

UCLA

Research Policy & Compliance

Department of Energy Interim Conflict of Interest Policy

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RAF

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DOE COI Requirements

Department of Energy Interim Conflict of Interest Policy Requirements for Financial Assistance

The DOE Interim Policy establishes standards that provide a reasonable expectation that the purpose, design, conduct, or reporting of projects funded under DOE financial assistance awards (e.g. grants, cooperative agreements or technology investment agreements) will be free from bias resulting from financial conflicts of interest or organizational conflicts of interest.



Department of Energy
Financial Assistance Regulations

FINANCIAL ASSISTANCE LETTER

No. FAL 2022-02
Date 12/20/2021

This Financial Assistance Letter is issued under the authority of the DOE and NNSA Senior Procurement Executives.

Subject: Department of Energy Interim Conflict of Interest Policy Requirements for Financial Assistance

References:

2 CFR part 910, Department of Energy (DOE) Financial Assistance Regulations

2 CFR part 200, e.g., 200.112, 200.318

DOE Interim Policy Prompted Changes: UCLA Process for Collecting Disclosures related to DOE awards

OLD

- Under Procedure 925.3 the PI and other investigators completed a Form 740U (Investigators' Statements of Financial Interests) and, as appropriate, the Disclosure Supplement
- Disclosures were submitted with every proposal.
- Disclosers determine if they have any financial interests related to the specific research being proposed.

NEW

- Under Interim Policy 927 disclosures are made through eDGE
- Investigators disclose all related financial interests: teaching/education, research, outreach, clinical service, and University and public service on behalf of the University of California performed in the course and scope of the Investigator's UC appointment/employment.
- Initial disclosures are made prior to submission of proposals.
- If awards are made, the PI and other Investigators must update disclosures at least annually. New related financial interests or changes to financial interests are to be disclosed within 30 days

Federal Disclosure Matrix Updates

FEDERAL DISCLOSURE REQUIREMENTS

	NSF or Other Federal Agency (Excludes PHS & DOE)	PHS & DOE
Reporting Triggers	<ul style="list-style-type: none"> NSF contract/grant for research and/or educational activity Other federal research contract/grant (except PHS & DOE) Non-governmental entity that flows down federal funds (excluding PHS & DOE funds and SBIR/STTR Phase I awards) California Institute for Regenerative Medicine (CIRM) UC Special Research Programs (e.g. MRPI, Tobacco, AIDS, Breast Cancer) 	<ul style="list-style-type: none"> PHS contract/grant for research (including research contracts and grants, career development awards, center grants, individual fellowships, infrastructure awards, institutional training grants, program projects, research resource awards and conference grants) Grant from other non-federal sponsors that adopt the PHS policy (such as Alliance for Lupus Research, American Cancer Society, American Heart Association, Arthritis Foundation, and Susan G. Komen for the Cure) DOE-funded financial assistance awards (e.g., a grant, cooperative agreement, or technology investment agreement) issued on or after June 18, 2022
Who Must Disclose	<ul style="list-style-type: none"> UCLA Principal Investigator(s) Other Investigators (others who share responsibility for design, conduct, or reporting of the results of a sponsored project) 	<ul style="list-style-type: none"> UCLA Principal Investigator(s) Other Investigators (others who share responsibility for purpose*, design, conduct, or reporting of the results of a sponsored project) <p>* The term purpose is an addition to the definition by DOE only.</p>
What to Disclose	<p>Significant Financial Interests* (see below)</p> <ol style="list-style-type: none"> That would reasonably appear to be affected by the research (or educational activities) funded or proposed for funding; or Are in entities who financial interests would reasonably appear to be affected by such activities 	<p>Significant Financial Interests** (see below) related to the Investigator's institutional responsibilities:</p> <p>Teaching/education, research, outreach, clinical service, and University and public service on behalf of the University of California which are in the course and scope of the Investigator's UC appointment/employment</p>

- <https://rpc.research.ucla.edu/wp-content/uploads/coi-disclosure-matrix.pdf>

EPASS Changes

EPASS now includes references to DOE policy

7. Additional Forms Required

Yes	No	COI (Disclosure Requirements)
<input type="checkbox"/>	<input type="checkbox"/>	Sponsor/Prime Sponsor is Federal Public Health Service (PHS) , agency that has adopted the PHS regulations, or Department of Energy ? If yes, provide names of other investigators on page 3 (See UCLA Policies 926 and 927)
<input type="checkbox"/>	<input type="checkbox"/>	Sponsor/Prime Sponsor is Federal (other than PHS), CIRM or special research programs managed by the UC Research Grants Program Office (RGPO)? If yes, attach COI Form 740 & Supplement to Form 740 (if applicable). See UCLA Procedure 925.3 .
<input type="checkbox"/>	<input type="checkbox"/>	Non-Government Sponsor/Prime Sponsor? If yes and project is Research , attach Form 700-U, 700-U Addendum and 700-U Supplement , as applicable, unless sponsor is exempt . See UCLA Procedure 925.2

For proposal submissions funded by **Federal Public Health Service (PHS)**, an agency that has adopted the PHS regulations, or **Department of Energy (DOE)**, provide the name and email address for all project personnel responsible for the purpose*, design, conduct, or reporting of research. All named individuals must have a current disclosure in eDGE, which can be accessed at coi.research.ucla.edu.

No other project personnel responsible for the **purpose***, design, conduct, or reporting of research.

