DOE POLICY UPDATE

DOE COI/COC policy: what researchers need to know

The rule is sponsor- and award-specific, but Emory's existing framework provides the compliance foundation.

Final regulations

DOE published final conflict-of-interest and conflict-of-commitment regulations in 2 CFR Part 910, Subpart C, effective August 17, 2026.

Check the award

Existing awards remain under current terms until DOE modifies them. For new applications, follow the policy identified in the NOFO and award terms.

Expanded lens

DOE addresses financial conflicts, conflicts of commitment, and organizational conflicts in financial assistance awards.

TAKEAWAY

Do not assume one DOE rule applies to every project.

Confirm the applicable requirement in the specific funding notice, award terms, and any subsequent DOE modification.

Emory alignment

Existing disclosure, review, management, annual certification, and training processes already support compliance. Implementation should focus on sponsor-specific mapping, communication, and documentation.

PRACTICAL DISCLOSURE SCREEN

The five-question test

Use this quick screen for DOE-funded work and across the broader research portfolio.

1	**Compensation**	Am I receiving compensation from someone other than Emory?
2	**Position or title**	Do I hold a position, title, or appointment outside Emory?
3	**Outside support**	Is anyone outside Emory supporting my research or scholarly activities?
4	**Commitment**	Could an outside activity interfere with my Emory responsibilities?
5	**Change**	Has anything changed since my last disclosure?

A “yes” is not a prohibition. It is a prompt to review, disclose when required, and seek guidance early.