



MEMORANDUM

TO: Deans, Directors, ADRs and Department Heads
FROM: Elizabeth "Betsy" Cantwell, MBA, PhD
Senior Vice President for Research & Innovation
CC: Sangita Pawar, John O'Neil, Taren Ellis Langford
DATE: June 17, 2022
RE: COI Disclosure Updates

PLEASE DISTRIBUTE TO YOUR RESEARCH FACULTY

The conflict-of-interest (COI) landscape is changing rapidly in terms of new federal regulations with which all universities must comply in the face of research security issues. In December, the Department of Energy (DOE) issued an [interim COI policy](#) requiring additional compliance components, including disclosure updates for Reimbursed and Sponsored Travel and for Assurance and Certification, effective June 18. To that end, University of Arizona [investigators](#) (any person who shares the responsibility of conducting research) must update their disclosure, as necessary, within two weeks of receiving this memo.

Reimbursed and Sponsored Travel

This update concerns only those investigators who receive or apply for DOE and Public Health Service (PHS) funding. PHS refers to the U.S. Department of Health and Human Services and any components of the PHS to which the authority involved may be delegated, including the National Institutes of Health.

Investigators who receive or apply for funding from either agency must disclose all travel that is paid for or reimbursed directly to them by an outside entity for travel related to their professional expertise. This disclosure requirement does not apply to travel that is reimbursed or sponsored by one of the following:

- a federal, state, or local government agency of the United States,
- a nationally accredited US institution of higher education, or
- a domestic research institute that is affiliated with a nationally accredited domestic institution of higher education.

To comply with this requirement and update your disclosure, please contact coi@arizona.edu to request a link. This link bypasses several steps, taking you directly to the workspace.

Assurance and Certification

An addition to the Assurance and Certification page at the end of the disclosure requires all investigators, even those not funded by DOE or PHS, to check a box acknowledging and certifying that they understand the federal government's position on why disclosures must be complete and accurate.

The Office of Responsible Outside Interests (OROI) has added the required components to the [eDisclosure](#) system and [screenshots](#) to the RII website. If you have any questions, please contact OROI's faculty liaison, Judi Lopez, at Judithl@arizona.edu. Thank you for your patience and diligence in ensuring your work is compliant with federal laws and regulations.