Emory Research A-to-Z

September 20, 2012
Agenda

- Year in Review
- RA Announcements
- Updates: Mandatory Training for Clinical Research Team
- NIH Human Subjects Requirements
- COI Policy Update
- Freedom of Information Act (FOIA) Requests
- Q&A
Year in Review - Proposals

Total Dollars Requested
$915,959,465

- Medicine: $593,172,971
- Public Health
- Emory College
- Yerkes
- Nursing
- All Others

$132,652,177
$49,928,397
$102,983,127
$15,963,862
$21,258,931
Year in Review - Awards

Total Sponsored Research
$518,574,278

- Medicine: $331,289,066
- Emory College: $28,863,967
- Nursing: $73,876,253
- Yerkes: $65,315,069
- Public Health: $7,435,173
- All Others: $11,794,151
- All Others: $11,794,151

Emory Research A-to-Z
# Year in Review – Expenditures (First Close)

<table>
<thead>
<tr>
<th>Emory University</th>
<th>Direct Costs</th>
<th>Indirect Costs</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>September</td>
<td>$30,146,098</td>
<td>$9,109,131</td>
<td>$39,255,229</td>
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<td>October</td>
<td>$27,969,800</td>
<td>$9,749,810</td>
<td>$37,719,610</td>
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<td>November</td>
<td>$28,668,296</td>
<td>$9,906,535</td>
<td>$38,574,830</td>
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<tr>
<td>December</td>
<td>$28,511,431</td>
<td>$10,478,437</td>
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<td>January</td>
<td>$29,316,336</td>
<td>$9,450,158</td>
<td>$38,766,494</td>
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<td>February</td>
<td>$37,619,844</td>
<td>$10,202,947</td>
<td>$47,822,791</td>
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<td>March</td>
<td>$30,874,607</td>
<td>$10,524,539</td>
<td>$41,399,146</td>
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<td>April</td>
<td>$29,021,277</td>
<td>$10,034,952</td>
<td>$39,056,230</td>
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<td>May</td>
<td>$29,932,439</td>
<td>$9,817,328</td>
<td>$39,749,767</td>
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<td>June</td>
<td>$32,837,758</td>
<td>$10,825,926</td>
<td>$43,663,684</td>
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<td>July</td>
<td>$32,547,130</td>
<td>$10,364,797</td>
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<td>August</td>
<td>$36,889,947</td>
<td>$11,659,238</td>
<td>$48,549,185</td>
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<td><strong>Total</strong></td>
<td><strong>$374,334,963</strong></td>
<td><strong>$122,123,797</strong></td>
<td><strong>$496,458,760</strong></td>
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High Five!
Future Trends?
Funding Trends Discussion
Fiscal Year 12 Awards

$518,574,278 total funding

- Federal – $349,196,140
- Foundation – $80,259,785
- Corporate – $40,087,267
- State – $7,170,865
- University – $35,631,569
- Foreign – $6,228,652
Sponsored Research at Emory

Fiscal Year 12 Proposals

- $915,959,465 Total Proposed
  - Federal – $673,712,366
  - Foundation – $98,367,187
  - Corporate – $62,168,059
  - State – $8,564,129
  - University – $62,408,287
  - Foreign – $10,739,438
Sponsored Research at Emory – Awards

FY03 FY04 FY05 FY06 FY07 FY08 FY09 FY10 FY11 FY12

TOTAL
FEDERAL
FOUNDATION
CORPORATE
UNIVERSITY
FOREIGN
STATE
Sponsored Research at Emory – Proposals

FY03  FY04  FY05  FY06  FY07  FY08  FY09  FY10  FY11  FY12
RA Announcements

- Contract Attachment in Compass:
  - Campus will have access to view signed invoices and Federal Financial Reports (FFRs).
  - For directions on how to view these documents, and for more information, please see the August 2012 RA Newsletter. [http://www.osp.emory.edu/communication/newsletter/newsletters/RA_News_Aug_12.pdf](http://www.osp.emory.edu/communication/newsletter/newsletters/RA_News_Aug_12.pdf)

- Additional topics in the August 2012 RA Newsletter:
  - Finding Research Funding
  - CRA Study Group Information
  - FY13 Federal Fringe Rates
  - ERS Upgrade
  - Budget Override Process for Journal Entries
  - EPEX Tips
  - Announcements from the OCR
Annual Certification Forms for are ready and available!

