

Approving University Official(s): Provost and Executive Vice  
President  
Responsible Office:Northwestern University Conflict of Interest  
Office (NUCOI)  
Effective date: January 2018  
Next review date: January 2021

## Policy on Conflict of Interest and Conflict of Commitment

### Policy Statement

### Purpose

### Audience

### Definitions

### Policy Implementation

- I. Guiding Principles
  - A. Conflict of Commitment
  - B. Conflict of Interest
- II. Appropriate Use of University Resources
- III. Situations that May Create a Conflict of Interest or Conflict of Commitment
  - A. Outside Professional Activities
  - B. Faculty Use of Students in Outside Professional Activities
  - C. Faculty Use of Staff in Outside Professional Activities
  - D. Financial Interests
- IV. Disclosure Requirements
- V. Appeals
- VI. Conflicts Related to Research
- VII. Conflicts Related to the Clinical Environment
- VIII. Roles and Responsibilities
  - A. Northwestern University Conflict of Interest Office
  - B. School Dean's Offices
  - C. Conflict of Interest Oversight Committee
  - D. Staff Conflict of Interest Committee
- IX. Gifts

### Consequences of Violating this Policy

### Related Information

### Contacts

### History

# Policy Statement

*Faculty:* for purposes of this Policy, any person possessing either a full or part-time academic appointment in Northwestern University, including faculty research appointees, faculty librarians, health system clinicians, and contributed service faculty, but normally excluding adjunct faculty.

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 University policy and federal regulations.

#### A. Conflict of Commitment

Faculty and Staff owe their primary professional allegiance to Northwestern; their primary professional commitment of time and intellectual energies is to the education, research, and other programs supporting the University's mission. A Conflict of Commitment occurs when a Staff or Faculty member's professional loyalty is not to Northwestern because he or she is devoted to outside activities adversely affects their capacity to meet University responsibilities.

Attempts to balance University responsibilities with outside activities such as consulting, government service, public service, or pro bono work can result in conflicts regarding allocation of time and energy. Conflicts of Commitment usually involve issues of time allocation. Whenever a Faculty member's outside activities exceed permitted limits established in the Conflict of Interest and Conflict of Commitment section of Northwestern's *Faculty Handbook*, a Conflict of Commitment exists. The *Faculty Handbook* describes the commitment expectations for and responsibilities of Faculty; the *Staff Handbook* describes the commitment expectations for and responsibilities of Staff. Faculty and Staff are also subject to the University's *Patents and Invention Policy*.

Faculty and Staff intending to engage in an external activity that involves significant effort outside of the University and that may present a Conflict of Commitment must have written approval from the relevant department chair, center director, and dean or department/unit head. Individuals may be required to take a leave of absence from the University to proceed with the external activity if it cannot be managed appropriately.

#### B. Conflict of Interest

Considerations of personal gain must not influence the decisions or actions of individual



## A. Outside Professional Activities

### 1. Staff

A Staff member wishing to engage in an Outside Professional Activity that may present a Conflict of Commitment or Conflict of Interest must provide a written request to the Staff member's immediate supervisor or department/unit head prior to engaging in the activity. Upon consideration of the request, if the supervisor or department/unit head determines that an actual or perceived Conflict of Commitment or Conflict of Interest exists given the relationship or impact on the external or personal activity to the Staff member's Institutional Responsibilities, management strategies may be established. NUCOI can serve as a resource to help supervisors and department/unit heads navigate and handle such requests, and can advise as to appropriate management strategies, if/as applicable. Permission is left to the discretion of the supervisor or department/unit head to be given if the proposed activity does not compete with Northwestern activities and does not interfere with or detract from the performance of the Staff member's University duties. Northwestern time and resources may not be used in any way for external activities. If the Outside Professional Activity meets the disclosure criteria outlined in this Policy and in the annual disclosure questionnaire, the Staff member must disclose it in Northwestern's disclosure system, *Disclosure*, during the subsequent annual disclosure process or sooner if/as advised or required.

Outside Professional Activities that use University resources or an individual's time on the job, thereby competing with the University or conflicting with the performance of the job, present a Conflict of Commitment or Conflict of Interest and are not permitted.

Outside Professional Activities that are unrelated to a Staff member]TJ EMC EedJ EMC Eed5( )1 n

responsibilities must be managed so they do not take ~~prece~~ over a Faculty member's primary professional

## D. Financial Interests

Financial Interests create Conflicts of Interest when they provide, or appear to provide, an incentive to a Faculty or Staff member to affect a University decision or other University activity (for example, because of the possibility for personal gain) and when the Faculty or Staff member has the opportunity to affect the University decision or other University activity (for example, because the Faculty or Staff member is the principal investigator for a research project or has University purchasing authority relative to use of an external vendor). If there is both sufficient incentive from the Financial Interest and opportunity to affect the University activity or decision, a Conflict of Interest exists.

For purposes of this Policy, "Financial Interest" is one or more of the interests defined below held by a Faculty or Staff member and/or an Immediate Family Member, if the interest reasonably appears to relate to one's Institutional Responsibilities:

1. With regard to any publicly traded Entity, a Financial Interest exists if the value of any remuneration received from the Entity in the twelve months preceding disclosure and the value of any equity interest in the Entity as of the date of disclosure, when aggregated for the Faculty or Staff member and their Immediate Family Members, exceeds \$10,000 OR is more than five percent (5.0%) of a company's equity for any single business. For purposes of the definition of Financial Interest, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;









approving or rejecting activities in which Faculty members propose to be engaged. School dean's offices are also expected to enforce the requirements and expectations of this Policy. Individual schools may have more, but not less, restrictive internal policies than those set forth by the

Acceptance of social invitations to occasional business meals, entertainment or hospitality will be subject to prudent judgment as to whether the invitation places or appears to place the recipient under any

*NUCOI homepage*

*Staff Handbook*

*Student-Faculty Agreement*

## Contacts

The following office can address questions regarding this Policy:

Northwestern University Conflict of Interest Office  
phone: (847) 467-615, email [nucoi@northwestern.edu](mailto:nucoi@northwestern.edu)

## History

Supersedes policy revision dated November 2012. Original policy was adopted in August 2012.

## Policy URL:

[http://www.northwestern.edu/coi/policy/core\\_coi\\_policy.pdf](http://www.northwestern.edu/coi/policy/core_coi_policy.pdf)