

Disclosing Outside Interests & Activities Using the Cayuse Outside Interests Module

Quick links & resources:

Cayuse Outside Interests module: https://chapman.app.cayuse.com/

Chapman University Institutional Conflict of Interest policy:

https://www.chapman.edu/campus-services/institutional-compliance-and-internal-audit/institutional-compliance/policies/institutional-conflict-of-interest-for-employees.aspx

Chapman University Sponsored Activity Disclosure Policy for Investigators and Directors: https://www.chapman.edu/research/integrity/_files/ds-signed-policy-11142023-skm_c300i23111615400.pdf

Chapman University Research Conflict of Interest webpage: https://www.chapman.edu/research/integrity/financial-conflict-interest/index.aspx
PHS Financial Conflict of Interest Regulations-Promoting Objectivity in Research: https://www.ecfr.gov/current/title-42/chapter-I/subchapter-D/part-50/subpart-F

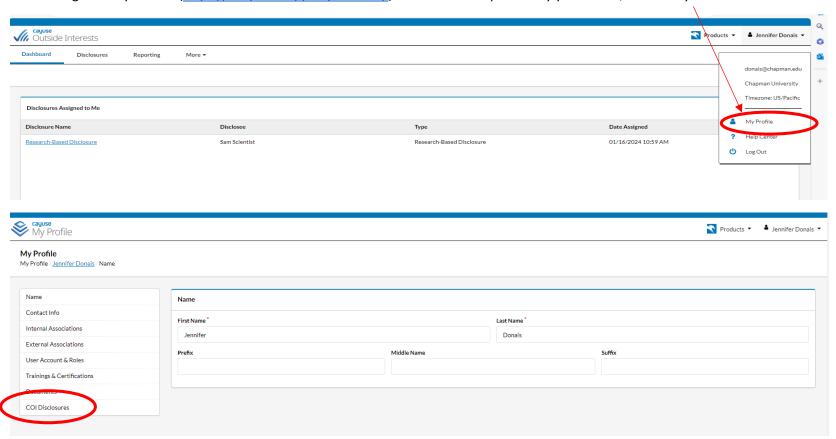
Questions? Contact Jen Donais in the Office of Research and Graduate Education at donais@chapman.edu or by phone at (714) 289-2014

Introduction to Submitting Disclosures of Outside Activities or Financial Interests in Cayuse

Chapman University has implemented the <u>Cayuse Outside Interests disclosure module</u> to enable more efficient management of the faculty disclosure process and to ensure compliance with University and Federal policies and requirements. Under Chapman's <u>Institutional Conflict of Interest and Conflict of Commitment Policy</u>, all full-time faculty are required to disclose their outside relationships/interests annually and to confer with their dean when considering new outside activities. Faculty and other Chapman personnel who are considered *Investigators* on sponsored projects are also required to follow Chapman's <u>Sponsored Activity Disclosure Policy</u>, including disclosing their outside relationships annually, and as new relationships arise, through Cayuse. Directors of Chapman research centers and institutes are also required to follow this policy. Principal Investigators (PIs) should identify others in their research group that meet the definition of Investigator and therefore, should also disclose. PIs are asked to provide information at the time of each proposal how the proposed new project may relate to ongoing outside activities.

A. Step by Step Instructions for Disclosure Submission

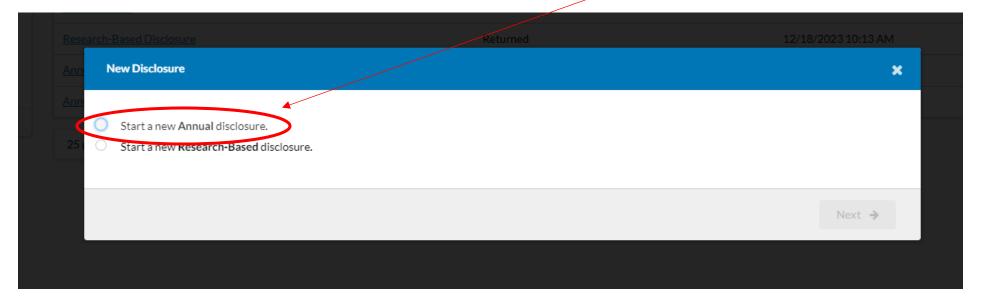
1. Log into Cayuse COI (https://chapman.app.cayuse.com/) and click on drop down by your name; select "My Profile" and then "COI Disclosures"



2. Select + New Disclosure to start either an Annual or a Research Based disclosure (N.B., do not use the "Modify" button on any existing disclosures you've already made).

