

SPACE SCIENCE INSTITUTE DEPARTMENT OF ENERGY CONFLICT OF INTEREST POLICY

The Department of Energy (DOE) issued new requirements for Conflicts of Interest for Financial Assistance. The purpose of this 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 Regulation: 2 CFR 200.112

SSI RESPONSIBILITIES

Space Science Institute (SSI) will maintain an up-to-date written and enforced policy on Financial Conflicts of Interest that complies with DOE requirements. This policy will be available on our publicly accessible website.

Investigators will be informed of this policy as well as their obligation to complete required trainings and receive the necessary certifications.

SSI will appoint a designated COI official at the Institution. This person will be responsible for identification and management of individual and institutional financial conflicts of interest.

Any Financial Conflicts of Interest (FCOI) will be reported to DOE.

Any potential or actual organizational conflicts of interest will be disclosed to DOE.

INVESTIGATOR RESPONSIBILITIES

Investigators will complete FCOI Training prior to engaging in DOE funded research. Researchers will then retake this training every four years thereafter. Proof of completion of training shall be sent to SSIs designated COI official.

Investigators will disclose to SSIs designated COI official any and all Significant Financial Interests (SFIs) related to their Institutional Responsibilities and Sponsored/Reimbursed travel BEFORE submitting a proposal to DOE.

Investigators will update, no less than annually, these disclosures during the period of an award and within 30 days of discovering or acquiring a new significant financial interest (SFI).

Definition:

- Investigator is a Principal Investigator (PI) or any other person, regardless of actual title, who is responsible for the purpose, design, conduct, or reporting of a project funded by, or proposed for funding to, DOE. Examples are: Co-PIs, Post-Docs, Collaborators, Consultants, Students, etc.)

SIGNIFICANT FINANCIAL INTEREST

A significant Financial Interest (SFI) can appear in 2 ways:

(1) A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's Institutional entity responsibilities:

(i) With regard to any foreign or domestic 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 the disclosure, when aggregated, is OVER \$5,000.

(ii) With regard to any foreign or domestic non-publicly traded entity: Remuneration (e.g., consulting fees, honoraria, paid authorship, etc.) received in the twelve months preceding the disclosure when aggregated, is OVER \$5,000.

(iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income (of any value) from PI rights and interests (e.g., patents, copyrights).

(2) Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available) related to their institutional responsibilities that is not otherwise disclosed in current and pending or other support disclosures, provided that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency of the United States; a domestic Institution of Higher Education; or a domestic research institute that is affiliated with a domestic Institution of Higher Education.

WHAT IS **NOT** A SIGNIFICANT FINANCIAL INTEREST?

Exclusions from the definition of SFI and Sponsored Reimbursed Travel:

- Salary, royalties, or other remuneration received from SSI.
- Income from investment vehicles, such as mutual funds and retirement accounts (if the Investigator does not directly control the investment decisions).
- Income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency of the United States, a domestic Institution of Higher Education, or a domestic research institute affiliated with a domestic Institution of Higher Education; the exclusion also applies to sponsored or reimbursed travel by these institutions.
- Income from service on advisory committees or review panels for a Federal, state, or local government agency of the United States, a domestic Institution or Higher Education, or a domestic research institution that is affiliated with a domestic Institution of Higher Education.
- Travel that is reimbursed or sponsored by a US federal, state, or local government agency, an American Institution of higher education, academic teaching hospital, medical center, or research institute that is affiliated with a domestic Institute of Higher Education.

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 SSI Ethics Department and Executive Director will develop and implement an FCOI mitigation plan and will monitor compliance with the plan.

If an Investigator's SFIs/FCOIs ARE related to the DOE funded projects, then SSI will submit FCOI reports to the DOE should the FCOI be unmanaged or unmanageable.

FCOI TRAINING REQUIREMENT 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 after any of the following circumstances:
 - Institutional FCOI policies or procedures change in any manner that affects the Investigator responsibilities.
 - An Investigator is new to SSI.
 - An investigator is not compliant with SSI's FCOI policy and/or their FCOI management plan.

ORGANIZATIONAL CONFLICTS OF INTEREST

Organizational conflicts of interest appear in situations where relationships between SSI and another entity would make it so that SSI is unable to, or appears to be unable to, be impartial in conducting a procurement activity or other business with that other organization. Should such a situation arise, the matter should be disclosed to the SSI Ethics Department for determination of whether such a conflict exists. Should there be an actual or potential organizational conflict, SSI will disclose to the DOE program office prior to using DOE funds.

DISCLOSURE

If, after reading this policy, you feel that you have a conflict to disclose to SSI, please contact the Ethics Department immediately at ethics@spacescience.org. The Department will aid in determining whether an actual or potential conflict exists. Should it be determined in the affirmative, the Department will provide a Form to be filled out and will work through next steps.