***The term purpose is an addition to the definition by DOE only.**

UCLA Interim Policy 927

UCLA Policy 927 : Interim Policy - Conflicts of Interest in Department of Energy Funded Projects

Issuing Officer: Vice Chancellor - Research & Creative Activities

Responsible Office: Research Policy and Compliance - [Look Up Contact Person](#)

Effective Date: June 23, 2022

Revision History: [APP History](#)



I. PURPOSE & SCOPE

This Policy implements the 2022, U.S. Department of Energy Interim Conflict of Interest Policy Requirements for Financial Assistance. The DOE Interim Policy establishes standards that provide a reasonable expectation that the purpose, design, conduct, or reporting of projects funded under DOE financial assistance awards (e.g. grants, cooperative agreements or technology investment agreements) will be free from bias resulting from financial conflicts of interest or organizational conflicts of interest.

This Policy applies to the Principal Investigator and all other Investigators (regardless of position or title) who are responsible for the purpose, design, conduct or reporting of a project funded under a DOE Financial Assistance Award (FOA). DOE Program Offices have the discretion of requesting that others who are participating on the project are also covered by this Policy.

This Policy applies to all DOE funding opportunity announcements issued after June 18, 2022, and to all new and renewal awards selected from those FOAs. This Policy does not apply to awards made by the Office of Indian Energy, and Phase 1 SBIR/STTR awards.

UCLA Policy 927 complements UCLA Policies 925 and 926.

Interim Policy - Conflicts of Interest in Department of Energy Funded Projects

Issued on June 28, 2022

Reflects changes in UC Policy on Disclosure of Financial Interests & Management of Conflicts of Interest, Public Health Service Research Awards revised on June 17, 2022 to indicate that it also applies to DOE support.

Disclosures

UCLA Policy 927 : Interim Policy - Conflicts of Interest in Department of Energy Funded Projects

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The electronic Disclosure Gateway (eDGE) developed at UCLA to implement the Public Health Service Regulations on Objectivity in Research has been modified so that it can also be used by DOE PIs and other Investigators.

- ▶ **Login**
- ▶ **How to Access the System**
- ▶ **Quick Reference Guides & Training Materials**
- ▶ **Contact Us**

Disclosure Quick Guide For a step by step guide on how to use the system, please reference our user quick guide.

Reference Materials:

- Conflict of Interest Policies and Procedures
- List of PHS Research Sponsors
- List of PHS Award Mechanisms

Investigator Briefing: Please note, this is a reference only. To comply with the Training requirement, please login to eDGE.

Frequently Asked Questions

Accessing eDGE

<https://coi.research.ucla.edu/COI> > Home > Quick Reference Guide & Training Materials

See [Disclosure Quick Guide](#) for step-by-step instructions

Training Requirement

PHS and DOE disclosures now both done through eDGE



eDGE
Electronic Disclosure Gateway

You Are Here: 📄 Annual Disclosure Certificatio...

<< Back Save | Exit | Hide/Show Errors | Print... | Jump To: Training Introduction ▾

INTRODUCTION

The eDGE system was created to facilitate UCLA's compliance with the U.S. Public Health Service regulations on Promoting Objectivity in Research. In 2022, the system was updated to include the U.S. Department of Energy's (DOE) interim Conflict of Interest (COI) policy.

Investigators on awards from Research Sponsors that Require Compliance with PHS Regulations who will share responsibility for design, conduct or reporting of the project must disclose all personal (or individual) financial interests that meet the PHS definition. DOE adopted an interim COI policy that aligns closely with the PHS conflict of interest rules.

Investigators must also complete a training session prior to participating in research related to any PHS or DOE -funded project. UCLA Policy 926, "PHS Regulations on Objectivity of Research," implements the 2011 PHS regulations. The 2022 DOE interim policy is covered by Policy 927. Under Policy 927, Investigators must disclose financial interests that fall within the reporting categories and meet thresholds that PHS and DOE define as "Significant Financial Interests." This is explained below.

Training

eDGE training module now contains DOE and PHS information.

Two new questions in eDGE related to DOE investigators

Are you an Investigator on any proposals or active awards funded by DOE?

Yes No [Clear](#)

* Provide your title:

Example (Professor, Post-Doctoral Scholar, Project Scientist)

I understand that this Disclosure is required to obtain funding from the U.S. Government.

I, **Josephine F. Bruin**- Project Scientist, certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to U.S. Government's funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above:

Agree [Clear](#)

Note: This attestation appears because "yes" was checked for Q.3. on the previous page: "What to Disclose". If this does not apply, use the "Jump To" drop down, select that page, and check "No".

Identification

DOE Investigators must identify themselves and enter their academic title. For example, Professor, Post-Doctoral Scholar, Project Scientist, et.

Attestation

DOE requires that a specific attestation be completed with each new disclosure or update to an existing one.

Updates to the ORA Portal

General Statistics

Pre-Award

Post-Award

Compliance

REPORTS

- PHS COI Certification Status Report
- IRB Protocol Review Status Report
By: Department, PI, Protocol #, Grant, Sponsor, etc.
- Effort Report Certification Status
- Salary Cap Reports
Overpayment/Disallowance Report **Retired**
Current Salary Cap Rate
Historical Salary Cap Rates
Sponsors Subject to Salary Cap

TOOLS

- CITI Training Lookup Tool
- Online IRB Protocol Management (webIRB)
- On-line ARC Protocol Management (RATS)
- Electronic Disclosure Gateway (eEDGE)
- IRB RAND MOU Database
- IRB Emergency Use Database
- Embryonic Stem Cell Research Committee (ESCRO) Online Review

FORMS

- Conflict of Interest Disclosures
- Forms to Upload in webIRB



This will be updated to
“PHS & DOE COI
Certification Status
Report”

Questions?

Website URL

<https://rpc.research.ucla.edu>

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