1. **Preamble: Section A**
   - This policy has been updated by the Office for Regulatory Affairs to incorporate changes that Northwestern University (“NU”) has implemented to comply with recently promulgated regulations from the Department of Health and Human Services, i.e. the Final Rule. In response to the Final Rule, NU updated its existing Northwestern University Policy on Conflict of Interest and Conflict of Commitment (“NU COI Policy”) and created the Northwestern University Policy on Conflict of Interest in Research (“NU COIR Policy”).
   - NU’s policy changes resulted in updates to several sections of this policy, including, Definitions (Section C) and Disclosure of Outside Professional Activities and Conflict of Commitment (Section D). These changes will be explained in further detail below.

2. **Application of the Feinberg Policy: Section B**
   - The Students/Trainees definition has been updated to include Feinberg students and housestaff members (residents and fellows) in the McGaw Medical Center of Northwestern University training programs.
   - Full-Time and Part-Time Faculty must still abide by all sections of the policy including all of the following newly added sections: Transactional/Research-Related Disclosure (Section D.2), Conflict of Interest Disclosure for Industry-Sponsored Research (Section D.4), Faculty Use of Students/Trainees in Outside Professional Activities (Section D.5), Training and Education Regarding the Use of Medical Devices (Section E.4), and Educational Grants and Donations (Section E.7).
   - The list of sections applicable to contributed services, health system clinician faculty, and regular-lecturer faculty has been updated to include all the new sections that fall under Section D (Transactional/Research-Related Disclosure (Section D.2), Conflict of Interest Disclosure for Industry-Sponsored Research (Section D.4), and Faculty Use of Students/Trainees in Outside Professional Activities (Section D.5)).
   - The list of sections applicable to students/trainees has been updated to include: Faculty Use of Students/Trainees in Outside Professional Activities (Section D.5), Training and Education Regarding the Use of Medical Devices (Section E.4), Industry-Sponsored Scholarships and Fellowships (Section E.6), and Educational Grants and Donations (Section E.7).

3. **Definitions: Section C**
   - Several definitions have been added in order to sync this policy with the updated NU COI Policy. The new definitions include Conflict of Commitment, Investigator, and Outside Professional Activities.

4. **Disclosure of Outside Professional Activities and Conflict of Commitment: Section D**
   - This section has been updated to incorporate the NU COI Policy changes. Section D.1 has not undergone significant changes as it relates to the Joint Affiliate Annual Disclosure Surveying that Feinberg continues to handle on a school basis, but other sections were edited or newly created; they will be described in further detail below.
Transactional/Research-Related Disclosure: Section D.2
• This newly created section outlines the recently instituted requirements set forth by the Final Rule. This section explains the applicability of these new requirements and the timeframes surrounding the transactional disclosure process.

Disclosure Review and Conflict Management: Section D.3
• This section has been updated to include reference to the NU Conflict of Interest Office (“NUCOI”) and the NU Conflict of Interest Oversight Committee (“COIOC”) and their involvement in the disclosure review process. Additionally, more detail has been added to the explanation of the Feinberg COIC and its responsibilities as described in the NU COIR Policy.

Conflict of Interest Disclosure for Industry-Sponsored Research: Section D.4
• This is a new section that outlines the Feinberg COIC’s role in approving any Industry-sponsored research study that may involve a conflict of interest.

Faculty Use of Students/Trainees in Outside Professional Activities: Section D.5
• Another new section, Faculty Use of Students/Trainees in Outside Professional Activities, explains how involvement of students/trainees in faculty enterprises must be approved and documented using the Student Engagement in Faculty Enterprises Student-Faculty Agreement. Additionally, such involvements must be disclosed by all involved.

5. Professional Integrity: Section E
• Several sections that cover topics related to professional integrity were edited or newly created; they will be described in further detail below.

Training and Education Regarding the Use of Medical Devices: Section E.4
• This new section describes the guidelines with which faculty members and students/trainees must comply if they wish to attend training sessions related to the safe and effective use of certain medical technology. These guidelines will help ensure that they receive appropriate training free from inappropriate influences over their clinical decision-making, prescribing, and purchasing decisions.

Industry-Sponsored Scholarships and Fellowships: Section E.6
• While the Industry-Sponsored Scholarships and Fellowships section was included in the previous policy, new forms were created to electronically streamline the approval process for these activities. Rather than requesting approval from the Feinberg Vice Dean for Regulatory Affairs via e-mail, approval requests can now be submitted through an online form on the Policy Links page of the Office for Regulatory Affairs website.

Educational Grants and Donations: Section E.7
• The updated policy now outlines the approval process and requirements associated with grants/donations from Industry in the Educational Grants and Donations section. This new section delineates compliance safeguards for ACCME-accredited versus non-ACCME-accredited educational programs. New forms were created to electronically streamline the approval process for non-ACCME-accredited educational programs. Rather than requesting approval from the Feinberg Vice Dean for Regulatory Affairs via e-mail, approval requests can now be submitted through an online form on the Policy Links page of the Office for Regulatory Affairs website.