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# COI & COC Disclosure Requirements

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Ask RCRA

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# COI – COC Disclosures



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# What is a COI?

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- A conflict of interest is financial or other personal considerations may compromise — or have the appearance of compromising — an investigator's professional judgment in conducting or reporting research
- An example would be engaging with a sponsor of your Emory research in a consulting role

# What is a COC?

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- A Conflict of Commitment is the institutional determination that an individual's intellectual energy, time, or effort to external activities interferes with Emory responsibilities
- An example would be taking on a 2nd role outside of Emory that would impede one's ability to do their job fully

# Importance of Disclosure

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- **Disclosing helps ensure compliance!**
- **Ethics of Transparency**
- **Good Science requires objectivity**
- **Avoiding Legal Issues**

# COC Disclosure Requirements

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- **Disclose Before Activity Begins**
- **Disclose these:** Professional Activities that are based on expertise and knowledge conducted on behalf of another institution regardless of whether compensation is received.
- **Disclose in eDisclose platform**

# Pre-Approval Request Form

1. The Pre-Approval Request SmartForm can be initiated from your Disclosure Profile workspace. Click on the **Request Pre-Approval** button to access the Pre-Approval Request SmartForm.



2. **Pre-Approval Request SmartForm: Request Information**
  - 2.1. Enter a name for this pre-approval request.
  - 2.2. Select the type of pre-approval request that you want to submit.

[Go to forms menu](#)
[Help](#)

**1. Requestor:**  
Nicole Tannebaum

**2. \* Request name/title:** [?](#)

**3. \* Type of request:** [?](#)

Name	Description
<input type="radio"/> Consulting - No Research	Paid contract for expertise to produce a specific deliverable within a specified time frame or to be available on retainer, but no research opportunities and no reduction in Emory FTE.
<input type="radio"/> Consulting - Research	Paid contract for expertise to conduct research at another institution or where allowed to conduct research at another institution to produce a specific deliverable within a specified time frame. No reduction in Emory FTE.
<input type="radio"/> Expert Witness	Serving as a witness or reviewing documents for a legal matter
<input type="radio"/> Fiduciary Duty / Board Service	Service on the Board of Trustees/Directors or serving in a senior management role for an outside nonprofit or for-profit organization. For start-up company activities, please select Start-up Company.
<input type="radio"/> Foreign Talent Program	Membership in a foreign government talent recruitment program.
<input type="radio"/> Other Appointments - No Research	Paid or unpaid appointment at another institution with any commitment of time that does not meet the definition of Outside Appointment or Consulting or provide research opportunities.
<input type="radio"/> Other Appointments - Research	Paid or unpaid appointment at another institution with any commitment of time to conduct research, where allowed to conduct research on behalf of the institution, or where allowed to apply for research funding from external organization. No reduction in Emory FTE.
<input type="radio"/> Outside Appointment with FTE Reduction - No Research	Reduction in Emory FTE for employment in field of expertise, but no research opportunities (e.g., teaching position)
<input type="radio"/> Outside Appointment with FTE Reduction - Research	Reduction in Emory FTE for employment in field of expertise either to conduct research at another institution or where allowed to conduct research on behalf of another institution.
<input type="radio"/> Start-Up Company	Founding a start-up company or organization; serving on the Board of Trustees/Directors; serving in a senior management role



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# More Information

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- <https://rcra.emory.edu/coi/faqs.html>
- <https://grants.nih.gov/policy/foreign-interference/requirements-for-disclosure>



# International Travel

## PAR

## Export Control

## Review



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# EC Review for International Travel

- Travel destination – is it sanctioned or embargoed
- Purpose of travel
- Traveling with equipment or research material (including hand-carried items)
  - Is an export license required
  - What is the end use of equipment or material
  - Who is the end user?
- Travel with laptops – requires specific paperwork for embargoed destination (Cuba, IRAN, Russia, Ukraine regions of Crimea, Luhansk and Donetsk)
- Electronic Export Information filing required for laptops and handheld devices – China, Russia, Venezuela
- Travel Briefings – provided by Global Safety and Security, Office of Global Strategy and Initiatives.

# International Travel PAR Research Security Review



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# International Travel PAR – Research Security Review

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- **Destination**  
FCOC (Russia, China, Iran, North Korea)
- **Purpose**  
Supporting documentation (invitation, contract, sponsor)  
VC check on host entity/contact
- **Comment**  
Concerns - briefing  
Loaner Laptop Program  
RS International Travel Recommendations
- **Contact [researchsecurity@emory.edu](mailto:researchsecurity@emory.edu)**



## Case Study

Dr. Johnson has been invited to be keynote speaker at a conference at Huazhong University in Wuhan, China. The conference offers to reimburse travel expenses and pay honorarium of USD500.

- How should Dr. J. purchase the ticket?
- What details need to be included in eDisclose?
- What supporting documentation should be included in eDisclose?
- Can Dr. J. take their laptop?
- Can Dr. J. talk about a new NIH award that is almost completed?



# DISCLOSURE REQUIREMENTS

	INTERNATIONAL TRAVEL	INTERNATIONAL COLLABORATION	SPONSORED RESEARCH	OUTSIDE ACTIVITY
RESEARCHER	✓	✓	✓	✓
NON-RESEARCH FACULTY	✓	✓	✗	✓
STAFF	✓	✓	✗	✓
VISITING SCHOLAR	✗	✓	✓	✗

- SPONSORED RESEARCH INCLUDES EXCHANGE OF MATERIALS OR DATA
- OUTSIDE ACTIVITIES INCLUDE PATENTS, STOCK, GIFTS, CONSULTING, CONTRACTS, BOARD SERVICE, FTRP, MFTRP, ROYALTIES, LICENSE FEES
- INTERNATIONAL TRAVEL IS REVIEWED BY EXPORT CONTROLS, RESEARCH SECURITY, AND GLOBAL STRATEGY & INITIATIVES OFFICES; PRE-TRAVEL BRIEFINGS ARE PROVIDED AS APPROPRIATE.
- [LOANER DEVICES](#) ARE AVAILABLE AND HIGHLY RECOMMENDED.

Rev 5

## Disclosure Requirements Matrix

# Contact Information:

- [exportcontrol@emory.edu](mailto:exportcontrol@emory.edu)
- [EDisclose@emory.edu](mailto:EDisclose@emory.edu)
- [researchsecurity@emory.edu](mailto:researchsecurity@emory.edu)



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