Here comes the Sun: Navigating Conflict of Interest Disclosure Requirements in the Age of Transparency
Learning Objectives

- Recognize internal and external factors that establish the need for conflict of interest disclosure, review and management
- Distinguish among the various requirements and processes for disclosure at Northwestern
- Understand initiatives underway to consolidate and ease disclosure requirements
- Gain clarity around the impacts of the Physician Payments Sunshine Act
Topics for Discussion

- The external environment driving our COI policies & processes
- Feinberg annual disclosure survey, review & posting processes
- NU research disclosure, review, & reporting processes
- How Feinberg & NU work together
- Impacts of the Sunshine Act
- Key takeaways
- Resources & guidance
The External Environment Driving Our COI Policies & Processes
Federal Focus on COI

“There’s a lot of skepticism about financial relationships between doctors and drug companies. Disclosure of those ties would help to build confidence that there’s nothing to hide. Requiring disclosure is a common sense reform based on the public dollars and public trust at stake in medical training, medical research and the practice of medicine.” -- Senator Charles Grassley
The Balancing Act

We care about COI because of the risk that an individual’s external financial interests may bias or compromise – or have the appearance of biasing or compromising – an individual’s judgment, objectivity, or decision-making in research, clinical care, or other responsibilities.

The relation and impact - even potential or perceived relation or impact - of external interests to institutional activities needs to be assessed.
Feinberg Annual Disclosure Survey, Review & Posting Processes
Our Survey Past

Six years ago, three affiliates (Feinberg, NMHC, and NMFF) annually surveyed for conflict of interest independent of one another

• Surveyed with different questions, using different tools, for different time frames

• Shared users completed multiple surveys, resulting in low completion rates and user frustration

• Senior leadership encouraged us to work together to determine if we could jointly survey and work cooperatively with one another
Our Current Results

Three affiliates worked together to develop and implement centralized, joint surveying; Lurie Children’s and RIC later joined as participants in the joint affiliate survey process

• Developed and implemented user interface and sys admin portal applications
• Created customized application design; each user is assigned to a master affiliate, affiliate, group, and role
• User assignment allows for customized content
• Created/implemented best practices for joint affiliates
Joint Affiliate Role-Based Content

Role assignment leads to the generation of customized content/surveys for each user.
Who is Surveyed?

- We survey board members, corporate officers, senior leadership, management, medical staff members, mid-level providers, faculty members (FT, PT, CS, HSC, Lecturer, Certain Others), hospital medical device and P&T committee members, and key others...
- ...for external professional relationships/activities; we ask for disclosures related to potential conflicts of interest, conflicts of commitment, research, purchasing decisions, receipt of gifts, use of trainees, other...
- ...on behalf of five joint campus affiliates (and their subsidiaries) – NMHC, NMG (NMFF), Feinberg, Lurie Children’s, and RIC
# What Information is Requested?

You may be asked up to 31 questions, in the following categories:

<table>
<thead>
<tr>
<th># of Questions</th>
<th>Category</th>
<th>Integration with NU?</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Service on Board of Directors and Other Fiduciary Relationships (Self and Immediate Family Members)</td>
<td>N</td>
</tr>
<tr>
<td>2</td>
<td>Ownership or Investment Interests (Self and Immediate Family Members)</td>
<td>Y</td>
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<td>6</td>
<td>Compensation</td>
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<tr>
<td></td>
<td>• Academic / Other Professional Relationships (Self)</td>
<td>Y</td>
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<td></td>
<td>• Industry Relationships (Self)</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>• Travel (Self) -- NEW</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>• Expert Witness Testimony/Legal Consulting (Self)</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>• Royalty Payments and Inventor Share (Self)</td>
<td>Y</td>
</tr>
<tr>
<td></td>
<td>• Industry Relationships (Family Members)</td>
<td>N</td>
</tr>
<tr>
<td>1</td>
<td>Participation in Purchasing Decisions</td>
<td>N</td>
</tr>
<tr>
<td>1</td>
<td>Referral Sources/Recipients</td>
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<tr>
<td>1</td>
<td>External Healthcare Services</td>
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<tr>
<td>1</td>
<td>Gifts/Receipts of Favors</td>
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</tr>
<tr>
<td>1</td>
<td>Use of Trainees (NU Only)</td>
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<td>3</td>
<td>Research (NU Only)</td>
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<td>1</td>
<td>Time Commitment (NU Only)</td>
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<tr>
<td>2</td>
<td>Licensing of Inventions/Inventions (NU Only)</td>
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<td>9</td>
<td>IRS Tax Form 990</td>
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<tr>
<td>1</td>
<td>Other</td>
<td>N</td>
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</table>
# Joint Affiliate Survey Key Dates

