

RESEARCH SUBJECT TO NORTHWESTERN’S RESEARCH CONFLICT OF INTEREST (COI) REQUIREMENTS

All FEDERAL AND INDUSTRY SPONSORED RESEARCH *(Automatically pulled into eDisclosure from CERES)*

SPONSORS FOLLOWING PHS COI REGULATIONS *(Automatically pulled into eDisclosure from CERES)*

Alliance for Lupus Research	Arthritis Foundation	Lupus Foundation of America (LFA)
American Asthma Foundation	California Breast Cancer Research Program (CBCRP)	Patient-Centered Outcomes Research Institute (PCORI)
American Cancer Society (ACS)	California HIV/AIDS Research Program (CHRP)	Susan G. Komen Foundation
American Heart Association (AHA)	CurePSP (Society for Progressive Supranuclear Palsy)	
American Lung Association (ALA)	Juvenile Diabetes Research Foundation (JDRF)	

KNOWN SPONSORS WITH OTHER COI REQUIREMENTS *(Automatically pulled into eDisclosure from CERES)*

Alfred P. Sloan Foundation	Burroughs Wellcome Fund	Muscular Dystrophy Association (MDA)
American Diabetes Association	Environmental Protection Agency (EPA)	Wellcome Trust
American Foundation for Suicide Prevention	Institute of Museum and Library Services (IMLS)	U.S. Department of Agriculture (USDA)

RESEARCH INVOLVING HUMAN PARTICIPANTS *(Protocols submitted to eIRB+ are automatically pulled into eDisclosure)*

OTHER SPONSORS WITH COI TERMS *(Not automatic – Check ‘Yes’ to the COI question on the Proposal Routing Form)*

An increasing number of research sponsors (outside of those listed above) are including terms and conditions related to COI in proposal solicitations and award and contract documents even though the sponsor may not have “across-the-board” COI.

Use a keyword search for “conflict of interest” in proposal solicitations and/or award documents to identify whether or not atypical COI terms are included. If you see COI terms from sponsors that are not listed above, please check “Yes” to the COI question on the CERES Proposal Routing Form.

SPECIAL NOTE: SOME SPONSORS REQUIRED COI REVIEW AND/OR ATTESTATIONS AT PROPOSAL TIME

Some sponsors required disclosure and certification of whether or not a COI exists **at the time of proposal submission**, which requires NUCOI review **prior** to proposal submission rather than at award time as is typical. Please let NUCOI know as soon as possible when noting language that asks for institutional certification as to whether an individual or organizational COI exists at the time of proposal. If a conflict is identified, NUCOI must prepare and submit a mitigation plan with the proposal for how the COI will be managed if the project is funded. Some sponsors require a waiver request to even submit the proposal if a COI does exist.

Use a keyword search for “conflict of interest” in solicitations, broad agency announcements, etc. to identify whether a COI certification and/or waiver is required prior to proposal submission. Such language is often included in sections titled “Organizational Conflicts of Interest.”

Please contact nucoi@northwestern.edu for guidance if you are uncertain as to what the impact of the COI language is and/or if COI certifications are required prior to proposal submission.

Department of Justice	<i>“Each applicant is to document research and evaluation independence and integrity...by providing...a specific assurance that the applicant has reviewed its application to identify any actual or potential apparent conflicts of interest (including through review of pertinent information on the principal investigator, any co-principal investigators, and any subrecipients), and that the applicant has identified no such conflicts of interest – whether personal or financial or organizational (including on the part of the applicant entity or on the part of staff, investigators, or subrecipients) – that could affect the independence or integrity of the research, including the design, conduct, and reporting of the research.”</i>
Department of Energy	<i>“At the time of submission, the applicant shall include information identifying potential, apparent, or actual organizational and individual conflicts of interest and proposed mitigation. This shall include the applicant, their team members, and senior/key personnel named in the application. Negative responses are also required. Prior to award, DOE reserves the right to require the submission of a Conflict of Interest Management Plan describing the applicants approach to managing conflicts of interest.”</i>
Office of Naval Research, DARPA	<i>“All facts relevant to the existence or potential existence of organizational conflicts of interest must be disclosed. The disclosure shall include a description of the action the offeror has taken to proposes to take to avoid, neutralize, or mitigate such conflict. Proposals that fail to fully disclose potential conflicts of interests will be rejected without technical evaluation and withdrawn from further consideration for award.”</i>
Department of Transportation	<i>“Seller represents and warrants that its performance of this Subcontract does not constitute and will not create an organizational conflict of interest (OCI) as defined in FAR Part 9.5 or under any other applicable OCI clause or regulation.”</i>
DARPA	<i>“Potential Conflicts of Interest within Project Team: The Applicant is required to disclose potential conflicts of interest within the Project Team. An apparent or actual conflict of interest may exist where an individual or entity has different, and potentially conflict, duties or relationships with respect to other individuals or entities within the Project Team. ... Examples of potential conflicts of interest include, but are not limited to: The PI for the Prime Recipient has an equity stake in a Subrecipient; The PI for a Subrecipient has a consulting arrangement with the Prime Recipient; or A Subrecipient is a subsidiary of or otherwise affiliated with the Prime Recipient.”</i>