Northwestern University

Responsible University Official: Provost
Responsible Office: Northwestern Conflict of Interest Office (NUCOI)
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Policy on Conflict of Interest in Research

Policy Statement

As noted in Northwestern's *Policy on Conflict of Interest and Conflict of Commitment*, the University encourages its faculty, staff, and students to participate in research activities and to do so with the highest ethical standards. While the potential for conflicts of interest to arise in research is understandable due to the innovative and entrepreneurial pursuits of our research community, we must identify and manage situations in which financial or other personal interests could bias or compromise – or have the appearance of biasing or compromising – objectivity or judgment relative to research. Faculty and Staff who are involved in outside consulting or business activities must clearly separate their Northwestern and outside obligations in order to avoid concerns as to their appropriate use of University resources and contributions by other Northwestern personnel. Researchers must be open about their involvement with and obligations to outside parties and should provide students, staff and colleagues with information about the funding that supports their research.

Reason for Policy/Purpose

Northwestern encourages its faculty, staff, and students, as appropriate, to seek research funding from internal and external sponsors. As external sponsors establish their own policies regarding conflict of interest, Northwestern is expected to administer and oversee compliance with these requirements. This Policy, along with Northwestern's *Policy on Conflict of Interest and Conflict of Commitment*, promotes objectivity in research and establishes the University's conflict of interest compliance framework.

Audience

Faculty, Staff and all other members of the Northwestern's research community.

Definitions

All definitions used in the *Policy on Conflict of Interest and Conflict of Commitment* also apply to this Policy, along with those listed below, which specifically apply to this *Policy on Conflict of Interest in Research*. For the purposes of this Policy, terms are defined as follows:

Covered Individual: An individual who (a) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and (b) is designated as a covered individual by the Federal research agency concerned. For the purposes of this policy, Principal Investigators and Senior/Key Personnel will always be considered Covered Individuals.

Entity: An Entity is an external business, company, or other such organization, and includes (but is not limited to) any partnership, corporation, limited liability corporation, unincorporated association, or other institution or organization, whether for-profit, non-profit, academic, or professional.

Financial Conflict of Interest: A Financial Conflict of Interest (FCOI) exists when Northwestern, through its designated official(s), reasonably determines that an Investigator's Significant Financial Interest is related to a funded research project and could directly and significantly affect the design, conduct or reporting of the funded research, or present the appearance thereof.

Foreign government sponsored talent recruitment program: A foreign government sponsored talent recruitment program is an effort organized, managed, or funded by a foreign government, or a foreign government instrumentality or entity, to recruit science and technology professionals or students (regardless of citizenship or national origin, or whether having a full-time or part-time position).[1]

Immediate Family Member: Immediate Family Member includes an Investigator's spouse, domestic or civil union partner, and dependent children.

Institutional Responsibilities: Institutional Responsibilities include professional activities that relate to an Investigator's responsibilities on behalf of Northwestern, such as research, teaching, institutional committee memberships, professional practice, and administrative activities and responsibilities for Northwestern.

Investigator: Investigator includes the project director or Principal Investigator and any other person responsible for the design, conduct, or reporting of research, regardless of title or position, and their Immediate Family Members.

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[1] NSPM-33 Implementation Guidance provides this definition and the following guidance: Some foreign government-sponsored talent recruitment programs operate with the intent to import or otherwise acquire from abroad, sometimes through illicit means, proprietary technology or software, unpublished data and methods, and intellectual property to further the military modernization goals and/or economic goals of a foreign government. Many, but not all, programs aim to incentivize the targeted individual to relocate physically to the foreign state for the above purpose. Some programs allow for or encourage continued employment at United States research facilities or receipt of Federal research funds while concurrently working at and/or receiving compensation from a foreign institution, and some direct participants not to disclose their participation to United States entities. Compensation could take many forms including cash, research funding, complimentary foreign travel, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or consideration, including in-kind compensation.

