

1.47 – Financial Disclosures and Conflicts related to Department of Energy (DOE) Funded Research

General Counsel
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All GEVARC
sites

I. Overview

The purpose of this Procedure is to set forth the GE Vernova Advanced Research Center (GEVARC) process for addressing significant financial conflicts of interest or organizational conflicts of interest for Department of Energy (DOE) funded awards. This Procedure supplements other Company conflict of interest policies and all GEVARC personnel subject to this Procedure also remain subject to the Company’s Spirit & Letter policies.

The DOE has issued a DOE Interim Conflict of Interest Policy for Financial Assistance regulations (2 CFR 200.112); hereinafter referred to as “DOE Interim COI Policy” or “Policy” with the stated intent to implement standards to provide a reasonable expectation that the design, conduct, and reporting of projects wholly or in part 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.

According to the DOE regulations, each non-Federal entity must have an up-to-date, written, and enforced administrative process to identify and manage conflicts of interest with respect to all projects for which financial assistance funding is sought or received from DOE. At a minimum, the non-Federal entity’s policy must address financial and organizational conflicts of interest. This GEVARC Procedure implements the DOE requirements for assessment of financial conflicts of interest as required by the DOE regulations, and requires, amongst other things, that certain individuals involved with DOE-funded research disclose to GEVARC any financial interests that are related to the respective individuals’ GEVARC duties.

II. Definitions

- A. “Award, financial assistance award or Federal award”** means the same as the definition provided in 2 CFR 200.1 for Federal award and has the meaning, depending on the context, in either paragraph (1) or (2) of this definition:
- (1)
- (i) The Federal financial assistance that a recipient receives directly from a federal awarding agency or indirectly from a pass-through entity, as described in [§ 200.101](#); or

(ii) The cost-reimbursement contract under the Federal Acquisition Regulations that a non-Federal entity receives directly from a federal awarding agency or indirectly from a pass-through entity, as described in [§ 200.101](#).

(2) The instrument setting forth the terms and conditions. The instrument is the grant agreement, cooperative agreement, other agreement for assistance covered in paragraph (2) of the definition of Federal financial assistance in this section, or the cost-reimbursement contract awarded under the Federal Acquisition Regulations.

(3) Federal award does not include other contracts that a federal agency uses to buy goods or services from a contractor or a contract to operate Federal Government owned, contractor operated facilities (GOCOs).

(4) See also definitions of Federal financial assistance, grant agreement, and cooperative agreement as described in [§ 200.101](#).

B. “Contracting Activity” means an organizational element that has the authority to award and administer contracting and financial assistance instruments.

C. “Disclosure of significant financial interests” means an individual’s disclosure of significant financial interests to a non-Federal entity.

C. “DOE” means the U.S. Department of Energy, the National Nuclear Security Administration (NNSA), and any components of the DOE to which the authority involved may be delegated.

D. “DOE Interim Conflict of Interest Policy for Financial Assistance” means “DOE Interim COI Policy” or “Policy”.

E. “DOE program office” means the organizational unit of DOE, led by an officer of the Department who has been appointed by the President by and with the advice and consent of the Senate, that funds and/or manages the awards subject to this Policy. For purposes of this Policy, the term DOE program office includes the organization responsible for executing program management functions; the cognizant contracting activity; and the field elements in safety and health, administrative, management, and technical areas.

F. “Financial Conflict of Interest” (FCOI) means a situation in which an Investigator or the Investigator’s spouse or dependent children has a significant financial interest or financial relationship that could directly and significantly affect the design, conduct, reporting or funding of a project.

G. “FCOI Report” means GEVARC’s report of a financial conflict of interest to the DOE program office.

H. “Financial Interest” means anything of monetary value, whether or not the value is readily ascertainable.

I. “Institution of Higher Education” means the same as the definition provided at 20 U.S.C. § 1001(a).

J. “Investigator” means the means the principal Investigator (PI) and any other person, regardless of title or position, who is responsible for the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE. DOE program offices have the discretion to expand the definition to include also any person who participate sin the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE. Such expansion will be specified in the applicable funding opportunity announcement and/or terms and conditions of the financial

K. “Investigator’s non-Federal entity responsibilities” means an Investigator's professional responsibilities on behalf of GEVARC, and as defined by GEVARC in its policy on financial conflicts of interest, which may include: activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.

L. “Manage” means taking action to address a financial conflict of interest, which can include mitigating or eliminating the conflict of interest, to ensure, to the extent possible, that the purpose, design, conduct, and reporting of a project will be free from bias.

M. “Non-Federal entity” means a State, local government, Indian tribe, Institution of Higher Education, nonprofit organization, or for-profit organization that carries out a DOE award as a recipient or subrecipient.

N. “Non-Federal entity’s designated official” means the individual designated by the non-Federal entity with the authority and responsibility to act on behalf of the non-Federal entity to ensure compliance with the DOE Interim COI Policy.

O. “Organizational conflict of interest” (OCI)” means a situation where because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. 2 CFR 200.318(c)(2).

P. “Potential conflict of interest” exists when an impartial observer reasonably believes that actual or apparent past, present, or currently planned interests could constitute a conflict of interest with a project funded under a DOE award. Principal Investigator (PI) means a principal investigator of a project funded under a DOE financial assistance award; PI is included in the definitions of senior/key personnel and Investigator.

Q. “Project” means the interdependent activities funded wholly or in part under the DOE financial assistance award. A project has a defined start and end point with objectives described in an application or in an approved scope that, when attained, signify completion and achievement of a specific goal, and creation of a FAL 2022-02 (12/20/2021) 7 unique product, service, or result. For awards that include recipient cost share as part of the approved budget, activities funded with that recipient cost share are included.

R. “Recipient” means an entity, usually but not limited to GEVARC, that receives a federal award directly from a Federal awarding agency. The term recipient does not include subrecipients or individuals that are beneficiaries of the award.