- DUE DATE: December 31, 2012 for all faculty involved in research
- Schools may require that all faculty and certain senior level staff complete annual disclosures.
- Faculty who are PHS Investigators, must complete the annual disclosure by the EARLIEST of the following dates:
  - Renewal of a current PHS award or subcontract;
  - Notice of award of for a new grant or contract;
  - Submission of a new proposal; or
  - December 31, 2012
RA Announcements

- “Body of Knowledge” Review Session @ Emory
  - Research Administrators Certification Council (RACC)
  - Possible Dates: 2\textsuperscript{nd} or 3\textsuperscript{rd} week of October
  - Register on the RACC website: \url{http://www.cra-cert.org/examschedule.html}
  - For more information: jepatte@emory.edu

- Introduction to Clinical Research @ Emory for Coordinators and Nurses
  - Effective September 7, 2012
  - MANDATORY
EDUCATION

General Information and Updates

Bridget D. Strong, MBA, CCRP
Director, Education & Outreach
Office for Clinical Research – OCR
Objectives

- To increase your awareness about the mandatory training for investigators, coordinators, nurses, residents, and fellows.

- To report the learner’s progress in completing the mandatory trainings.

- To verbalize the consequences of not completing the mandatory requirements.
Mandatory Trainings

- Key Concepts in Clinical Research for Investigators Course
  **Deadline:**
  June 19, 2012

- Introduction to Clinical Research for Coordinators and Nurses
  **Deadlines:**
  New Hire/New Research – 60 days for hire
  Existing Coordinators/Nurses - March 7, 2013
Any investigator conducting a clinical trial has to complete this mandatory course.

Many were notified about the course through various means –

- Clinical_Investigator Listserv
- Coordinators/Nurses
- Research Billing Compliance Contacts
- Word of Mouth
- Internal Auditors
- IRB
Progress Report: 09-01-2012

Key Concepts Course: Investigator Progress

- Started at least 1 module: 18
- Not Started: 264
- Completed: 654
- Total: 936
What’s next...

- **IRB review**

  **SAMPLE EMAIL:**

  DEAR ____________

  ACCORDING TO ELMS, ____________ HAS NOT COMPLETED THE MANDATORY ON-LINE KEY CONCEPTS COURSE IN CLINICAL RESEARCH. I WILL NOT BE ABLE TO PROCESS THIS ____________ UNTIL THAT IS COMPLETE. PLEASE CONTACT OCR AT OCR@EMORY.EDU OR 404-778-4960 IN REFERENCE TO THE MANDATORY ON-LINE KEY CONCEPTS COURSE AND FOR REGISTRATION INFORMATION.

  PLEASE DO THIS ASAP AND LET ME KNOW WHEN THIS IS COMPLETE SO I CAN NOTIFY THE IRB. UNTIL THIS IS DONE, YOUR REQUEST CANNOT BE APPROVED.

- **OCR Registration** – The course is administered and facilitated using the Emory Learning Managements System (ELMS). Investigators will not automatically see the course in ELMS. Reference [www.ocr.emory.edu](http://www.ocr.emory.edu) for next steps.
What’s next...

- Starting **September 4, 2012**, new clinical studies, and studies adding new clinical investigators, will be required to upload the Key Concepts training certification into eIRB. The IRB staff will no longer be performing this check.

- ELMS provides investigators with a Certificate of Completion.

- Monthly, OCR issues continuing medical education credits (CMEs) to investigators who have completed the course.

- Re-certification will be every 2 years (i.e. 2014).
Questions?
Introduction to Clinical Research at Emory for Coordinators and Nurses
Introduction to Clinical Research at Emory for Coordinators and Nurses

- This course replaced the “How to Conduct Clinical Research at Emory: The Basics” course.

- Any key staff personnel functioning as a clinical research coordinator or nurse on a clinical trial has to complete this mandatory course.

- Many were notified about the course through various means –
  
  ▶ Personal Email
  ▶ CTO_Announcements Listserv
  ▶ Department Administrators
  ▶ Research Billing Compliance Contacts
  ▶ Word of Mouth
  ▶ Internal Auditors
  ▶ IRB
- Supporting Role (not Investigators)

5.0 Name of Principal Investigator. Limit is one person; Emory affiliation is required. If name does not appear in menu, the person probably does not yet have an eIRB account. For more information about obtaining an eIRB account, click here.

6.0 Names of Emory Co-Investigators. May include Emory personnel and non-Emory persons with sponsored eIRB accounts. If name does not appear in menu, the person probably does not yet have an eIRB account. For more information about obtaining an eIRB account, click here.