Malign Foreign Talent Recruitment Program: A Malign Foreign Talent Recruitment Program is defined as:
(A) any program, position, or activity that includes compensation in the form of cash, in-kind compensation, including research funding, promised future compensation, complimentary foreign travel, things of non de minimis value, honorific titles, career advancement opportunities, or other types of remuneration or consideration directly provided by a foreign country at any level (national, provincial, or local) or their designee, or an entity based in, funded by, or affiliated with a foreign country, whether or not directly sponsored by the foreign country, to the targeted individual, whether directly or indirectly stated in the arrangement, contract, or other documentation at issue, in exchange for the individual—

(i) engaging in the unauthorized transfer of intellectual property, materials, data products, or other nonpublic information owned by a United States entity or developed with a Federal research and development award to the government of a foreign country or an entity based in, funded by, or affiliated with a foreign country regardless of whether that government or entity provided support for the development of the intellectual property, materials, or data products;
(ii) being required to recruit trainees or researchers to enroll in such program, position, or activity;
(iii) establishing a laboratory or company, accepting a faculty position, or undertaking any other employment or appointment in a foreign country or with an entity based in, funded by, or affiliated with a foreign country if such activities are in violation of the standard terms and conditions of a Federal research and development award;
(iv) being unable to terminate the foreign talent recruitment program contract or agreement except in extraordinary circumstances;
(v) through funding or effort related to the foreign talent recruitment program, being limited in the capacity to carry out a research and development award or required to engage in work that would result in substantial overlap or duplication with a Federal research and development award;
(vi) being required to apply for and successfully receive funding from the sponsoring foreign government's funding agencies with the sponsoring foreign organization as the recipient;
(vii) being required to omit acknowledgment of the recipient institution with which the individual is affiliated, or the Federal research agency sponsoring the research and development award, contrary to the institutional policies or standard terms and conditions of the Federal research and development award;
(viii) being required to not disclose to the Federal research agency or employing institution the participation of such individual in such program, position, or activity; or
(ix) having a conflict of interest or conflict of commitment contrary to the standard terms and conditions of the Federal research and development award; and

(B) a program that is sponsored by:

(i) a foreign country of concern[2] or an entity based in a foreign country of concern, whether or not directly sponsored by the foreign country of concern;

[2] The list of "foreign countries of concern" includes the People's Republic of China, the Democratic People's Republic of Korea, the Russian Federation, the Islamic Republic of Iran, or any other country deemed to be a country of concern as determined by the Secretary of State. For questions as to whether a specific country or entity is "of concern" please contact the Office of Export Controls & International Compliance: exportcontrols@northwestern.edu.

(ii) an academic institution or a foreign talent recruitment program on the list developed in the National Defense Authorization Act.[3]

Significant Financial Interest: A Significant Financial Interest includes an external financial interest consisting of one or more of the following interests of an Investigator (and those of the Investigator's Immediate Family Members) that is *related to their Institutional Responsibilities*:

(i) For a publicly traded entity, when the value of remuneration received in the twelve months preceding the disclosure and the value of any equity interest as of the date of the disclosure, when aggregated, exceeds $5,000[4].

(ii) For a non-publicly traded entity (e.g. a startup company), when the value of remuneration received in the twelve months preceding the disclosure, when aggregated, exceeds $5,000, or when the Investigator holds **any** equity interest, regardless of whether that interest's value can be defined.

(iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests (e.g., royalty payments).

(iv) Occurrence of any sponsored or reimbursed travel.

Significant Financial Interests do **NOT** include:

(1) Salary, royalties or other remuneration paid by Northwestern to the Investigator if the Investigator is currently employed or otherwise appointed by the University;

(2) Intellectual property rights assigned to Northwestern and agreements to share in royalties related to such rights;

(3) Equity interests through investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles;

(4) Income from seminars, lectures or teaching engagements sponsored by a U.S. federal, state or local government agency, a qualifying institution of higher education, a U.S. academic teaching hospital, a U.S. medical center or a research institute that is affiliated with a qualifying institution of higher education[5];

(5) Income from service on advisory committees or review panels for a U.S. federal, state or local government agency, a qualifying institution of higher education, a U.S. academic teaching hospital, a U.S. medical center or a research institute that is affiliated with a qualifying institution of higher education; or

(6) Travel sponsored, paid or reimbursed by a U.S. federal, state or local government agency, a qualifying institution of higher education, a U.S. academic teaching hospital, a U.S. medical center or a research institute that is affiliated with a qualifying institution of

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[3] The full reference for these lists can be found under section 1286(c)(8) of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 (10 U.S.C. 2358 note; Public Law 115-232).

