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Conflict of Interest & Commitment (COI/COC) Office Insight Information and Annual Certification Kick-Off

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**Ask RCRA
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Insight:



Emory University's new system for all Annual Certifications, Disclosures, and External Activity Requests (EARs)

- Launched on August 29, 2025
- Pre-Approval Request (PARs) and now known as External Activities Request (EARs)



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Research Compliance and Regulatory Affairs
Research Administration

Insight Resources:



- The training in Brainier provides great information for learning about the navigation of Insight

- Visit the COI/COC Office webpage to **view relevant job aids:**

[LEARN MORE ON OUR INSIGHT IMPLEMENTATION PAGE >>](#)

- Insight support requests will be handled via [ServiceNow](#), and the support request form is configured to automatically route to the correct team, ensuring timely responses and resolutions.



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Research Administration

Important Dates:

The Annual Certification Cycle is from
December 1, 2025, to February 28, 2026.



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Importance of Proper Disclosure:

- Ensure compliance and adherence to **regulations!**
- Ethics of Transparency
- Good Science requires objectivity
- Avoiding Legal Issues

Who must Disclose:

- Covered Individuals (involved in Design, Conduct, Reporting [DCR] of research) at Emory University must update their disclosure profiles and disclose
 - **External Activities**
 - **Conflicts of Interests**
 - **Foreign Travel**
 - **Foreign Affiliations**

Policy 7.7 Financial Conflicts of Interest in Research

Disclosure Requirements:

<https://rcra.emory.edu/includes/documents/sections/coi/international-disclosure-matrix-1.pdf>

Significant Financial Interests



Covered Individuals must disclose SFIs (as defined in [Emory Policy 7.7](#) and [Emory Policy 7.24](#)):

- During the 60-day annual certification period
- Within 30 days of discovering or acquiring a new Financial Interest (e.g., through purchase, marriage, or inheritance)
- Within 30 days of hire

Disclosing: Insight

- [Disclosure profile update \(My Updates\)](#)
- [Annual Certifications \(My Annual\)](#)
- [Confirming no disclosures \(Annual Cert\)](#)

Applicable Policies/Regulations:

- [Emory Policy 7.7 - Financial Conflicts of Interest](#)
- [Emory Policy 7.38 - Conflict of Commitment for Faculty, Postdoc/Trainees, and Research Staff](#)

External & Professional Activities



Covered Individuals must disclose prior to engaging in the External Activity

Disclosing: Insight - External Activity Report

- [Creating External Activities in the Agreements Module](#)
- [Create an External Activity Agreement Record \(with pictures\)](#)

Applicable Policies/Regulations:

- [Emory Policy 7.7 - Financial Conflicts of Interest](#)
- [Emory Policy 7.38 - Conflict of Commitment for Faculty, Postdoc/Trainees, and Research Staff](#)

Foreign Travel

All Faculty & Staff

All travel should be booked with one of 3 Emory approved vendors via the Travel Registry. Prior to traveling to comprehensively embargoed countries, travelers should report the country of destination, purpose of travel, travel dates/duration, itinerary, and who is responsible for paying for travel to ensure additional required screenings for export controls compliance are completed

Disclosing: [Emory Approved Travel Vendors](#)

Covered Individuals*

International Travel should be reported as soon as it is booked, and no later than 10 business days before departure. Please note that if an export license is required, additional time for approval may be necessary.

Disclosing: Insight 'My Travel' Form

- [Foreign Travel Disclosure \(My Travel\)](#)
- [Viewing and Searching for Travel](#)

Applicable Policies/Regulations:

- [Emory Policy 7.11 - Export Control](#)
- [Emory Policy 7.38 - Conflict of Commitment for Faculty, Postdoc Fellows /Trainees, and Research Staff](#)
- [Emory Policy 10.18 - Emory-Sponsored International Travel](#)
- [NSPM-33](#)

Foreign Affiliations

Covered Individuals must disclose Foreign Affiliations. Approval timeline requirements may vary depending on the type of Foreign Affiliation.

- Prior approval is required before engaging in the following activities:
 - Active appointments, position with or research support from any entity in a country of concern
 - Co-authorships;
 - Co-inventorships on patent applications
 - Appointments, positions or research support with collaborators
 - Active appointments, positions and research support for graduate students on the proposal

Disclosing: Insight

- [Disclosure profile update \(My Updates\)](#)
- [Annual Certifications \(My Annual\)](#)
- [Confirming no disclosures \(Annual Cert\)](#)

Applicable Policies/Regulations:

Emory	Federal
• Emory Policy 7.7 - Financial Conflicts of Interest • Emory Policy 7.11 - Export Control • Emory Policy 7.38 - Conflict of Commitment for Faculty, Postdoc Fellows /Trainees, and Research Staff	• CHIPS and Science Act • DOD Policy on Risk-Based Security Reviews for Fundamental Research • NIH - Other Support disclosure requirements • DOE Order 486.1 • NSF • NSPM-33

***Covered Individual:** an individual who (a) contributes in a substantive, meaningful way to the scientific development or execution of a research and development project proposed to be carried out with a research and development award from a Federal research agency; and (b) is designated as a covered individual by the Federal research agency concerned.

See [NSPM-33 definition](#) for additional relevant definitions.

Completion Requirements:

- Faculty/staff (may include **adjunct faculty** and **emeritus faculty**)- If non researchers, then *please confirm with your Assoc Dean of Faculty*
- Postdoctoral scholars
- Research personnel engaged in designing, conducting, or reporting (DCR) sponsored research (including part-time and temporary employees).

Job Aids for Annual Certification :

- [Disclosure profile update \(My Updates\)](#)
- [Annual Certifications \(My Annual\)](#)
- [Confirming no disclosures \(Annual Cert\)](#)
- [Disclosure Requirement Matrix](#)

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- COI/COC Virtual Office Hours -[SharePoint Annual Certification Page](#)