7.0 Names of Emory Study Coordinators. May include Emory personnel and non-Emory persons with sponsored eIRB accounts. If name does not appear in menu, the person probably does not yet have an eIRB account. For more information about obtaining an eIRB account, click here.

8.0 Names of other Emory Study Staff not listed above. If name does appear in menu, the person probably does not yet have an eIRB account. For more information about obtaining an eIRB account, click here.

9.0 Enter information on Non-Emory Study Staff: (this is for non-Emory personnel who will not be logging into eIRB)
Congratulations!!!

250+ Coordinators and Nurses have completed the “How to Conduct Clinical Research at Emory: The Basics course” and they do not have to new mandatory course.

All that hard work paid off!!!!
What’s next ...

- Exemption
- Pre-requisites
- Learning Environments
  - Classroom (2-day, consecutive Fridays)
  - Online (7 modules)
- Continuing Education Units (CEUs)
- Refer OCR’s website for detailed instructions at
  [http://www.ocr.emory.edu/Education_&_Outreach/Courses/index.cfm](http://www.ocr.emory.edu/Education_&_Outreach/Courses/index.cfm)
What’s next ...

- IRB review will start in March 2013.

- ELMS provides coordinators and nurses with a Certificate of Completion.

- Monthly, OCR will issue CEUs to coordinators and nurses who have completed the course.

- Re-certification will be every 2 years (i.e. 2014).
Questions?
Introduction to Clinical Research at Emory for Residents and Fellows
Mandatory Training for Residents and Fellows

COMING SOON
Questions?
Questions?

Contact:
Office for Clinical Research (OCR)
404-778-4960 (Main)
404-778-4989 (Fax)
www.ocr.emory.edu
NIH Human Subjects Requirements

Holly Sommers

Director, Pre-award Grants Administration

Sarah Putney

Director, Institutional Review Board

September 20, 2012
Human Subjects Requirements

Agenda

- **Active Awards** – Changes to human subjects involvement that require NIH Prior Approval

- **Delayed Onset Awards** – Awards Initially Submitted without Definitive Plans for Human Subjects Involvement
Active Awards

- Changes in Scope have always required NIH prior approval.
- Change in Scope – change in the direction, aims, objectives, purposes, or type of research identified in the approved project.
- Includes change from the approved involvement of human subjects, a shift of the research emphasis from one disease to another, or a clinical hold by the FDA under a study involving an IND or IDE.
Active Awards

- NOT-OD-12-129 provides additional clarification on changes that involve human subjects on active awards which will require NIH prior approval.
- Issued 8/2/12
- Effective immediately
- In general, any change in research procedures that would result in an increased risk level to human subjects will require NIH prior approval.
Active Awards

This would include:

- Any change to the study design or protocol that results in the need to change the overall human subjects designation or clinical trial designation of the grant:
  - Change from non-human subjects research to human subjects research (exempt or non-exempt)
  - Change from exempt to non-exempt human subjects research
  - Change from “No CT” to “Includes a CT”
Active Awards

- The new inclusion of subject populations that are covered by additional regulatory protections (pregnant women, human fetuses, and neonates; prisoners; or children)
Active Awards

- Any change to the protocol that would result in an overall increase in risk level for subjects, including physical, psychological, financial, legal, or other risks. Examples include:
  - Addition of a new study population that would be at higher risk from existing procedures;
  - The addition of new study procedures that are greater than minimal risk;
  - Modification of existing study procedures that increase overall risk;
  - Addition of a new CS/CT intervention arm not originally proposed that is greater than minimal risk.
Active Awards

- New information that comes to light after a study is underway that indicates a higher level of risks to participants than previously recognized.
Active Awards

- Principal Investigators should notify OSP prior to any such changes when such changes are contemplated or considered.
- The IRB will monitor modifications to existing IRB protocols and will notify OSP if they receive any requests for amendments that involve these types of changes.
  - The responsibility still lies with the PI to comply with the NIH policies.
  - The IRB will do its part to help, but systems are manual and imperfect.
When such changes are necessary, prior approvals must be submitted in writing by OSP to the NIH GMS no later than 30 days before the proposed change.