[4] Investigators whose primary appointment is in the Feinberg School of Medicine (FSM) are subject to a zero dollar disclosure threshold for remuneration, intellectual property interests, and sponsored or reimbursed travel, meaning that regardless of the $5,000 remuneration disclosure threshold identified above, FSM faculty must report any remuneration, intellectual property interests, or sponsored or reimbursed travel greater than zero.

[5] Qualifying institutions of higher education are institutions within the United States, among other requirements as defined in 20 U.S.C. 1001(a).

higher education.

Subrecipient: A Subrecipient is a legal entity that receives a Subcontract from a pass-through entity to carry out a portion of a sponsored program. A Subrecipient has responsibility for programmatic decision making; has its performance measured in relation to whether objectives of a programmatic scope of work were met; and is responsible for adherence to applicable sponsored program requirements specified in the sponsored award, as opposed to providing routine goods or services for the benefit of the pass-through entity.

Policy/Procedures

1.0 Guiding Principles

Northwestern, and external research sponsors, seeks to promote objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct and reporting of research will be free from bias resulting from financial interests or conflicts of commitment.

2.0 Applicability

Investigators and Covered Individuals who:

- Submit applications for research funding to any federal or industry sponsors, or other sponsors that have conflict of interest requirements, and/or
- Are engaged in research involving human research participants subject to review by Northwestern's Institutional Review Board (IRB) or an external IRB (as defined in any reliance agreement), regardless of funding source,

are subject to the training, disclosure, review, and management requirements of this Policy unless otherwise specified in this Policy. Additional requirements of this policy (e.g., reporting identified FCOIs to the sponsor) are applicable depending on the requirements of the sponsor.

For the purposes of this Policy and the procedures and responsibilities described, the term "Investigators" includes "Covered Individuals" throughout, such that any individual who is a Covered Individual is considered an Investigator and must comply with all requirements applicable to Investigators.

Faculty and Staff must also comply with Northwestern's *Policy on Conflict of Interest and Conflict of Commitment*.

To the extent that any external sponsor's standards are more stringent than this Policy or the Northwestern's *Policy on Conflict of Interest and Conflict of Commitment*, the sponsor's requirements will take precedence.

3.0 Training

Investigators involved in research funded by sponsors subject to this Policy must complete required conflict of interest training before engaging in research and every four years thereafter. Northwestern

may require training more frequently than every four years if there is a substantive conflict of interest Policy change or specific instances of noncompliance.

4.0 Disclosure

4.1 What Must Be Disclosed?

Investigators are required to disclose any Significant Financial Interests, as defined above, that reasonably appear to be related to the Investigator's Institutional Responsibilities for themselves and their Immediate Family Members, and any participation in a foreign talent recruitment program, malign or otherwise. In addition, when sponsor terms require it, Investigators may be asked about additional relationships or activities that create other potential organizational conflicts of interest[6] with respect to procurement decisions and/or Northwestern's ability to 1) render impartial assistance to the government, 2) perform work under an awarded contract in an objective way, or creates an unfair competitive advantage for Northwestern in seeking funding. Required disclosures may include, but are not limited to, instances of providing Advisory and Assistance Services (A&AS) or Systems Engineering and Technical Assistance (SETA) to federal agencies.

4.2 Who Must Disclose?

Any individual responsible for the design, conduct, or reporting of research covered under this Policy, regardless of title or position, is an Investigator and must satisfy the requirements of this Policy. The Project Director or Principal Investigator (PD/PI) is always considered an Investigator. For purposes of this Policy, individuals meeting the definition of Investigator may include faculty, staff, postdoctoral and clinical fellows, graduate students, and/or others who assume independent responsibility for the design, conduct, or reporting of research covered under this Policy. The Principal Investigator is responsible for designating which individuals involved in specific research activities meet the definition of Investigator.

