
EMORY
UNIVERSITY
Conflict of Interest &
Commitment (COI/COC) Office
Annual Certification Kick-Off
Ask RCRA
October 20, 2026

Important Dates:

The Annual Certification Cycle is from
December 1, 2026 to **February 28, 2027**

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

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/trainees
- Research personnel engaged in designing, conducting, or reporting (DCR) research (including part-time and temporary employees and research administrators)
- **New: Graduate Students**

Disclosure Requirements:

Significant Financial Interests



Covered Individuals must disclose SFIs (as defined in Emory Policy 77 and Emory Policy 724):

- 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 77 - Financial Conflicts of Interest
- Emory Policy 738 -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 77 - Financial Conflicts of Interest
- Emory Policy 738 -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 711 - Export Control
- Emory Policy 738 - 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

- Emory Policy 77 - Financial Conflicts of Interest
- Emory Policy 711 - Export Control
- Emory Policy 738 - Conflict of Commitment for Faculty, Postdoc Fellows /Trainees, and Research Staff

Federal

- 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 relevent definitions.

Disclosure Requirements:

Emory Research

DISCLOSURE QUICK GUIDE

Do I Need to Disclose This?

Most outside activities are appropriate. Disclosure allows Emory to review them and manage concerns, when needed.

Emory faculty and researchers often participate in consulting, collaborations, publications, startups, advisory boards, and other external activities. Some activities, financial interests, affiliations, support, and commitments may need to be disclosed under Emory Policy 7.7, Policy 7.38, or applicable sponsor requirements.

Use the five questions below as a quick screen. A "yes" does not mean the activity is prohibited. It means you should review the applicable requirements, disclose when required, or contact Research Compliance for guidance.

#	Question	Examples
1	**Am I receiving compensation from someone other than Emory?**	Consulting; advisory boards; honoraria; speaking; expert witness work; external employment.
2	**Do I hold a position, title, or appointment outside Emory?**	Adjunct or visiting appointments; scientific advisor roles; board service; company leadership; startup founder roles.
3	**Is anyone outside Emory supporting my research or scholarly activities?**	Funding; equipment; laboratory space; data; materials; personnel; visiting researchers; other in-kind resources.
4	**Could an outside activity interfere with my Emory responsibilities?**	Significant time commitments; competing obligations; outside management duties; activities that affect availability or professional judgment.
5	**Has anything changed since my last disclosure?**	A new activity, financial interest, appointment, affiliation, collaboration, research resource, or source of support.

Insight - Job Aids for Annual Certification :

- Annual Certification (My Annual)
- Disclosure profile update (My Updates)
- Confirming no disclosures (Annual Cert)



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- COI/COC Virtual Office Hours Forthcoming
- SharePoint Annual Certification Page
- Focus Group Feedback and FAQs

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

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.