

Research Subject to Northwestern’s Research Conflict of Interest (COI) Requirements

Investigators involved in research sponsored by federal agencies, research funded by organizations that follow the Public Health Service (PHS) COI regulations, industry-sponsored research, other sponsors with specific COI policies or requirements, and any research involving human research participants, regardless of funding source, are subject to Northwestern's COI requirements.

Federal and industry sponsored research is automatically pulled into eDisclosure from InfoEd

Sponsors following PHS COI regulations (Automatically pulled into eDisclosure from InfoEd)

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)	

Research involving human research participants is pulled into eDisclosure from eIRB+

Other sponsors with COI requirements

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 published “across-the-board” COI policies or requirements. If you see unusual COI language in proposal solicitations and/or award documents from sponsors that are not automatically included in our policy and process via the sponsor or research type, please check “Yes” to the COI question on the InfoEd Proposal Routing Form.

Special note on COI language requiring review and/or attestations at proposal time

Conflict of interest reviews are generally initiated at JIT or award/contract stage; please note that some sponsors require 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, organizational, or other COI exists at the time of proposal. If there is a COI, 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. 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 Defense	<i>"Organizational and Individual Investigator Conflicts of Interest: All <u>conflicts of interest on the part of an organization or individual investigators must be resolved prior to the award of an assistance agreement. All awards must be free of any conflicts of interest that could bias the research projects.</u>"</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 COI 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. If during the course of performance, Seller becomes aware of any actual or potential organizational conflict of interest caused by its performance of this Subcontract, Seller shall promptly notify SAIC in writing of the nature of such actual or potential organizational conflict of interest."</i>
DARPA	<i>"Potential COI within Project Team: The Applicant is <u>required to disclose potential COIs within the Project Team. An apparent or actual COI 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 COIs 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.</u>"</i>