

Ask RCRA:

**Conflict of Interest &
Conflict of Commitment
Policy Update and Annual
Certification**

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The Team!

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When is my Annual Certification Due?

The annual certification cycle is from
December 1, 2023-February 29, 2024



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**Updated Policy- 7.7 Financial Conflict of Interest in Research

Policy Highlights

Went into effect on 9/28/23

- More closely aligned with Federal agency and University guidelines:
 - Timelines and definitions had most significant overhauling
 - Outlines Annual Certification period
 - Stresses Disclosure requirements (new SFI's within 30 days)
- Clarifies Key Personnel expectations
- Gives overview of the Financial Conflict of Interest Process
 - Disclosure to Committee Review



What is a COI Annual Certification?

Active COI Management Plans undergo a **COI ANNUAL CERTIFICATION** to answer a series of questions in eDisclose. This information may include, but is not limited to:

- Updating the list of people working on the project (i.e., Emory personnel, students/trainees, personnel from the external organization)
- Listing any new intellectual property related to the project that was filed since the plan's implementation or previous annual review
- Entering the statement, you will use/have used to disclose the conflict of interest to students, etc., and in publications or presentations



Why Disclose

- **Proper Disclosure is important because it allows:**
 - Protect research integrity
 - Protect researcher and institutional reputations
 - Protect population safety
 - Compliance with Federal law: 42 CFR Part 50, Subpart F



Disclosure Obligations

- Individuals have an obligation to avoid conflicts of interest and commitment when carrying out their external/outside activities (submission of a **Pre-Approval Request**) and University education, research, scholarship, or service responsibilities.

All external relationships, domestic and international should be transparent and must be disclosed in a manner that is consistent with applicable requirements, including federal and state laws/regulations/agency guidance, as well as Emory University's own policies and procedures.



COI Completion Requirements

- All faculty/staff (including **adjunct faculty**; and **emeritus faculty**)
- Postdoctoral scholars
- Research personnel engaged in the design, conduct, or reporting of sponsored research (including part-time and temporary employees)



Resources and Reminders

Resources:

- COI/COC Webpages
- SharePoint page on Annual Certification
- COI/COC Virtual Office Hours

Reminder:

- The annual certification cycle is from December 1, 2023-February 29, 2024
- Disclosure Requirements:
 - Within 30 days of onboarding to Emory University
 - Within 30 days of discovery or acquiring a new significant financial interest (SFI)

