2015 CONFLICT OF INTEREST QUESTIONNAIRE FOR STAFF

Annually, staff members are required to complete a conflict of interest (COI) disclosure. The external interests and activities disclosed by staff in the COI questionnaire are assessed to determine whether or not they could potentially interfere with or detract from one's University obligations and responsibilities.

COI disclosure requirements and the procedures for handling potential conflicts of interest are outlined in the University’s Policy on Conflict of Interest and Conflict of Commitment, found at:
http://www.northwestern.edu/coi/policy/core_coi_policy.pdf

Please answer all questions honestly and completely. If you are uncertain of whether or not to disclose something, it is generally prudent to disclose rather than not disclose. If you are not certain of specific information requested, a reasonable estimate is appropriate. You may also contact nucoi@northwestern.edu or 847.467.4515 with questions or concerns regarding disclosure.

Disclosure responses are confidential and are reviewed by a staff member’s manager, the Staff COI Committee, and very few others who have a specific need to know.

DEFINITIONS:

**Staff:** Any regular, non-exempt and exempt staff in research, academic or administrative positions, including postdoctoral fellows, research associates, coaches, non-faculty physicians and non-faculty veterinarians.

**Immediate Family Members:** The immediate family of a staff member or includes spouses or domestic partners, parents, children, siblings, aunts, uncles, nephews, nieces, grandparents, and grandchildren (whether related by blood, marriage, or adoption).

**Entity:** An external business, company, or other such organizational entity.

**Outside Professional Activities:** An outside activity is any paid or volunteer activity undertaken by a Staff or Faculty member outside the scope of his or her regular University duties. Outside Professional Activities may include consulting, participation in civic or charitable organizations, working as a technical or professional advisor or practitioner, or holding a part-time job with another employer, whether working in one's University occupation or another.

**Conflict of Interest:** A situation in which an individual's financial, professional or other personal considerations may directly or indirectly affect, or have the appearance of affecting, his or her professional judgment in exercising any University duty or responsibility.
INSTRUCTIONS FOR DISCLOSURE

1. Each question requires a “Yes” or “No” answer. If you answer, “Yes” to any question, please provide an explanation in the space provided, based on the supplemental instructions for the question.
2. Once you answer all the questions, please sign and date the form and submit to your manager.

ACTIVITIES WITH ENTITIES THAT CONDUCT BUSINESS WITH NORTHWESTERN

1. During the previous calendar year, were you or was any member of your immediate family a director, officer, partner, employee, an independent contractor of, an agent of, or a consultant to any entity that does business with Northwestern University?

   Yes: _____   No: _____

   If yes, identify the name of the business, describe the business, the nature of your relationship to it and/or that of your immediate family, and whether or not you were compensated.

FINANCIAL INTERESTS IN ENTITIES THAT CONDUCT BUSINESS WITH NORTHWESTERN

2. During the previous calendar year, did you or did any member of your immediate family have direct financial interests (such as ownership or equity interests), or indirect financial interests (such as reciprocal relationships or arrangements) with any entity that does business with Northwestern University?

   Do not disclose equity interests in publicly-traded entities or interests related to retirement accounts or mutual funds.

   Yes: _____   No: _____

   If yes, identify the name of the business, describe the business, and the nature of your relationship to it and/or that of your immediate family.

2015 Staff COI Disclosure Form
Employee Name: ________________________________

**RECEIPT OF GIFTS FROM ENTITIES/INDIVIDUALS THAT CONDUCT BUSINESS WITH Northwestern**

3. During the previous calendar year, did you or did anyone from your immediate family **receive** any gift (other than promotional items or an occasional business meal) or receive unusual or extraordinary hospitality from a supplier or vendor of Northwestern University?

   Yes: _____   No: _____

   If yes, please explain. If an event, what was the approximate value of the event tickets, and did the donor of the tickets attend the event with you?

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**PROVISION OF GIFTS TO ENTITIES/INDIVIDUALS THAT CONDUCT BUSINESS WITH Northwestern**

4. During the previous calendar year, did you (either personally or in your role at NU) or did anyone from your immediate family **give** any gift (other than promotional items) or provide unusual or extraordinary hospitality to a supplier or vendor of Northwestern University?

   Yes: _____   No: _____

   If yes, please describe here the nature of any gifts and the parties receiving them.
Employee Name: ______________________________

**USE OF UNIVERSITY RESOURCES FOR OUTSIDE ACTIVITIES**

5. During the previous calendar year, did you use University resources (equipment, space, supplies or your paid work time other than incidental interruption) in performing paid or volunteer activity for entities other than Northwestern University or its affiliates?
   
   Yes: _____     No: _____

   If yes, please describe here use of resources and nature of activities.

**OTHER ACTIVITIES**

6. During the previous calendar year, were there any other activities not already reported under the previous questions that you think might be (or might be perceived as) a conflict of interest with respect to your work at Northwestern?

