2014 Annual Conflict of Interest (COI) Disclosure Available February 3rd!

Annual COI Disclosure season has arrived! Annually, all faculty and staff are required to complete a COI disclosure. External activities, interests, and relationships meeting certain criteria must be disclosed and are assessed to determine whether or not they could potentially interfere with, detract from, or influence University obligations and responsibilities.

The Annual COI Disclosure processes will be available in FASIS from February 3rd through March 3rd.*

The timing of this year's disclosure cycle is due to the consolidation of the annual staff, faculty, and research COI disclosure processes; individuals with multiple roles can now meet all annual COI requirements simultaneously.

The COI disclosure will be accessible in the FASIS Portal on February 3rd. A go-live email will be sent to all faculty* and staff on February 3rd with specific access and disclosure instructions.

*Faculty with a primary appointment in Feinberg School of Medicine can complete their annual faculty disclosure in The Joint Affiliate Annual Disclosure of External Professional Relationships Survey starting February 17th.

Faculty & Staff who are Researchers
For those faculty and staff involved in research funded by certain sponsoring agencies, you may have already submitted conflict of interest disclosures in FASIS due to research conflict of interest disclosure requirements. If you have completed a research conflict of interest disclosure in FASIS, and you disclosed external activities or relationships that occurred during this annual conflict of interest disclosure period (January 1, 2013 through December 31, 2013), any positive responses to the relevant questions in this annual faculty conflict of interest disclosure will be prepopulated with your responses from the research conflict of interest disclosure.

Also note that there are now only four (4) research questions to streamline the disclosure process.

Verify Staff COI Approvers in FASIS
To facilitate a smooth staff COI disclosure process, managers are strongly encouraged to proactively verify that the staff COI approvers in FASIS for their employees are accurate; this will ensure that COI disclosures are routed to the appropriate approvers. Click here to learn how managers and administrators can update COI approvers for their staff within FASIS.

Updates for Staff Disclosers
This year's FASIS staff COI pages include several enhancements. Rather than solely allowing text comment responses, staff disclosers will be required to provide specific information in designated fields if they respond “yes” to any question. The additional detailed information will allow managers/approvers, and the Staff COI Committee, to better assess situations and/or relationships for potential COI concerns.

Updates for Staff COI Approvers
The approver pages in FASIS are structured differently than in past years; while disclosures require review and a COI designation/approval (e.g., a status of “No Conflict” or “Conflict Managed”), all comments relative to a staff COI disclosure may be entered into one “Comment” page, rather than a separate comment page relative to each “yes” response by question. However, approver comments relative to each “yes” response must be addressed on the “Comments” page. For example, if a staff member responds “yes” to question number one and question number three, an approver’s comments on the “Comments” page must reflect assessment of what was disclosed in both question number one and question number three. Other changes include a “Monitor Compliance” page, which offers you a global view of all employees’ disclosure submittal and disclosure approval statuses as well as an ability to view all disclosures. The “Monitor Compliance” page also includes a “Send Email” button which will automatically send an email reminder to any staff members who have not yet completed their disclosure. The “COI Reviewer” page serves as your task list; this is the page you will use to make COI designations/approvals (e.g., “No
Conflict” or “Conflict Managed”) as well as enter comments relative to staff COI disclosures that include any affirmative responses.

While the new staff COI disclosure pages are very straightforward, the “approver” pages for managers are quite different than previous years. Managers are strongly encouraged to participate in one of the four online training opportunities detailed below. Training and resources (including a Staff COI Approver Tip Sheet) can be found on the NUCOI website. Managers may also contact NUCOI at any time with questions or concerns.

NUCOI and FASIS are continuously working to identify opportunities to improve the user experience and facilitate streamlined processes, all while ensuring compliance. We appreciate your patience and flexibility as we roll-out, and subsequently assess, various changes.

FASIS online training sessions:

**HRS221: Staff COI for Employees and Managers**

- 2/4/2014: 11:00 a.m.
- 2/5/2014: 1:30 p.m.

**HRS223: Staff COI for Managers Only (COI Approvers)**

- 2/25/14: 11:00 a.m.
- 2/27/14: 11:00 a.m.

COI disclosure requirements and the procedures for handling potential conflicts of interest are outlined in the University’s Conflict of Interest and Conflict of Commitment policy.

For questions regarding COI policies and procedures, please contact NUCOI at nucoi@northwestern.edu or 847.467.4515. For additional guidance, please refer to Training and Resources for the annual staff COI disclosure process.

For technical issues, please contact the FASIS Help Desk at 847.467.4800 or fasishelp@northwestern.edu