



Northwestern  
University

**Approving University Official(s):** Provost and Executive Vice President  
**Responsible Office:** Northwestern University Conflict of Interest Office (NUCOI)  
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## Policy on Conflict of Interest and Conflict of Commitment

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## **Policy Statement**

Faculty and Staff have a primary professional obligation to act in the best interests of Northwestern; their primary professional commitment of time and intellectual energies is expected to be toward supporting the University's mission of education, research, and service. Considerations of personal gain from Outside Professional Activities or Financial Interests, as defined below, must not influence the decisions or actions of Faculty or Staff in performing their University responsibilities. This Policy outlines requirements for disclosure of Outside Activities and Financial Interests; educates Faculty and Staff about situations that generate Conflicts of Interest and Conflicts of Commitment; provides guidance to individuals and the University to manage or eliminate such conflicts; promotes the best interests of students and others whose work depends on Faculty and Staff direction; and describes situations that are prohibited.

## **Purpose**

Northwestern Faculty and Staff are expected to conduct the affairs of the University consistent with high ethical and legal standards and in a manner that will further the interests of the Northwestern community. As part of this responsibility, the University expects Faculty and Staff to apply their time and effort appropriately, to use University resources toward University ends, and to avoid any interaction that creates, or appears to create, a Conflict of Interest or Conflict of Commitment, as defined below. When the application or use of University time or resources results in inappropriate personal advantage, or is detrimental to the University's mission, that use of time or resources represents a conflict between one's interest and that of the University. Accordingly, this Policy establishes standards and requirements to protect the financial well-being, reputation, and legal obligations of the University. Furthermore, this Policy establishes a method to protect the University community from questionable circumstances that might arise and to resolve any apparent or real conflicts.

## **Audience**

All Faculty and Staff, as defined below.

## **Definitions**

*Conflict of Commitment:* a situation where an individual engages in outside activities, either paid or unpaid, that interferes with the individual's primary professional obligation and commitment to Northwestern.

*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, the individual's professional judgment in exercising any Northwestern duty or responsibility.

*Entity:* any business, company, or other organization, including (but not limited to) any partnership, corporation, limited liability corporation, unincorporated association, or other institution or organization, whether for-profit or not-for-profit.

*Faculty:* for purposes of this Policy, any person possessing either a full- or part-time academic appointment in Northwestern University, including faculty-level research appointees, faculty librarians, health system clinicians, and contributed service faculty, but normally excluding adjunct faculty.<sup>1</sup>

*Financial Interest:* defined in [Section III.D](#) of this Policy.

*Immediate Family Member:* a Faculty or Staff member's spouse, dependent child, domestic or civil union partner, or others as defined in the Faculty or Staff Handbook.<sup>2</sup>

*Institutional Responsibilities:* responsibilities expected and performed on behalf of Northwestern for which a Faculty or Staff member is employed and compensated by Northwestern.

*Outside Professional Activity:* any paid or volunteer activity undertaken by a Staff or Faculty member outside the scope of one's employment at Northwestern. 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.

*Staff:* for purposes of this Policy, 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.

## **Policy Implementation**

### **I. Guiding Principles**

It is the policy of Northwestern University that its Faculty and Staff conduct the affairs of the University in accordance with the highest ethical and legal standards. To avoid a conflict between personal or professional interests and Northwestern interests, individuals must not be in a position to act on behalf of or make decisions for the University if their personal economic gain or interest may directly or indirectly influence, or have the appearance of influencing, the performance of their Northwestern duties.

Good judgment of Faculty and Staff is essential, and no list of rules can provide direction for all the varied circumstances that may arise. If a situation raising questions of Conflict of Interest or Conflict of Commitment arises, Faculty and Staff are urged to discuss the situation with their school dean, supervisor or the Northwestern University Conflict of Interest Office (NUCOI).

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<sup>1</sup> Adjunct and visiting faculty and others meeting the definition of Investigator as set forth in Northwestern's [Conflict of Interest in Research](#) policy (for example, an adjunct faculty member serving as principal investigator or serving in a role in which that individual is independently responsible for research design, conduct, or reporting on a Northwestern sponsored project) are subject to the training, disclosure, and other requirements set forth in the University's [Conflict of Interest in Research](#) policy.

<sup>2</sup> To the extent there are differences in how this definition is addressed in the Faculty and Staff Handbooks, Faculty and Staff may be subject to different definitions of Immediate Family Member. Current definitions are always provided to Faculty and Staff in the survey questions based on their appointment to the University.