   *Do not disclose activities or events relative to professional associations affiliated with Northwestern University or Northwestern University-authorized professional development activities or events.*

   Yes: _____     No: _____

   If yes, please describe here the nature of activities.

**EMPLOYEE CERTIFICATION**

I certify that the above information is true and accurate to the best of my knowledge.

Signature: ___________________________________________     Date: _________________
**Manager Instructions**

1. Review the responses of your employees.
2. If there are any “Yes” responses, please address them in the comments box below.
3. Sign and send via campus mail to:
   NU Conflict of Interest | 720 University Place, Room 108 | Attn: Maria Daniele

**Manager Comments and Certification**

Please check one of the responses below:

______ This employee answered “No” to all questions, which is correct to the best of my knowledge.

______ This employee has at least one “Yes” answer.

For every “Yes” response from your employee, please provide comments regarding the disclosed interest and a determination of “No Conflict” or “Potential Conflict Identified.” For example,

#1: An employee discloses activity as an independent contractor for a company that does business with Northwestern.

Approver response example: "I am aware of this outside activity and it does not interfere with or detract from this employee’s NU responsibilities. The work occurs outside of NU work hours and NU resources are not utilized in any way for this outside work. No Conflict."

I certify that I have reviewed the information provided.

Manager Name: ________________________________

Manager Signature: _____________________________ Date: __________________________
2015 Staff COI Disclosure Additional Guidance

1. **Activities with Entities that Conduct Business with Northwestern**

**DO DISCLOSE** relationships/activities with entities that relate to Northwestern activities or that conduct business with Northwestern.

- My husband is a sales representative for [company name], which is an approved vendor for Northwestern University.
- My partner works for a pharmaceutical company that sponsors research studies at Northwestern.
- My wife is a freelance writer who worked with my department for five years. She still occasionally writes articles for us.
- I am currently a member of the board of directors at [company name], which has a long-term contract to supply Northwestern with goods/services.

**DO NOT DISCLOSE** relationships/interests with entities that have no interaction with Northwestern.

2. **Financial Interests in Entities that Conduct Business with Northwestern**

**DO DISCLOSE** financial interests in/arrangements with entities that relate to Northwestern activities or that conduct business with Northwestern.

- My husband owns [company name], which provides design and print services to our department.
- My start-up company provides lab equipment and services to various departments at Northwestern.
- I own a business that supplies promotional items and apparel to Chicagoland companies, colleges and universities.

**DO NOT DISCLOSE** financial interests/arrangements that do not relate in any way to Northwestern activities or that do not do business with Northwestern (e.g., you are a research assistant in molecular biosciences and you also own an herbal garden business, and that business does not provide goods or services to Northwestern).

**DO NOT DISCLOSE** interests in publicly-traded companies (e.g., your family has stock CDW Corporation), even if they are a University vendor.

3. **Receipt of Gifts from Entities/Individuals that Conduct Business with Northwestern**

Gifts to the University from suppliers can affect or appear to affect the objectivity of judgment with respect to both the gift giver and recipient.

**DO DISCLOSE**

- Gifts that have a more than nominal value (above $75)
- Significant individual gifts, such as holiday hams, steaks, gift certificates over $25, wine, iPads, private air travel, etc.
- Hospitality (outside of an occasional business meal) from a University vendor
- Cash or checks from individuals internal or external to Northwestern.
  - Within the past year, a vendor has hosted me at a professional basketball game on two occasions. The value of the tickets was approximately $100. A company representative was present at each basketball game with me.
  - A vendor sent me a holiday ham worth approximately $95. I handled the gift in this way [explain how you handled the individual gift (e.g., you donated it or returned it) and, who was notified (e.g., your immediate supervisor, NUCOI, etc.)].

**DO NOT DISCLOSE** promotional items, occasional business meals, or nominal gifts (e.g., flowers, baked goods, candy, pens, notebooks, etc. **Note:** Gifts to a department or team should be placed in a common area to be shared, such as a department kitchen or conference room.

2015 Staff COI Disclosure Guidance
4. **Provision of Gifts to Entities/Individuals that Conduct Business with Northwestern**

Gifts given to suppliers can affect or appear to affect the objectivity of judgment regarding that supplier.

**DO DISCLOSE** gifts provided to University vendors or suppliers (e.g., providing a vendor tickets to a University sporting event).

**DO NOT DISCLOSE** charitable or other donations that you or a family member may have contributed to Northwestern University or a company that does business with Northwestern University.

5. **Use of University Resources for Outside Activities**

**DO DISCLOSE** greater than incidental use of University time or resources for outside activities.

- I am involved in civic activities for which I use my work computer to make meeting materials and receive e-mails. I occasionally receive and make related phone calls, too.
- I occasionally use the department copier to make handouts for a youth group I volunteer with once a month. I have discussed this with my supervisor.

6. **Other Activities**

**DO DISCLOSE:** Anything that could potentially be perceived as influencing or deterring from your role at the University that is not covered by the previous questions, such as providing other employers with the same services you provide to the University.