have deleted all activities, you will have an option to “Go back and update your answers” to the initial RNUA screening questions. On the RNUA screening questions, you should change your response to question 1 to “No” if you have no activities to report in order to proceed to the certification and submission of your RNUA.
You are in the “Entity” section (see Navigation Bar on the top right of the section).

Enter the name of the non-University entity, organization, or individual.

Be specific. DO NOT enter general descriptions such as:
  o Consulting
  o Owner

Provide a description of the entity’s activities, products, and/or services. Use the cursor on the lower right hand corner to expand the size of the text box. The entity description is limited to 500 characters (or letters, spaces, etc.). If you need to provide more information, you should use the attachment section at the end of the disclosure. PDF attachments are preferred.

You must also identify if the entity is US or outside the US or collaborates with foreign entities.
  o Identify if the entity is a talent or recruitment program or associated with one.
  o Select the non-US country.

Select the “Save and Continue” button.
You are in the “Interest/Time” section (see Navigation Bar on the top right of the section).

The entity’s name is displayed at the top of this section (See blue bar).

For the named entity, provide information related to:
  o The level of your financial interest
  o Use of University Resources

Questions will expand based on your responses.

You must answer all questions with an asterisks. If you miss a question with an asterisks, the form will prevent you from saving and continuing.

When all questions have been answered, click the “Save and Continue” button.

Note: Your responses on this page trigger the application to determine whether the activity reaches the University’s significance threshold or uses University resources.

If the activity meets the significance threshold or uses university resources, you will be required to complete additional information about the activity. Providing this information is required by the University Policy on Conflict of Commitment and Interest. This
information will be used to help your Unit Executive Officers assess whether the activities present conflicts of commitment or interest and how to manage or eliminate any conflicts of commitment or interest.

- If the activity does not meet the significance threshold and does not use University resources, then you will be asked a shorter set of questions. You will be required to provide information about your time commitment (if your appointment is 50% or more), your/your family’s role with the entity, and if applicable, your or your family member’s fiduciary responsibilities. After you complete the description of your/your family’s role, you will return to the List of You Non-University Activities. A summary section will now appear and the activity you have just described will be on the list. At this time, you may edit or delete this activity as needed.
For the named entity, provide information related to:
  - Your time commitment with this entity
    - Retrospective time commitment (Note: if you completed the section on Checking your retrospective time for this activity, then the response you provided earlier will auto-fill in this section, you may edit if needed).
    - Prospective time commitment

You must answer all questions with an asterisks. If you miss a question with an asterisks, the form will prevent you from saving and continuing.

When all questions have been answered, click the “Save and Continue” button.

If your appointment is less than 50%, then you will not see this page.
RNUA: My/My Family’s Role with the Entity

In both questions, you may select more than one option. Select the most appropriate answer(s).

If the answer you selected expands, please provide additional information as required.

If you indicate that you or your family member has a fiduciary role with the entity, you will be asked a few more questions about your and your family’s responsibilities on the next screen (shown below).

After you answer the questions click the “Save and Continue” button.
If you indicate that you or your family member has a fiduciary role with the entity, you will be asked a few more questions about your and your family’s responsibilities.

Either select the check box “self” for yourself or use the text box to list your family member’s name.

Complete the information about yourself or your family member. Answer questions only for yourself or the named individual.

After you answer the questions click the “Save and Continue” button.
On the summary page, you will see a list of yourself or family members you enter.
Repeat this section for each family member involved in the entity. You may add as many family members as needed.
You can click on the down arrows on the right to see a summary of family responsibilities for each person listed.
Use the icons on the right (blue pencil or red X) to edit or delete.
When you are finished adding information for yourself and your family, click “Save and Continue.”
Your responses on level of financial interest page trigger the application to determine whether the activity reaches the University’s significance threshold or uses University resources.

- If the activity meets the significance threshold or uses university resources, you will be required to complete additional information about the activity. Providing this information is required by the University Policy on Conflict of Commitment and Interest. This information will be used to help your Unit Executive Officers assess whether the activities present conflicts of commitment or interest and how to manage or eliminate any conflicts of commitment or interest.
- You will be asked about the Entity’s relationship to your University responsibilities.
- If you indicate that they are related, additional choices to identify how the activity is related will appear.
- If you indicated that your university research was related to the entity, the instructions will inform you that after you complete your RNUA disclosure, you will be directed by the application to complete a SFI disclosure under the Sponsor Specific Questionnaire. This will provide the COI Office with additional information to identify and manage any conflicts of interest related to sponsored research projects.
- Click “Save and Continue.”
You will be asked about the involvement of other University personnel.
If you answer Yes, you will have the opportunity to add people involved in the activity on the next screen.
Click the green “Save and Continue” button.
Adding information about a non-University activity

