**Research Administrator’s Guide to COI at Proposal Time**

Northwestern’s **Policy on Conflict of Interest in Research** covers all federally- and industry-sponsored research, research involving human participants, and other sponsors with COI requirements or terms.

**Creating a Proposal**

**What is the sponsor?**

<table>
<thead>
<tr>
<th>Sponsor</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>NIH (AHRQ)</td>
<td>Include language relative to having a COI compliant policy in LOI, or include SCF in submission; OSR may proceed with submission</td>
</tr>
<tr>
<td>NSF</td>
<td></td>
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<tr>
<td>DOD, ONR, Air Force, Army</td>
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<tr>
<td>Dept. of Energy</td>
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<tr>
<td>NASA</td>
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<td>CMMS, CDC</td>
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<tr>
<td>DOJ (NU, OVW)</td>
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<tr>
<td>Other Sponsors</td>
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</tbody>
</table>

**Prior to submission: All Northwestern Investigators**

1. Have a disclosure dated within the last year
2. Have a training date within the last four years

**Confirm using:** COI Compliance Page in eDisclosure; if someone listed is not an Investigator, update their status on the project.

*If the proposal includes Consultants or Subrecipients, see below for proper handling.*

**NIH and NSF require that institutions take “reasonable steps” to ensure any subrecipient has a compliant COI policy**

Start with FDP COI Clearinghouse

**In FDP COI Clearinghouse:**

**YES**

**Institution has a compliant policy; Investigators may follow their “home” policy.**

**NO**

**US university or academic medical center?**

**YES**

LOW RISK: Safe to trust that they have a policy; OSR may request NUCOI verify, but not required

**NO**

**US nonprofit, for-profit, or a foreign institution?**

**YES**

Send request to NUCOI to verify institution’s policy:

- SP#
- Admin contact
- SCF / prelim emails

**NO**

**Prior to submission:**

If required, NUCOI writes a letter disclosing any conflicts, organizational or otherwise. Submitting without declaring potential conflicts can disqualify proposals.

**Prior to submission:**

If required, NUCOI completes Conflict of Interest Certificate.

**Prior to submission:**

NUCOI completes the Research Independence and Integrity letter.

**Prior to submission:**

If required, NUCOI writes a letter disclosing any conflicts, organizational or otherwise. Submitting without declaring potential conflicts can disqualify proposals.

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**Covered research**

- All federal
- All industry
- Other if COI terms
- All research w human participants

**If there is a Subk, prior to submission:**

**If there is a Key Consultant or other Consultant Investigator, prior to submission:**

Other sponsors do not specifically require the prime to verify the compliance of the subrecipient’s policy, but we sometimes need to obtain a statement as to whether any conflicts exist prior to proposal submission.

In reviewing the solicitation, NUCOI will determine what, if anything is required. Otherwise, terms will be flowed down to the subrecipient in any resulting award agreement.

**Consultant Investigators will need to be added to project in eDisclosure and complete a disclosure. Send to NUCOI:**

- Name
- Email address
- Confirm compliance: COI Compliance Page