S. “Senior/key personnel means” the PI; any other person who significantly influences the design, conduct, or reporting of a project funded under a DOE award; and any other person identified as senior/key personnel by GEVARC in the application for financial assistance, approved budget, progress report, or any other report submitted to the DOE by GEVARC under this Policy.

T. “Significant Financial Interest” (SFI)” means

(1) A **Financial Interest** as described above consists 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 GEVARC responsibilities:

(i) “Publicly Traded Entity” means with regard to any foreign or domestic publicly traded entity, a significant financial interest exists if:

- a) the value of any remuneration received from the entity in the twelve months preceding the disclosure; and
- b) the value of any equity interest in the entity as of the date of disclosure when aggregated, exceeds \$5,000.

For purposes of this definition:

- a) remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); and
- b) equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;

(ii) “Non-Publicly Traded Entity” means with regard to any foreign or domestic non-publicly traded entity, a significant financial interest exists if:

- a) the value of any remuneration, not otherwise disclosed as current, pending, or other support, received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000; or
- b) or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest)

(iii) **“Intellectual Property Rights and Interests”** means (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

(2) **“Travel”** means that 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.

(i) Details of this disclosure will specify and include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration.

The SFI Lead Reviewer will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes a FCOI with the project funded under the DOE award.

(3) **Significant Financial Interest does not include** the following types of financial interests:

- a) salary, royalties, or other remuneration paid by the GEVARC to the Investigator if the Investigator is currently employed or otherwise appointed by the non-Federal entity, including intellectual property rights assigned to the non-Federal entity and agreements to share in royalties related to such rights;
- b) any ownership interest in GE held by the Investigator, if the non-Federal entity is a commercial or for-profit organization;
- c) income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles;
- d) 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 that is affiliated with a domestic Institution of Higher Education; or

- e) income from service on advisory committees or review panels for 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.

U. “Small Business Innovation Research (SBIR) Program and Small Business Technology Transfer (STTR) Program” mean the extramural research programs for small businesses that are run by the DOE Office of Science and the Advanced Research Projects Agency-Energy and certain other Federal agencies under Public Law 97-219, the Small Business Innovation Development Act, as amended, and Public Law 102-564.

V. “Subrecipient” means an entity, usually but not limited to GEVARC, that receives a subaward from a pass-through entity to carry out part of a Federal award, but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a federal awarding agency.

III. Details

In order to comply with DOE regulations pertaining to DOE awards, all GEVARC Investigators (as defined herein) on proposals for DOE awards awarded to GEVARC must complete a questionnaire (hereinafter referred to as an “SFI Questionnaire;” see attachment A) that identifies any SFIs (as defined above). SFI Questionnaires must be submitted as required by DOE regulation (*e.g.*, at the time of bid submission and periodically thereafter).

Additionally, prior to expenditures of any funds under a DOE funded research project, the GEVARC Principal Investigator must complete a questionnaire (hereinafter referred to as an “COI Questionnaire;” see attachment B) that will provide a disclosure of any DOE Organization Conflict of Interest to DOE in an application for financial assistance or prior to engaging in a procurement or transaction using DOE funds with a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe.

Questions about the necessity of submitting an SFI and an OCI, or whether a matter should be reported on an SFI or OCI, should be promptly reviewed with GEVARC Global Compliance Leader or Legal Counsel.

This Procedure supplements, but does not supplant, GE’s Spirit & Letter policies regarding conflicts of interest. Thus, all members of the GEVARC community are expected to comply with GE’s Conflict of Interest Policy and all GEVARC implementing procedures, which require employees to disclose all outside activities, financial interests, or relationships that may present possible conflicts of interest with respect to his/her GEVARC duties.

A. Identifying Financial Conflicts of Interest

The process for identifying FCOIs is outlined below.

1. The PI shall identify those persons who will be considered “Investigators” (as defined above) on the project being bid or executed. The PI and each person identified as an Investigator shall prepare an SFI Questionnaire and submit it to the SFI Lead Reviewer. In order to protect the privacy of the information on the SFI Questionnaire, the completed forms should be treated as GE Restricted data and should not be provided to the PI, the BD team, or the Contracts team.
2. Promptly upon receipt of the SFI Questionnaire, the SFI Lead Reviewer shall:
 - (a) review all Investigator disclosures of SFIs;
 - (b) preliminarily determine whether any SFIs relate to DOE award;
 - (c) make a preliminary determination if there is the potential for an FCOI based on the following factors:
 - (i) the nexus of research to the SFI; and
 - (ii) whether the SFI has the potential to significantly bias the Investigator’s design, conduct, or reporting of the DOE award. In making this determination, consideration should be given as to whether the conduct or findings of the DOE award has the potential to significantly affect the valuation of the SFI (including any valuation on non-GE intellectual property that constitutes the SFI).
 - (d) In the event of a preliminary determination of the potential for an FCOI, the SFI Lead Reviewer will convene the GEVARC FCOI Review Board (“the Board”) to make a final determination based on the above criteria.

The Board shall be comprised of, at a minimum, at least one GEVARC employee from the following groups: (i) Finance (to be designated by the Manager, Finance Operations); (ii) Legal Operation (to be designated by the General Counsel); (iii) relevant Technical Organization (for the PHS-funded work to be performed) designated by the Technical Leader; and (iv) the SFI Lead Reviewer. Additional members appropriate for adjudication of a given SFI disclosure may be identified by the SFI Lead Reviewer. The Board will make a final determination as to the existence of an FCOI based on the above criteria.

B. Management of Financial Conflicts of Interest

In the event of a determination of an FCOI:

1. the SFI Lead Reviewer will develop and, with the approval of the Board, implement a management plan that shall specify the actions that have been, and shall be, taken to manage the FCOI. Examples of conditions or restrictions that might be imposed to manage a conflict include, but are not limited to:

(a) public disclosure of the FCOI (*e.g.*, when presenting or publishing the research);

(b) for research projects involving human subjects research, disclosure of the FCOI directly to participants and persons considering participation;

(c) appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the FCOI;

(d) modification of the research plan;

(e) changing of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research;

(f) reduction or elimination of the financial interest (*e.g.*, sale of an equity interest); and

(g) severance of relationships that create financial conflict.