4.3 When is Disclosure Required?

Investigators must disclose Significant Financial Interests prior to submitting or engaging in research, within 30 days of discovery or acquisition of a new Significant Financial Interest, and at least annually (even if acknowledging no change to previous disclosures). Participation in a Malign Talent Recruitment Program must similarly be disclosed prior to participating in submission of a federal proposal, and within 30 days of becoming a member of a foreign talent recruitment program, malign or otherwise. Investigators must perform initial and ongoing

[6] Note that the Department of Energy's Financial Assistance Regulations (2 CFR Part 910) prescribes requirements for identification and reporting of conflicts of interest, conflicts of commitment, and organizational conflicts of interest. Other agencies often cite 48 CFR Subpart 9.5 (Federal Acquisitions Register; FAR) in their definition of organizational conflict of interest. This section acknowledges both definitions, and additional, agency-specific requirements for disclosure.

disclosures of Significant Financial Interests in Northwestern's conflict of interest disclosure system.

Ad hoc disclosure of other relationships is required upon request by NUCOI, School dean's offices, or other designated administrative officials.

5.0 Review

Significant Financial Interests and other disclosed relationships are reviewed by Northwestern's Conflict of Interest Office (NUCOI) in conjunction with applicable School Dean's Offices or other designated administrative official, and/or conflict of interest committees in the context of each research project on which an individual is an Investigator. For the purposes of this policy, an administrative official within the Office for Research may be designated as serving the role of a "School Dean's Office" with respect to the review and disposition of individuals who have a primary appointment within a University Research Institute or Center (URIC) and/or when a matter arises within a URIC. Conflict of interest reviews take into account the nature and extent of an Investigator's role on a project, the nature and extent of the disclosed Significant Financial Interest(s) and/or other disclosed relationships, and the nature of the research activity under review. These reviews are conducted to assess whether or not Significant Financial Interests or other disclosed relationships of an Investigator relate to and could directly and significantly affect the design, conduct, or reporting of research, thus presenting a Financial Conflict of Interest relative to the research, or an appearance thereof.

NUCOI performs an initial review of all Investigator disclosures of Significant Financial Interests relative to all applicable research projects. NUCOI may make determinations, on a research project by research project basis, that an Investigator's Significant Financial Interests do not relate to nor have the ability to directly and significantly affect the design, conduct, or reporting of the research.

Any Significant Financial Interests that have the potential to present a Financial Conflict of Interest for any research project are referred by NUCOI to the applicable School for review and disposition. Designated individuals in each Schools' Dean's Office then review the Significant Financial Interest(s) to determine whether the Significant Financial Interest presents a Financial Conflict of Interest for the related research activity. Reviews for Investigators whose primary appointment is in a University Research Center will be conducted by NUCOI, a designated administrative official within the Office for Research, or Northwestern's Conflict of Interest Oversight Committee (COIOC), rather than a School Dean's Office or an individual School-based committee. The determination of whether a Significant Financial Interest represents a Financial Conflict of Interest may occur by designated individuals in the Schools' Dean's Offices, School-based conflict of interest committees, designated administrative official within the Office for Research, or the COIOC. Individual matters or reviews may be referred to the COIOC at any time by NUCOI, School Dean's Offices, or School-based conflict of interest committees.

Reviews and determinations must occur prior to expenditure of funds for new projects and within 60 days of newly-disclosed Significant Financial Interests. Additionally, reviews and determinations must occur within 60 days of the addition of new Investigators to projects during the life of a project. In the event that a Significant Financial Interest is not disclosed in a timely manner, a review and determination must be made within 60 days. Similarly, if the Institution identifies a previously disclosed Significant Financial Interest that was not appropriately reviewed at the time of disclosure, a review and determination must be made within 60 days of identifying that interest.