For: test

Add University Person

University Email: [email protected]

First and Last Name *

Department

Describe his/her involvement with the non-University entity *

- Internal (e.g., he/she is involved with the non-University entity through his/her University role/responsibilities and not through outside employment.)
- External (e.g., his/her involvement with the non-University entity is not a function of his/her University role/responsibilities)

His/Her affiliation with University *

- Faculty
- Staff
- Student

Does he/she have a University reporting line to you? Or do you have any oversight for this person (e.g., student is enrolled in your course)? *

- No
- Yes

Does he/she have a familial relationship with you? *

- No
- Yes

If you have a letter disclosing this outside interest to any of the individuals listed above, you will be able to upload it before you submit your disclosure.

[Add New Person] Back

Adding information about a non-University activity

For: Permanent Perennials

Add Additional University Persons

List each person involved with this activity separately

Your disclosure of the University person involved with this activity does not act as approval for their involvement. The faculty and academic staff members need to obtain prior approval from their Unit Executive Officer.

Other University persons involved with Permanent Perennials:

[Phyllis Pnox]

[Add Person]

Save and Continue Back Cancel
Click “Add New Person” to go to the summary page for people involved in the research.

Enter each University person involved with the entity separately.

Add the person’s email address. When the RNUA is approved, this person will receive an automated email notification letting them know you disclosed the activity and how to contact someone if there are any concerns. This is a requirement of the University policy.

NOTE: You may proceed without adding the email address, however, you will be responsible for documenting the notification to the named person.

You will be asked a series of questions about the University Person identified. Answer the questions specific to the University Person named.

On the summary page, you will see a list of University Persons you identified.

You can click on the down arrows on the right to see a summary of information about the University Person named.

Use the icons on the right (blue pencil or red X) to edit or delete.

Repeat this section for each University Person. You may add as many University Persons as needed.

When you are finished adding information for the University Person(s), click “Save and Continue.”
You will be asked about the use of intellectual property (IP).
If you answer Yes, you will have the opportunity to add a description of the IP being negotiated, optioned, licensed, or otherwise on the next screen (below).
Click "Add Intellectual Property."
Enter IP disclosures one at a time; you may add as many IP disclosures as needed.

On the summary page, you will see a list of University IP you identified.
You can click on the down arrows on the right to see a summary of information about the University IP named.
Use the icons on the right (blue pencil or red X) to edit or delete.
Repeat this section for each University IP description. You may add as many University IP descriptions as needed.
When you are finished adding information for the University IP, click “Save and Continue.”
You will be asked about the Use of University Resources.

- If you answer "Yes," the application will expand and require you to answer additional questions.
- Once you have completed this section click the green "Save and Continue" button.
You’ve indicated that you have a non-University activity.

Next, you’ll answer a set of questions about each non-University activity or interest that you have.

When you’ve finished listing and answering questions for each activity or interest, you will have a chance to review your list before submitting your RNUA.

### My Non-University Activities

<table>
<thead>
<tr>
<th>NAME</th>
<th>FINANCIAL INTEREST</th>
<th>RETROSPECTIVE DAYS</th>
<th>PROSPECTIVE DAYS</th>
<th>COMPLETE</th>
<th>ACTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>TEST</td>
<td>$0 - $4,999</td>
<td>1</td>
<td>1</td>
<td>No</td>
<td>Edit</td>
</tr>
<tr>
<td>Big Business</td>
<td>$0 - $4,999</td>
<td>2</td>
<td>2</td>
<td>Yes</td>
<td>Edit</td>
</tr>
</tbody>
</table>

At this point, you have returned to the summary of your non-University Activities.

The summary table lists the name of the entity, the level of the financial interest, the number of retrospective and prospective days.

The summary table identifies if the entry for the activity is complete. If the entry is not complete the table will say “No” under the column for “Complete.” You will not be able to submit your RNUA until all activities are listed as “Yes” in the “Complete” column.

You have the option to edit or delete activities.
• Once all activities are listed and complete ("Yes" is indicated in the complete column), you may click "Continue" to certify your disclosure.
• This will take you to a page where you have an option to upload an explanation or add comments in the comment box. Uploading additional documents is not required but may be necessary for certain disclosures that require more information or management.
RNUA – Add Attachments or Add Comments

Add Additional Information

Optional: Use this page to upload documents or add comments about your RNUA disclosure.

Choose file

Upload now

Add Comment:

Please note that all of the time I spend on my two companies is spent during weekends and vacation time.