**Surveyee E-mail Communications**

<table>
<thead>
<tr>
<th>E-mail Distribution Dates</th>
<th>Purpose</th>
<th>Recipient(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>February 3rd</td>
<td>Pre-Launch E-mail</td>
<td>All Surveyees</td>
</tr>
<tr>
<td><strong>February 17th</strong></td>
<td>Launch E-mail</td>
<td>All Surveyees</td>
</tr>
<tr>
<td>February 24th</td>
<td>1&lt;sup&gt;st&lt;/sup&gt; Reminder E-mail</td>
<td>Remaining Surveyees</td>
</tr>
<tr>
<td>March 3rd</td>
<td>2&lt;sup&gt;nd&lt;/sup&gt; Reminder E-mail</td>
<td>Remaining Surveyees</td>
</tr>
<tr>
<td>March 10&lt;sup&gt;th&lt;/sup&gt;</td>
<td>3&lt;sup&gt;rd&lt;/sup&gt; Reminder E-mail</td>
<td>Remaining Surveyees</td>
</tr>
<tr>
<td><strong>March 14th</strong> <strong>(SURVEY DEADLINE)</strong></td>
<td>Final Reminder E-mail</td>
<td>Remaining Surveyees</td>
</tr>
</tbody>
</table>
How Do I Login?

http://jointsurvey.feinberg.northwestern.edu
What is New This Year?

• Integration with NU COI transactional research surveying – we’ll share more with you later in this presentation (read: this is awesome!!)

• Pre-population – You will have the option to pre-populate your survey with last year’s survey responses (read: this is equally awesome!!)

• New/improved method of entry – “one-stop shopping” review page, versus moving through 31 separate questions

• Improved methodology to select vendors

• Improved response ‘buckets’ for ease of entry
What Happens to My Disclosures?

- 3 Levels of review occur: Chief, Chair, and Affiliate Leadership
- If research-related, may go to the Feinberg COIC for further review/assessment
- Conflict management plans may be implemented, if needed
- Monitoring and follow-up occurs, as needed
- Disclosure analysis occurs so that we can prepare for public posting within Feinberg faculty profiles
Public Posting of Faculty Disclosures

Feinberg was sixth in the country to publically post external professional relationships (in late 2009 for CY 2008 disclosures). This data has been updated annually since then.

• Search for a faculty profile using this link: http://fsmweb.northwestern.edu/faculty/

• A link to external professional relationships displays within the faculty member's Feinberg Faculty Profile (for FT, PT, CS, and HSC faculty)

• NMG (NMFF) and NMH also link to the external professional relationship information from their physician finder websites
Public Posting of Faculty Disclosures

Disclosures are posted in categories. Entity names are displayed within each category; no compensation amounts are posted.

Categories include:

- Service on Board of Directors
- Industry Relationships
- Consulting/Related Activities
- Ownership or Investment Interest
- Royalty Payments and Inventor Share
- Academic and Other Professional Activities
- May also include statement regarding compensation for medical record consultation and/or expert witness testimony
## Search Faculty Profiles

[http://fsmweb.northwestern.edu/faculty/](http://fsmweb.northwestern.edu/faculty/)

