RCRA Newsletter

Research Compliance News from your Trusted Partners

February 2026, Issue 112

Research COI News You Can Use

Annual Certification Statistics:

Annual Certification Progress:

- 11,278 individuals have completed Annual Certifications

Outstanding Certifications:

- 7,569 individuals have not yet started
- 383 individuals have started but not finished — completion still required

Completion by Role:

- 4,328 faculty members have completed
- 6,901 staff members have completed

Notifications will be sent weekly until February 28, 2026, to identify individuals who haven't finished the necessary tasks and to keep reminders active. The Research COI will assist units and their liaisons by pinpointing non-compliant personnel and sharing this information with the respective unit leaders. Some units may also add criteria beyond those from Research COI.

As deadlines near, communication will become more urgent and direct, and persistent non-compliance may result in serious consequences, emphasizing the need for prompt action and adherence.

Walk-In Wednesday

Join COI/COC Office on the 4th Wednesday of every month, 11:00 a.m.–12:00 p.m. for open Q&A & occasional learning sessions with COI/COC office members.

Join Zoom Session via this link

Loaner Laptop Program

Loaner laptops are available for international travel when faculty are conducting Emory related work, research, or academic activities. Faculty may also request a loaner laptop for personal international travel (e.g., PTO) if they need to access Emory systems or continue Emory related work while abroad.

Required Use for Certain Destinations

Use of a loaner laptop is *required* for travel to designated high risk locations. This includes countries of concern—China, Iran, North Korea, Russia, and regions of Ukraine under Russian control (Crimea, Luhansk, and Donetsk)—as well as any destination classified as Level 3 or Level 4 on the U.S. State Department Travel Advisory website.

Cost and Responsibility

There is no cost to borrow a loaner laptop. However, travelers are responsible for any loss of or damage to the laptop and any associated peripheral equipment

Device Options

Loaner laptops are available in both PC and Mac formats.

Request a loaner through ServiceNow Service Portal
Please see the loaner laptop webpage for full details.

CUI Quick Tips: Do's and Dont's

Controlled Unclassified Information (CUI) is sensitive government information that isn't classified but is protected by law or policy, and you'll know if you're handling it as it will be explicitly marked as CUI or specifically identified in your contract, award, or sponsor communications.

DO:

- Access and share CUI only if you're authorized, trained, and have a need-to-know
- Store and transmit CUI only on approved, secure systems
- Follow required markings and report any suspected spill or improper access immediately.

DON'T:

- Don't use personal email, devices, or unapproved storage for CUI.
- Don't share CUI with unauthorized individuals or remove markings without official authorization.
- Don't assume information is safe to share – verify first.

When in doubt, stop and contact the Export Control and Research Cybersecurity Office (exportcontrol@emory.edu)

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ClinCard Program Update - As of Feb. 23rd

Beginning February 23, Emory has new payment options for study participants which include **VISA virtual cards, VISA physical cards and direct bank deposits**. These new options provide lower fees, more flexibility, and a smoother experience for both participants and study teams. The How do I Submit a ClinCard Request job aid is updated with the new instructions.

What You Need to Know

- You may only request these new options when you have issued all of your remaining physical MasterCards. **All physical MasterCards previously purchased should be issued by May 31. After May 31, you should be fully issuing new VISA or ACH payments.** Encourage participants to spend down any remaining funds, as balances cannot be transferred to VISA virtual cards, VISA physical cards, or bank transfer.
- Continue to make card requests for new studies through the Compass ClinCard Request form and existing studies through emoryclincards@emory.edu.
- Continue to use Greenphire to manage payments to participants for both virtual and physical cards. ACH requests are completed directly in Greenphire.
- Physical cards will still be available, but new forms submitted will default to virtual cards.

Please see Human Research Participant Payments Website for more details

Clinicaltrials.gov

ClinicalTrials.gov is a clinical trial registry & results database run by NIH that provides patients/research subjects, family members, health care professionals, researchers, and the larger public with easy access to information on federally and privately supported clinical studies. Clinical studies are registered on ClinicalTrials.gov via a web-based data entry system called the Protocol Registration System (PRS). Information on ClinicalTrials.gov is provided and updated by the Sponsor or Principal Investigator of the clinical trial.

