Conflict of Interest and IRB studies:

All studies submitted to the IRB that involve human participants are subject to the Conflict of Interest in Research policy, which requires:

1. All Investigators must complete COI training and complete a disclosure in eDisclosure prior to initiating a study.
2. A determination must be made for all Investigators on a study prior to initiating a study. If a conflict is identified, that conflict must be managed prior to study initiation.

How do I know COI review for my study is complete?

- The COI tab has project information for your study – project ID, title and list of Investigators (PI and Co-I’s)
- The COI Determination for everyone listed is either “No Conflict” or “Conflict Managed”

<table>
<thead>
<tr>
<th>The COI tab in eIRB+...</th>
<th>Action?</th>
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</table>
| Is totally blank         | • If it is a new study, it will probably be imported the next time we do an import – we import twice a week.  
• If urgent, or it is not a new study, email NUCOI. |
| Has a title, but no people | • If project ID is an STU#, we are likely in the middle of the import process.  
• If project ID is an SP#, we need to associate people to it – email NUCOI. |
| Has title & people, but people are wrong / some people are missing | Email NUCOI to let us know personnel list is incorrect. |
| Has a funding source associated with it (an SP#) but it is incorrect | Email NUCOI to let us know that the protocol was associated with an incorrect grant/contract. |
| Has a title & people, but the project is listed as (Inactive) | • If the project ID is the STU# and it is (Inactive), email NUCOI to let us know that this study is active.  
• If the project ID is an SP# and it is (Inactive), it may be that the grant/contract has ended but the study is still open. Email NUCOI if you have questions about it. |
| COI tab has title & correct people, but someone is still “Under Review” | There are multiple reasons why someone might be Under Review:  
1. They have not completed their disclosure  
2. They have not completed a brief COI training (which is different than CITI training)  
3. That person is still under review with respect to this project  
We prioritize reviews based on the status of the study in the eIRB+ system (e.g., those studies that are in a status of “Committee Review” are a higher priority than those studies in a status of “Pre Review”). We are in constant, close contact with the IRB to help prioritize which studies are close to being finalized to minimize delays. |
The COI tab for my study looks more complicated...

If a study is linked to a funding source in InfoEd, the SP# and title for that grant/contract will display in the COI tab.

COI review is complete when COI Determinations for all Investigators are either: No Conflict or Conflict Managed
If someone is still “Under Review”, COI review is not complete.

How does this process work? What are the different roles and responsibilities?

**Study Team:**
- Submits new study in eIRB+

**NUCOI:**
- Imports study information from eIRB+ into eDisclosure (2x / week)
- Checks: Do PI and Co-l’s have current COI training & disclosure dates? If not, NUCOI emails Investigators to complete this.
- Reviews: Is there any overlap between outside interests and this study?

Determinations display in eIRB+ on COI tab

Once a study is submitted in eIRB+, NUCOI pulls study information and the list of Investigators (PI’s and Co-l’s but not study team members) into eDisclosure. eIRB+ then displays COI Determinations for each Investigator on the COI tab. Review is complete when all Investigators have disclosed, completed training, and a determination of “No Conflict” or “Conflict Managed” is made for all Investigators on the study.

<table>
<thead>
<tr>
<th>Study Team</th>
<th>Investigators (PI and Co-l’s)</th>
<th>NUCOI</th>
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</table>
| - Enter study information into eIRB+  
- List PI and Co-Investigators on the study  
- Make any requested updates to the study in response to management | - Complete disclosure and COI training in eDisclosure  
- Communicate with dean’s office re: any requested management strategies  
- Comply with any implemented management strategies (e.g., disclosure in informed consent and to study team) | - Import study information from eIRB+ to eDisclosure & complete reviews  
- As needed, NUCOI will:  
  - Ask Investigators to complete disclosures and training  
  - Refer reviews to Investigator’s dean’s office or committee  
  - Upload management plans information for IRB review |

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