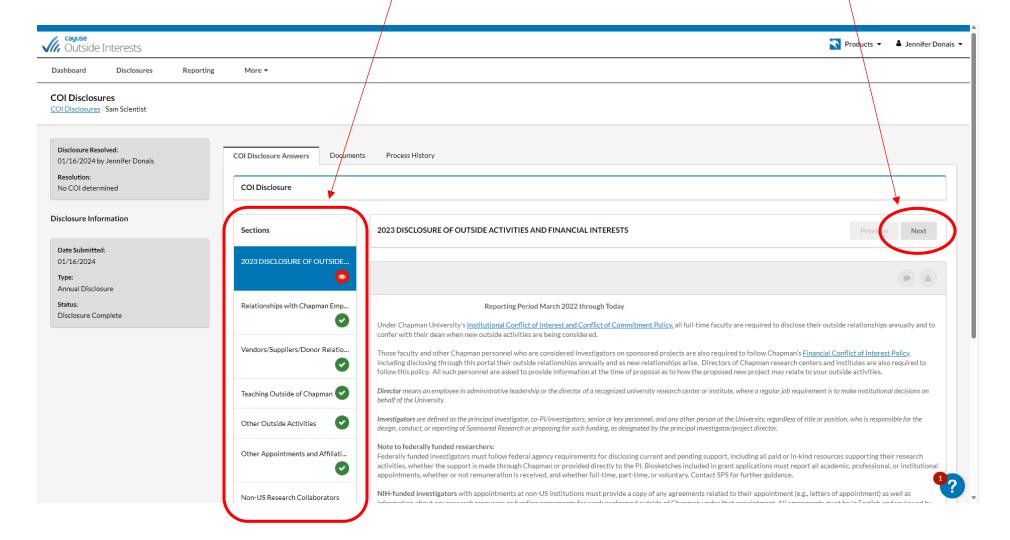


3. Select the type of disclosure you are seeking to make (i.e., Annual or Research Based). For Spring 2025, all disclosures submitted through the system should be "Annual 2024" disclosures.¹

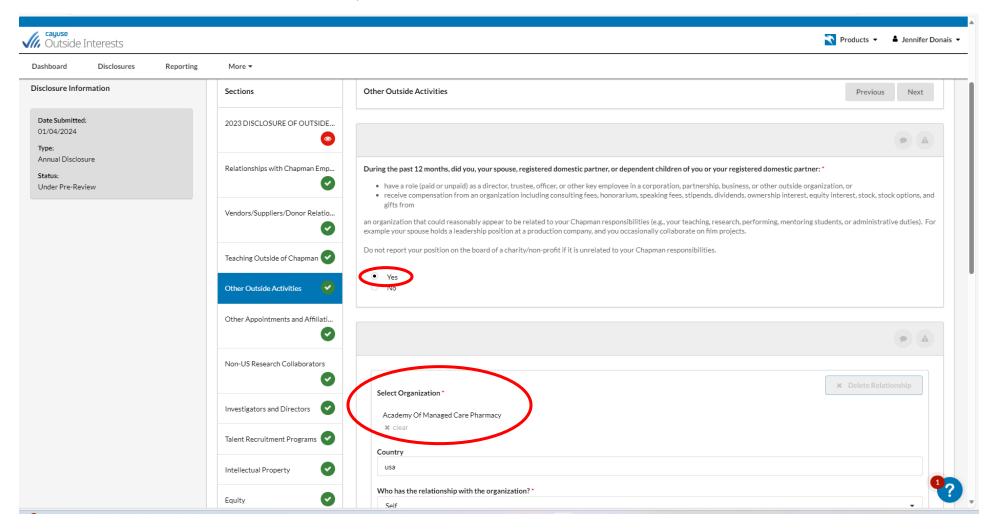


¹ Once your Annual is submitted, use the Research Based disclosure (RBD) to update your activities throughout the year when applying for, or receiving, Federal funding. Please note you may only <u>add</u> entities/engagements using the RBD, not <u>remove</u> them. If an activity has ceased, you should remove it on your next new Annual disclosure. Do not use the "Modify" button for any disclosures. If you wish to document the cessation of an activity before your next annual, please email Jen Donais <u>donais@chapman.edu</u> for assistance.

