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
**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
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

What is a COI Annual Certification?
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)