Overview
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.

External interests and activities are not prohibited, but they must be assessed to ensure that the integrity of University activities is not negatively impacted in cases where a relationship could present a potential or actual conflict of interest. A 'Yes' response to the COI questionnaire does not necessarily mean a COI exists. However, without complete disclosure of the facts, a fair and reasonable assessment of an individual's situation cannot be made. It is the University's obligation to determine if the disclosed interests could directly or significantly affect University responsibilities or interests and, if so, how to manage, reduce, or eliminate the identified conflict.

Assistance
For your reference, the below links are provided to staff for completing the staff COI disclosure:

- Complete Conflict of Interest and Conflict of Commitment Policy: [http://www.northwestern.edu/coi/policy/core_coi_policy.pdf](http://www.northwestern.edu/coi/policy/core_coi_policy.pdf)
- Staff COI Questionnaire Instructions and Guidance: [http://www.northwestern.edu/coi/training/index_annual_staff.html](http://www.northwestern.edu/coi/training/index_annual_staff.html)

For any additional questions about the COI Policy, questionnaire, and approval process, please contact our office:

- Email: nucoi@northwestern.edu
- Phone: (847) 467-4515

General Troubleshooting

**Recommended Browsers:** We recommend using Mozilla Firefox or Internet Explorer on Microsoft Windows or Safari on Mac OS X for accessing FASIS.

**Turn off your pop-up blocker:** The FASIS Portal system will attempt to open windows that may be blocked by your pop-up blocker. Please see these [step-by-step instructions for turning off your pop-up blocker](#).

**Clear your cache:** If you have trouble logging in, you may need to clear your cache. Instructions for doing this can be found [here](#).

**Offsite? Use the VPN system:** If you are having trouble completing your disclosure and are offsite (for example, if you are at Argonne National Laboratory, or Lurie Children’s Hospital), please see [this webpage](#) for information on logging in to Northwestern using a VPN.
## Accessing and Approving the Staff COI Disclosure

1. Log in to FASIS with your NetID and Password at this link: https://nupa.northwestern.edu/psp/pa91prod_direct/EMPLOYEE/EMPL/h/?tab=NW_CONFLICT_OF_INTEREST&cmd=login

   **Tip! If** you signed up for Multi-Factor Authentication, there is an extra step in the login process. After entering your Net ID and password, the system will contact your registered smartphone via the Duo Mobile App (or it will initiate a phone call to your registered phone) and prompt you to verify that you are trying to access your FASIS account.

2. Click the purple “COI Reviewer Tools” menu bar to expand the accordion menu.

   Then click “Review COI Disclosures.”

3. If you have multiple disclosure options, select “Annual Staff Disclosure.”

   ![Conflict of Interest Disclosure Review Search](image)
4. By default, disclosure year 2014 will be selected.

Click the “Search” button to display all disclosures pending your review.

5. The “COI Administrator Disclosure Review” page allows you to:

- View each disclosure
- Select a disclosure review status
- Add/view comments
- Add management plans (if applicable)

If your search does not return any results, you do not have any pending approvals at this time. To view all disclosures and COI review statuses for each staff member, see the section on Monitor Compliance (step 11) below.
6. Click “View Disclosure” to review each staff member’s individual disclosure. For any ‘yes’ response, decide whether each disclosed interest is, or is not a conflict and why.

Navigate back to the previous window, “COI Administrator Disclosure Review,” to perform your review.
7. Once you have reviewed the disclosure, click the “Disclosure Review Status” drop-down field on the “COI Administrator Disclosure Review” page to designate a COI status for the disclosure.

If you select a status of “C – No Conflict,” “G – Conflict Managed,” or “D – Potential Conflict Identified,” a comment window will appear and you will be required to enter a comment explaining why something is or is not a conflict, how it is managed, and/or why it requires further review. These statuses will remove the person from your queue once you click “Save” and your review of those individuals is now complete!

Selecting a status of “A – Pending Review,” or “B – Under Review,” will keep the person in your review queue. When you hit “Save” you will receive a warning that these people will remain in your queue until you select one of the statuses above.

After selecting a status and entering a comment (as required), clicking “Save” will submit and complete your review.

COI Review Status:
● = in progress status   ● = final status

A - Pending Review (Has not yet been looked at; no determination yet)
B - Under Review (It has been looked at and it is being looked into; no determination yet; perhaps information-gathering is underway and/or the staff member is being engaged for more information)
D - Potential Conflict Identified (It has been reviewed and further review is needed; this status escalates the disclosure for review by the NUCOI office and Staff COI Committee. A comment will be required.)
C - No Conflict Identified (It has been reviewed and determined to be no conflict; final determination. A comment is required.)
G - Conflict Managed (It has been reviewed and determined to be a COI, management plan is finalized and uploaded to FASIS; final determination. A comment is required.)

Additional Statuses for use by NUCOI:
E - Sent to Committee (It has been reviewed and been escalated to Staff COI Committee; no determination yet)
F - No COI Per Committee (It has been reviewed and determined to be no conflict by the Staff COI Committee; final determination)
10. By clicking the “Add Management Plan” link on COI Administrator Disclosure Review” page, you can add a new management plan

- Enter the appropriate information and use the icons to add or remove a plan.
- Click the icon to upload a COI management plan.
- Click “Save” located at the bottom left of this page.

Monitor Compliance: To check all disclosure and COI review statuses for staff, click the “Compliance for Annual COI” link from the main COI Portal menu.

11. Click the purple “COI Compliance Tools” menu bar to expand the accordion menu.

Then click the “Compliance for Annual COI.”

12. If you have multiple disclosure options, select “Annual Staff Disclosure.”

The disclosure year will default to 2014; click “Search.”
13. The “Monitor COI Compliance – Annual Process” page provides a global view of your staff’s COI disclosure statuses:
   - **Submitted Disclosure Date** (if a date does not appear, the disclosure has not been submitted)
   - **Approval Status** (completed or in progress)
   - **Disclosure Routing Details**
   - **View Disclosure**
     You can sort by clicking the column heading. Use the filter options at the top of the page to search by individual, department, and School Admin Unit.

14. You can generate automatic emails to all staff who have NOT submitted a disclosure by clicking the “Send Email Reminder” button. Reminder emails will automatically be sent from the system.

   For quick access to review disclosures, the “COI Disclosure Review” link is also available at the top right corner of the page.