2. Whenever, in the course of an ongoing PHS-funded research project, an Investigator who is new to participating in the research project discloses an SFI or an existing Investigator discloses a new SFI to the Non-Federal entity, or where GEVARC did not previously review an existing SFI during an ongoing PHS- funded research project, GEVARC shall, within sixty days:

(a) evaluate the SFI according to the process specified above (see section III (A)); and

(b) if an FCOI exists, implement, on at least an interim basis, a management plan that shall specify the actions that have been, and will be, taken to manage such FCOI. Depending on the nature of the SFI, GEVARC may determine that additional interim measures are necessary with regard to the Investigator's participation in the PHS funded research project between the date of disclosure and the completion of the Non-Federal entity's review.

3. In addition, whenever an FCOI is not identified or managed in a timely manner, including failure by the Investigator to disclose an SFI that is subsequently determined by GEVARC to constitute an FCOI; failure by GEVARC to review or manage such an FCOI; or failure by the Investigator to comply with an FCOI management plan, such situation shall constitute a Reportable FCOI and GEVARC shall, within 120 days of the Non-Federal entity's determination of noncompliance, complete a retrospective review of the Investigator's activities and the DOE funded research project to determine whether any DOE-funded research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of such research.

(a) Where GEVARC is required to document the retrospective review; such documentation shall include, but not necessarily be limited to, all of the following elements:

(i) DOE award number;

(ii) project title;

(iii) PD/PI or contact PD/PI if a multiple PD/PI model is used;

(iv) name of the Investigator with the FCOI;

(v) name of the entity with which the Investigator has an FCOI;

(vi) reason(s) for the retrospective review;

(vii) detailed methodology used for the retrospective review (*e.g.*, methodology of the review process, composition of the review panel, documents reviewed);

(viii) findings of the review; and

(ix) conclusions of the review.

(b) Based on the results of the retrospective review, if appropriate, GEVARC shall update previously submitted FCOI Report(s), specifying the actions that will be taken to manage the FCOI going forward. If bias is found, GEVARC will to notify the DOE program office promptly and submit a mitigation report to the DOE program office. The mitigation report must include, at a minimum, the key elements documented in the retrospective review above and a description of the impact of the bias on the research project and GEVARC's plan of action or actions taken to eliminate or mitigate the effect of the bias (*e.g.*, impact on the research project; extent

of harm done, including any qualitative and quantitative data to support any actual or

future harm; analysis of whether the research project is salvageable). Thereafter, GEVARC will submit FCOI Reports annually with respect to that project. Depending on the nature of the FCOI, GEVARC may determine that additional interim measures are necessary with regard to the Investigator's participation in the DOE award between the dates that the FCOI or the Investigator's noncompliance is determined and the completion of the non-Federal entity's retrospective review.

4. Whenever GEVARC implements a management plan pursuant to the policy, GEVARC (via the SFI Lead Reviewer) shall monitor Investigator compliance with the management plan on an ongoing basis until the completion of the DOE award.

5. Prior to the GEVARC's expenditure of any funds on a given DOE award project, GEVARC shall ensure public accessibility, via a publicly accessible website or written response to any requestor within five business days of a request, of information concerning any Reportable FCOIs pertaining to the given DOE award.

6. The information that GEVARC makes available via a publicly accessible website or written response to any requestor within five business days of a request, shall include, at a minimum, the following:

(a) Investigator's name;

(b) Investigator's title and role with respect to the award;

(c) name of the entity in which the SFI is held;

(d) nature of the SFI; and

(e) approximate dollar value of the SFI (dollar ranges are permissible: \$0–\$4,999; \$5,000–\$9,999; \$10,000–\$19,999; amounts between \$20,000–\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000), or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value.

7. In the event GEVARC uses a publicly accessible website for the purposes of this subsection, the information required by this Procedure to be posted on that site shall be updated at least annually. In addition, GEVARC shall update the website within sixty days of receipt or identification of information concerning any additional SFI of the Senior/Key Personnel for the DOE award that was not previously disclosed, or upon the disclosure of an SFI of Senior/Key Personnel new to the DOE award, if GEVARC determines that the SFI is related to the DOE award and is an FCOI. The website shall note that

the information provided is current as of the date listed and is subject to updates, on at least an annual

basis and within sixty days of GEVARC's identification of a new FCOI. If GEVARC responds to written requests for the purposes of this subsection, it will note in its written response that the information provided is current as of the date of the correspondence and is subject to updates, on at least an annual basis and within sixty days of GEVARC's identification of a new FCOI, which should be requested subsequently by the requestor.

8. Information concerning the SFIs of an individual subject shall remain available, for responses to written requests or for posting via GEVARC's publicly accessible website for at least three years from the date that the information was most recently updated.

9. In addition to the types of FCOI that must be managed, GEVARC may require the management of other FCOI in its policy on FCOI, as GEVARC deems appropriate. Matters addressed under internal Company Integrity policies are not subject to the public reporting obligations herein.

C. Reporting of Financial Conflicts of Interest

Prior to expenditures of any funds under a DOE funded research project, GEVARC shall provide to the DOE program office an FCOI Report regarding any FCOI that is identified by GEVARC and will not be eliminated prior to the expenditure of DOE awarded funds. For non-reportable FCOIs (that is, matters in which the potential FCOI has been or will be eliminated prior to the expenditure of DOE-awarded funds), GEVARC is not required to submit an FCOI Report to the PHS Awarding Component.

