Researchers and Research Administrators:

As regulating agencies continue to offer clarification, guidance, and interpretations regarding COI requirements, we continue to adjust Northwestern’s policies and practices accordingly.

We are pleased to announce welcome news regarding the timing and frequency of research COI disclosures. The following clarifications and changes relative to research COI disclosure timing are effective immediately:

1. Investigators must submit an initial research COI disclosure in the FASIS system subsequent to 8/24/12; and

2. Investigators must update their COI disclosure within 30 days of acquiring/receiving a new significant financial interest (SFI); and

3. Investigators must submit a research COI disclosure at least annually.

What this means:

- If an investigator has completed an initial research COI disclosure in the FASIS COI system and has no new SFIs to report throughout the year, they need only update/verify their COI disclosure on an annual basis.

- The annual research COI disclosure requirements have been consolidated with the annual faculty COI disclosure requirements – this will occur at the same time annually for all faculty starting in February 2014.

- Investigators do not have to submit a new COI disclosure with every proposal submitted or within the 30-day period prior to a proposal submission solely to acknowledge no change.

- The annual faculty COI disclosure, which will include the required research questions, will be sufficient to meet ongoing research COI disclosure requirements, provided that new SFIs are disclosed within 30 days throughout the year as they occur.

- In lessening overall COI disclosure frequency, it is critical that investigators understand and continue to comply with requirements for disclosing new SFIs within 30 days. For example, if an investigator receives new consulting or travel remuneration meeting the disclosure thresholds, it must be disclosed within 30 days by submitting an update to the research COI disclosure in FASIS. As new SFIs arise throughout the year, they must be disclosed in FASIS within 30 days – investigators may not wait until the next annual faculty disclosure to disclose new SFIs.

Please contact Northwestern’s COI Office (NUCOI) with questions or concerns regarding these changes.

Detailed process information relative to the research COI process has been made available to Northwestern’s community here (login required). Please refer to NUCOI’s subrecipient page for updated information relative to handling of subrecipients.

We continuously update our webpage with new information and resources, so please bookmark us. If you would like to schedule in-person training relative to COI at any School or department meeting, please contact nucoi@northwestern.edu.

QUESTIONS OR HELP?

Email: nucoi@northwestern.edu
Phone: 847.467.4515
Website: http://www.northwestern.edu/coi/index.html