### Faculty Profile Search

<table>
<thead>
<tr>
<th>Last Name</th>
<th>First Name</th>
<th>Title</th>
<th>Department</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abbott</td>
<td>Sabra M</td>
<td>Instructor</td>
<td>Ken and Ruth Davee Department of Neurology</td>
</tr>
<tr>
<td>Abdelrhaman</td>
<td>Tamer R</td>
<td>Research Assistant Professor</td>
<td>Radiation Oncology</td>
</tr>
<tr>
<td>Abdelwahid, Elsyeb</td>
<td></td>
<td>Research Assistant Professor</td>
<td>Feinberg Cardiovascular Research Institute</td>
</tr>
<tr>
<td>Abecasis, Michael M</td>
<td></td>
<td>Professor</td>
<td>Surgery-Organ Transplantation and Microbiology-Immunology</td>
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<tr>
<td>Abern, Steven B</td>
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<td>Instructor</td>
<td>Clinical Pediatrics-Community-Based Primary Care</td>
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<tr>
<td>Abicht, Travis O</td>
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<td>Assistant Professor</td>
<td>Surgery-Cardiac Surgery</td>
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<tr>
<td>Abrah, Aida</td>
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<td>Adjunct Assistant Professor</td>
<td>Cell and Molecular Biology</td>
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<td>Abraham, Anub A</td>
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<td>Instructor</td>
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<tr>
<td>Abram, Karen</td>
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<td>Psychiatry and Behavioral Sciences</td>
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<td>Abramson, Judith G</td>
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<td>Assistant Professor</td>
<td>Medicine-Hematology-Oncology</td>
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<td>Abrego, Fidel</td>
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<td>Assistant Professor</td>
<td>Obstetrics and Gynecology</td>
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<td>Accardi, Susan</td>
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<td>Instructor</td>
<td>Clinical Psychiatry and Behavioral Sciences</td>
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</table>

<table>
<thead>
<tr>
<th>Last Name</th>
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<th>Department</th>
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<tbody>
<tr>
<td>Amaral, Luis N</td>
<td></td>
<td>Professor</td>
<td>McCormick School of Engineering and Medicine</td>
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<tr>
<td>Ambler, Cynthia R</td>
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<td>Instructor</td>
<td>Clinical Pediatrics-Community-Based Primary Care</td>
</tr>
<tr>
<td>Amdur, Rachel L</td>
<td></td>
<td>Instructor</td>
<td>Medicine-General Internal Medicine and Geriatrics</td>
</tr>
<tr>
<td>Ameer, Guillermo A</td>
<td></td>
<td>Professor</td>
<td>McCormick School of Engineering-Surgery-Vascular</td>
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<tr>
<td>Amin, Ahmad Shatil</td>
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<td>Dermatology</td>
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<tr>
<td>Amin, Amanda L</td>
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<td>Instructor</td>
<td>Surgery-Breast Surgery</td>
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<tr>
<td>Ampe, Leon J</td>
<td></td>
<td>Assistant Professor</td>
<td>Emeritus in Anesthesiology</td>
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<tr>
<td>An-Grogor, Yuemi</td>
<td></td>
<td>Instructor</td>
<td>Emergency Medicine</td>
</tr>
<tr>
<td>Anandappa, Eugene C</td>
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<td>Instructor</td>
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</tr>
<tr>
<td>Anania, Nicole D</td>
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<tr>
<td>Anavis, Monique A</td>
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<td>Assistant Professor</td>
<td>Clinical Ophthalmology</td>
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<tr>
<td>Anchala, Anupama R</td>
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<td>Assistant Professor</td>
<td>Ophthalmology</td>
</tr>
</tbody>
</table>
Our Faculty Profiles include a section for External Professional Relationships:
Sample Faculty Profile

External Professional Relationships

Pharmaceutical, device, and biotechnology companies frequently collaborate with basic scientists and physicians within an academic medical center to help advance science and improve patient care. These relationships are important in achieving scientific breakthroughs and in establishing the effectiveness and safety of promising new therapies. In order to assure objectivity in clinical research and patient care, the Northwestern University Feinberg School of Medicine (Feinberg), Northwestern Memorial Hospital, Northwestern Medical Faculty Foundation, Ann & Robert H. Lurie Children’s Hospital of Chicago, and the Rehabilitation Institute of Chicago have adopted integrity policies that require research and clinical faculty (in full-time, part-time, and voluntary categories) to report compensated and uncompensated external industry relationships and other academic professional activities. Patients are encouraged to discuss these disclosures with their physician as well as to inquire as to how these relationships are overseen by Feinberg. To learn more about our Disclosure and Professional Integrity Policy, and the conflict of interest policies of our joint affiliate-s(IRP) partners, please go to our Office for Regulatory Affairs Policies page.

Feinberg will provide yearly disclosure updates to each faculty member’s profile. Please note there may be some discrepancies between this and other public sites as a result of different reporting periods or categorization of relationships. In addition, conference management, educational, and similar organizations may provide compensation to physicians on behalf of pharmaceutical, device, and biotechnology companies. If patients would like additional information regarding their physician’s relationships with these organizations, they should contact their physician directly.

