



FEDERAL DEMONSTRATION PARTNERSHIP
Redefining the Government & University Research Partnership

COI Subcommittee

Lindsey Spangler, Duke University

Amanda Humphrey, Northeastern University

FDP Meeting – September 2023



Agenda

- Updates:
 - fCOI Clearinghouse
 - Survey on COI practices & processes
 - COI Management plan tools
- FYI: consulting addendum
- Discussions:
 - Inclusion of VC funding in NSF PAPPG: how has that changed your institution's disclosure and review process?
 - Impact of new DOD matrix on COI reviews



FCOI Clearinghouse

- New FDP website launching soon
- Short-term:
 - Re-direct to the original fCOI Clearinghouse
 - Created new certification form to mirror expanded clearinghouse certification
 - Expanded Clearinghouse participants' profiles will point to expanded clearinghouse automatically
- Long-term: update fCOI Clearinghouse on new site
 - At the end of 2023, fCOI subcommittee will reach out to non-members registered in the clearinghouse asking them to re-register on new site
 - Eventually re-certification process/ability to update
- Thank you to Lawson Culver for making this work!



FCOI Clearinghouse

The Federal Demonstration Partnership [Home](#) [NIH Data Management and Sharing](#) [About](#) [Direct](#)

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Institutional Certification Detail

The institution below has certified on the FDP Clearinghouse that they are compliant with PHS FCOI Regulations.

Institution Name	Northeastern University
Authorized Representative	Amanda Humphrey
Authorized Representative Title	Director of Award Administration
Authorized Representative Email Address	a.humphrey@northeastern.edu
Primary DUNS Number Optional	14236



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Certifications

Conflict of Interest

Entity certifies that it has an active and enforced conflict of interest policy that is consistent with the provisions of the following agencies

Public Health Service (PHS): Yes
National Science Foundation (NSF): Yes
National Aeronautics and Space Administration (NASA): Yes
Department of Energy (DoE): Yes

Entity certifies that it has either incorporated conflict of commitment into its conflict of interest policy or has a stand-alone conflict of commitment policy.

Yes

Entity certifies that it has an organizational conflict of interest policy that is consistent with the provisions of FAR 9.5.

Yes



Survey on COI Practices/Processes

- Initial draft has been completed
 - Demographics
 - Process
 - Policy
 - Systems
- Finalizing draft to maximize consistency
 - Goal to release prior to end of 2023
- Analysis & report out
 - Raw, de-identified data will be provided to FDP member institutions
 - Final report & presentation to membership
 - Subcommittee will utilize to help plan future activities



COI Management Plan Tools

- Led by April Pepperdine at University of Michigan
- GOAL:
 - Generate a toolbox of management plan terms for institutions to streamline their COI management plans
- Project Status:
 - COMPLETE: gathered management templates via COI list serv
 - COMPLETE: generated template management tool box
 - **CURRENT: posted for comment to COI list serv (please provide guidance by end of September)**



FYI: Consulting Addendum

- Consulting addendum can be utilized by faculty for their outside consulting activities, clarifies their obligations to their home institutions
- Wide range of practice around providing/requiring addendum, subcommittee not ready to craft a comprehensive tool kit
- Will be gathering a few publicly available examples and posting some resources to our subcommittee page for institutions to utilize



Venture Capital Discussion

- [NSF PAPPG 2023, IX.A.1 \(pg 139\)](#)
- The term “significant financial interest” means anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interest (e.g., stocks, stock options, private equity, or other ownership interests); **venture or other capital financing**, and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).



Venture Capital Discussion

- How is your institution interpreting this?
- How has this played out at your institution?
- Has NSF asked your institution about how a PI's start-up is financed/funded?
- Will you collect and review information on venture capital or other financing of a PI's start-up?
 - **Alternatively, advise faculty with start-ups of this obligation?**
- Risks and unintended consequences of various approaches?



DOD Matrix Discussion

- June 30, 2023, DOD released a [new DOD Policy](#) on “Countering Unwanted Foreign Influence in Department-Funded Research at Institutions of Higher Education”
 - Guidance to DOD employees on how to assess and monitor risk
 - However, their guidance will inevitably impact how we review and guide risk discussions with our faculty and assess disclosures
- COGR has a good summary [here](#)



DOD Matrix Discussion

- How has this impacted your institution?
 - Need to change policy by Sept 2024 (define MTRP)
 - What about process?
 - DARPA and DEVCOM have their own slightly different matrices, not sure if they will convert to this
- Has this impacted any awards at your institution to date?
- How will you communicate this to faculty?
- Risks and unintended consequences of various approaches?



Key Takeaways

- Subcommittee is mid-stream on 3 projects:
 - fCOI Clearinghouse
 - Survey on COI practices & processes
 - COI Management Plan Tools
- We are also creating a small resource on consulting addenda, which institutions will not be required to utilize, but may be useful for faculty with outside activities
- The subcommittee is exploring how new funding agency guidance is impacting COI reviews, specifically related to DOD and NSF funding



Contact Us

- Co-chairs:
 - Amanda Humphrey, Northeastern University
 - Lindsey Spangler, Duke University

coi@thefdp.org