Access to information collected in connection with this Policy will be limited to those with a need to know and will be shared in accordance with University policy and federal regulations.

#### A. Conflict of Commitment

Faculty and Staff owe their primary professional allegiance to Northwestern; their primary professional commitment of time and intellectual energies is to the education, research, and other programs supporting the University's mission. A Conflict of Commitment occurs when a Staff or Faculty member's professional loyalty is not to Northwestern because the time devoted to outside activities adversely affects their capacity to meet University responsibilities.

Attempts to balance University responsibilities with outside activities – such as consulting, government service, public service, or pro bono work – can result in conflicts regarding allocation of time and energy. Conflicts of Commitment usually involve issues of time allocation. Whenever a Faculty member's outside activities exceed permitted limits established in the Conflict of Interest and Conflict of Commitment section of Northwestern's [Faculty Handbook](#), a Conflict of Commitment exists. The [Faculty Handbook](#) describes the commitment expectations for and responsibilities of Faculty; the [Staff Handbook](#) describes the commitment expectations for and responsibilities of Staff. Faculty and Staff are also subject to the University's [Patent and Invention Policy](#).

Faculty and Staff intending to engage in an external activity that involves significant effort outside of the University and that may present a Conflict of Commitment must have written approval from the relevant department chair, center director, and dean or department/unit head. Individuals may be required to take a leave of absence from the University to proceed with the external activity if it cannot be managed appropriately.

#### B. Conflict of Interest

Considerations of personal gain must not influence the decisions or actions of individuals in discharging their University responsibilities. Such incentives might create a perception of impropriety and, therefore, require that such conflicts be identified, and then managed, reduced, or eliminated.

The following activities are examples of situations that may raise questions regarding an apparent or real Conflict of Interest:

1. Undue personal gain from University funds or resources;
2. Excessive or unauthorized use of University time or resources for professional, charitable, or community activities;
3. Exploitation of students for private gain;
4. Compromise of University priorities due to personal financial considerations;
5. Unfair access by an outside party to Northwestern programs, services, information, or technology;
6. Selection of an entity as a University vendor by an individual who has a personal or economic interest in that entity; this includes engaging a relative as an independent contractor, subcontractor, or consultant; or
7. Acceptance of a gift or favor from an Entity (or representative of an Entity) conducting (or seeking to conduct) business with Northwestern, when a Faculty or Staff member is in a position to influence or inform decision-making relative to engaging the Entity on behalf of Northwestern.

Northwestern will exercise oversight and care in eliminating or managing Conflicts of Interest that do or may arise because of an individual's personal interest in activities related to their Institutional Responsibilities. The University will not accept or enter into agreements, contracts, gifts, or purchases that give rise to a Conflict of Interest unless the conflict can be eliminated or appropriately managed through administrative oversight to protect the interests of the individual and the University.

## **II. *Appropriate Use of University Resources***

University resources are to be used only in the interest of the University. Faculty and Staff may not use University resources, including facilities, personnel, equipment, or confidential information, as part of their outside consulting activities or for any other non-University purposes. Inappropriate use of University resources includes, but is not limited to, the following examples:

1. A Faculty member assigning students, Staff, or postdoctoral scholars University tasks to advance the Faculty member's own monetary interest rather than to advance the scholarly field or educational needs;
2. Granting external Entities access to Northwestern programs, resources, services, information, or technology for purposes outside the University's mission;
3. Offering inappropriate favors to outside Entities in an attempt to unduly influence them in their dealings with the University; and
4. Using for personal gain, or granting others unauthorized access to, confidential information acquired through conduct of University business or research activities.

## **III. *Situations that May Create a Conflict of Interest or Conflict of Commitment***

## A. Outside Professional Activities

### 1. Staff

A Staff member wishing to engage in an Outside Professional Activity that may present a Conflict of Commitment or Conflict of Interest must provide a written request to the Staff member's immediate supervisor or department/unit head prior to engaging in the activity. Upon consideration of the request, if the supervisor or department/unit head determines that an actual or perceived Conflict of Commitment or Conflict of Interest exists given the relation of or impact on the external or personal activity to the Staff member's Institutional Responsibilities, management strategies may be established. NUCOI can serve as a resource to help supervisors and department/unit heads navigate and handle such requests, and can advise as to appropriate management strategies, if/as applicable. Permission is left to the discretion of the supervisor or department/unit head and may be given if the proposed activity does not compete with Northwestern activities and does not interfere with or detract from the performance of the Staff member's University duties. Northwestern time and resources may not be used in any way for external activities. If the Outside Professional Activity meets the disclosure criteria outlined in this Policy and in the annual disclosure questionnaire, the Staff member must disclose it in Northwestern's disclosure system, [eDisclosure](#), during the subsequent annual disclosure process or sooner if/as advised or required.