Other disclosed relationships are reviewed by NUCOI relative to research projects in accordance with the requirements of the applicable sponsor. If a disclosed relationship is identified as creating a potential conflict for a given research project, it is referred to the applicable School for review and disposition. In the event that a disclosed relationship involves a foreign entity, the Office of Export Controls and International Compliance may be consulted.

6.0 Management

If a Financial Conflict of Interest determination is made, School Dean's Offices, School-based conflict of interest committees, the COIOC, and/or NUCOI (working with Investigators and others as needed) develop a conflict of interest management plan to manage, reduce, or eliminate the Financial Conflict of Interest. Conflict of interest management plans are strategies designed to mitigate the potential for an Investigator's Significant Financial Interests to impact or bias research objectivity and/or the safety or welfare of human research participants.

Conflict of interest management plans could include disclosure of the Financial Conflict of Interest (to study teams, collaborators, the Institutional Review Board, human research participants, and in presentations and publications), a reduced role in the research, and/or independent review of research data and results. Additional conflict of interest management strategies may be employed depending on the nature of the Financial Conflict of Interest and the nature of the research activity. In extreme cases, an Investigator may be prohibited from participating in research due to the level and extent of Significant Financial Interests deemed to present a Financial Conflict of Interest relative to specific research activity.

Investigators must acknowledge agreement to conflict of interest management plans in order to engage in research for which Financial Conflict of Interest determinations are made.

Financial Conflict of Interest determinations are made, and conflict of interest management plans implemented, by designated applicable institutional conflict of interest officials/parties (i.e. NUCOI, School Dean's Offices, School-based conflict of interest committees, designated official in the Office for Research, or the COIOC). However, it is in the purview of Northwestern's Institutional Review Board (IRB) to review the conflict of interest management strategies associated with IRB protocols. The IRB will determine whether the conflict of interest management is sufficient, or if additional conflict of interest management is necessary to protect the rights and welfare of human research participants. NUCOI notifies the IRB of Financial Conflict of Interest determinations made, and conflict of interest management strategies, relative to the human research projects that are subject to review by Northwestern's IRB. When Northwestern University relies on another IRB, adequacy of the conflict of interest management strategies relative to the rights and welfare of human research participants will be reviewed by the IRB of record for the associated research, as defined in the respective reliance agreement.

The conditions of and compliance with Investigator conflict of interest management plans are reviewed on at least an annual basis by School Dean's Offices and NUCOI. On an ad hoc basis, NUCOI and/or School Dean's Offices may also conduct independent monitoring and verification to ensure that the conditions of conflict of interest management plans are being met.

In the event that an organizational conflict of interest is identified, a mitigation plan will be developed by NUCOI for submission with applications for financial assistance to the relevant federal agency if/when required. Other management and mitigation strategies may be implemented for an Investigator's other disclosed relationships that create apparent conflicts with their research depending on the nature and extent of the apparent conflict and/or the requirements of the sponsor(s).

7.0 Unmanageable Activities

Participation in a Malign Foreign Talent Recruitment Program is prohibited for researchers applying for or receiving federal funding. Investigators must disclose if they are talent program members (malign or otherwise) for appropriate review.

8.0 Appeals

For information on appealing determinations regarding Financial Conflicts of Interest or conflict of interest management, refer to sections 5.3 and 10.0 of the *Policy on Conflict of Interest and Conflict of Commitment*.

9.0 External Reporting

NUCOI administers and oversees all external conflict of interest reporting for Northwestern in accordance with federal and individual sponsor requirements.

Some external sponsors, such as PHS and Department of Energy, require Northwestern to provide initial and ongoing reports relative to Investigator's Financial Conflict of Interest determinations as they relate to specific research activities. For Financial Conflicts of Interests relative to research funded by these sponsors, NUCOI must perform the required conflict of interest reporting prior to the expenditure of funds for new projects, within 60 days of newly-determined Financial Conflicts of Interest identified during the life of a project, and on an annual basis thereafter prior to progress report submission during the life of a project. Required elements of an FCOI report include information about the project (award number, title, contact Project Director / Principal Investigator), information about the identified FCOI (Investigator name, entity name, value of the financial interest, how the financial interest relates to the project), and information about the management plan and the Investigator's acceptance of it.

