Update Disclosure Profile

The Disclosure Profile is the focal point of the Huron COI system for the discloser. It provides a summary of discloser's interest and everything that was disclosed previously.

Disclosers need to disclose to their institutions all of their significant financial interests related to their institutional responsibilities.

Disclosers also need to complete training related to the regulations and their institution’s conflict of interest policy.

Update Disclosures

Discloser's record their interests in UTRMS. You will receive an e-mail notification when you need to disclose your interests in the COI module. You can either click the link in the e-mail notification or go to your Disclosure Profile in the COI module to disclose your interest. You can refer the Instruction Center in the Disclosure Profile for the action that you need to take and also the reason for that action.

Note: The Disclosure Profile will be in the Action Required state if you need to update your Disclosure Profile.

To update your disclosure profile

If you do not have anything to disclose, do the following:

1. On the disclosure workspace, click Edit Disclosure Profile.
2. After you have completed your COI training (this could be Huron COI or a third-party training partner like CITI), select the check box for the question 'I certify that I have read and understood the education materials presented to me' on the Instructions and Policies page. Click Continue to move to the next page.
3. Select No for the question 'Do you have any financial interests and/or outside activities to report?'.
4. Click Continue to go to the Complete Disclosure Profile page.
5. Click Complete Disclosure Profile Update and click OK.

Note: The Discloser Profile moves to No Action Required state.

To disclose your interests, do the following:

1. On the disclosure workspace, click Edit Disclosure Profile.
2. After you have completed your COI training select the check box for the question 'I certify that I have read and understood the education materials presented to me' on the Instructions and Policies page. Click Continue to move to the next page.
3. Select Yes for the question 'Do you have any financial interests and/or outside activities to report?'
4. Click Add in the entity disclosures section.
5. Select the Entity, Relation to discloser and Disclosure types. You may also enter your entity in the free text box if you can't find the your entity in the menu. Based on the Disclosure type selected, you get further questions.
6. Answer the questions and click OK to add the entity disclosure or click OK and Add Another to add the entity disclosure and then add another entity disclosure.
7. Click Continue to go to the Complete Disclosure Profile page.
8. Click Complete Disclosure Profile Update and then click OK.

Note: The Disclosure Profile moves to No Action Required state.

Note: You must click Complete Disclosure Profile Update and OK. Submit will not complete this action.

You can View your disclosures by clicking View on the Disclosures tab.
Respond to a Clarification Request

If a reviewer has questions or requires you to provide additional information about 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 pre-approval request. Log on to the system and navigate to your disclosure profile to respond to this request.

- **To review the request details and submit your response**

1. On the disclosure workspace, click **Submit Response** to complete the process.

   ![Disclosure Profile for Owner](image)

2. Click **Update** on the request you are responding to.
   
   **Note:** There may be multiple clarification requests outstanding at the same time.

3. In the Request text field, review the request sent by the reviewer.

4. Review any attached documents.

5. In the Response text box, 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.

6. 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 review and accept a management plan

1. On the disclosure workspace, click Review and Accept Plans.

2. Click Update next to the management plan that you want to review.

   **Note:** There may be multiple management plans to review.

3. Click the management plan document to review the details of the management plan.

4. Select Yes to accept the management plan. Alternatively, select No if you need to clarify the details of the management plan or suggest edits to it.

   **Note:** If you select No, then you have to provide a reason for not accepting the management plan. You can also upload documents to indicate the reason.

5. Click OK.