

COI Compliance Page Overview

This is the page that research administrators and OSR can see to confirm the compliance of their Investigators at proposal time and award time: <https://coi.northwestern.edu>

Proposal Time Compliance:

- ✓ COI Training date must be within last 4 years.
- ✓ Last Disclosure Submitted Date must be within last 365 days.

Award Time Compliance:

Status	Meaning
Blank	Not clear: Project is not in NUCOI's review queue
Under Review	Not clear: Project review is in progress
Review Complete	Clear: A final determination has been made
Inactive	Not clear: Contact NUCOI

Project ID	Manage Project	Investigators																									
SP0033999	My Activities▼	<table border="1"> <thead> <tr> <th>First Name</th> <th>Last Name</th> <th>COI Training Date</th> <th>Last Disclosure Submitted Date</th> <th>Review Status</th> </tr> </thead> <tbody> <tr> <td>Melissa</td> <td>Brown</td> <td>8/27/2012</td> <td>2/16/2016</td> <td></td> </tr> </tbody> </table>	First Name	Last Name	COI Training Date	Last Disclosure Submitted Date	Review Status	Melissa	Brown	8/27/2012	2/16/2016																
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My Activities:

- **Update Investigator Status** – indicate someone listed on the project does not meet the definition of Investigator
- **Send Email to NUCOI** – send a message directly to NUCOI that has your name and the SP#. ****Useful if someone is missing from the list of people****
- **Email Reminder to Investigator** – send a message to the Investigator asking them to disclose or complete training

FAQ's:

Q: Who from the InfoEd record are brought into COI workflow?

A: All named personnel on the InfoEd record will appear in this list and be considered Investigators unless their status is updated to indicate that they are not an Investigator.

Q: One of the people on my project are out of date. What are the instructions for having them update?

A: Have them log in at <https://coi.northwestern.edu> and click "Disclose" in the upper left hand corner. Full instructions are below.

Q: Why is someone missing from this list who should be here?

A: If this is the first time a person is listed on a research project subject to Northwestern's COI policy, they may need to be added to the system, or have their role adjusted. Contact NUCOI to have them added.

Q: Why are there additional people listed here who are not on the InfoEd record?

A: If there is an IRB protocol associated with the project, they may be listed as Co-Investigators on the IRB protocol. IRB protocols associated with the project are included in the project review. Contact NUCOI with questions.

More Information about Review Statuses

Status	Meaning	What to do?
Blank	The project is not in NUCOI's queue for review; this is usually driven by the Proposal Status in InfoEd. <ul style="list-style-type: none"> - For grants, reviews are triggered by JIT, Prespend, or any Award status - For industry-sponsored clinical trials, the project is available for review when created in InfoEd 	If the status is blank, but the project should be in the review queue, please contact NUCOI. Projects can easily be brought into the review queue at any time.
Under Review	The project is being reviewed by NUCOI and/or the School Dean's Offices. New chartstrings should <u>not</u> be opened.	If things are urgent, please contact NUCOI.
Review Complete	The project has cleared review; a final determination has been made and any identified conflicts have been sufficiently managed and reported, as applicable.	Chartstrings can be opened. Move forward with the project!
Inactive	Projects will become inactive if it is more than 90 days past the project end date.	If the project has received a no-cost extension and/or some other extension, please contact NUCOI. It is easy to re-activate a project.

Policy Statement

Northwestern's [Conflict of Interest in Research policy](#), which is based on federal regulations, requires that all Investigators have completed COI training and have disclosed to Northwestern prior to submission of a proposal and on an ongoing basis throughout the project, when a new significant financial interest is acquired and at least annually. Each Investigator's disclosed interests will be reviewed along with the project prior to initiating work on a project; any identified potential, perceived or actual conflicts of interests must be managed prior to opening a chartstring in the case of grants, or fully executing the contract in the case of contracts. This is a [one-page overview](#) of the process.

Sample template Instructions: *Investigator has an out of date disclosure and needs to update her/his disclosure*

1. Log into eDisclosure using your NetID and password at this link: <https://coi.northwestern.edu>
2. In the upper left, click the 'Disclose' button
 - a. If there is no 'Disclose' button, make sure you are on the 'Discloser Page' of the grey "Go To:" menu
3. Navigate through the disclosure using the "Continue" button
4. Answer all the questions
5. Click "Submit" on the Summary Page

Sample template Instructions: *Investigator has a current disclosure date, but needs to complete and/or update her/his training date*

1. Log into eDisclosure using your NetID and password at this link: <https://coi.northwestern.edu>
2. In the upper left, click the 'Disclose' button
 - a. If there is no 'Disclose' button, make sure you are on the 'Discloser Page' of the grey "Go To:" menu
3. Navigate to the Training Page using the "Continue" button or the "Jump To" menu
4. Review the training pdf and click the attestation box
5. If you do not need to update your interests, navigate to the Summary Page and click "Submit" or exit the disclosure and click "Submit My Disclosure" on the left menu