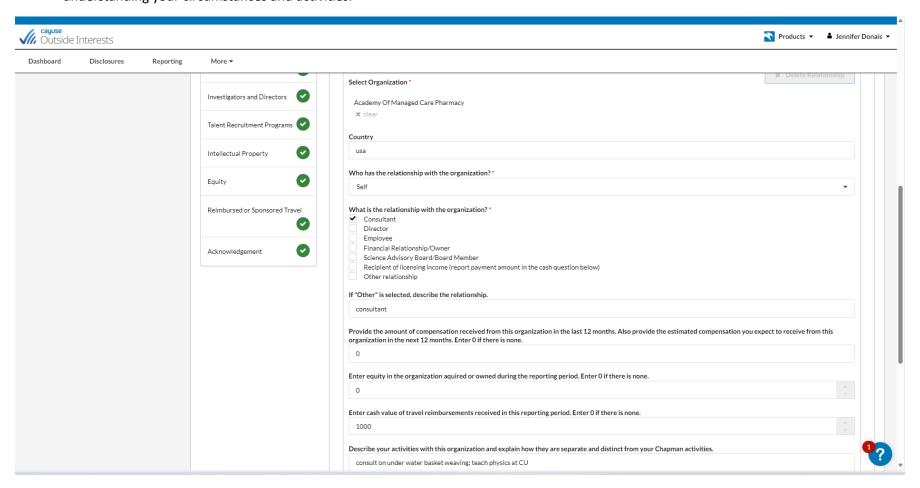
4. Provide appropriate responses and relevant information via the smart form disclosure, navigating to each section by clicking "Next" at the top right or selecting the specific section from those listed down the left side of the screen. The disclosures are smart forms with branching logic that will reveal follow-up questions or necessary actions (e.g., add a relationship with an outside organization) based upon your yes or no answers.



5. The system will launch a relationship form when disclosers click "Yes." This section of the form captures information about Significant Financial Interests (SFIs) you have from relationships with outside organizations. The "SFI" relationship form captures information helpful for conflict of commitment/conflict of interest review and analysis.

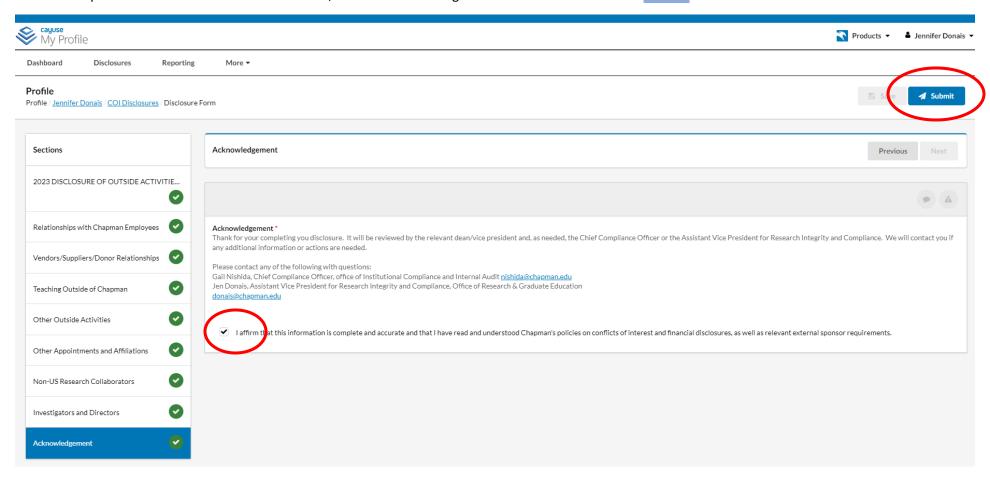


6. Search for the organization² and click add, then complete the SFI relationship form by responding to each prompt. (N.B., incomplete mandatory fields will prevent submission; they are marked with a red asterisk.) Provide as much detail in your responses as possible to aid the dean and other reviewers in understanding your circumstances and activities.



² If the organization is not already included in the pick list, follow the instructions in section on Adding Organizations in Cayuse OI.

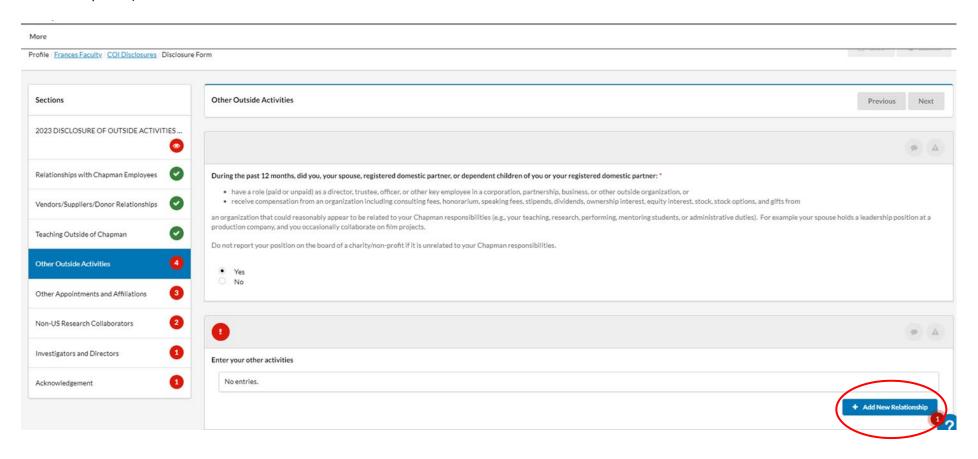
7. Complete all sections of the disclosure form³, click the acknowledgement statement and then the Submit button.

