



# **Department of Energy Interim Conflict of Interest Policy**

**University of Oklahoma Implementation**

Office of Research Services

# Purpose and Context

The Department of Energy (DOE) issued an interim Conflict of Interest (COI) policy for Financial Assistance on Dec. 20, 2021, FAL 2022-02.

The purpose of the COI policy is to establish "...standards that provide a reasonable expectation that the design, conduct, and reporting of projects ... funded under DOE financial assistance awards (e.g., a grant, cooperative agreement, or technology investment agreement) will be free from bias resulting from financial conflicts of interest or organizational conflicts of interest."

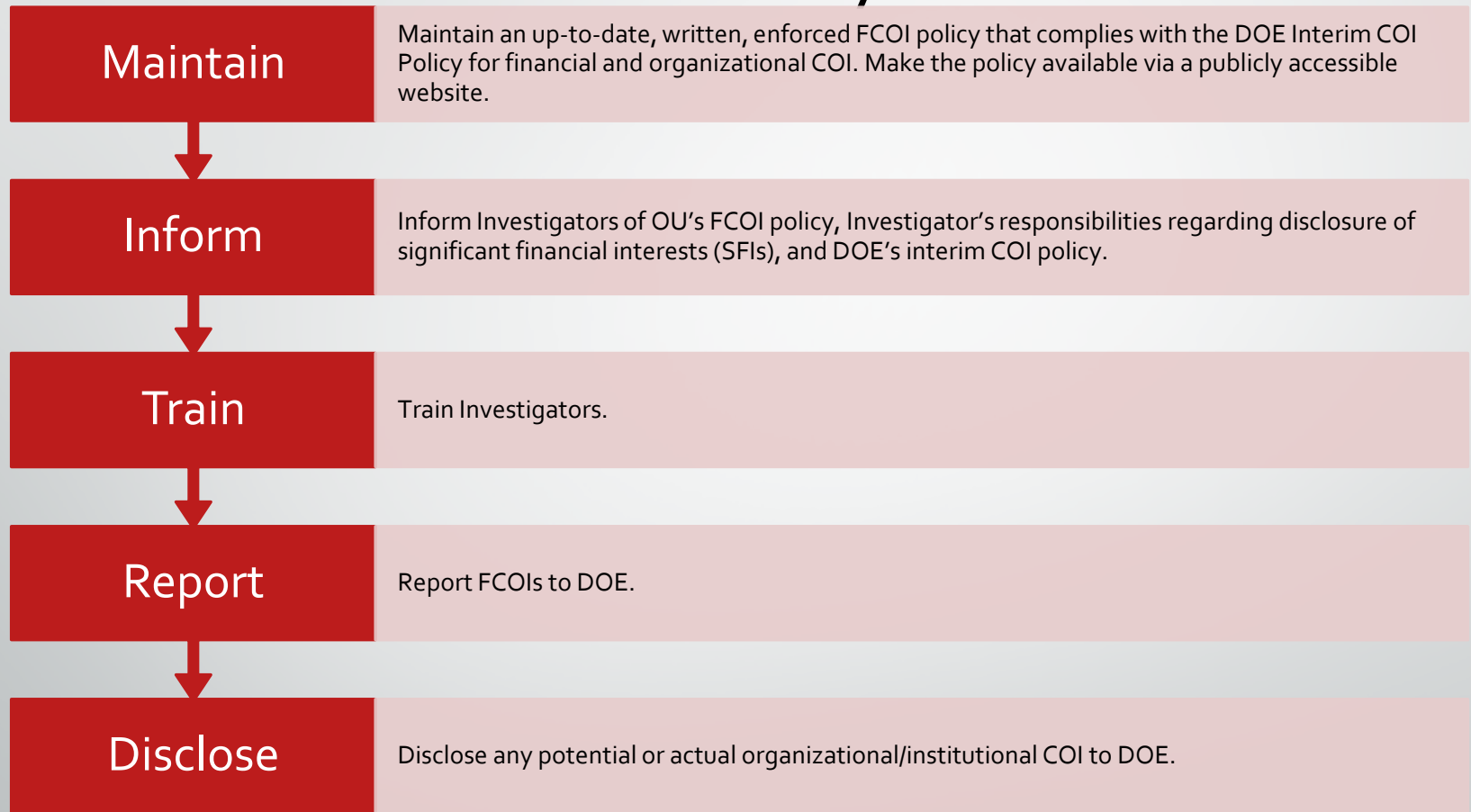
Applicable Federal Regulations: 2 CFR 200.112.