Outside Professional Activities that use University resources or an individual's time on the job, thereby competing with the University or conflicting with the performance of the job, present a Conflict of Commitment or Conflict of Interest and are not permitted.

Outside Professional Activities that are unrelated to a Staff member's Institutional Responsibilities and that do not use Northwestern time or resources do not need to be disclosed.

### 2. Faculty

Appointment as a Faculty member of Northwestern University confers the obligation to pursue teaching, research, and/or University service. Fulfillment of these obligations requires a primary professional commitment of expertise, time, and energy. Faculty engagement in Outside Professional Activities is a privilege and not a right and must not detract from a Faculty member's obligation to University duties.

A full-time appointment conveys an obligation for a Faculty member to have a significant physical presence on campus, to be accessible to students and Staff, to carry the member's share of committee responsibilities, to meet any assigned obligations, and to be available to interact with Northwestern colleagues, unless the relevant department chair and/or school dean has granted specific prior approval for extended or frequent absences from campus. Activities such as pro bono work, government service in the public interest, and any outside employment unrelated to the Faculty member's University

responsibilities must be managed so they do not take precedence over a Faculty member's primary professional commitment to the University.

Significant management roles (those that involve substantial supervision of the work of others and/or day-to-day responsibility for operating decisions) in private business typically are demanding both in terms of time and energy.

Because full-time Faculty are expected to devote their primary professional energies and interests to their University obligations, they may not accept significant managerial responsibilities as part of their Outside Professional Activities. It will be necessary for a Faculty member to obtain the permission of the member's chair and school dean and may require an unpaid leave of absence from his or her University responsibilities in order to take on a significant management role in an outside Entity.

Certain Outside Professional Activities, such as submitting or directing a program of research or scholarship at another institution that could be conducted appropriately at Northwestern, can generate conflicts regardless of the time involved. Absent express approval by the relevant chair and school dean, Northwestern Faculty are prohibited from serving as principal investigators on sponsored projects submitted and managed through other academic, federal, or commercial institutions. This stipulation does not apply to subcontracts awarded to the University; it is not intended to limit Faculty members' participation in multi-site training or research programs, nor is it intended to apply to circumstances in which the Faculty member's research requires access to facilities not available at Northwestern.

Outside Professional Activities that are unrelated to a Faculty Member's Institutional Responsibilities and do not use Northwestern resources do not need to be disclosed.

#### B. Faculty Use of Students in Outside Professional Activities

Student involvement in Faculty enterprises may provide the potential for substantial benefits to the education and career development of the student. Such involvements need to be guided to avoid Conflicts of Interest or interference with the student's primary educational and research duties. Before engaging in these activities, whether paid or unpaid, Students and Faculty must sign the [Student-Faculty Agreement](#) and seek approval from the school's dean or the dean's designee.

#### C. Faculty Use of Staff in Outside Professional Activities

Faculty and others in a supervisory capacity may not require those they supervise to perform services outside those related to their University positions. It may be appropriate for Staff to assist Faculty members in their Outside Professional Activities, depending upon the nature and extent of the Staff involvement and whether it is on an incidental or infrequent basis. However, because such involvement is a potential source of conflict between Faculty members and their Staff, any Staff involvement must be approved by the relevant department chair, center director, or dean and discussed with the Staff member.

## D. Financial Interests

Financial Interests create Conflicts of Interest when they provide, or appear to provide, an incentive to a Faculty or Staff member to affect a University decision or other University activity (for example, because of the possibility for personal gain) and when the Faculty or Staff member has the opportunity to affect the University decision or other University activity (for example, because the Faculty or Staff member is the principal investigator for a research project or has University purchasing authority relative to use of an external vendor). If there is both sufficient incentive from the Financial Interest and opportunity to affect the University activity or decision, a Conflict of Interest exists.