1. Any FCOI Report shall include sufficient information to enable the DOE program office to understand the nature and extent of the financial conflict, and to assess the appropriateness of GEVARC's management plan. Elements of the FCOI Report shall include, but are not necessarily limited to, the following:

(i) DOE award number;

(ii) PD/PI or Contact PD/PI if a multiple PD/PI model is used;

(iii) name of the Investigator with the FCOI;

(iv) name of the entity with which the Investigator has an FCOI;

(v) nature of the financial interest (*e.g.*, equity, consulting fee, travel reimbursement, honorarium);

(vi) value of the financial interest (dollar ranges are permissible: \$0–\$4,999; \$5,000–\$9,999; \$10,000–\$19,999; amounts between \$20,000–\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000), or a statement that the interest is one whose value

cannot be readily determined through reference to public prices or other reasonable measures of fair market value;

(vii) a description of how the financial interest relates to the PHS funded research and the basis for the Non-Federal entity's determination that the financial interest conflicts with such research; and

(viii) a description of the key elements of the non-Federal entity's management plan, including:

(a) role and principal duties of the conflicted Investigator in the research Project;

(b) conditions of the management plan;

(c) how the management plan is designed to safeguard objectivity in the research project;

(d) confirmation of the Investigator's agreement to the management plan;

(e) how the management plan will be monitored to ensure Investigator compliance; and

(f) other information as needed.

2. For any FCOI previously submitted with regard to an ongoing PHS-funded research project, GEVARC shall provide to the DOE program office an annual FCOI Report that addresses the status of the FCOI and any changes to the management plan for the duration of the DOE award. The annual FCOI Report shall specify whether the financial conflict is still being managed or explain why the FCOI no longer exists. GEVARC shall provide annual FCOI Reports to the DOE program office for the duration of the project period (including extensions with or without funds) in the time and manner specified by the DOE program office.

D. Responsibilities regarding of Organizational Conflicts of Interest

Prior to expenditures of any funds under a DOE funded research project, GEVARC will provide a disclosure of any Organization Conflict of Interest to DOE in an application for financial assistance or prior to engaging in a procurement or transaction using DOE funds with a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe.

1. GEVARC will maintain a written policy and procedures for the procurement or transaction to effectively mitigate any organizational conflict of Interest. General Procurement Standards 2 CFR 200.318(c)(2).

2. The Contracts Administrator (CA) will brief technical personnel at Kickoff Meetings (“Tollgate 2) of the requirements of this Procedure.
3. GEVARC will disclose in writing any potential or actual organizational conflict of interest to the DOE program office in an application for financial assistance or prior to engaging in a procurement or transaction using DOE funds.
The elements of the disclosure shall include, but are not limited to the following:
 - (i) The name, address, and website (as applicable) of the entity that presents a potential or actual organizational conflict of interest;
 - (ii) The relationship between the non-Federal entity and the entity at issue;
 - (iii) The nature of the anticipated procurement or other transaction with the parent, affiliate, or subsidiary organization; the anticipated value of the procurement or other transaction; and the basis for making the procurement or other transaction with a parent, affiliate, or subsidiary organization;
 - (iv) The basis for the non-Federal entity’s determination regarding the existence of an organizational conflict of interest; and
 - (v) How the non-Federal entity will avoid, neutralize, or mitigate the organizational conflict of interest.
4. If GEVARC determines that the effects of the potential or actual organizational conflict of interest cannot be avoided, neutralized, or mitigated, the anticipated procurement or other transaction using DOE funds may not be made. Where there is an organizational conflict of interest that cannot be avoided, neutralized, or mitigated, GEVARC must procure goods and services from other sources when using DOE funds.

E. Remedies

In the event of the failure of an Investigator to comply with this Procedure so as to have resulted in bias of the purpose, design, conduct, or reporting of the DOE award, GEVARC (through the GEVARC Global Compliance Leader) shall promptly notify the DOE program office of the corrective action taken or to be taken by GEVARC. GEVARC (through the GEVARC Global Compliance Leader) shall further respond to any direction that the DOE program office provides in response to such submission.

1. As the DOE program office may inquire at any time (before, during, or after award) into GEVARC’s compliance with the FCOI regulations (including, for example, an Investigator’s disclosure of financial interests and GEVARC’s review of, and response to, such disclosure, regardless of whether or not the disclosure resulted in GEVARC’s determination of a financial conflict of interest), GEVARC is required to make available to the Awarding Component records pertinent to compliance with the applicable regulations.

2. In any case in which the DOE determines that a DOE awarded project was not managed or reported by GEVARC as required by 2 CFR 200.112, GEVARC shall require the Investigator involved to disclose the FCOI in each public presentation of the results of the awarded project and to request an addendum to previously published presentations.

3. If a non-Federal entity fails to disclose an organizational conflict of interest to DOE prior to engaging in a procurement or transaction using DOE funds with a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the costs of such procurement or transaction may be disallowed. If a non-Federal entity fails to disclose an organizational conflict of interest to DOE prior to engaging in a procurement or transaction using DOE funds with a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, and the organizational conflict of interest is not avoided, neutralized, or managed, DOE may determine that imposition of specific award conditions under 2 CFR 200.208 is necessary. DOE may also take one or more actions specified under 2 CFR 200.339, as appropriate in the circumstances.

IV. Responsibilities

A. Investigator

The Principal Investigator shall identify those other persons engaged, or expected to be engaged on the research project, who shall be considered “Investigators” (as defined above); the PI and all persons identified by the PI as investigators shall be subject to the SFI reporting obligations set forth herein.

All GEVARC Investigators working on DOE research bids or DOE awarded projects must be alert to report SFIs (as described herein), on behalf of oneself and Covered Family Members in a timely fashion. In particular, such submissions must be made:

- (a) prior to the time the bid for the DOE award is submitted to NIH;
- (b) prior to commencing work on DOE awarded projects;
- (c) periodically (at least annually) at time intervals to be established to enable GEVARC to meet regulatory filing requirements;
- (d) within 30 days of a potential reportable SFI arising during the course of work on a PHS funded research project (*e.g.*, through purchase, marriage, or inheritance); and
- (e) at such other times as may be determined by GEVARC Compliance Counsel.