# Applicability

## Applies to

- Institutions that apply for, and receive DOE funding by means of financial assistance awards such as grants, cooperative agreements, or technology investment agreements
- Investigators planning to participate in, or participating in, projects funded under a DOE financial assistance award
- DOE SBIR/STTR Phase II applicants/awardees (Phase I SBIR/STTRs are exempt).

# OU's Responsibilities under the DOE COI Policy



OU maintains a [COI website](#) that is open to the public, as well as a documented and enforced COI policy and administrative process for identifying and managing financial conflicts of interest and ensuring compliance with all federal COI rules.

## Responsibilities of Investigators

- **Disclose** all Significant Financial Interests (SFIs) related to their Institutional Responsibilities and Sponsored/Reimbursed Travel before submitting a proposal to DOE and/or DOE agencies
- **Complete** FCOI Training prior to engaging in DOE-funded research, every four years thereafter, and/or immediately under designated circumstances.
- **Update** SFI and Travel disclosures at least annually during the period of an award and within thirty days of discovering or acquiring (e.g., through purchase, marriage, or inheritance) a new significant financial interest.

# What is a Significant Financial Interest (SFI)?

- One or more of the following financial interests of the Investigator and those of the Investigator's spouse and dependent children that reasonably appear to be related to the Investigator's institutional responsibilities will constitute a Significant Financial Interest (SFI).
  - From a Publicly traded entity: Remuneration (e.g., consulting fees, honoraria, paid authorship, etc.) received in the twelve months preceding the disclosure and the value of any equity interest (stock, stock option, or other ownership interest, etc.) in the entity as of the date of disclosure when aggregated, is > \$5,000.
  - From a Non - publicly traded entity:
    - Remuneration (e.g., consulting fees, honoraria, paid authorship, etc.) received in the twelve months preceding the disclosure when aggregated, is > \$5,000.
    - Any equity interest (stock, stock option, or other ownership interest, etc.)
  - Intellectual property (IP) rights and interests - receipt of income (of any value) from IP rights and interests (e.g., patents, copyrights).
- Reimbursed or sponsored travel related to institutional responsibilities if paid on behalf of the Investigator must be disclosed as a Significant Financial Interest.

# Financial Conflict of Interest (FCOI)

An FCOI exists in circumstances where the SFIs of the Investigator or their spouse or dependent children could have a direct and significant impact on the design, conduct, reporting, or funding of a project.

If an FCOI is identified, the PI will work with OU's Conflict of Interest Committee (COIC) to develop and implement an FCOI management plan (MP).

The plan is accepted and signed by the Investigator, the Chair/Director, the Dean, and the COIC.

If an Investigator's SFIs/FCOIs are related to the DOE-funded project(s), FCOI reports must be submitted to DOE.

# FCOI Training Requirements for DOE Investigators

Each DOE Investigator/Researcher must complete FCOI training:

- Prior to engaging in DOE-funded grant or contract
- At least every four years or
- Immediately under any of the following circumstances:
  - Institutional FCOI policies or procedures change in any manner that affects the Investigator's responsibilities
  - An Investigator is new to the Institution
  - An Investigator is not compliant with the Institution's FCOI policy and/or their FCOI management plan.

To complete the online FCOI training, sign into the [CITI website](#) using your OU credentials.