



October 30, 2009

Members of the Emory Research Community:

As you know, the NIH imposed Special Award Conditions on Emory on October 8, 2008. During the past year, the University has made improvements to its business practices regarding the management of research financial conflicts of interest. The NIH has monitored our operations throughout the year, including a site visit in the Spring. Based on our new processes and demonstration of compliance with those processes, the NIH has lifted the special conditions, effective immediately.

While the lifting of the special award conditions will affect several of our procedures, we are still required by regulation to identify any Significant Financial Interests of Emory Investigators at the time an application is submitted. Any Financial Conflicts of Interest must be reported to the appropriate funding agency prior to the expenditure of funds under an award. If a Significant Financial Interest arises during an award period, it must be reported immediately to the COI Office. If it is found to be a Financial Conflict of Interest, the Office will report it to the sponsor within 60 days of its identification.

Going forward, OSP must continue to receive Investigator Financial Interest in Research Reports from each Emory Investigator participating in the Research. **Investigators on subawards do not need to submit a form with your application but must follow their own institution's policies and procedures.** The subaward institution will provide a standard consortium letter or Face Page at the time of proposal submission, as well as an assurance for compliance with all regulations and policies as a part of the subcontract at the time an award is made. By the end of the year, the electronic reporting system will be available to all Emory Investigators. Until that time, forms may be found on the OSP and COI websites: http://www.osp.emory.edu/shared_web/forms/spaf/COI.pdf. As a reminder an Emory Investigator means anyone who is responsible for design, conduct or reporting of the research. At minimum the following Emory individuals must complete the forms:

- Any person whose biographical sketch is included in the proposal; and/or
- Any person whose name appears in the budget.

Any questions regarding the policy (<http://policies.emory.edu/7.7>) or procedures may be directed to the Conflict of Interest Office at 712-0046.

Sincerely,

Brenda Seiton, JD, Asst. Vice President for Research Administration

Holly Sommers, Associate Director of OSP

David Wynes, PhD, VP for Research Administration