Proposed changes may be addressed in an annual progress report, however, a formal prior approval request must be submitted as a separate request prior to initiating new human subjects activity.
Active Awards

- Required documentation for a prior approval request:
  - Complete grant number (okay in subject line of e-mail)
  - Grantee name, name of the initiating PI, PI phone, fax, and e-mail address, and corresponding contact information for AOR
  - Documentation of proposed changes (such as new/revised protocol)
  - New or revised human subjects section
  - New or revised Inclusion Plans for Women, Minorities, and Children, if applicable
  - New or revised Targeted Enrollment Table, if applicable
  - New or revised Data and Safety Monitoring Plan (DSMP) and Board (DSMB), if applicable
  - Certification that Key Personnel have taken appropriate education in the protection of human subjects
Active Awards

- NIH will require certification of Emory’s FWA, if not previously provided, and IRB approval of the NIH-approved plans before any new activities can begin.

- IRB review will continue while the NIH request is being evaluated. If NIH requests additional modifications, additional IRB review may be necessary.
Active Awards

- NIH encourages PI’s to discuss any potential changes with the NIH PO and GMS;
- NIH will help determine if proposed changes will require prior approval as a change from the approved involvement in human subjects;
- If such changes necessitate an increase in support in a current budget period, a competing type 3 application will need to be submitted in accordance with IC-specific submission requirements;
- NIH will assist in determining whether a proposed change represents an expansion of scope.
Delayed Onset Awards

- NOT-OD-12-130 clarifies requirements related to NIH prior approval requirements for awards which were submitted with the intent to conduct human subjects research, but for which definitive plans could not be included in the application;

- Issue 8/2/12

- Effective immediately
Delayed Onset Awards generally include:

- Single project awards in which results of pre-clinical research are needed before human subjects research can be fully planned;
- Clinical research networks or consortia that plan to add new protocols over the course of the award;
- Award mechanisms that include funds for small projects that will be selected and funded by the grantee (e.g., pilot projects).
For single project awards, requests must be submitted no later than 30 days before the proposed change.

Requests must be signed by an OSP authorized official.
Delayed Onset Awards

- Required documentation for single project awards includes:
  - Complete grant number (okay in subject line of e-mail)
  - Grantee name, name of the initiating PI, PI phone, fax, and e-mail address, and corresponding contact info for AOR
  - Documentation such as the scientific protocol or revised research timeline
  - New or revised human subjects section
  - New or revised Inclusion Plans for Women, Minorities, and Children, if applicable
  - New or revised Targeted Enrollment Table, if applicable
  - New or revised Data and Safety Monitoring Plan (DSMP) and Board (DSMB), if applicable
  - Certification that Key Personnel have taken appropriate education in the protection of human subjects
As with changes to active awards, NIH will require certification of Emory’s FWA, if not previously provided, and IRB approval of the NIH-approved plans before any new activities can begin.

IRB review will continue while the NIH request is being evaluated. If NIH requests additional modifications, additional IRB review may be necessary.
For research consortia or multi-site programs that routinely implement new human subjects research projects after award, the PI must follow procedures of that consortia or group for approval of new protocols which are determined by the IC. Review is often conducted by a defined external advisory board. PI’s must follow the instructions of the IC when preparing and submitting such requests.
Delayed Onset Awards

- For awards which include mechanisms for selecting and funding small projects (e.g., pilot projects), the institution must ensure that selected projects follow all relevant regulations and policies, including those governing human subjects research (including obtaining prior IRB approval).

- PI’s should also follow the IC’s guidance regarding prior approval of such individual projects and updating the status of funded projects in an annual progress report. (Such requirements are generally described in the FOA or NGA.)
In either of the latter two cases, IRB approval for new protocols must be received before any human subjects research may begin.
Changes in Active Awards

Delayed Onset Awards
Summary of Changes

- Reporting thresholds have been lowered
  - $5,000 fees, salary, honoraria, royalties, public traded investments
  - Any equity/ownership interests in privately held companies
  - Fiduciary duties
  - Sponsored Travel – PHS Investigators only
- PHS Investigators must report all Significant Financial Interests Related to their Institutional Duties
- Subrecipient Monitoring
- Detailed Reporting to Funding Agency
- Public Reporting of Investigators (including subs) with FCOI
- Mandatory Training for all Investigators & Staff through eCOI
- Retrospective Review for non-compliance with policy or management plan
Who is an Investigator?

A. The PD/PI
B. Anyone listed on the grant or contract
C. Senior or Key Personnel
D. Anyone listed on the IRB protocol
E. Anyone listed on the IACUC protocol
F. Anyone the PD/PI identifies as having responsibility for and independent decision making authority for the design, conduct, or reporting

ANSWER: A, C, & F.
Words of Wisdom

A PD/PI should be judicious in determining who is Senior or Key Personnel. Misidentifying personnel as senior/key unnecessarily increases burden for the preparation of the application, submission of Just-in-Time information and annual reporting requirements, in addition to required financial interest disclosures.
Which of the following financial interests don’t need to be reported?

