Research Sponsors Subject to Northwestern’s Research Conflict of Interest (COI) Disclosure Requirements

PUBLIC HEALTH SERVICE AGENCIES, NATIONAL SCIENCE FOUNDATION, ALL INDUSTRY-SPONSORED CLINICAL TRIALS
(Automatically pulled into FASIS)

SPONSORS FOLLOWING PHS COI REGULATIONS (Automatically pulled into FASIS)

<table>
<thead>
<tr>
<th>Sponsoring Organization</th>
<th>COI Entity</th>
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<tbody>
<tr>
<td>Alliance for Lupus Research</td>
<td>Arthritis Foundation</td>
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<tr>
<td>American Asthma Foundation</td>
<td>California Breast Cancer Research Program (CBCRP)</td>
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<tr>
<td>American Cancer Society (ACS)</td>
<td>California HIV/AIDS Research Program (CHRP)</td>
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<tr>
<td>American Heart Association (AHA)</td>
<td>CurePSP (Society for Progressive Supranuclear Palsy)</td>
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<tr>
<td>American Lung Association (ALA)</td>
<td>Juvenile Diabetes Research Foundation (JDRF)</td>
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SPONSORS WITH OTHER COI REQUIREMENTS (Automatically pulled into FASIS)

<table>
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<tr>
<td>Alfred P. Sloan Foundation</td>
<td>Burroughs Wellcome Fund</td>
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<tr>
<td>American Diabetes Association</td>
<td>Environmental Protection Agency (EPA)</td>
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<tr>
<td>American Foundation for Suicide Prevention (AFSP)</td>
<td>Institute of Museum and Library Services (IMLS)</td>
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EXAMPLES OF COI LANGUAGE TO LOOK FOR (Not automatic – Check ‘Yes’ to the COI question on the Proposal Routing Form)

An increasing number of research sponsors (outside of those listed above) are including terms and conditions related to COI in proposal solicitations and award and contract documents even though the sponsor may not have “across-the-board” COI requirements like the sponsors listed above do. Below are example excerpts from proposal solicitations and award documents that include COI requirements, even though the sponsor does not have an overall COI policy.

If you see unusual COI language in proposal solicitations and/or award documents from sponsors that are not automatically included in our policy and process via sponsor-wide requirements, please check “Yes” to the COI question on the InfoEd Proposal Routing Form.

Note that some of the language requires disclosure and certification of whether or not a COI exists at the time of proposal submission, which requires NUCOI review prior to proposal submission rather than at award time as is typical – please let NUCOI know as soon as possible when noting language that asks for institutional certification as to whether an individual or organizational COI exists at the time of proposal.

We suggest using a keyword search for “conflict of interest” in proposal solicitations, broad agency announcements, etc. to identify whether or not atypical COI terms are included. Such language is often included in sections titled “Organizational Conflicts of Interest”, “Other”, etc.

Please contact nucoi@northwestern.edu for guidance if you are uncertain as to what the impact of the COI language is and/or if COI certifications are required prior to proposal submission.

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<td>American Fndn for Suicide Prevention</td>
<td>“Award recipients must promote objectivity in research by establishing standards to ensure that the design, conduct, and reporting of research funded under XXX awards are not biased by a conflicting financial interest of an Investigator.”</td>
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<tr>
<td>Department of Defense</td>
<td>“Organizational and Individual Investigator Conflicts of Interest: All conflicts of interest on the part of an organization or individual investigators must be resolved prior to the award of an assistance agreement. All awards must be free of any conflicts of interest that could bias the research projects.”</td>
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<tr>
<td>Department of Energy</td>
<td>“At the time of submission, the applicant shall include information identifying potential, apparent, or actual organizational and individual conflicts of interest and proposed mitigation. This shall include the applicant, their team members, and senior/key personnel named in the application. Negative responses are also required. Prior to award, DOE reserves the right to require the submission of a Conflict of Interest Management Plan describing the applicants approach to managing conflicts of interest.”</td>
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<tr>
<td>Office of Naval Research, DARPA</td>
<td>“All facts relevant to the existence or potential existence of organizational conflicts of interest must be disclosed. The disclosure shall include a description of the action the offeror has taken to propose to take to avoid, neutralize, or mitigate such proposals. Proposals that fail to fully disclose potential conflicts of interests will be rejected without technical evaluation and withdrawn from further consideration for award.”</td>
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<tr>
<td>Department of Transportation</td>
<td>“Seller represents and warrants that its performance of this Subcontract does not constitute and will not create an organizational conflict of interest (OCI) as defined in FAR Part 9.5 or under any other applicable OCI clause or regulation. If during the course of performance, Seller becomes aware of any actual or potential organizational conflict of interest caused by its performance of this Subcontract, Seller shall promptly notify SAIC in writing of the nature of such actual or potential organizational conflict of interest.”</td>
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<tr>
<td>DARPA</td>
<td>“Potential Conflicts of Interest within Project Team: The Applicant is required to disclose potential conflicts of interest within the Project Team. An apparent or actual conflict of interest may exist where an individual or entity has different, and potentially conflict, duties or relationships with respect to other individuals or entities within the Project Team. ... Examples of potential conflicts of interest include, but are not limited to: The PI for the Prime Recipient has an equity stake in a Subrecipient; The PI for a Subrecipient has a consulting arrangement with the Prime Recipient; or A Subrecipient is a subsidiary of or otherwise affiliated with the Prime Recipient.”</td>
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