Regulations:

FDAAA/Final Rule	ICMJE Publication Requirements	NIH Dissemination Policy	CMS Billing Requirements
Applicable Clinical Trials (trials of drugs/ biological products other than phase 1 trials, devices trials other than feasibility studies, & pediatric device post market surveillance) are required to be registered and result reported	The International Committee of Medical Journal Editors (ICMJE), in 2005, required that all clinical trials be entered into the public registry and included data sharing plan	Clinical trials funded in whole or in part by the NIH initiated after Jan. 18, 2017, are required to be registered and result reported	Published by the Center for Medicare and Medicaid Services (CMS), as of Jan. 2014, the National Clinical Trial (NCT) number is required for qualified claims

Reminders:

- Registration of the clinical trial must be done *prior to first participant enrollment* and in general, results of the clinical trial must be submitted *no later than **12 months** after the primary completion date.*
- Consequences for failing to register a clinical trial or submit trial results can include but are not limited to:
  - Monetary penalties (~$12,000/day)
  - Withholding of grant funds
  - Medicare/Medicaid claims not paid
  - Denied publication in medical journals
  - Hold on eIRB study activation
  - Hold on coverage analysis finalization

For detailed requirements and FAQs visit the Office for Clinical Research website.

Research Policy Digest

This digest summarizes recently approved compliance policies to keep stakeholders informed and includes a link to the policy brief for each policy. Policy Briefs provide a quick overview of scope, applicability, and compliance with university policies.

Click to view the first edition!

View our full Research Compliance policy handbook on our Program Effectiveness Website

AAALAC Accreditation Site Visit

The AAALAC International site visit was successfully completed between February 9–11. Overall, the evaluators expressed appreciation for Emory's strong commitment to animal welfare and program oversight of the animal activities. As expected, several Suggestions for Improvement (SFIs) were identified and will be addressed in the coming weeks.

Stay tuned for updates as follow-up activities move forward!

View the IACUC Feb. 2026 Newsletter here.

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Research Controlled Drug Compliance (RCDC)

Emory has recently updated its procurement process for Controlled Substances, Dangerous Drugs, and List I & II Chemicals (collectively referred to as **Controlled Drugs**). The RCDC team will now review and approve all requisitions flagged for these items. To avoid processing delays, please ensure the following:

- The DEA/GBP license holder's name (Registrant) is listed in the "Ship To" address field
- The address in the "Ship To" field matches the address on the license exactly.
- A current, active DEA and/or GBP license is attached in the requisition attachment section.
- Non-catalog orders include a screenshot of the product pricing in the attachment section.

As part of enhanced due diligence and security measures, Emory now requires each Registrant to formally identify and register authorized purchasers under their DEA or GBP license. Authorized purchaser information will be maintained and verified in EHSA.

Orders submitted by individuals who are not registered as authorized purchasers will be suspended until the Registrant confirms the requestor's authorization.

Users of DEA-regulated List I & II Chemicals must also register these chemicals with Emory and indicate whether they are used in manufacturing controlled substances. Submit disclosures via the **Controlled Drug Compliance Disclosure & Notification Form**. Thank you for supporting these strengthened compliance measures.

Minors in Research Form

Policy 7.21 Minors Participating in Research Activities at Emory University requires PIs/sponsors to complete a Minors Registration Form if they plan host minors in their lab. The Minors' Registration form is **now available online**.

- Minors are permitted to enter laboratories or participate in research activities at Emory University only if they are participating in an approved program (hosted by a PI/sponsor who has received pre-approval for the project).
- The minor cannot begin participating in research activities until Program Effectiveness/RCRA provides final approval.
- The minor is authorized to participate only in the activities specified in the approved form. Any changes to these activities require an updated form and RCRA approval.

Approval Process:

1. The PI/sponsor will need the minor's name and email to begin the form.
2. After saving the minor's information, the minor will receive an email link to complete their portion of the form and to enter their parents' and school official's email.
3. The parent and school official will receive links to complete their portions of the form.
4. The PI will then receive an email notification that the minor, parent, and school official have completed their portions of the form and asking the PI to go in the portal to complete the remaining sections of the form.
5. Once the PI completes the form, internal review will be triggered based on applicability (EHSO, research security/export control, and IACUC).
6. Once the internal Emory offices have signed off, RCRA will issue final approval. The minor can begin participating in research activities only after RCRA issues approval.

Please note: Approval timelines may vary. PIs are strongly advised to submit the form *at least four weeks* prior to the anticipated start date to allow adequate time for review and processing. Once final approval is received, PIs may begin training and onboarding the minor.