For purposes of this Policy,<sup>3</sup> “Financial Interest” is one or more of the interests defined below held by a Faculty<sup>4</sup> or Staff member and/or an Immediate Family Member, if the interest reasonably appears to relate to one’s Institutional Responsibilities:

1. With regard to any publicly traded Entity, a Financial Interest exists if the value of any remuneration received from the Entity in the twelve months preceding the disclosure and the value of any equity interest in the Entity as of the date of disclosure, when aggregated for the Faculty or Staff member and their Immediate Family Members, exceeds \$10,000 OR is more than five percent (5.0%) of a company’s equity for any single business. For purposes of the definition of Financial Interest, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
2. With regard to any non-publicly traded Entity (e.g., a start-up company), a Financial Interest exists if (a) the value of any remuneration received from the Entity in the twelve months preceding the disclosure, when aggregated for the Faculty or Staff member and their Immediate Family Members, exceeds \$10,000 or (b) the Faculty or Staff member or an Immediate Family Member holds any equity interest in the Entity, even if the value of such interest is zero or is unknown; or
3. Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

Financial Interests **DO NOT** include the following interests:

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<sup>3</sup> Faculty and Staff determined to be an investigator as defined in Northwestern’s [Conflict of Interest in Research](#) policy are subject to different disclosure thresholds as defined in that policy.

<sup>4</sup> Faculty with a primary appointment in the Feinberg School of Medicine are subject to different disclosure thresholds, which are more specific and take precedence over this Policy. Please refer to Feinberg School of Medicine’s [Disclosure and Professional Integrity Policy](#).



1. Salary, royalties, or other remuneration paid by Northwestern to the Faculty or Staff member if currently employed or otherwise appointed by the University;
2. Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency; a qualifying institution of higher education; an academic teaching hospital; a medical center; or a research institute that is affiliated with a qualifying institution of higher education;
3. Income from service on advisory committees or review panels for a federal, state, or local government agency; a qualifying institution of higher education; an academic teaching hospital; a medical center; or a research institute that is affiliated with a qualifying institution of higher education;
4. Income from investment vehicles or equity interests, such as mutual funds and retirement accounts, as long as the Faculty or Staff member does not directly control the investment decisions made by these vehicles;
5. Intellectual property rights assigned to the University and agreements to share in royalties related to such rights;
6. Textbook and publishing royalties; or
7. Any of the above-noted Financial Interests if unrelated to one's Institutional Responsibilities.

#### **IV. Disclosure Requirements<sup>5</sup>**

Upon hire and on an annual basis, Faculty and Staff members must provide information on the nature and extent of their Outside Professional Activities and Financial Interests related to their Institutional responsibilities. This occurs by disclosure in Northwestern's electronic disclosure system, [eDisclosure](#). The information required to be disclosed is specified in the disclosure questionnaire. Faculty disclosures are reviewed by designated individuals in the Faculty member's school dean's office, and/or University research center, if applicable. At the discretion of the school dean's office, disclosures may also be shared with and reviewed by department chairs, division chiefs, school-based committees, and others if/as necessary based on one's role in Northwestern or hospital affiliate activities.

For Faculty in University research centers, review and oversight of Faculty disclosures resides with the Northwestern University Conflict of Interest Oversight Committee (COIOC). Dean's disclosures are reviewed by the Provost or designee.

Staff disclosures are reviewed by the immediate supervisor or department/unit head, or their designee. Staff disclosures are also subject to review by the Staff Conflict of Interest Committee.

If there is doubt about the existence of an actual or apparent Conflict of Commitment or Conflict of Interest, or uncertainty as to the relation of an Outside Professional Activity or Financial Interest to one's Institutional Responsibilities, the Faculty or Staff member should err on the side of disclosing it for review and approval. Each school of the University may request more, but not less, information than that specified in this Policy and/or in the disclosure questionnaire. Faculty with a primary appointment in the Feinberg School of Medicine (FSM) are subject to different disclosure thresholds, which are more

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<sup>5</sup> Additional guidance relating to disclosures is available on NUCOI's website: <http://www.northwestern.edu/coi/>.

specific and take precedence over this Policy. Please refer to Feinberg School of Medicine's [Disclosure and Professional Integrity Policy](#).

Northwestern employees involved in decisions relative to selecting vendors and/or that are involved in making certain purchasing decisions are subject to additional disclosure requirements in accordance with Northwestern's [Purchasing and Payment Policy and Procedures](#).

NUCOI may be involved in disclosure reviews and COI management for Faculty and Staff.

#### A. Disclosure Updates

Faculty members are expected to update their disclosure information outside of the annual disclosure process if an Outside Professional Activity or Financial Interest arises with the potential to impact one's Institutional Responsibilities in a meaningful or significant way.