Please click this link to submit Disclosure Feedback.

As of 2/4/2013, [FEINBERG NAME] has reported the external professional relationships noted below for calendar year 2012.

Service on Board of Directors
Faculty member served in a fiduciary capacity, such as a board member/director, officer, or trustee, for the following companies or other entities:

➤ Gold T-Tech, Inc.

Industry Relationships
Consulting/Related Activities
Faculty member engaged in activities such as speaking, advising, consulting, or providing educational programs for the following companies or other for-profit entities:

➤ Medtronic, Inc.
➤ Network for Continuing Education (NCME Holding Corp.)

In addition, faculty member received compensation for medical record consultation and/or expert witness testimony.

Ownership or Investment Interests
Faculty member had an ownership or investment interest in the following companies:

➤ Gold T-Tech, Inc.

Academic and Other Professional Activities
Faculty member engaged in activities such as authorship, editorial work, grant review, lecturing, or advising for the following academic institutions, hospitals or medical centers, government agencies, professional societies, academic publishers, foundations, and other similar entities:

➤ Cedars-Sinai Medical Center
➤ National Heart, Lung, and Blood Institute (NHLBI) (NHI)
➤ NorthShore University HealthSystem
➤ Path to Improved Risk Stratification, NFP
➤ University of California, San Francisco
Linked Faculty Profiles

Northwestern Memorial Hospital

Find A Physician

Clinical Interests
Important Definitions: Perimortem, Supraventricular Tachycardia, Cardiac Rhythm Disorders, Catheter Ablation

Northwestern Medical Faculty Foundation
The Faculty Practice Plan of Northwestern's Feinberg School of Medicine

Practice Information
Office Location: Northwestern Medical Faculty Foundation
Galler Pavilion
675 North St Clair
Suite: 19-110
Chicago, Illinois 60611
Google Map Directions

Academic Location
NMIF/Feinberg Room B-510
251 E Huron
Chicago Il 60611

Professional Education
Board Certification: Cardiovascular Disease
Board Certification: Internal Medicine
Board Certification: Cardiac Electrophysiology
Medical School: Albert Einstein College of Medicine 1984
Residency: Browne Municipal Hospital Center
Fellowships: University of California-San Francisco Medical Center

Clinical Area(s) of Interest
- Heart Rhythm Problems
- Clinical Cardiac Electrophysiology

Academic Interests
Clinical cardic electrophysiology, heart rhythm problems

Return to the find a physician page

Northwestern University
## Our Joint Affiliate Survey Stats

<table>
<thead>
<tr>
<th>Survey Year</th>
<th>For Calendar Year</th>
<th>Joint Affiliates</th>
<th>Total Surveyees</th>
<th>Total 100% Compliance</th>
<th>Feinberg Surveyees</th>
<th>Feinberg 100% Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>2008</td>
<td>NMHC, NMFF, Feinberg</td>
<td>2,855</td>
<td>100% - July</td>
<td>2,005</td>
<td>100% - 81 days post completion deadline</td>
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<tr>
<td>2010</td>
<td>2009</td>
<td>NMHC, NMFF, Feinberg, Children’s Memorial</td>
<td>4,401</td>
<td>100% - June</td>
<td>3,062</td>
<td>100% - 75 days post completion deadline</td>
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<td>2011</td>
<td>2010</td>
<td>NMHC, NMFF, Feinberg, Children’s Memorial, RIC</td>
<td>4,832</td>
<td>100% - June</td>
<td>3,138</td>
<td>100% - 29 days post completion deadline</td>
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<td>2011</td>
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<td>5,222</td>
<td>100% - June</td>
<td>3,217</td>
<td>100% - 21 days post completion deadline</td>
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<td>2013</td>
<td>2012</td>
<td>NMHC, NMFF, Feinberg, Lurie Children’s, RIC</td>
<td>5,492</td>
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<td>3,334</td>
<td>100% - 40 days post completion deadline</td>
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<tr>
<td>2014</td>
<td>2013</td>
<td>NMHC, NMG (NMFF), Feinberg, Lurie Children’s, RIC</td>
<td>5,714</td>
<td>100% - TBD</td>
<td>3,430</td>
<td>100% - TBD</td>
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</table>
NU Research Disclosure, Review, & Reporting Processes
August 24, 2012: The Final Rule
Impetus and Environment
Prompting New COI Regulations