A. An honoraria paid by University of Pennsylvania
B. Airline & hotel fare paid by the University of Helsinki for a keynote address that you are presenting
C. Airline & hotel fare to Beijing paid by an foundation award to Emory University
D. Stock valued at $6000 in Apple Computers
E. 2% ownership interest in a new start-up company

Answer: A & C do not need to be reported; D is maybe.
Exceptions for COI reporting

- Income or sponsored travel from:
  - Local, state or federal government agency
  - A US institution of higher education
  - A US academic teaching hospital, a medical center, or
  - A research institute that is affiliated with a US institution of higher education
- Income or sponsored travel from an award to Emory University
- Please call the office if you have any questions – (404)712-0046
TRUE OR FALSE – TIME TO COMPLETE THE FORMS

- I only need to complete a Proposal Financial Interest Form when I initially submit a proposal.

FALSE
Proposal Financial Interest Forms & Investigator Forms

- For each year of a grant, please complete a Proposal Financial Interest related to Research Report.
  - Submit prior to annual Progress Report
  - For non-PHS awards, one year after Notice of Award for grant or contract.
- Ensure that any new Investigator is added when s/he comes onto an award.
- Annually, ensure that Investigator list is updated and correct
TRUE OR FALSE - SUBCONTRACTS

- I’m the PI of an AHRQ subcontract from the University of Minnesota, but I only need to complete the Emory forms
  - TRUE
- I need to ensure that the subcontractors on my NIH grant complete Emory disclosure forms
  - IT DEPENDS
QUESTIONS – YES, YOU AND YOUR PI WILL HAVE MANY

Emory’s Conflict of Interest Review Office
Office of Research Administration
1599 Clifton Road, 6th Floor
Phone: 404-712-0046
Fax: 404-712-0069

Website: www.coi.emory.edu
List serve: COI-Office@listserv.cc.emory.edu
FREEDOM OF INFORMATION ACT REQUESTS

Kris West, J.D., M.S.
Office of Research Compliance
ERAZ Presentation – Sept. 20, 2012
What is it?
Federal law that gives persons the right to request that federal agencies provide access to their records.

Federal agencies must provide access to their records except for records, or portions of records, that fall within one of nine exemptions or one of three law enforcement record exclusion.

Requests for records are directed to the federal agency that keeps the records.

Each agency has its own FOIA Office.
Applicability

• Emory is not a Federal Agency. So, why do I have to worry about this?
Well, sometimes you don’t have to worry . . .

“Animal Rights, Inc.
1234 Furry Drive
Atlanta, GA 30322

Dear Emory University,

Under the Freedom of Information Act and Georgia Open Records Act, we are requesting all of your records on the following research project . . .”
But other times, you have to worry . . .

“NIH FOIA Office

Dear Dr. Researcher,

Ms. Concerned Citizen of the National Animal Rights Group has requested a copy of your grant application 1P01 AG54321-678A entitled “Research on Nonhuman Primates.” The Freedom of Information Act (FOIA) requires release of records held by the Government, except for any portions permitted to be withheld under the exemptions set forth in the FOIA. . . .
“Consistent with the enclosed general guidance, please advise us of any portions of the records that you believe should be withheld. You may find it convenient to send us an extra copy of the material, either in hard copy or electronic form, indicating the portions that you recommend be withheld.

The FOIA mandates that we respond to the requested within a certain period of time. Therefore please provide us with your reply by the end of this week, September 21, 2012.” (End of the Week????????!!!! YIKES!!!!!)
So, what’s the process if you get “FOIA’d”?
(1) Read the letter.

- Read the letter from the federal agency. Read the WHOLE letter, including any DATES by which you have to respond.
- Agency has 10 days to respond as to whether it will provide records. Can be extended for an extra 10 days if agency must negotiate with document submitted on exemption applicability.
- Emory does not always get the request from the agency as soon as the agency gets it.
(2) **Call ORC.**

- Call the Office of Research Compliance (ORC) right away!
- FOIA letters often specify that responses are due within a few days.
- We can request and extension, and can usually (but not always) get a week long extension.
- Send ORC a copy of the FOIA letter.
(3) Gather materials.

• Gather the materials that the letter requests.

