



EMORY
UNIVERSITY

**Conflict of Interest &
Commitment (COI/COC) Office
Annual Certification**

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Ask RCRA

February 10, 2025

The Annual Certification Cycle will run until
February 28, 2026.



EMORY
UNIVERSITY

Research Compliance and Regulatory Affairs
Research Administration

Let's Look at the Numbers

- 11278 Completed Annual Certifications
 - 7569 Still Not Started
 - 383 Have Started – Please finish!

- 4328 Faculty Have Completed
 - 6901 Staff Have Completed

What is Next?

Notifications
Ongoing
Weekly Until
2/28/2026

Identify Non-
Completes And
Continued
System
Notifications

Leadership
within Units
Looped In

- Research COI will help units and their liaisons find individuals who are non-compliant and communicate this to their unit's leadership
- Some units are expanded criteria outside of Research COI
- Progressive communication escalates in severity
- Non-Completion can result in severe consequences – Please Complete!

Common FAQs:

Question: I'm a student- should I select Faculty or Staff

Answer: Staff

Question: I believe I have received this request in error. Are you able to confirm that I need to complete this request?

Answer: A full or part-time faculty member who meets the criteria as required by their school/unit

- * An EHC provider or manager and above
- * A full-time Emory University Staff member
- * A Covered Individual (engaged in research)

Please consult with your department liaison for more information.

Question: I received the following email [External] Annual Disclosure Form - Action Required- is this spam?

Answer: No, this is an automatic message from Insight

Insight –Resources for Annual Certification :

Log in to complete the Annual Certification (My Annual):

- [Access Insight here](#)

Insight job aids for Annual Certification:

- [Annual Certification Form Completion \(My Annual\)](#)
- [Updating Previous External Activities \(My Updates\)](#)

For more information, visit:

- [Annual Disclosures](#)
- [Insight Implementation](#)



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

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 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	Covered Individuals*
<p>All travel should be booked with one of 3 Emory approved vendors via the Travel Registry.</p> <p>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</p> <p>Disclosing: Emory Approved Travel Vendors</p>	<p>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.</p> <p>Disclosing: Insight 'My Travel' Form</p> <ul style="list-style-type: none"> • Foreign Travel Disclosure (My Travel) • Viewing and Searching for Travel
<p>Applicable Policies/Regulations:</p> <ul style="list-style-type: none"> • 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	Federal
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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.