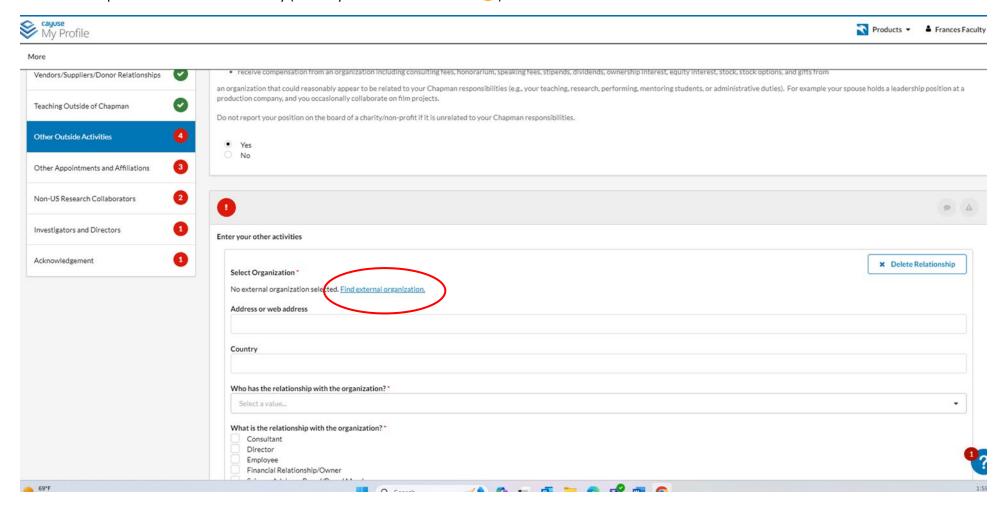


³ If you answered "No" to each question, the disclosure will be automatically approved, and you will receive a confirming email.

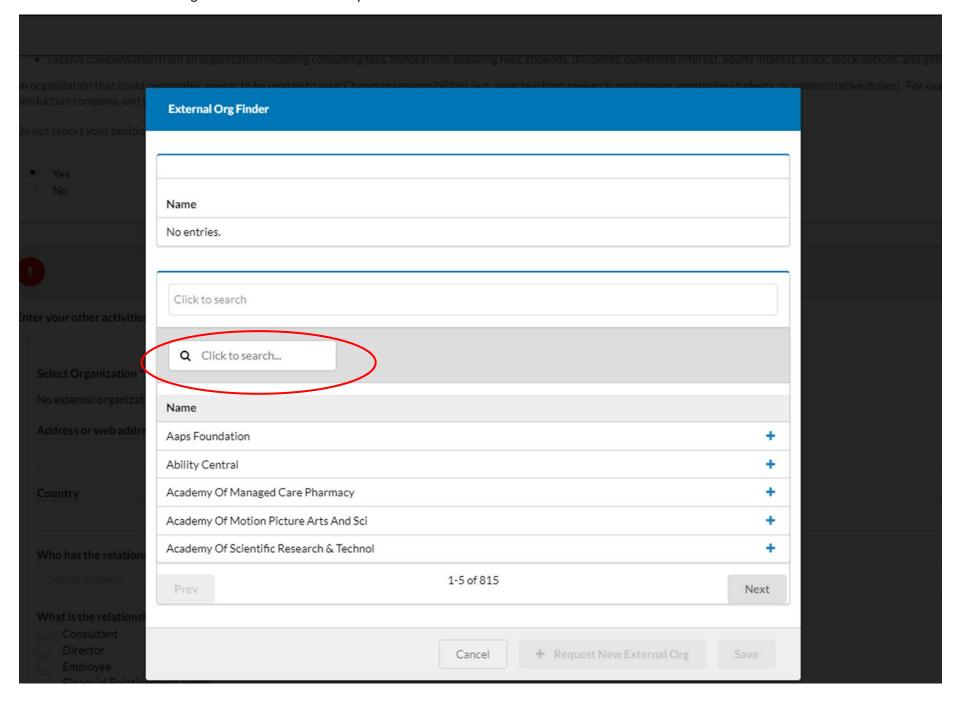
B. Adding Organizations to the Cayuse OI Module

1. Select +Add New Relationship after answering "Yes" to an outside relationship question (e.g., "Other Outside Activities" or "Teaching Outside of Chapman").