• Send ORC an electronic copy of the materials requested.
(4) Review the materials for exemption.

- The “owner” of the documents must review the documents to see if any FOIA exemptions apply.
- The document “owner” is usually the principal investigator on the research project for which documents have been requested.
Applicable FOIA Exemptions

- Confidential Business Information – CBI
- Federal agency will notify us that they are disclosing documents and ask us to identify any CBI in the documents.
- Regulations state that we should have at least 5 days to respond, but this can vary.
CBI

- CBI includes:
  - Trade Secrets = secret, commercially valuable plan, formula, process or device that is used for making, preparing, compounding or processing of trade commodities and can be said to be the end product of either innovation or substantial effort. There must be a direct relationship between the trade secret and the productive process.
CBI Includes:

• “Commercial or Financial Information” – Federal agency won’t disclose records containing information that is commercial or financial; is obtained from a person; and is privileged or confidential.

• “Commercial of Financial” = relates to businesses, commerce, trade, employment, profits or finances (including personal finances).

• “Obtained from a Person” = obtained from someone outside of the federal government, or from someone within the government who has a commercial or financial interest in the information.

• “Person” includes individuals and business entities. ("Corporations are people, my friend.")
CBI Includes:

- “Privileged” = Protected from discovery in a civil suit by a evidentiary privilege, e.g., attorney client privilege.
- “Confidential” = Meets one of the following tests:
  - Disclosure may impair the government’s ability to obtain necessary information in the future.
  - Disclosure would substantially harm the competitive position of the person who submitted the information.
  - Disclosure would impair other government interests, e.g., program effectiveness.
  - Disclosure would impair other private interests, such as an interest in controlling the availability of intrinsically valuable records that are sold in the market by their owner.
Is it CBI? Ask these questions:

• Is the information of a type customarily held in strict confidence and not disclosed to the public by the person to whom it belongs?

• What is the general custom or usage with respect to such information in the relevant occupation or business?

• How many, and what types of, individuals have access to the information?

• What kind and degree of financial injury can be expected if the information is disclosed?
Also ask:

• Was the information marked as confidential or privileged?

• Did you state somewhere else in the document that there was no confidential or privileged information?
Other Possible Exemption

• Clearly Unwarranted Invasion of Personal Privacy – records have personal or private information and harm from disclosure outweighs public benefit.

• Agency will usually redact on its own:
  • Social security numbers
  • Home addresses
  • Salary information
(5) Identify CBI.

- Record owner needs to let ORC know specifically what portions of the documents requested constitute CBI.
- Record owner may need to consult other collaborators.
- This is done on a word-by-word basis, e.g., if only three words in a sentence are CBI, then only those three words are redacted.
(6) Mark the Document. (Get out the highlighters!)

- The document must be marked to highlight text that Emory claims is covered by an exemption. Different colored highlight is used for different exemptions and/or to show CBI for different collaborators.
(7) Make the legal argument.

- ORC drafts a letter to the federal agency setting forth the legal arguments as to why the marked text qualifies for exemption.
- Letter and marked materials are sent to the federal agency.
- If there is no CBI in the document and no other exemption applies, then record owner just signs the notification letter provided by the agency and send it back. Agency releases documents without any redactions.
The federal agency lets Emory know whether it accepts the arguments advanced and what information will be redacted (if any).
Winning Arguments

• Information that is proprietary.
• Information that has not yet been published.
Losing Arguments

- Information may be used by animal rights activists to harm research or individuals.
- Document states that it contains no proprietary or confidential information.
- Old information.
- Already published.
Remember, Time is of the Essence

• FOIA requests are always on the fast track.
• It takes a long time to go through the documents requested on a page by page basis, mark CBI, and draft the legal arguments.
• Emory must articulate why something is CBI – it can’t just assert that it is CBI.
Questions

Kris West
(404) 727-2398
(404) 727-2237 (direct)
kwest02@emory.edu
It's QUESTION TIME!!
Reminders:

- **NEXT MEETING:**
  November 15th – 9:30 am to 11:00 am
  Woodruff Health Sciences Administration Building Auditorium, 1440 Clifton Road N.E. – 1st Floor

- Find information about ERAZ at [http://www.or.emory.edu/eraz/eraz.php](http://www.or.emory.edu/eraz/eraz.php)

- Email topics and suggestions for future meetings to [eraz@emory.edu](mailto:eraz@emory.edu).

- Your opinion and thoughts matter. Please complete the survey that will be sent out after this meeting.