Northwestern Conflict of Interest Policy Effective August 24, 2012
WCAS Highlights of Changes to Policy

New Public Health Service/NIH regulations regarding research conflict of interest go into effect on August 24, 2012. As of that date, the Faculty and Staff Information System (FASIS) will be used to enter Conflict of Interest (COI) disclosure information related to sponsored projects. This new process will replace the current practice of processing OSR-100 forms in eProposal. Phase 2 of the COI project, which will be available in spring 2013, will be utilizing FASIS to enter faculty annual COI disclosures.

It is recommended you review the six questions asked in the Sponsored Research Disclosure and begin to collect any required information. You will be asked to report data for the past 12 months at the time of your initial disclosure. The questions are available at the following website, which requires your net id and password for access: http://www.northwestern.edu/coi/policy/quick-reference.html. Found below is information and resources that may help as you prepare for this transition.

Who must Disclose?- Definition of Investigator

- Any Faculty, Staff, Post-Doctoral Fellow or Student who meets the definition of “Investigator” must complete a disclosure at the time of proposal submission. Note that this is distinct from the annual faculty/staff COI disclosure process.
- An “Investigator” is one who is responsible for the design, conduct, or reporting of the proposed research.
- In general, most post doctoral fellows and graduate students will likely not meet this definition of having responsibility for the research. However, it is the responsibility of the PI to make this determination and to designate who is an Investigator on the grant proposal. This designation can and may be different for each proposal submitted.
- Post doctoral fellows and graduate students who submit independent fellowships, such as NRSAs, or who work for commercial entities owned or managed by their faculty mentor must also complete a COI disclosure.

COI Training

- Training must be completed before you will be allowed access to your disclosure form.
- Training involves reading a 10-page training module and attesting you understand the contents.
- Time to complete training is generally less than 1 hour.
- Training must be completed once with the initial proposal and then subsequently updated every 4 years.
- Access to the training module is through FASIS (Faculty and Staff Information System) Portal https://nuhr.northwestern.edu/psp/hr91prod_ss/?cmd=login.

Disclosures Related to Sponsored Projects

- COI disclosure is required to complete the submission of a new or continuing proposal.
- After the initial disclosure is completed, you will only be required to update relevant information as significant changes occur.
- Disclosure is completed in the FASIS (Faculty and Staff Information System) Portal at https://nuhr.northwestern.edu/psp/hr91prod_ss/?cmd=login.

Please note:
- Completing the initial disclosure may require some time and effort.
- We encourage you to complete your initial disclosure after the system goes live on August 24 so as to avoid delays at proposal submission.
Travel Disclosure

- This is required only for PIs submitting proposals to or funded by the PHS (which includes NIH).
- Travel paid for or reimbursed by a government agency or an institution of higher education is exempt from disclosure.
- Travel disclosure is completed in the FASIS (Faculty and Staff Information System) Portal at https://nuhr.northwestern.edu/psp/hr91prod_ss/?cmd=login.

Help Options for Weinberg Faculty
Department – Department administrators have attended training on these new policy and processes and should be a first line for inquiries.
WCAS - Kelly Mayo, Associate Dean of Research and Graduate Studies (k-mayo@northwestern.edu).
WCAS - Gretchen Talbot, Director of Research Administration (g-talbot@northwestern.edu).
Northwestern Conflict of Interest Office (NUCOI) (http://www.northwestern.edu/coi/) and nucoi@northwestern.edu.
NIH Website – FAQs (http://grants.nih.gov/grants/policy/coi/coi_faqs.htm)