



ORI Mission:

- Identifying compliance risks in our research practices and communicating those risks to the research community;
- Partnering with the research community in innovative and effective ways to minimize and manage research risks;
- Educating the research community with respect to appropriate business practices related to the conduct of research at Northwestern University; and
- Monitoring and correcting non-compliance in accordance with University and federal

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Conflict of Interest – What you need to know

You have almost undoubtedly heard from Northwestern's Conflict of Interest Office (NUCOI) in the last month asking that you complete your annual conflict of interest (COI) disclosure. Why is such a disclosure required, and what happens to the disclosures once submitted, whether collected during the annual process or the ongoing research-related process?

There are three main COI processes at Northwestern: the annual staff disclosure, the annual faculty disclosure, and the ongoing research disclosures.

These three processes are administered and overseen by NUCOI and the required disclosures are collected in the Faculty and Staff Information System (FASIS)*. The process similarities pretty much end there.



Disclosure questions are role-based, meaning the questions you are asked to answer when you access your disclosure in FASIS are determined by your role at the University and your engagement in certain activities. For example, in general, a staff member receives questions that vary from those that a faculty member receives. A faculty member with a primary appointment in the School of Law may receive a specific question relative to involvement in legal activities that a faculty member in the School of Communication does not receive. Those individuals (faculty and staff) engaged in research funded by sponsors with research-related COI requirements receive specific additional questions required by federal regulations.

Where an annual disclosure is routed for review is determined by one's primary University role. A staff member's completed disclosure is reviewed by her manager (or other individual as designated by one's manager). Managers assess disclosed activities and relationships of their staff to determine whether or not they could interfere with or detract from one's University responsibilities, or impact objective decision-making or judgment with respect to University activities. The [Staff Conflict of Interest Committee](#) provides an additional level of review to ensure actual or potential COIs are being managed.

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* Those faculty with primary appointments in the Feinberg School of Medicine (FSM) perform their annual faculty disclosure in a separate FSM system administered by FSM, rather than FASIS.



Did You Know?

The NIH Salary cap has changed! Effective January 11, 2015, the NIH salary cap increased by 1 percent from \$181,500 to \$183,300. Begin using the new salary cap in proposals and applications for funding. Please see the salary cap summary and the time frames associated with salary caps at:

http://grants.nih.gov/grant/policy/salcap_summary.htm.

The National Science Foundation recently issued an updated Grant Proposal Guide (GPG) which must be used for proposals submitted or due on or after Friday, December 26, 2014.

Please refer to page 2 of the Guide for a summary of the significant changes, clarifications and other changes. The revised GPG can be found online at:

http://www.nsf.gov/publications/pub_summ.jsp?ods_k=grantsgovguide1214.

A new format for NIH & AHRQ biosketches will be required for proposals with due dates on or after January 25, 2015. See

<http://grants.nih.gov/grant/guide/notice-files/NOT-OD-15-024.html> for the full announcement.

The revised forms and instructions are now available on the SF 424 (R&R) Forms and Applications page.



Introducing

Julia Campbell....

1) What is your title at Northwestern?

Director, Conflict of Interest

2) What does that mean?

The COI Office (NUCOI) oversees and administers the conflict of interest (COI) processes at Northwestern for faculty, staff and researchers. The annual COI process for faculty and staff is just that – annual. Conversely, the research COI process is dynamic and active throughout the year, as each investigator's outside interests and relationships are reviewed relative to each body of research activity. The purpose for disclosure and review of outside interests and relationships is to ensure we identify and manage any interests and relationships that could interfere with, detract from, or bias University activities and obligations.

3) What is one thing you want people to know about what you do here?

COI has a negative connotation; we have to remember that not all outside interests and relationships actually present COIs, and most COIs that do exist can be appropriately mitigated. The COI processes we facilitate are aimed to ensure appropriate transparency and management, not to police or stop the innovative and entrepreneurial pursuits of our University community. The key mission of our office is to ensure (through robust disclosure, review, and management) that outside interests and relationships do not inappropriately influence objectivity, judgment, or decision-making in University research, academic, or business activities.

4) How long have you been at Northwestern?

I have been in my current role as Director, COI for 2 and a half years. However, I am a returning warrior – I previously worked at Northwestern in the Office for Research Integrity for four years.

5) What did you do before you came to NU?

I was an associate compliance officer at the Rehabilitation Institute of Chicago.

6) Where is your home town?

Homewood, IL

7) What is your favorite ice cream flavor?

Mint chocolate chip

8) What is your favorite thing to do outside of work?

I am very active and I like to exercise. When I am laying low, I like to read historical non-fiction.

9) What is your favorite yearly Chicago event?

The Chicago Park District's "Movies in the Park" program – it promotes a great feeling of community

Doing innovative research and need resources? Consider a core facility!