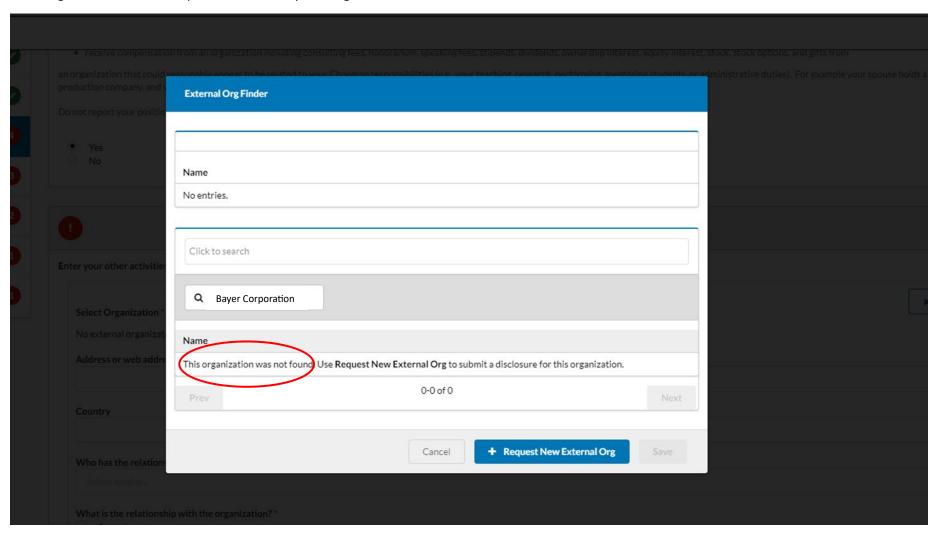




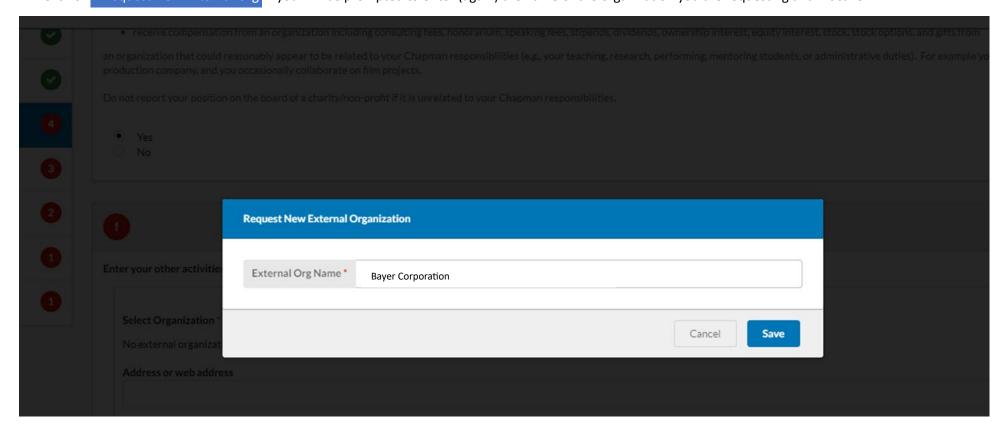
3. Search in the External Org Finder screen for the entity.



