# Northwestern | CONFLICT OF INTEREST

## Guidelines on External Appointments and Agreements for Faculty

### **External Appointments**

#### Summary

- Faculty appointments at other institutions (including visiting, honorary, and adjunct) require dean's office prior approval.
- Service as a principal investigator at an external institution requires dean's office prior approval.
- Significant management roles in a private business (e.g., serving as CEO) require dean's office prior approval.
- Other roles like board service and paid speaking engagements require disclosure, and faculty should request restricted party screening for any role with an entity /institution in a foreign country of concern prior to accepting the role.

Faculty holding full-time appointments may not hold full-time appointments of any type in any other organization, nor may they hold faculty appointments at other educational institutions without written approval from their dean. [Faculty Handbook] Therefore, faculty appointments at external institutions (including visiting, honorary, and adjunct) require prior dean's office approval.

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. [Policy on Conflict of Interest and Conflict of Commitment]

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. Faculty may not accept significant managerial responsibilities at outside entities without prior approval and permission of their department chair and school dean. [Policy on Conflict of Interest and Conflict of Commitment]

Other external roles such as visiting or honorary appointments, board service, speaking engagements, and scientific collaborations do not require prior approval from a school dean, however they do require disclosure in <a href="mailto:eDisclosure">eDisclosure</a>. If the role is with an entity located in a <a href="mailto:foreign country of concern">foreign country of concern</a>, it is strongly encouraged that faculty request a <a href="mailto:restricted party screening">restricted party screening</a> from <a href="mailto:Export Controls and International Compliance">Export Controls and International Compliance</a> (ECIC) prior to accepting the role and engage with the dean's office for prior review. ECIC can also help assess if an activity may be considered a <a href="mailto:mailt

# Northwestern | CONFLICT OF INTEREST

### Consulting

#### **Summary**

- Review the full guidelines on faculty consulting prior to accepting a consulting agreement.
- Disclose promptly in eDisclosure.
- If the consulting work constitutes research, be attentive to <a href="Other/Current & Pending Support disclosure">Other/Current & Pending Support disclosure</a> obligations.

There are many important considerations around consulting for external entities, namely your ability to fulfill Northwestern responsibilities, intellectual property rights, proper use of Northwestern resources, and foreign talent recruitment program restrictions. Before accepting a consulting agreement, faculty are strongly encouraged to review the full guidelines on faculty consulting agreements.

When considering consulting for an entity located in a <u>foreign country of concern</u>, it is strongly encouraged that Faculty request a <u>restricted party screening</u> from <u>Export Controls and International Compliance</u> and engage with their dean's office for prior review.

Timely disclosure of the activity must be done in <u>eDisclosure</u>. If you are engaged in research, you must update within 30 days of meeting disclosure <u>thresholds</u>.

### **Federal Agency Requirements**

Under NSF Important Notice No. 149, awardees are required to maintain documents related to foreign agreements as reported in Current & Pending support. Be aware that these documents must be available to the NSF upon request, and that the university may be required to review them.

The NIH has released a <u>preview of the Other Support Common Form</u> which contains a reminder to submit copies of contracts specific to foreign appointments and/or employment for foreign activities as reported in Other Support. Please be prepared to supply that documentation.