“Biomedical and behavioral research and the resulting interactions among government, research institutions, and the private sector have become increasingly complex.”
~ 42 CFR Part 50 Federal Register Notice Summary

“NIH's Plan for Public Disclosure Is Getting Help from Senator Grassley”
~ Project on Government Oversight, August 2011

“Baylor College of Medicine Faces NIH Sanctions Over Financial Conflicts”
~ Chronicle of Higher Education, January 2010

“29 Percent Of Cancer Studies Report Conflict Of Interest”
~ Science Daily, May 2009

"Top Psychiatrist Failed to Report Drug Income”

“Grassley Intensifies Probe Into NIH & Stanford”
~ Pharmalot, August 2008

"Drugmakers and College Labs - Too Cozy?”
~ Business Week, June 2008
## Key Changes in COI Regulations

<table>
<thead>
<tr>
<th>Policy Area</th>
<th>Old Requirements</th>
<th>New Requirements</th>
</tr>
</thead>
</table>
| Expanded disclosure | Researchers disclose Significant Financial Interests (SFIs) related to the research activity being proposed | ☑ Researchers disclose SFIs relating to any Institutional Responsibilities, before proposals are submitted, within 30 days of new SFIs, and annually  
☑ Institution must determine whether or not an SFI relates to specific research activity and constitutes an FCOI |
| Definition of SFI | • General $10,000 threshold  
• Travel expenses not specified                                                   | ☑ General thresholds lowered to $5,000  
☑ Inclusion of sponsored or reimbursed travel |
| Training         | No training requirements                                                        | ☑ Specific COI training requirements                                                               |
| External Reporting | Initial sponsor reporting required                                               | ☑ Expanded and more frequent sponsor reporting                                                      |
| Public Access    | None                                                                            | ☑ COI policy must be available on public website  
☑ The public may request, and NU must provide, information relative to certain FCOIs related to PHS-funded research |
Who Must Disclose?

**Investigators**: individuals responsible for the design, conduct, or reporting of research.

Because of the definition of Key Personnel (i.e., individuals who contribute to the scientific development or execution of a project in a substantive, measurable way), Key Personnel are **always** Investigators.

**Non-Key Personnel? Consultants? Other significant contributors?**

Individuals in these categories **may** or **may not** be Investigators subject to COI requirements.
When Must Disclosure Occur?

- Prior to submission of the proposal*
- Within 30 days of acquisition of new SFIs
- Annually

* Investigators must submit initial disclosure in FASIS subsequent to 8/24/12 – disclosures “on file” in FASIS can meet the “prior to proposal submission” disclosure requirement on an on-going basis – there is no need to “acknowledge no change” for every submission **provided** that new SFIs are disclosed within 30 days, and an investigator reaffirms their disclosure **at least** annually.
Where Must Disclosure Occur?

FASIS (the Faculty and Staff Information System)
Research COI Reviews

NUCOI and School Dean’s Offices review investigator disclosures to assess SFIs compared to each body of research activity in order to identify any real or perceived COIs that could impact or bias the research activity.

Disclosures are person-specific!
Reviews are project-specific!
Research COI Reviews

Working with faculty, School Dean’s Offices, and School Committees, we review and make determinations regarding the reduction, elimination, or management of COIs and report to sponsors, as required.

Manage, reduce, or eliminate COI? We usually manage via a COI management plan.

COI determinations must be made prior to funding release. Some sponsors (such as PHS) require specific reporting of COIs prior to funding release.
Key Initial Compliance Points

- Disclose SFIs
- Complete COI training

Proposal Submission

- FCOI determination made
- FCOI managed, as applicable
- FCOI reported, as applicable

Funding Released
Key Ongoing Compliance Points

- Disclose new SFIs within 30 days – investigator
- Disclose SFIs annually – investigator
- Complete COI training every 4 years – investigator
- Comply with COI management plan, if applicable – investigator
- Annual sponsor COI reporting, if applicable – NUCOI
How Feinberg & NU Work Together
Ongoing Interaction & Collaboration

- NUCOI and Feinberg Dean’s Office work closely together relative to research COI reviews and other COI issues
- NUCOI is represented on and involved with Feinberg’s COI Committee
- Feinberg is represented on and involved in the University COI Oversight Committee
- Feinberg and NUCOI collaborate on various policy, process, and educational issues and initiatives
Consolidating Processes Where Possible