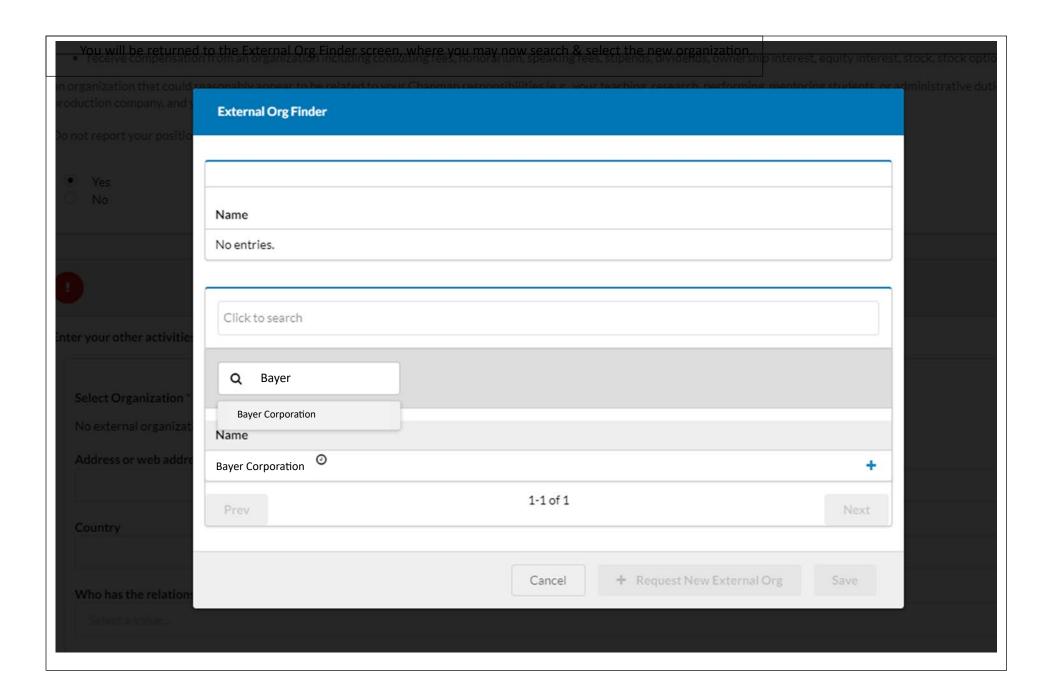
If the organization isn't in Chapman's database, you will get a screen that looks like below:



4. Click on + Request New External Org - you will be prompted to enter (again) the name of the organization you are requesting and hit save.

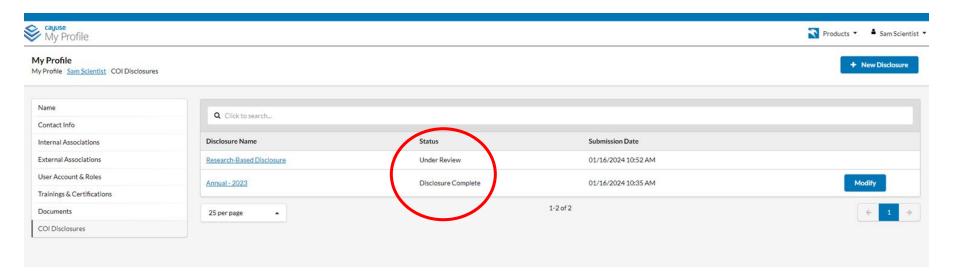


You will be returned to the External Org Finder screen, where you may now search & select the new organization.



C. After Disclosure Submission

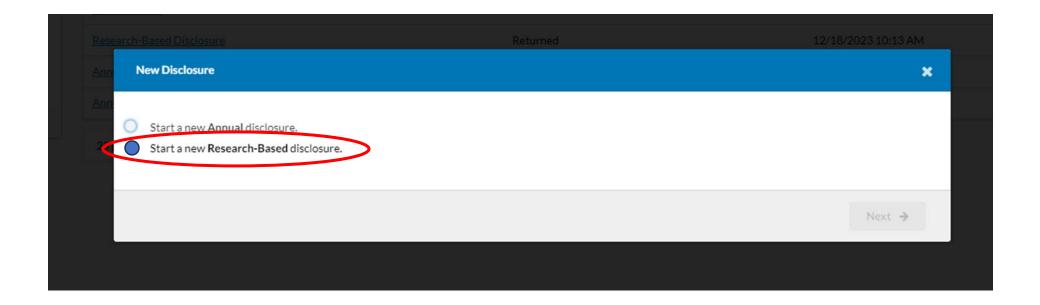
Once you have completed and submitted your disclosure, your dean and others on the disclosure review team will take over the process; they will be in touch with you as needed for clarifications or additional information. You can check the status of your disclosures in the system at any time by selecting "My Disclosures" from the "My Profile" page.



Disclosed activities and interests are reviewed for overlap with Chapman responsibilities or interests and, as required in particular cases, with Federally funded research projects. Chapman is obligated to identify any Significant Financial Interests (SFIs) that overlap with Federal research, manage or mitigate any resulting conflict, and report as required to Federal sponsoring agencies.