### V. Appeals

If a Faculty or Staff member disagrees with a decision regarding a Conflict of Commitment or Conflict of Interest, he or she may appeal the determination to the appropriate school dean's office, supervisor, NUCOI, Staff Conflict of Interest Committee, school-based COI committee, or COIOC if/as applicable. All appeals must be made in writing within 15 calendar days of the date of the individual's receipt of the determination regarding the Conflict.

If a Faculty member wishes to appeal a Conflict of Interest or Conflict of Commitment matter reviewed by or under consideration by the COIOC, such an appeal should be made to the Provost or designee within 15 calendar days of receipt of the COIOC's determination. If a Staff member wishes to appeal a Conflict of Interest or Conflict of Commitment matter reviewed by or under consideration by the Staff Conflict of Interest Committee, such an appeal should be made to the Vice President and Chief Human Resource Officer or designee within 15 calendar days of receipt of the Staff Conflict of Interest Committee's determination.

Should a Faculty or Staff member be determined to be an investigator as defined in Northwestern's [Conflict of Interest in Research](#) policy, the Faculty or Staff member may make an appeal of any Conflict of Interest determination or management plan to the COIOC within 15 calendar days of receipt of the Conflict of Interest determination. For appeals relative to a Conflict of Interest determined by or under consideration by the COIOC, such an appeal should be made to the Vice President for Research or designee within 15 calendar days of receipt of the COIOC's determination.

### VI. Conflicts Related to Research

Northwestern strongly encourages its Faculty, students, and, where appropriate, Staff, to participate in scholarly activities that may benefit not only the participants, but also the University and the larger public. Researchers are expected to carry out such activities consistent with high ethical and legal standards.

External research sponsors, whether governmental or private, promulgate Conflict of Interest regulations of their own for investigators seeking research funding. The purpose of such regulations is to promote

objectivity in research and to provide a reasonable expectation that the design, conduct, and reporting of sponsored research will be free from bias arising from Financial Interests of participating investigators. As a recipient of external funding from governmental and nongovernmental sponsors, the University must comply with these regulations. To the extent that any external research sponsor's regulations, policies, or guidelines are more stringent than this Policy and/or the [Conflict of Interest in Research](#) policy, the sponsor's requirements will take precedence.

Investigators engaged in Northwestern research that is covered by Northwestern's [Conflict of Interest in Research](#) policy must follow the requirements set forth in that Policy. The [Conflict of Interest in Research](#) policy supports Northwestern's commitment to the basic values of openness, academic and scholarly integrity, as well as to its tradition and expectation that researchers will at all times conduct themselves with integrity in their scholarly pursuits.

## **VII. Conflicts Related to the Clinical Environment**

Conflicts arising in the clinical environment will be addressed in accordance with applicable hospital affiliates' policies and procedures and the provisions of the Feinberg School of Medicine's [Disclosure and Professional Integrity Policy](#), as applicable.

## **VIII. Roles and Responsibilities**

### **A. Northwestern University Conflict of Interest Office**

NUCOI is responsible for administering and overseeing Northwestern's Conflict of Interest program, including institutional, individual, and research Conflict of Interest policies and procedures. NUCOI leads conflict of interest-related policy training and education development, and implementation. NUCOI performs, assists with, and provides guidance relative to Conflict of Interest reviews across the University, and administers the Conflict of Interest Oversight Committee (COIOC) and the Staff Conflict of Interest Committee. NUCOI partners with school dean's offices, administrative units, Faculty, Staff, and school-based Conflict of Interest committees relative to Conflict of Interest matters. NUCOI is responsible for making institutional compliance certifications relative to Conflict of Interest and for reporting Conflicts of Interest to external research sponsors and to the public as set forth in the Northwestern's [Conflict of Interest in Research](#) policy.

### **B. School Dean's Offices**

Each school dean's office is responsible for establishing guidelines for acceptable standards for Outside Professional Activities and Financial Interests, including disclosure thresholds, timely collection and review of disclosures, establishment and monitoring of management plans, and

approving or rejecting activities in which Faculty members propose to be engaged. School dean's offices are also expected to enforce the requirements and expectations of this Policy. Individual schools may have more, but not less, restrictive internal policies than those set forth by the University in this Policy. The Feinberg School of Medicine (FSM) has specific disclosure thresholds for Faculty with primary appointments in FSM, outlined in the Feinberg School of Medicine's [\*Disclosure and Professional Integrity Policy\*](#).