The PI shall submit, and require Investigators to submit, SFI Questionnaires annually to the SFI Lead Reviewer. Such annual SFI Questionnaires should include any information

that was not previously disclosed to GEVARC (*e.g.*, any FCOI identified on a PHS-funded project that was transferred from another institution), and shall include updated information regarding any previously disclosed SFI (*e.g.*, the updated value of a previously disclosed equity interest).

B. SFI Lead Reviewer

The SFI Lead Reviewer(s) will be designated by GEVARC General Counsel (for backup or other process purposes, more than one individual may be charged with the responsibilities of the SFI Lead Reviewer).

The SFI Lead Reviewer shall review all disclosures of SFIs and, using the standards set forth in this procedure, determine whether there is a reasonable potential for the existence of an FCOI, as defined in this procedure. In the event the SFI Lead Reviewer assesses an SFI disclosure as presenting such a reasonable potential for an FCOI, the SFI Lead Reviewer will refer that disclosure to the FCOI Review Board for adjudication.

For those SFI disclosures that the SFI Lead Reviewer determines do not present a reasonable potential for the existence of an FCOI, the review process is complete and the SFI Lead Reviewer shall advise the cognizant Business Development Manager (BDM) of such fact.

Following the identification of an FCOI by the FCOI Review Board, the SFI Lead Reviewer will develop (subject to approval by the FCOI Review Board) and implement a management plan that shall specify the actions that have been, and shall be, taken to manage such FCOI (see Section III(B)(3)).

At any time the SFI Lead Reviewer may consult with GEVARC technologists, Legal, Compliance, and/or Finance, to obtain information with which to make the assessment of an SFI disclosure. Given the personal nature of the information involved, such consultations should be conducted on a confidential basis and only with those who have a legitimate business need to know of such information.

C. GEVARC FCOI Review Board

The responsibility of the Board will be to review any SFI disclosures referred by the SFI Lead Reviewer to assess whether an FCOI exists. Any member of the Board who does not concur in the assessment of the Board may present his or her concerns to the GEVARC General Counsel.

In the case of an identified FCOI, the Board shall review and approve an FCOI management plan that shall specify the actions that have been, and shall be, taken by

GEVARC to manage such FCOI (see Management of Financial Conflicts of Interest, Section III(B)(1)).

D. Manager, External Affairs & Technology Programs (or designee Business Development Manager)

With regard to participation in DOE awarded projects, the Manager, External Affairs & Technology Programs (or designee) shall perform the tasks listed below.

1. At Bid/No Bid Meetings (“Tollgate 1”), the BDM having responsibility for the proposed bid will discuss requirements of this Procedure with the PI and Key Personnel.
2. By the time of the Final Cost Volume E-review (“Tollgate 6”), the BDM shall ensure, pursuant to GEVARC Procedure 1.06, that each Investigator has submitted a completed SFI Questionnaire identifying his/her known SFIs. (An example document for this process is included as Attachment A.

E. Legal Counsel

With regard to participation in PHS-funded research:

1. GEVARC Legal Counsel (or designee) shall maintain an up-to-date, written, enforced policy on financial conflicts of interest that complies with the DOE Regulations; and
2. GEVARC General Counsel (or designee) shall designate the SFI Lead Reviewer(s).

F. GEVARC Chief Compliance Officer

The GEVARC Chief Compliance Officer (or designee) shall:

1. make a copy of this Procedure publicly-available as required by DOE regulations;
2. communicate as appropriate with the DOE program office regarding any reportable FCOI matters and otherwise take actions as may be required under DOE regulations, including reporting conflicts to designated DOE program offices, to ensure that identified conflicting interests are managed, reduced, or eliminated;
3. manage review and adjudication of SFI Questionnaires made pursuant to this Procedure to assure compliance with applicable regulations;

4. provide guidance, upon request, to Investigators regarding the requirements of this Procedure, the Investigator's responsibilities regarding disclosure of SFIs, and the DOE Regulations;

5. ensure appropriate training materials are available outlining the requirements of this Procedure and the DOE regulations and deliver training to each Investigator regarding the same prior to engaging in research related to any PHS-funded grant and at least every four years, and immediately when any of the following circumstances apply:

(a) GEVARC revises this Procedure in any manner that affects the requirements of Investigators;

(b) an Investigator is new to GEVARC; or

(c) GEVARC finds that an Investigator is not in compliance with this Procedure or a management plan initiated hereunder; and

6. maintain records of SFI Questionnaires and GEVARC's review of, and response to, disclosures and necessary follow-up actions for at least three years from the submission date of the final expenditure report or longer as may be required under other U.S. regulations or GEVARC's Document Management Procedure.

G. Finance – Manager, Contract Services

With regard to participation in PHS-funded research, the Manager, Contracts Department (or designee) shall:

1. require each Investigator to have submitted to the SFI Lead Reviewer a completed SFI Questionnaire identifying his/her known SFIs.

(a) At Kickoff Meetings ("Tollgate 2"), the Contracts Administrator (CA) will brief technical personnel potentially subject to the requirements of this Procedure on the requirements of this Procedure and provide the SFI Questionnaires for completion by the affected individuals (i.e., the PI and persons to be designated as Investigators on the project).

(b) At award and through contract negotiation, the CA shall re-issue requests for verification to PI/Key Personnel and subcontractors.