Beginning in February 2014, the annual Feinberg COI survey will meet the *annual* research COI requirement as a result of a system interface between FASIS and the Feinberg COI system. This interface is intended to:

- Eliminate duplicative COI disclosure reporting for Feinberg faculty, thus reducing administrative burden;
- Resolve compliance risks associated with inconsistent COI disclosure information in two separate systems; and
Interface Between Systems

- The interface will allow the annual Feinberg COI requirement to meet the annual research requirement.
- Information faculty have entered into FASIS throughout the previous calendar year will be pre-populated into the response fields for the applicable and corresponding questions in the Feinberg annual COI survey.
- Faculty will be able to simply reaffirm their previously-entered responses, or may edit their responses.
Interface Between Systems

• This interface does not eliminate the requirement to disclose in FASIS on an on-going basis throughout the year to meet federal research regulations – new SFIs must still be disclosed throughout the year

• The interface is primarily intended to eliminate the need for Feinberg faculty to have to re-enter the same information in the annual Feinberg COI survey that they have already entered in FASIS throughout the year
Impacts of the Sunshine Act
What is the Sunshine Act?

Part of the Affordable Care Act

• Requires that applicable manufacturers and group purchasing organizations provide CMS with the details of any direct or indirect payments they made to physicians and teaching hospitals
  
  o Direct and indirect payments include payments and/or transfers of value exceeding $10 and including, among other things, consulting fees, compensation for speaking or other activities, travel, food, entertainment, gifts, honoraria, royalties, education, research, and current or prospective ownership or investment interests

• Purpose: to provide the public with access to information about the financial relationships their health care providers may have with industry
Sunshine Act – Key Impacts

- The Act applies only to physicians (including doctors of medicine and osteopathy, dentists, podiatrists, optometrists, and chiropractors)
- The Act does not affect faculty members who are not physicians. The Act also specifically excludes medical residents
- Physicians have no reporting responsibilities – companies must collect and report the information
- Physicians may review and contest the information provided by companies to the government before it is publicly posted online
Sunshine Act – Timing

- The start date for companies to begin collecting and tracking payment was 8/1/13
- Payment information must be reported by companies to CMS by 3/31/14
- CMS must post the information on a publicly accessible website by 9/30/14
- Thereafter, the annual posting of information will be June 30th each year
Sunshine Act – Physician Review

- Physicians will have the opportunity to review the payment information reported by companies and will have the opportunity to raise questions and resolve discrepancies in payment information with companies during a 60-day period before the information is publicly posted.

- Physicians will need to register with CMS to review the payment information – details regarding registration have not yet been made available by CMS.

- Reviews and disputes are between the physician and the companies/CMS (NU not involved).
Sunshine Act – Research Payments

- Research support through industry-sponsored research agreements to Northwestern as an institution is included in the Act as indirect payments/transfers of value to physicians who are investigators on such agreements.

- This support will be categorized specifically as research payments and will be listed in a separate section of the public website.
Sunshine Act – CME

• Payments to physicians for serving as faculty or speakers for **accredited** CME activities are **excluded** from The Act.

• Payments to physicians are reportable by companies if they are associated with **non-accredited** CME activities.

*Accredited CME Activities/Organizations*
- The Accreditation Council for Continuing Medical Education (ACCME)
- The American Academy of Family Physicians
- The American Dental Association’s Continuing Education Recognition Program
- The American Medical Association
- The American Osteopathic Association
Sunshine Act – Stay Informed

Receive updates directly from CMS by entering your email address in the “Receive Email Updates” box at the bottom of any CMS.gov webpage.
Key Takeaways
Key Takeaways

• There is a major trend toward transparency regarding physician and researcher relationships with industry.

• COI disclosure and management protects the integrity of the individual and the institution should decisions or relationships be questioned.

• NU and Feinberg (+ affiliates) are working collaboratively to ensure we meet COI requirements while reducing redundancies where possible.

• We are here to help if you have questions or need guidance.
Resources & Guidance
Northwestern COI Office (NUCOI)

http://www.northwestern.edu/coi/

- Policies
- FAQs
- Educational materials
- System access
- Contacts
Contact Information – Feinberg ORA

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

We're happy to provide guidance!
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Questions?
THANK YOU!