Continue to certification and submission  Back

- Uploading files or adding comments is optional.
- You will not have access to upload documents or add comments if you indicate on the RNUA initial screen question that you have no activities to report.
- This page provides you with the option to upload a document or write comments in the text box.
- To upload a document click “Select a file.” The application will allow you to browse your computer to find the file you want to upload. You may upload any type of file (Word, Excel, PDF, etc.).
  - The file name cannot be longer than 60 characters. If you have trouble uploading a document, try renaming the document with a shorter name.
  - It is recommended you label the document clearly. (For example: Name of Company Business Plan 2019)
- This functionality may be helpful for certain individuals who have documentation related to the disclosed activities such as:
  - Letters of explanation to students, faculty or staff
  - Time records
  - Employment records
  - Company descriptions
  - Executed conflict management plans related to activities within the disclosure
- Uploaded documents and comments will be shared with your Unit Executive Officer and will be a permanent part of your RNUA record once the review of your disclosure is completed by your Unit Executive Officer.
- Once you have uploaded your documents or added any comments as needed, you should continue by clicking “Continue to certification and submission.”
RNUA – Review and Certify

Review and Certify

This disclosure satisfies the requirements of the University Policy on Conflicts of Commitment and Interest (POCCI), which requires you to disclose all income-producing non-University activities and all activities (including unpaid) which may present a conflict of commitment or interest to your University responsibilities. Depending on your disclosed non-University activities and interests, you may be required to manage or eliminate any conflicts of commitment or interest.

You’ve listed the following non-University activities:

- Perfect Pants, LLC
- Permanent Perennials

Need to make changes to this list?  
Review your information

I affirm that I have read the University’s Policy on Conflicts of Commitment and Interest and the information I have provided is true to the best of my knowledge.

If changes in activities or interests occur during the year, your disclosure must be updated and approved by the UEO prior to engaging in the activity or interest.

Submit My Disclosure  Back To Guidelines

Check the box after reading the Policy on Conflicts of Commitment and Interest and select “Submit My Disclosure” to complete the process.

- This page reminds you to read the University Policy on Conflict of Commitment and Interest (POCCI).
- Once you have read the POCICI, check the box to affirm that you have read the POCICI and that your disclosure is true to the best of your knowledge.
- You cannot submit your disclosure without completing the certification.
- If you need to make any changes to the activities you reported, click “Revise your information” located in the right side column located on the middle of the screen.
- Click the green “Submit My Disclosure” button to submit your RNUA to your Unit Executive Officer.
If you indicated on the initial RNUA screening questions that you are a physician, you are required to complete an additional certification.

Follow the instructions and links to access the Open Payments database.

Using the Open Payment search tool, conduct a search for your name in the database.

If payments in your name appear in the database, consult the University’s guidance on what payments require disclosure.

If the nature of the payment requires disclosure, then revise your RNUA as needed. Click on “Revise your information” to go back to the initial screening questions to revise your response or summary of your activities to edit or add to your list of activities.

Once your activities are complete and consistent with the data in Open Payments as required by the University, then click on the “Submit My Disclosure” button to submit your RNUA to your Unit Executive Officer.
RNUA – Review and Certify (Terms and Conditions)

You’ve listed the following non-University activities:

- Faculty Start-Up Business

You will be required to certify that you will follow the Terms and Conditions to manage any conflicts if one of the activities you reported represents a significant financial interest and meets any of the following:
  - Uses University resources;
  - Involves University faculty, staff, or students;
  - Licenses University intellectual property.

Once you have read the Terms and Conditions, check the box to affirm that you will abide by the Terms and Conditions.

You cannot submit your disclosure without completing the certification.

If you need to make any changes to the activities you reported, click on “Revise your information” located in the right side column located on the middle of the screen.

Submitting your disclosure represents your virtual signature.

Click the green “Submit My Disclosure” button to submit your RNUA to your Unit Executive Officer.
If you identified an entity that is based outside the US, on the Review and Certify page a message will be included explaining that your disclosure will be shared with the University’s export control officer as part of the COI Office’s routine reporting. You are encouraged to contact the Export Control Office with any questions, uicexport@uic.edu.
After you submit your RNUA, the disclosure will be routed to the Unit Executive Officer (UEO) of your home department.

When you submit the RNUA it is not yet approved. You can use START myDisclosures to monitor the status of the review.

Once you have submitted your disclosure, you cannot edit it. If you need to edit your disclosure prior to review, you may contact the UEO to request that your disclosure be returned for revisions.

Once your RNUA has been reviewed and approved, if you need to update your disclosure to submit a new activity or revise your disclosure, you must submit a new RNUA.

Secondary Appointments

If you have a secondary appointment, the form will route first to your home department; after the home department completes the review, it will route to the UEO of your secondary appointment (if the UEO is different from your home department).

If a second level of review is needed, the disclosure will route to the second level of review (e.g. dean of the college of your home department) after the secondary UEO review is completed.