

To: Research Administrators, Associate Deans for Research

From: Monique Tavares, Associate Vice President - Research Administration

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Re: Organizational Conflicts of Interest (OCI)

Date: February 3, 2017

Recently, the Office of the Executive Vice President for Research (EVPR) has seen an increasing number of Organizational Conflict of Interest (OCI) review requests. This increase corresponds to the growing group of faculty who are engaging in contracts, rather than grants, sponsored either directly or indirectly by Department of Defense agencies. While the Georgia Tech Research Institute (GTRI) has significant experience with such contracts, on the campus side we are still learning the most efficient ways to address OCI and developing our best practices.

GTRI is already involved in the campus process simply because OCI reviews must be organization-wide, meaning that GTRI projects have to be evaluated as potential conflicts even for work done in the academic units or Interdisciplinary Research Institutes. In an effort to combine forces and better leverage the knowledge and resources housed at GTRI for the campus review process, the EVPR office is establishing a standing review process in partnership with Marty Broadwell at GTRI, who conducts OCI reviews for GTRI and has provided generous support and direction to our office as we've considered these review requests.

The review process will work as follows:

- For any project that requires an OCI certification—for example in the proposal response or as contractual language—or any project (new or old) in which an OCI issue may exist, PIs (or their designates) will provide the following to Gail Spatt (spatt@gatech.edu), with a copy to Marty Broadwell (marty.broadwell@gtri.gatech.edu) and the appropriate contracting officer:
 - Routing sheet
 - Statement of Work and/or Technical Proposal
 - Language specific to OCI within the request for proposals or draft contract
 - Any information regarding potential OCIs
- OCI requests will be reviewed on a weekly basis, typically on Thursdays at 3:00 pm, by a small committee that includes both Gail and Marty. Interviews with the PIs will likely be scheduled after this meeting, with the final paperwork released to the contracting officers as quickly as possible after all relevant conversations have concluded.

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Our office is highly aware of the time-sensitive nature of these requests, which is why we encourage PIs to contact us as early as possible in the submission process. We understand that OSP's deadline falls five days before the agency deadline, but because we will only be meeting weekly, we can provide a more thorough analysis and better address potential issues if we are contacted as soon as the PI begins work on a proposal rather than only five days out. It is unlikely that five days is enough time to create an OCI mitigation plan should one be necessary, so the OCI review should take place prior to releasing a proposal to OSP for submittal.

Note that OCI "certifications" or "representations," when required, are typically described in the RFP or BAA proposal instructions and sometimes appear in teaming agreements or subcontract clauses. These documents often supply templates and/or OCI wording to be submitted with the proposal and are usually available early in the proposal timeline. Pay special attention to calls from DARPA, NASA, and I-ARPA; these contracts generally require an OCI representation/certification.

Note that OCI is distinct from personal conflicts of interest (pCOI), which continue to be managed by [Jeff Steltzer's office](#). Personal COIs must be disclosed when they arise and any time they are related to a sponsored project or IRB protocol.

Please direct all questions regarding OCI to Gail Spatt at 404-385-8334 or spatt@gatech.edu Gail can also arrange a brief training for anyone who would like to learn more about OCI.