(c) At the start of the program, the CA shall re-issue requests for verification to PI/Key Personnel and subcontractors

2. CA will also be responsible for managing potential subcontractors in accordance with the requirements of the DOE Regulations by:

(a) inquiring whether the subcontractor has an existing policy consistent with the DOE regulations;

(b) incorporating as part of a written agreement with the subcontractor terms that establish whether the FCOI policy of GEVARC or that of the subcontractor will apply to the subcontractor's Investigators;

(i) if the subcontractor's Investigators must comply with the subcontractor's FCOI policy, requiring the subcontractor to certify as part of the agreement referenced above that its policy complies with the DOE Regulations, and if the subcontractor cannot provide such certification, the agreement shall state that subcontractor Investigators are subject to the terms of this Procedure;

(ii) if the subcontractor's Investigators must comply with the subcontractor's FCOI policy, the agreement referenced above shall specify time period(s) for the subcontractor to report all identified FCOI to GEVARC, with such time period(s) being sufficient to enable GEVARC to provide timely FCOI Reports, as required;

(iii) if the subcontractor's Investigators must comply with this Procedure, the agreement referenced above shall specify time period(s) for the subcontractor to submit all Investigator disclosures of SFIs to GEVARC, with such time period(s) being sufficient to enable GEVARC to comply timely with its review, management, and reporting obligations;

(c) including in subcontracts the necessary flow down clauses as required by the GEVARC prime contract and by this Procedure and applicable regulations; and

(d) establishing a subcontractor SFI reporting process consistent with this Procedure.

3. CA will notify Investigators annually of the requirement to submit annual SFI Questionnaires to the SFI Lead Reviewer.

H. GEVARC Technology Manager (TMs)

GEVARC Technology Manager (TMs) are responsible for ensuring that all personnel in their respective technical organizations who are subject to the provisions of this Procedure (*i.e.*, soliciting or performing PHS-funded research) are aware of the requirement to be

trained in the requirements of the DOE regulations and this Procedure at least every four years, and immediately when any of the following circumstances apply:

- (1) GEVARC revises this Procedure in any manner that affects the requirements of Investigators;
- (2) an Investigator is new to GEVARC; or
- (3) GEVARC finds that an Investigator is not in compliance with this Procedure or a management plan initiated hereunder.

For his/her respective technical organization, each TM shall ensure that new PI's to ongoing PHS-funded research projects are aware of the requirements under the DOE Regulations and this Procedure.

TMs are responsible for assuring compliance with this Procedure on the part of all affected personnel in their respective technical organizations, including compliance with the requirements regarding the submission of annual SFI Questionnaires.

I. Business Program Managers (BPMs)

BPMs, or their respective designees, shall confirm with the GEVARC Chief Compliance officer and the appropriate CA and, as appropriate, certify, in each application for funding to which the DOE regulations apply, that GEVARC:

- (1) has in effect an up-to-date, written, and enforced administrative process to identify and manage FCOI with respect to all research projects for which funding is sought or received from the DOE;
- (2) shall promote and enforce Investigator compliance with the requirements of the DOE Regulations;
- (3) shall manage FCOI and provide initial and ongoing FCOI Reports to the DOE program office consistent with the DOE regulations; and
- (4) agrees to make information available, promptly upon request, to the DOE relating to any Investigator disclosure of SFI and the non-federal entity's review of, and response to, such disclosure, whether or not the disclosure resulted in the non-federal entity's determination of an FCOI.

IV. Related Information

The following sources provide further information on approval and signature requirements and limitations for specific transactions.

- GEVARC Procedure 1.06 – Proposals and Contracts
- GEVARC Procedure 1.37 – Misconduct in Science

V. Revision History

Date	Description	Author
January 2024	New procedure created	Adelman

GEVARC DOE FCOI Training Summary & SFI Questionnaire

What's the Purpose & Scope of the Regulations?

- **Promote objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of projects wholly or in part funded under DOE financial assistance awards (e.g., a grant, cooperative agreement, or technology investment) will be free from bias resulting from Investigator and his/her covered family members' financial conflicts of interest (FCOIs).**
- Covers each institution that applies for or receives a DOE financial assistance award (e.g. GEVARC)
 - see last section below for historical PHS funding sources
- Covers Investigators planning to participate in or participating in research
- Note: Investigators are still required to adhere to GE's general Conflict of Interest policy & procedure

What's Different about the Revised Regulations?

- Expanded definition of "Investigator"
- Modified definition of "Significant Financial Interest (SFI)"
- Extent of Investigators' SFI disclosure per project to GEVARC
- GEVARC's management of resulting "Financial Conflicts of Interest (FCOIs)"
- Information reported to the DOE program office
- Information potentially disclosed to the public

Key Terms

- **Investigator:** means the principal Investigator (PI) and any other person, regardless of title or position, who is responsible for the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE. DOE program offices have the discretion to expand the definition to include also any person who participates in the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE. Such expansion will be specified in the applicable funding opportunity announcement and/or terms and conditions of the financial assistance award; **for GEVARC, this is the PI plus all technologists staffed on the project**
- **Covered family members:** each Investigator's spouse & dependent children
- **Institutional non-Federal entity responsibilities:** means an Investigator's professional responsibilities on behalf of the non-Federal entity, and as defined by the non-Federal entity in its policy on financial conflicts of interest, which may include: activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.
- **Significant Financial Interest (SFI) Lead Reviewer:** GEVARC US Compliance Leader
- **Financial Conflict of Interest (FCOI):** see next page
- **FCOI Review Board:** SFI Lead Reviewer, Finance rep, Legal rep, Technology rep

GEVARC DOE FCOI Training Summary & SFI Questionnaire

When & to Whom do Investigators Need to Disclose their SFIs?

SFIs must always be disclosed per project **only to the SFI Lead Reviewer**:

- **At Bid/No-Bid Meeting:** the PI will identify those to be deemed as Investigators, including sub recipient Investigators if applicable, who will then be required to disclose SFIs.
- **Prior to Final Cost Volume E-Review:** each Investigator will disclose SFIs
- **Prior to Commencing Work on the Project:** each Investigator will disclose SFIs
- **Annually:** each PI & Investigator will submit an updated disclosure of SFIs annually during the period of the award.
- **Within 30 days:** each Investigator will submit an updated disclosure of SFIs within 30 days of **discovering or acquiring** (e.g. through purchase, marriage, or inheritance) **a new SFI**.
- **Within 30 days:** each **new Investigator** assigned to an ongoing project will submit a disclosure of SFIs within 30 days.

