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)
✓ All investigators have disclosed within the last year, and completed training within the last four years
✓ The COI Determination for everyone listed is either “No Conflict” or “Conflict Managed”

How do I interpret the information on the COI tab?

<table>
<thead>
<tr>
<th>The COI tab in eIRB+...</th>
<th>Action?</th>
</tr>
</thead>
</table>
| Is totally blank         | • If it is a new study that has been submitted, the tab will refresh in the next two hours.  
• If urgent, or it is not a new study, email NUCCI. |
| Has title & people, but people are wrong / some people are missing | Only PIs and Co-Is are represented in the personnel list. eDisclosure is usually updated when MODs with updates to the study team are submitted – but it can take a few minutes for the change to be captured by eDisclosure. |
| Has a funding source associated with it (an SP#) but it is incorrect | Use the Funding tab in eIRB+ to link the study to the correct SP#. |
| Has a title & people, but the project is listed as (Inactive) | • If the project ID is the STU# and it is (Inactive), email NUCCI to let us know that this study is, in fact, 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 NUCCI 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 (disclosure dates are blank)  
2. Their disclosure is older than a year and they need to update their disclosure  
3. They have not completed a brief COI training (which is different than CITI training)  
4. That person is still under review with respect to this project – either with NUCCI, a dean’s office, or possibly with the Investigator.  
Instructions for completing a disclosure or training are below, and on our website.  
• Log in to eDisclosure using your NetID and password,  
• Click “Disclose” and follow the system prompts to navigate the system,  
• Click “Submit” on the last page of the disclosure form. |
The COI tab for my study looks more complicated...

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

Once a study is submitted in eIRB+, eDisclosure receives study information and the list of Investigators (PI’s and Co-I’s but not study team members). 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-I’s)</th>
<th>NUCOI</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Enter study information into eIRB+</td>
<td>• Complete disclosure and COI training in eDisclosure</td>
<td>• Review disclosure information for each Investigator on a study</td>
</tr>
<tr>
<td>• List PI and Co-Investigators on the study</td>
<td>• Communicate with dean’s office re: any requested management strategies</td>
<td>• As needed, NUCOI will:</td>
</tr>
<tr>
<td>• Keep personnel list accurate – removing individuals who are no longer at Northwestern</td>
<td>• Comply with any implemented management strategies (e.g., disclosure in informed consent and to study team)</td>
<td>o Ask Investigators to complete disclosures and training</td>
</tr>
<tr>
<td>• Make any requested updates to the study in response to management</td>
<td></td>
<td>o Refer reviews to Investigator’s dean’s office or committee</td>
</tr>
<tr>
<td></td>
<td></td>
<td>o Upload management plan information for IRB review</td>
</tr>
</tbody>
</table>

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.

For the COI review to be complete, all Investigators must have completed COI Training in the last 4 years, and must have disclosed in the last 12 months.

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