#### C. Conflict of Interest Oversight Committee

The Provost has established a Conflict of Interest Oversight Committee (COIOC) comprised of representatives from each of the schools of the University and from central administration. The role of the COIOC includes review and disposition relative to institutional conflict of interest matters in accordance with Northwestern's [\*Institutional Conflict of Interest in Research policy\*](#); resolution of potential Conflicts of Interest arising through disclosures that cross school or Faculty/Staff boundaries or from within University-level research centers; oversight of management plans brought to the Committee's attention by the schools; and other actions needed to ensure consistent application of this Policy throughout the University. The COIOC interacts with and receives periodic updates as needed from any school-based Conflict of Interest committee, and from the Staff Conflict of Interest Committee. The COIOC also reviews appeals filed by Faculty or Staff as outlined in Section V of this Policy. The COIOC may identify the need for, provide insight into, and approve guidelines, standards, and communications that may benefit the Northwestern community. Finally, the COIOC will oversee and recommend changes, as needed, to the University's Conflict of Interest policies. NUCOI administers the activities of the COIOC.

#### D. Staff Conflict of Interest Committee

The Vice President and Chief Human Resource Officer has established a Staff Conflict of Interest Committee comprised of representatives from administrative units and schools across the University. The role of the Staff Conflict of Interest Committee includes review and disposition relative to Staff disclosures and matters in accordance with this Policy. The Staff Conflict of Interest Committee may identify the need for, provide insight into, and approve guidelines, standards, and communications that may benefit Northwestern Staff. NUCOI administers the activities of the Staff Conflict of Interest Committee.

### IX. *Gifts*

Favors of any value should be recognized for their potential to influence the objectivity of the recipient. Faculty and Staff shall not solicit or accept a gift or offer of hospitality when such solicitation or acceptance may influence, or have the appearance of influencing, the performance of Northwestern duties. Gifts include (but are not limited to) any item, service, favor, monies, credits, or discounts not available to others. Faculty and Staff may accept trivial items as a matter of courtesy, but may not solicit them. Individual gifts outside of trivial items from Entities (or representatives from Entities) that are in the process of seeking business with, or that are current vendors of, Northwestern should not be accepted.

Acceptance of social invitations to occasional business meals, entertainment, or hospitality will be subject to prudent judgment as to whether the invitation places or appears to place the recipient under any obligation. Many units in the University have more stringent restrictions or specific guidelines pertaining to gifts and hospitality, and when such unit-specific policies or guidelines are in place, they take precedence over this Policy.<sup>6</sup> Questions about unit-specific policies or the appropriateness of accepting a gift or invitation should be referred to one's supervisor, department chair, center director, dean, or department/unit head.

## **Consequences of Violating this Policy**

Failure to comply with this Policy, including failure to disclose or submission of an incomplete, erroneous, or misleading disclosure; failure to submit other information required by this Policy; or failure to comply with prescribed management plans and/or monitoring procedures, will be handled in accordance with disciplinary policies and procedures as stipulated in Northwestern's [Faculty Handbook](#) or [Staff Handbook](#), as applicable. This handling may result in disciplinary action, up to and including termination of employment or faculty appointment.

## **Related Information**

*University Policies*

[\*Conflict of Interest in Research\*](#)

[\*Copyright\*](#)

[\*Employment or Evaluation of Relatives\*](#)

[\*Gifts to Northwestern University from Faculty and Staff\*](#)

[\*Institutional Conflict of Interest in Research\*](#)

[\*Patent and Invention\*](#)

[\*Purchasing and Payment Policy and Procedures\*](#)

*Other information*

[\*eDisclosure\*](#)

[\*Faculty Handbook\*](#)

[\*Feinberg School of Medicine Disclosure and Professional Integrity Policy\*](#)

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<sup>6</sup> For example, faculty with a primary appointment in the Feinberg School of Medicine are subject to specific expectations with respect to gifts and hospitality, which take precedence over this Policy. Please refer to Feinberg School of Medicine's [\*Disclosure and Professional Integrity Policy\*](#).

[NUCOI homepage](#)

[Staff Handbook](#)

[Student-Faculty Agreement](#)

## **Contacts**

The following office can address questions regarding this Policy:

Northwestern University Conflict of Interest Office  
phone: (847) 467-4615, email: [nucoi@northwestern.edu](mailto:nucoi@northwestern.edu)

## **History**

Supersedes policy revision dated November 2012. Original policy was adopted in August 2012.

## **Policy URL:**

[http://www.northwestern.edu/coi/policy/core\\_coi\\_policy.pdf](http://www.northwestern.edu/coi/policy/core_coi_policy.pdf)