What's the Difference between an SFI and a Financial Conflict of Interest (FCOI)?

An "FCOI" is an SFI that could directly and materially affect the design, conduct, or reporting of DOE awarded research. For example:

- A GEVARC employee was paid \$7,500 in consulting fees by an energy company 6 months ago. That employee has now been identified as a potential Investigator participating in a bid with the same company for a DOE grant.

What will the "SFI Lead Reviewer" do with the SFI Disclosures?

Note: The SFI Lead Reviewer will handle disclosures as "GE Restricted" data.

- The SFI Lead Reviewer will review SFIs disclosed by each Investigator.
- The SFI Lead Reviewer will make an initial assessment as to whether an SFI is an FCOI.
- If an initial assessment of FCOI is made, the SFI Lead Reviewer will review with the FCOI Review Board, who will make the final determination.
- If determined to be an FCOI, the SFI Lead Reviewer will work with the FCOI Review Board, PI and Investigator to develop a management plan that specifies actions to take.
- If it's determined initially or otherwise there is no FCOI, the SFI Lead Reviewer will notify the project's Business Development Manager (BDM).

GER DOE FCOI Training Summary & SFI Questionnaire

What are GEVARC's Options for Managing FCOIs?

- Public disclosure of FCOI
- Modification of research plan
- Change of Investigator or Investigator responsibilities
- Reduction or elimination of the SFI (e.g. sale of equity interest)
- Severance of relationship creating FCOI

What does a "Management Plan" consist of?

- Role and principal duties of the conflicted Investigator in the research project
- Conditions of the management plan
- How the management plan is designed to safeguard objectivity in the research project
- Confirmation of the Investigator's agreement to the management plan
- How the management plan will be monitored to ensure Investigator compliance
- Other information as needed

Who Reports FCOIs, and When?

For FCOIs that have not been eliminated prior to the expenditure of funds, the SFI Lead Reviewer will provide initial & ongoing reports to PHS:

- Prior to the expenditure of funds
- During the period of the award (i.e. within 60 days of identifying a new FCOI)
- Annually report on the status of FCOIs & any changes in applicable management plans

GER DOE FCOI Training Summary & SFI Questionnaire

What does "Public Disclosure of FCOIs" Mean?

Prior to expenditure of funds, the SFI Lead Reviewer will ensure information concerning FCOIs is provided via written response within 5 business days of a request by the public. GEVARC must retain this information for 3 years:

- Investigator's name
- Investigator's title & role with respect to the research project
- Name of entity in which the SFI is held
- Nature of the SFI
- Dollar range of the SFI (\$0-4,999; \$5K-9,999; \$10K-19,999; amounts between \$20K-\$100K by increments of \$20K; amounts > \$100K by increments of \$50K), or, a statement that the value cannot be readily determined Severance of relationship creating FCOI

GEVARC Historical DOE Funding Sources

- DOE – Department of Energy
- EERE - Energy Efficiency and Renewable Energy
- National Labs
- NNSA - National Nuclear Security Administration (NNSA)

GEVARC DOE FCOI Training Summary & SFI Questionnaire

DOE Proposal Information

Proposal PI Name: _____

Proposal Number: _____

Proposal Name: _____

GE CONFIDENTIAL (when filled in)

GEVARC Significant Financial Interests (SFI) Questionnaire for DOE financial assistance awards

NOTE – information requested below is required pursuant to Federal regulations governing DOE-financial assistance awards. GEVARC shall treat all sensitive personal information below as Strictly Private/GE Restricted Information, to be handled only by designated persons for purposes of complying with applicable regulations and policies.

This form is to be completed by proposed Investigators for all PHS-funded grants and proposals including the NIH.

Note: Significant Financial Interest” (SFI) is defined below.

NOTE: THE INFORMATION PROVIDED IS TO BE FOR THE INVESTIGATOR AND ALSO FOR THE INVESTIGATOR’S SPOUSE AND DEPENDENT CHILDREN.

Questions? - More information is available in GEVARC Compliance Procedure 1.47; also contact GEVARC Compliance Counsel or the GEVARC SFI Lead Reviewer (Chief Compliance Officer)

Investigator's Name: _____ Date: _____

GEVARC or Non-GE Organization: _____

SSO ID No.: _____ Project Role: _____

As an investigator (and for your spouse and dependent children), you must report all Significant Financial Interests, which are defined as follows:

“Significant Financial Interest” (SFI) means a financial interest of an Investigator (including those financial interests of the Investigator’s spouse and dependent children), other than an Exempt Financial Interest, that meets the following criteria:

- (1) the financial interest is in an entity or undertaking that is reasonably related to the Investigator’s institutional responsibilities; and
- (2) the value of the financial interest meets one or more of the Significant Financial Interest Threshold Values as defined herein below.

GEVARC DOE FCOI Training Summary & SFI Questionnaire

To be reportable as an SFI, the financial interest must be in excess of the following Significant Financial Interest threshold value”

1. Publicly Traded Entity

With regard to any **publicly** traded entity, the Significant Financial Interest threshold value is \$5,000 for the aggregate of a) the value of any remuneration received by the Investigator or Covered Family Members from the entity in the twelve months preceding the disclosure and b) the value of any equity interest in the entity as of the date of disclosure.

For purposes of this definition:

(a) “remuneration” includes salary and any payment for services not otherwise identified as salary (*e.g.*, consulting fees, honoraria, paid authorship); and

(b) “equity interest” includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

2. Non-Publicly Traded Entity

With regard to any **non-publicly** traded entity, the Significant Financial interest threshold value is met by:

(a) any equity interest in the entity; or

(b) any remuneration received by the Investigator or Covered Family Members from the entity in the twelve months preceding the disclosure in an amount, in the aggregate, of \$5,000.

