




**Georgia Institute
of Technology**

Conflict of Interest Office
Office of Sponsored Programs
Atlanta, Georgia 30332-0420 U.S.A.
Phone: 404-894-6925
Fax: 404-385-2078

August 13, 2015

To: eCOI Administrators

From: Jeff Steltzer, Director
Conflict of Interest Management Office 

Subject: Review of External Activity Reports in eCOI

For persons responsible for reviewing External Activity Reports (EARs) for employees in your unit, I wanted to remind you of the review process and let you know that my staff and I are always available to help if you have any questions.

Your role as reviewer is to determine whether a proposed external activity is appropriate for your employee, *e.g.* does the employee have the time to do the activity, is it an activity that is appropriate for consulting, does the activity create a conflict of commitment with proposed or ongoing sponsored research, teaching and other Institute duties. If during the course of reviewing an EAR you believe that the proposed activity would be inappropriate for your employee or would create an unmanageable conflict of interest, you may disapprove the activity. For those of you in GTRI, please remember that your employees must use vacation time for their external activities if the activity occurs during their normal working hours. Therefore, reviewers in GTRI should ensure that their employees have adequate leave for the proposed activity prior to approval.

Certain activities should receive heightened scrutiny because they do create the potential for major Conflicts of Interest (COIs). These potential COIs are not necessarily a bar to the activity, but will require review and management by the COI Review Committee. For example, startup company formation and licensure of IP related to Georgia Tech research is almost always fraught with real and potential COIs. When students are involved in the startup the issues are more complicated and Georgia Tech must protect our students and the educational mission of the Institute even as we pursue our economic development goals. These situations will always require the assignment of a co-advisor and should be carefully scrutinized by the School Chair to make sure that the arrangement is in each student's best interest. If a faculty member serves as a consultant for a start-up company in which he or she has an interest, a COI management plan will be required.

In addition, if the faculty member indicates on the EAR that he or she will need GT resources for the activity by answering "yes" to question 11 on the EAR, you need to make sure that the proposed use complies with Georgia Tech policy. In general, Georgia Tech employees and faculty are not permitted to use Georgia Tech resources for their personal consulting activities. There are certain instances where the employee can pay Georgia Tech a fair-market rate for using the resource, but these are only in established cost centers and/or in other areas where an approved method to reimburse the Institute is in place. If your faculty member indicates he or she will need access to Georgia Tech resources, then you need to find out what resources are

required and whether there is a cost center through which the faculty member or start-up company can pay Georgia Tech for their use. If the activity will require the use of significant Georgia Tech resources, the activity might be more appropriately structured as a sponsored research project.

As a reminder, it is not your responsibility to determine whether any particular activity creates a COI. That is the COI office and COI Review Committee's responsibility per the Institute's "Conflict of Interest and Outside Professional Activity Policy" (See faculty handbook policy 5.6, which is available online at <http://www.policylibrary.gatech.edu/faculty-handbook/5.6-conflict-interest-and-outside-professional-activity-policy#node-1737>). Institute COI review is centralized to ensure that Institute Policy, state law, and our various sponsor regulations and policies are followed and applied uniformly across the Institute. Furthermore, this centralized COI review enables the Institute to remain in compliance with a multitude of sponsor, federal, and state regulations governing COI review, management, and reporting.

Thank you for your help in meeting GA Tech's compliance responsibilities. Please feel free to contact me if you have any questions.