Joint Affiliate Annual Disclosure Survey

Facilitator Training

January 23, 2018
Joint Affiliate Annual Disclosure Survey – Process Overview

• The Joint Affiliates consist of the following entities:
  - Northwestern University Feinberg School of Medicine
  - Northwestern Memorial HealthCare and its subsidiaries
  - Children’s Hospital of Chicago Medical Center
  - Shirley Ryan AbilityLab Formerly Rehabilitation Institute of Chicago (RIC)

• The Joint Affiliates partner to conduct an annual disclosure survey that addresses their conflict of interest and business integrity policies.

• Role assignment leads to the generation of customized content/surveys for each user.

• Faculty complete ONE annual disclosure survey.

• Public posting of faculty disclosures.
Software Tool - e Disclosure

- Same tool used by researchers for transactional disclosures and staff for their annual disclosures.

- Tool Functionality Highlights
  - Single disclosure point and single disclosure record.
  - Prior-year disclosure information is pre-populated.
  - Disclosures are entered and summarized by entity/vendor.
  - Events can be entered throughout the year.
  - Proxy functionality allows disclosers to assign another individual to assist in the completion of their survey. The discloser is still required to complete the attestation.
Facilitator’s Introductory Page

Survey Statuses

- **Unsubmitted** – the status that requires follow-up.
- **Under review**
- **Review completed**

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System Functionality – Error/Warning Messages

Common Errors

- A field is blank.
- The attestation button was not checked.
- For researchers, survey submission will fail, if COI training is outstanding.
System Functionality – Error/Warning Messages

Kavita Facilitator: Relationship(s) and/or Interest(s) - Other Activities

- Northwestern expects its resources to be used for university purposes. During the previous calendar year, did you use Northwestern resources (equipment, space, supplies or your paid work time other than incidental interruption) in performing paid or volunteer activity for entities other than Northwestern or its affiliates? [ ]
  [ ] Yes [ ] No [ ] Skip
- Northwestern must ensure that decisions about university funding or assistance are not impacted by personal relationships or interests. At any time during fiscal year 2016 (September 1, 2015 through August 31, 2016), did you participate in the selection of any University grant or other similar assistance (for yourself, for any Family Member, or for any [ ] family member in any direct or indirect capacity? [ ]
  [ ] Yes [ ] No [ ] Skip
- Are there any other activities, relationships and/or interests not specified in the previous questions that you would like to disclose in the interest of full transparency, and/or, do you anticipate any changes in the current year, that would lead you to answer "yes" to any of the previous questions that you did not answer affirmatively? [ ]
  [ ] Yes [ ] No [ ] Skip

Error/Warning Messages

- This is a required field. Therefore, you must provide the required information. Resources for Staff: Other Activities
- This is a required field. Therefore, you must provide the required information. University Grants or Assistance: Other Activities
- This is a required field. Therefore, you must provide the required information. Additional Information: Other Activities
Frequently Asked Questions

• Why do I have to do this?
  - The respective policies of their affiliations require the completion of a conflict of interest disclosure, at least annually.

• Can the survey be sent to my personal email address?
  - No, survey communications have to be sent to approved Northwestern-affiliated email addresses.

• What if I do not remember the exact date of a transaction?
  - Exact Date or Reasonable Estimate
  - Aggregate entries for annual disclosers will be permitted with an activity date of 12/31/17.
    • This does not apply to researchers, who are required to enter update disclosers within 30 days of the occurrence of an activity.
We Need Your Help

- Communicate the information to your faculty members
- Provide guidance on unique circumstances
- Assist with outreach
  - All survey communications will be sent to approved Northwestern-affiliated email addresses.
  - Survey launch emails include personalized survey links – emails should not be forwarded to others.
Key Dates

- Survey Launch: February 1, 2018
- Disclosures Due: February 28, 2018
Resources – Office of Regulatory Affairs

Please contact us if you have any compliance, conflict of interest, or disclosure questions or concerns.

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Email: rrosa@northwestern.edu

Joan Trimuel, JD, CPA
Director, Compliance
Phone: 312.503.2855
Email: j-trimuel@northwestern.edu

Survey Help Line
Phone: 312.503.SURV (503.7878)
Email: disclosure@northwestern.edu

Conflict of Interest and Professional Integrity Policies
COI and Professional Integrity Policies Link