3. Intellectual Property Rights

The Significant Financial Interest threshold value is met by any income related to intellectual property rights not held by GE or its affiliates.

4. Travel

The Significant Financial Interest threshold value is met by any sponsored or reimbursed travel other than GE sponsored or reimbursed travel 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.

GEVARC DOE FCOI Training Summary & SFI Questionnaire

To be reportable, the SFI should reasonably relate to your (the Investigator's) institutional Responsibilities, which are defined as: an Investigator's professional responsibilities for work performed for, or on behalf of the GEVARC, which may include: activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.

"Exempt Financial Interest" means an Investigator's financial interest the value of which is excluded when determining whether the aggregate value of a financial interest exceeds the SFI Threshold Value. Exempt Financial Interests include the following types of financial interests:

- (1) salary, royalties, or other remuneration paid by GE (or its affiliates that may pay or fund the Investigator) if the Investigator is currently employed or otherwise appointed by the GE, including intellectual property rights assigned to the non-Federal entity and agreements to share in royalties related to such rights;
- (2) any ownership interest in GE held by the Investigator or Covered Family Members;
- (3) income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator or Covered Family Members do not directly control the investment decisions made in these vehicles;
- (4) 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 that is affiliated with a domestic Institution of higher Education; or
- (5) income from service on advisory committees or review panels for 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.

GEVARC DOE FCOI Training Summary & SFI Questionnaire

Do you have any potential Significant Financial Interests (as defined above) to be reported?

NO

YES

Please indicate below the applicability of this SFI Questionnaire by selecting one of the following:

At Proposal	_____
Prior to Commencing Work on the Project	_____
Annually	_____
Within 30 days of discovering or acquiring a new SFI	_____
Within 30 days for each new Investigator	_____

Upon review, additional information may be required.

I understand that this Disclosure is required to obtain funding from the U.S. Government. I, [Full Name and Title _____], 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.

By signing below, you hereby certify that you have reviewed and understand the training materials accompanying this form and have, to the best of your knowledge, provided accurate and complete information in accordance with 2 CFR 200.112.

Signature

Date

Print name

WHEN COMPLETED, SUBMIT THIS FORM DIRECTLY TO: GEVARC SFI LEAD REVIEWER K-1 3A65A

The SFI Lead Reviewer shall keep this Questionnaire on file for 3 years from the date of the final expenditure report.

GEVARC DOE Organizational Conflict of Interest (OCI) Questionnaire

DOE Proposal Information

Proposal PI Name: _____

Proposal Number: _____

Proposal Name: _____

GE CONFIDENTIAL (when filled in)

NOTE – information requested below is required pursuant to Federal regulations governing DOE-financial assistance awards. This form is to be completed by Principal Investigator (PI) as part of the proposal kick off process, and returned to the Contract Administrator (CA). More information is available in GEVARC Compliance Procedure 1.47; also contact GEVARC Compliance Counsel or the GEVARC Significant Financial Interest (SFI) Lead Reviewer (Chief Compliance Officer).

An “Organizational conflict of interest” means:

- A. A situation where, because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization (2 CFR 200.318(c)(2)) or
- B. The non-Federal entity has access to nonpublic information, or has performed or expects to perform work for the Federal Government that may provide any member of GE Research with an unfair competitive advantage in applying for federal funding or that could appear to bias GE Research’s judgment?

1. Pursuant to paragraph A above, as part of this DOE funded project, do you (the recipient) or any subrecipients intend to engage in a procurement with a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe?

OR

Is any other GE business providing any cost share?

Check one:

NO

YES If Yes provide a brief description and complete the questions below that will be used for disclosure purposes:

- a) Name, address, and website (as applicable) of the entity that presents a potential or actual organizational conflict of interest.
- b) The relationship between the GE Research and the entity at issue.
- c) The nature of the anticipated procurement or other transaction with the parent, affiliate, or subsidiary organization.
- d) The anticipated value of the procurement or other transaction.
- e) The basis for making the procurement with a parent, affiliate, or subsidiary organization.
- f) The basis for GE Research’s determination regarding the existence of an organizational conflict of interest.
- g) How will GE Research avoid, neutralize, or mitigate the organizational conflict of interest.

2. Pursuant to Paragraph B above, do you have access to nonpublic information, or have performed or do you expect to perform work for the Federal Government what may provide you or another member of GEVARCResearch with an unfair competitive advantage in applying for federal funding or that could appear to bias your judgment?

This may occur in cases where you:

- provide advice, scientific, engineering, or technical direction to the Federal Government,
- prepare the specifications or statement of work for a federal funding opportunity, or
- evaluate the work performed by another employee or contractor of GEVARC under a Federal Award.

Check one:

NO

YES If Yes provide a brief description below. Further review from the GEVARC Chief Compliance Officer will be performed as needed.

Please indicate below the applicability of this OCI Questionnaire by selecting one of the following:

- At Proposal _____
- Prior to Commencing Work on the Project _____
- Annually _____
- Within 30 days of discovering or acquiring a new SFI _____
- Within 30 days for each new Investigator _____

Upon review, additional information may be required.

I understand that this Disclosure is required to obtain funding from the U.S. Government. I, **[Full Name and Title _____]**, 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.

By signing below, you hereby certify that you have reviewed and understand the training materials accompanying this form and have, to the best of your knowledge, provided accurate and complete information in accordance with 2 CFR 200.112.

Signature

Date

Print name

WHEN COMPLETED, SUBMIT THIS FORM DIRECTLY TO: GEVARC SFI LEAD REVIEWER K-1 3A65A

The SFI Lead Reviewer shall keep this Questionnaire on file for 3 years from the date of the final expenditure report.