In addition, certain sponsors require Northwestern to make available to the public, upon request, specific information regarding Financial Conflicts of Interest determined for senior and key personnel relative to research funded by these sponsors. NUCOI is required to provide specific information relative to such public requests within five business days of the request.

Investigators must disclose to federal agencies all talent plan affiliations (malign or otherwise, past or current) on their applicable other or current and pending support reports to federal sponsors, biographical sketches, and/or other documents as required by the sponsor. Certain sponsors also require an institution to disclose whether any Investigator(s) are a member of a talent recruitment program. In the event that the university becomes aware of an Investigator participating in such a program, required reports will be filed accordingly.

10.0 Subrecipients

Northwestern must apply relevant originating sponsor conflict of interest requirements to subrecipients. Therefore, when required by the originating sponsor, Northwestern must identify whether or not a subrecipient has a conflict of interest policy compliant with applicable originating sponsor conflict of interest requirements. If a subrecipient does not have a conflict of interest policy compliant with applicable originating sponsor conflict of interest requirements, in order to proceed with the Northwestern collaboration, the subrecipient must agree to abide by this Policy relative to the subrecipient investigators

and the specific subrecipient research activity for the duration of that activity. The subrecipient agreement must incorporate terms that establish whether the conflict of interest policy of Northwestern or that of the subrecipient will apply to subrecipient investigators, and obligations of the subrecipient relative to conflict of interest in either case.

11.0 Noncompliance

The following are examples of noncompliance with this Policy:

a) Failure to submit a timely disclosure;
b) Submission of an incomplete, erroneous or misleading initial, updated or annual disclosure;
c) Failure to disclose information as required by this Policy; or
d) Failure to comply with prescribed management plans.

Any instances of Investigator noncompliance may require that the individual repeat Northwestern's required conflict of interest training module. Additional disciplinary action for noncompliance with this Policy will be decided in accordance with applicable Northwestern disciplinary policies and procedures as outlined in the Faculty Handbook, the Staff Handbook, and other relevant policies. Ramifications for noncompliance could include restrictions relative to proposing and engaging in Northwestern research and/or an internal review of the research, as well as other disciplinary action up to and including termination.

For instances of noncompliance involving PHS-funded research, and certain other sponsors, whenever a Financial Conflict of Interest is not identified or managed in a timely manner, including failure by the Investigator to disclose a Significant Financial Interest, or failure of an Investigator to comply with the conditions of a conflict of interest management plan, Northwestern must conduct a retrospective review of the Investigator's research activities on the project to determine if there is bias in the design, conduct, or reporting of the research resulting from the Financial Conflict of Interest. The retrospective review must be completed within 120 days of the determination of noncompliance. The retrospective review will be documented, and such documentation will include, but may not be limited to, the project number and title, the Project Director(s) or Principal Investigator(s), name of the Investigator with the FCOI, entity name, reason(s) for the retrospective review, and the methodology followed, findings and conclusions of the review. If bias is found in the course of the retrospective review, Northwestern must promptly notify the sponsor and submit a mitigation report that addresses the impact of the bias on the research and the University's plan of action to eliminate or mitigate the effect of the bias.

Additionally, for instances of noncompliance noted above involving PHS-funded clinical research whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment, the Investigator is thereafter required to disclose the Financial Conflict of Interest in each public presentation of the results of the relevant research and also request an addendum to previously published presentations of the relevant research.

12.0 Confidentiality

Access to information collected in connection with this Policy will be limited to those with a need to know and will be shared in accordance with Northwestern policies and federal regulations.

13.0 Record Retention

Conflict of interest records relative to research covered under this Policy must be maintained for a period of three years after any applicable research project's final financial report is submitted to the sponsor, or until three years after the final action has been taken on any audit, litigation, or claim. Please refer to the *Policy on Retention of University Records, Appendix A*.

14.0 Roles and Responsibilities

14.1 Investigators

Investigators are responsible for engaging in research design, conduct, and reporting that is free from bias resulting from conflicts of interest. Investigators have an obligation to meet initial and ongoing conflict of interest training and disclosure requirements and comply with the conditions of conflict of interest management plans, if applicable.