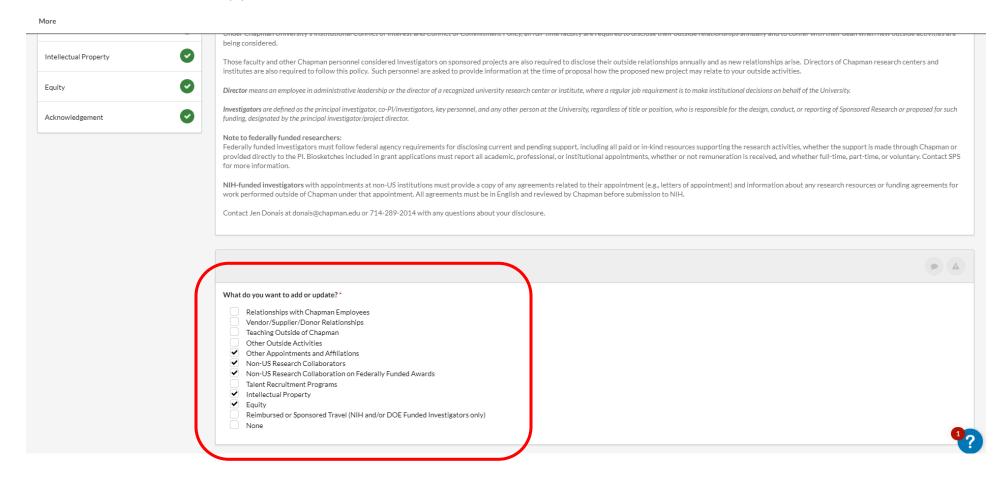
D. Updating a Disclosure

Investigators who experience a triggering circumstance⁴ after submission of their Annual disclosure (prior to the next Annual) must use the Research Based disclosure (RBD) to add new activities, engagements or relationships. (N.B., <u>you should not remove existing relationships/organizations using the RBD</u>, although the system offers you that option; any deletions you wish to make to existing relationships/activities should be made upon the submission of your next Annual disclosure; contact Jen Donais if you have questions or concerns regarding the cessation of an activity previously reported.)



⁴ For Federally funded faculty, triggers include submission of a Federal proposal, receipt of a Federal award, or the addition of a new activity/engagement. Federal regulations, policies and guidance mandate that these events prompt you to update your disclosure so Chapman can evaluate the new relationship and advise you on any steps needed to comply with Federal requirements.

Once you have launched the RBD, you should use the check boxes to indicate those sections where you need to add information (this step opens them up for updating). The system will carry forward any existing organizations/relationships for you to review and affirm. (Please remember, even if that engagement has ceased, do not delete it here – simply review and affirm; deletions should be done at the next annual disclosure submission.)



Research Based disclosures, and any engagements they include, will be reviewed and analyzed for relatedness to Federally funded activities; resulting actual or perceived conflicts of interest will be managed and reported, or eliminated, as required by the applicable Federal regulation, policy or guidance.

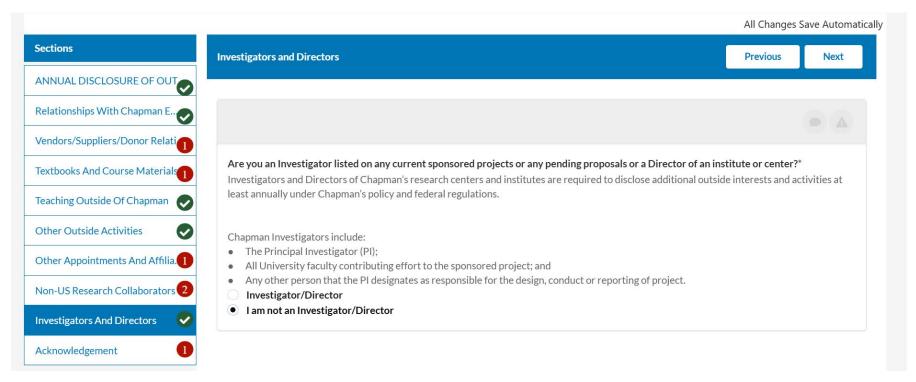
E. Troubleshooting Submission Issues

I am having trouble logging onto the Cayuse OI module.

If you are having trouble launching the OI module, it may be helpful to clear your browser's cache/history. Sometimes, trying a different browser also solves the problem.

No SUBMIT button is available to me after I completed my disclosure form.

First, be sure to check that all sections are completed. One quick way to check is to look at the lefthand navigation. Incomplete sections appear in red vs. green and include the number of unanswered questions in each section, as shown below:



Sometimes the submit button is unavailable because a user entered entity information in response to a "yes" answer and then changed the response to "no" without deleting the entity information in the relationship form. This can cause a submission problem, which can be prevented by ensuring all text entered about an entity in the relationship form is deleted when you are changing a response from yes to no.

