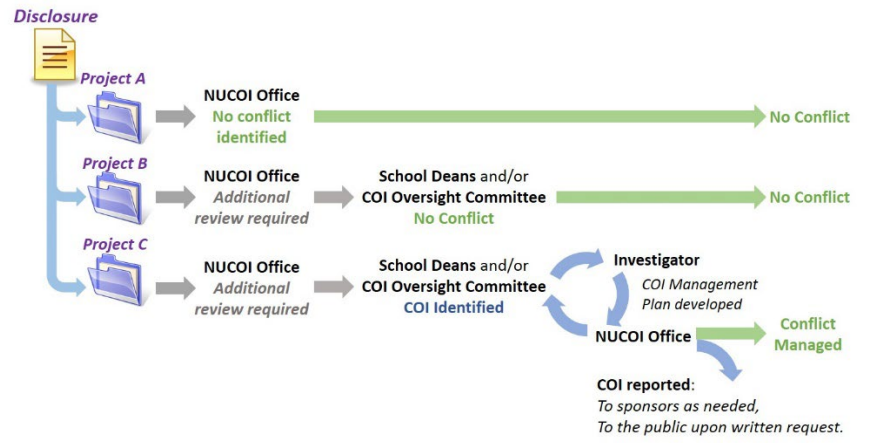


#### Overview

Federal regulations and University policies require that researchers' external interests be assessed relative to each body of research in which they are engaged. This requires ongoing disclosure of external interests by researchers and ongoing review by the University with respect to research activities. External interests do not automatically present COI concerns. A COI determination for a particular body of research is made when an external interest relates to and could directly impact or bias the research. COIs must be eliminated, reduced, or managed.

Northwestern's COI in Research Policy is accessible [here](#).

#### Key Points for Research-Related COI Disclosure, Review, and Management Processes

<i>Who must disclose?</i>	Anyone who is an investigator (an individual responsible for research design, conduct, or reporting) on research covered by Northwestern policy and/or named on protocols submitted to Northwestern's IRB.
<i>Where do I disclose?</i>	In eDisclosure. Click <a href="#">here</a> to access the eDisclosure system.
<i>What do I disclose?</i>	<p><a href="#">Significant Financial Interests</a> (SFIs) related to your institutional responsibilities:</p> <ul style="list-style-type: none"> <li>• Compensation/payments for service (&gt;\$5,000* from single entity in previous year)</li> <li>• Equity in non-publicly traded entity (any ownership/equity interests, even if valued at \$0)</li> <li>• Equity in publicly traded entity (&gt;\$5,000* value)</li> <li>• Intellectual property interests (&gt;\$5,000* from single entity in previous year)</li> <li>• Sponsored/reimbursed travel (&gt;\$5,000* from a single entity in previous year)</li> </ul> <p>*Investigators with primary appointments in FSM are subject to a \$0 threshold</p>
<i>When do I disclose?</i>	Prior to engaging in research, within 30 days of new SFIs and at least annually. Annual disclosure is not enough if you acquire new SFIs throughout the year!
<i>What happens to my disclosure?</i>	<p>Your disclosure is initially reviewed by NUCOI relative to your research activities. If additional review is required the review is referred to your dean's office, school-based committees, and/or the <a href="#">Conflict of Interest Oversight Committee</a>.</p> <p>Final disposition for every project on which you are an investigator is either "No Conflict" or "Conflict Managed."</p> 
<i>What happens if a COI is identified?</i>	<p>Your dean's office and NUCOI will work with you to reduce, manage, or eliminate any COIs. In most cases a COI management plan will be implemented to mitigate even the perception of a lack of objectivity in the research due to the COI. The most common strategy for COI management is transparency relative to the interest through disclosure. Click <a href="#">here</a> for examples of management strategies and examples of disclosure language.</p> <p>If the sponsor requires COI reporting NUCOI handles these requirements and will notify you if and when such reporting occurs.</p>