14.2 Northwestern Conflict of Interest Office

Northwestern's Conflict of Interest Office (NUCOI) oversees and implements the University's faculty, staff, research, and institutional conflict of interest policies and procedures, ensures compliance with applicable conflict of interest regulatory requirements, provides guidance and support to the Northwestern community regarding conflict of interest policies, systems, standards, and procedures, and administers and supports the activities of the COIOC and the Staff Conflict of Interest Committee. NUCOI administers conflict of interest training and disclosure requirements University-wide, performs initial reviews of Investigators' Significant Financial Interests and other disclosed relationships in the context of research activities, and refers reviews to Schools or the COIOC for further evaluation and disposition. Northwestern's institutional official for conflict of interest fulfills Northwestern's conflict of interest reporting requirements to federal agencies, external sponsors, and the public when required. NUCOI performs ongoing compliance monitoring of the conflict of interest requirements detailed in this Policy, the *Policy on Conflict of Interest and Conflict of Commitment*, and the *Policy on Institutional Conflict of Interest in Research*. NUCOI may escalate reviews, disputes, or issues to the COIOC at any time.

14.3 School Dean's Office Designees and School-based Conflict of Interest Committees

Schools are responsible for promoting and facilitating research design, conduct, and reporting that is free from bias resulting from conflicts of interest. Designated individuals in each School Dean's Office and School-based conflict of interest committees, if applicable, perform reviews referred from NUCOI of Investigators' Significant Financial Interests and other disclosed relationships relative to applicable research projects. Schools make determinations, on a research project by research project basis, whether or not Investigators' Significant Financial Interests present conflict of interest concerns. If a Financial Conflict of Interest determination is made, Schools work with Investigators and others as needed to develop a conflict of interest management plan to manage, reduce, or eliminate the Financial Conflict of Interest. Schools review conflict of interest management plans of Investigators on at least an annual basis. Schools may escalate reviews, disputes, or issues to the COIOC at any time.

14.4 Conflict of Interest Oversight Committee (COIOC)

The role of the Conflict of Interest Oversight Committee (COIOC) includes review and resolution of institutional conflicts of interest, as well as conflict of interest issues arising through annual or periodic disclosures that cross school or Faculty/Staff boundaries or involving Faculty and/or Investigators in University-level research centers, and conflict of interest matters referred from NUCOI, School Dean's Offices, or School-based conflict of interest committees. The COIOC interacts with and receives periodic updates from School-based conflict of interest committees and the Staff Conflict of Interest committee. The COIOC also ensures consistent application of this Policy throughout the University. Furthermore, the COIOC oversees and recommends changes, as needed, to this Policy, Northwestern's *Policy on Conflict of Commitment and Conflict of Interest,* and the *Policy on Institutional Conflict of Interest in Research*. The COIOC is comprised of representatives from each of the Schools of Northwestern and from key relevant offices within central administration.

14.5 Staff Conflict of Interest Committee

The Staff Conflict of Interest Committee may review conflict of interest disclosures from Staff members acting in the capacity of Investigators, and interacts with NUCOI and the COIOC as needed.

Forms/Instructions

NUCOI website: http://www.northwestern.edu/coi/index.html

eDisclosure: https://coi.northwestern.edu

Related Information

Northwestern University Policy on Conflict of Interest and Conflict of Commitment

Northwestern University Policy on Institutional Conflict of Interest in Research

Northwestern University Faculty Handbook

Northwestern University Staff Handbook

Northwestern University Policy on Subcontracting on Sponsored Programs

Public Health Service, "Promoting Objectivity in Research," 42 CFR Part 50, Subpart F

Public Health Service, "Responsible Prospective Contractors," 45 CFR Part 94

National Institutes of Health Financial Conflict of Interest Tutorial

Department of Energy Interim Conflict of Interest Policy Requirements for Financial Assistance

Contacts

If you have any questions with regards to the policy or procedures e-mail: nucoi@northwestern.edu

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