If you answered yes to any of the questions and were prompted to enter an outside relationship, sometimes the fact that the entity is not on the organizations pick list can cause submission problems. If you have added an entity in your disclosure, but it was not one from the drop-down list, please reopen your disclosure form and re-select the entity, which should now be on the pick list. Once this is done, submission is typically enabled.

I do not have any tasks assigned to me in the Cayuse OI module.

Your disclosure will not show up in your task list – please follow the navigation instructions provided in the step-by-step instructions above (that is, go to "My Profile" and "Outside Interests").

Who should I contact for help?

If you have questions or need assistance using the Cayuse OI system, please contact Jen Donais in the Office of Research Integrity and Compliance at donais@chapman.edu or via phone at (714) 289-2014.

F. Frequently Asked Questions about Outside Interest Disclosure

What is an Outside Interest?

An Outside Interest is any non-Chapman source of remuneration, income or equity/ownership/value. This could be from engagements such as non-Chapman teaching activities, consulting, research appointments at other institutions, editorships, etc. Most of the time, faculty outside activities are causes for celebration and a source of institutional pride, indicative of the excellence and relevance of Chapman's academic contributions.

Occasionally, Outside Interests give rise to Conflicts of Interest (COIs) when the non-Chapman interest overlaps with Chapman responsibilities, obligations, or institutional interests. However, even in such cases, many activities can be approved.

Why is it important to disclose Outside Interests?

It is crucial to maintain transparency in order to fulfill our ethical obligations to our students, sponsors, donors, and the public consumers of Chapman research, scholarly and creative outcomes. Consistent with our <u>Code of Ethics</u>, Chapman University is committed to fostering an environment where individuals act responsibly and accept accountability for their actions and behaviors. The University expects all of its community members "to act in an honest, transparent and truthful manner." In addition, where the University compensates individuals on a full-time basis, it rightly expects its faculty and staff to honor their trust obligation toward Chapman with fulsome disclosure of Outside Interests. Finally, faculty who enjoy sponsored funding from Federal agencies may be required to make regular disclosures in order to comply with regulations and requirements.

What happens if an Outside Interest is deemed a COI?

In circumstances of actual or apparent conflicting interests, Chapman would typically implement mitigations, in addition to disclosure, to "manage the conflict." COI management plans typically require broad disclosure (e.g., in related publications and presentations, to lab teams or collaborators), ongoing communication as circumstances develop, preclusion to involving Chapman students or staff in the outside engagement, etc. Each circumstance is analyzed and evaluated individually, and the offices of Institutional Compliance and Research Integrity and Compliance work together with faculty disclosers, deans, the Provost and other relevant campus leadership to determine whether a situation requires COI management and what that management plan should include. Rarely, a conflict is so substantial that the only way to mitigate it is to eliminate it entirely, for example through stepping down from a position or selling a company. Most academic conflicts of interest are manageable through a series of recognized mitigations and management steps.

What is a conflict of commitment?

Unlike a financial conflict of interest which involves money, a conflict of commitment impacts an individual's ability to fulfill his or her obligations to Chapman (such as teaching courses, advising students, etc.) because it takes him or her away from University activities. Under Chapman's Faculty Handbook, full-time University faculty are allowed to spend up to one day per week during academic periods engaged in outside activities, subject to disclosure and prior approval. This allowance recognizes the benefit – to the University, its students and the community – of faculty engagement in opportunities outside of Chapman which help to develop and enhance faculty's expertise, teaching and research, creative or scholarly activities.

Do I have to submit a disclosure if I have no activities or interests to disclose?

Yes, all faculty must submit a disclosure. The disclosure form allows disclosers to indicate negative responses to all the questions (e.g., do you teach outside of Chapman?), and if all answers are no, the disclosure is automatically approved.

What if I acquire a new Outside Interest after submitting my annual disclosure?

Faculty should update their disclosures as needed. Federally funded faculty, in particular, are obligated to refresh and update their disclosures whenever new activities or interests arise. The University is obligated to evaluate such updates and determine if any disclosed interest or activity is related to a Federally funded project. Annual disclosures can be updated after submission by utilizing the Research Based Disclosure (RBD), so-called because updates are typically in response to submitted proposals. The RBD allows any faculty to update any section of an already submitted disclosure with new information.

If you have a question about updating your disclosure after it has been submitted, please contact the Office of Research Integrity and Compliance for assistance.

Please know that we are here to help. If you have any questions or technical challenges, please do not hesitate to reach out to Jen Donais in the Office of Research Integrity & Compliance at donais@chapman.edu or 714-289-2014.