The Research Facilities Administration office manages Northwestern's "core facilities," specialized laboratories that provide equipment and services for the Northwestern research community. The purpose of the core facilities is to pool Northwestern's state-of-the-art resources and provide them at cost so that the research community can take advantage of facilities that they may not otherwise be able to afford. Core facilities charge users a fee to cover expenses, but do not make a profit. There are approximately 60 core facilities available for use in the areas of chemistry, engineering, biomedical sciences and medicine. See the Research Facilities Administration webpage for more information on what resources are available for your research. <http://www.facilities.research.northwestern.edu/>

Quote Corner

I was taught that
the way of
progress was
neither swift nor
easy
- Marie Curie

COI

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Disclosures made by faculty during the annual process are routed to the dean's office of the school in which the faculty member holds their primary appointment. There are designated individuals in each school dean's office with responsibility for reviewing faculty disclosures. Some schools also have school-based committees to review and come to determinations relative to faculty disclosures. Faculty disclosures, like staff disclosures, are reviewed in order to identify and manage outside interests or relationships that could impact University responsibilities. High-level policy matters, cross-school COI issues, and complex COI cases are often referred to the [Conflict of Interest Oversight Committee \(COIOC\)](#), a group comprised of representatives from each school dean's office and key central administrative units.

Researchers' disclosures are reviewed in a separate and distinct process for several reasons. Regulations require that those engaged in certain research (e.g., federal and industry-funded) complete COI training and disclose certain financial interests at specific points in time and on an ongoing basis as *well as* annually.

NUCOI has "joined" the annual faculty/staff disclosure and annual research disclosure processes to allow all annual requirements to be met simultaneously. Otherwise, faculty and staff engaged in research would be asked to complete two separate annual disclosures. During the annual disclosure process each February, disclosure information is shared between the research-related disclosure the annual faculty/staff disclosure, and the most recent disclosure information and disclosure date are updated accordingly for research purposes in FASIS.

Researchers' disclosures are routed to NUCOI and reviewed against each active research project. NUCOI's initial review involves analysis and summary of information gathered from the grant application, the IRB or IACUC protocol, relevant intellectual property records, and more. Sometimes it is clear that there is no relation between a researcher's financial interests and the research activity, in which case NUCOI can make a determination that no conflict exists relative to the project. Any situation in which a researcher's interests could present a potential conflict of interest with respect to specific research activity is referred to the researcher's dean's office for additional review. A COI exists when a financial interest directly relates to and could impact or bias the design, conduct, or reporting of research. School dean's office representatives, working with the researcher (and school-based committees and the NUCOI as needed) establish management plans to mitigate any COIs that are identified.

While the annual staff, annual faculty, and research conflict of interest processes differ in several ways operationally, the principles behind our COI program are shared among all disclosure types and processes: **transparency** to ensure **objectivity** and **integrity** in our University activities.

Have COI questions? Need COI assistance? Want COI training?

Contact nucoi@northwestern.edu | 847.467.4515 | <http://www.northwestern.edu/coi/>



EthicsPoint is a third party vendor that allows you to confidentially raise ethical concerns, ask questions, and/or report activities that may involve misconduct or violations of Northwestern University policy. For more information visit the website at:

www.northwestern.edu/ethics



NU Implementation of the New OMB Uniform Guidance

On December 26, 2013, the Office of Management and Budget (OMB) issued the *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards*, often referred to as the *Uniform Guidance*. The Uniform Guidance, effective December 26, 2014, consolidates the eight circulars that govern financial assistance, including A-21, A-110, and A-133. This guidance is meant to ease administrative burden and strengthen oversight of federal funds to reduce risks of waste, fraud and abuse.

How will NU implement these changes? Over the past year, OSR, ASRSP and other central offices have met to examine, discuss and interpret guidance in order to recommend changes at Northwestern. Additionally, the offices of OSR & ASRSP Chicago and OSR & ASRSP Evanston have asked the research community to provide their feedback on NU's Uniform Guidance Implementation Plan. These offices have hosted multiple informational sessions where key stakeholders and the broader research administration community were offered an opportunity to discuss and raise questions regarding the Uniform Guidance and its evolving implementation at Northwestern. These offices continue to work with the research community to discuss and disseminate the NU Implementation Plan.

On the Chicago campus, OSR Chicago and ASRSP will coordinate monthly workgroups based on the 11 Uniform Guidance topics. These groups will designate leaders, recruit volunteers from affected units, review current practices, identify new requirements, and collaboratively write procedures that support the change. The workgroup leaders will contact others as more volunteers are needed. Email [OSR Chicago](mailto:OSR.Chicago) for more information.

OSR Evanston and ASRSP have planned additional information sessions on the Evanston campus in the coming months. These sessions will focus on specific issues e.g., subcontracting, procurement, Federal Demonstration Partnership (FDP) Research Terms and Conditions (RTC), and agency-specific implementations, with time carved out for Q&A. Stay tuned for additional information on the upcoming Evanston information sessions.

The [Uniform Guidance website](#) provides the NU Implementation Plan that lists each topic and the Northwestern approach for each change. For questions on the Uniform Guidance and how it is being implemented at Northwestern, please direct inquiries to Uniform-Guidance@northwestern.edu.

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NORTHWESTERN
UNIVERSITY

Research Administration Upcoming Training

This four-session seminar is geared toward research administrators, staff involved in research administration and anyone who wants to learn about NU's research administration process, policies, and procedures. The seminar serves as an introduction to NU's research community and the extensive systems involved. It is a great networking and educational opportunity for staff new to research or experienced staff who would like a refresher in certain areas. Representatives from departments throughout NU will be on hand to present and answer questions.

The next seminar will next take place April 14th, 16th and April 21st and 23rd from 9:00 a.m. - 12:30 p.m. on the Evanston campus (Chambers Hall, lower level). To register, email nu-ori@northwestern.edu