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
The Northwestern University Conflict of Interest (NUCOI) website (www.northwestern.edu/coi) has many resources available to help you understand Northwestern’s policies and correctly answer disclosure questions. Below are links to two key references for completing the staff disclosure:

- Complete Conflict of Interest and Conflict of Commitment Policy: 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

For any additional questions about the COI Policy and questionnaire, 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.
Completing 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 Training & COI Disclosure” menu bar to expand the accordion menu.

   Then click “COI Disclosure”

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

4. Check “Disclosure Year 2014” and then press the “Continue” button.
5. Read through the Introduction and Instructions. Navigate through by hitting the “Next” and “Previous” buttons.

Completing the Disclosure Questions

For each question, Additional Guidance is available by clicking the link. This will bring up a box with helpful hints on the type of information that should and should not be disclosed.

Answer each question by selecting the correct radio button.
Completing the Staff COI Disclosure

If you select “Yes” for any question, you will be asked for more information. Please fill out each required field and click “Save & Return” to save your responses.

When asked for an Entity Name, the system has a look-up table of Entities that are familiar to Northwestern.

Click on the magnifying glass to search for the entity’s name.

In the default, Basic Lookup, mode, type the first few letters or word of the entity and hit “Look Up.” Select the entity by clicking on the Long Description name.

In the Advanced Lookup mode you can choose to search for any entity that contains a word. This is particularly useful when the entity may have a “The” in front of it – for example, searching Chicago Bar Association will result in no hits because the name of the entity is The Chicago Bar Association.

If you cannot find the name using these methods, close the Lookup window and type the name in or copy it from another document and paste it into the field.
Once you have provided responses in each of the required fields, click the Save & Return button.

Your answer will now show in a grid. Click the pen to edit your response, or the trash can to delete it, if it was entered in error.

If you have more than one response to the question, click the Add Response link under the grid to add another row.

You may also enter comments in the Comment box below to elaborate on any response.

Proceed in the same way through all the questions, navigating using the Previous and Next buttons to move from question to question.

**Note for Researchers:**

If you are an Investigator on a research project subject to Northwestern’s Policy on Conflict of Interest in Research, you will also be updating your research questions, which will satisfy the requirement of updating your research disclosure annually. Any responses you already provided from calendar year 2014 will be pre-populated for the respective questions. Please review these responses and take the opportunity to update your disclosure with any new SFIs for calendar year 2014.
After completing all of the questions, you will reach a summary page where you can review your answers.

To review the details of any “Yes” response, click the **Show Response** link.

Once the responses are all correct, scroll down to the Certification step. Read the signature statement and press the **Sign** button to insert your electronic signature and the date.

Then press the **Submit** button to submit your disclosure.

When you submit your disclosure, a screen will pop up telling you that you have successfully submitted your disclosure, and have completed the Annual Staff COI Disclosure!