Conflict of Interest / Commitment Disclosure Statement

Complete this form for each sponsored project on which you are a Principal Investigator, Co-PI, Project Director, project manager, or other person responsible for the design, conduct, or reporting of the funded work (the broadest applicable definition across DOE's "covered individual," PHS's "Investigator," and NSF's "Investigator"). This single form consolidates disclosure requirements across federal sponsors, whose underlying frameworks are not identical. DOE and PHS use dollar-threshold significant financial interest disclosure (2 CFR Part 910, Subpart C, effective August 17, 2026; 42 CFR Part 50, Subpart F). NSF uses its own threshold, set out in the NSF Proposal and Award Policies and Procedures Guide (PAPPG), Chapter IX.A, together with a mandatory eligibility certification regarding Malign Foreign Talent Recruitment Programs (42 U.S.C. § 19232). DoW relies on NMT's general policy plus risk-based screening under the DoW Component Decision Matrix (March 2026) and Section 1260H of the FY21 NDAA.

Family Members. Throughout this form, "Family Members" means your spouse, registered domestic partner, and dependent children. Federal rules require disclosure of interests held by your spouse and dependent children (42 CFR 50.603; 2 CFR 910.200; NSF PAPPG Chapter IX.A).

Note on sources: NSF's individual financial conflict of interest policy is not codified in the Code of Federal Regulations. It is set out solely in the NSF PAPPG, an NSF policy document that NSF revises on its own schedule, most recently as NSF 24-1.

Section A. Investigator and Project Information

Investigator (Last, First): _____ **Department:** _____

Proposal / Award Number: _____ **Sponsor ID:** _____

Project Title: _____

Your Role on the Project: _____ **Disclosure Date (mm/dd/yyyy):** _____

Funding source:

☐ PHS / NIH ☐ DOE ☐ NSF ☐ DoW ☐ Other (non-federal / other federal)

For DOE- or NSF-funded proposals, this disclosure must be complete no later than the date the application is submitted. Conflicts are reviewed as part of the application, not deferred to time of award (2 CFR 910.230(b)(3), 910.240(a)(1); NSF PAPPG Chapter IX.A).

Section B. Significant Financial Interest Thresholds

Different sponsors use different dollar thresholds below, but every one of them starts from the same underlying question: is a financial interest connected to your research at all. Question 1 asks that regardless of amount. Questions 2 through 4 then apply the dollar test for your specific funding source.

1. Do you or your Family Members have any financial interest, of any value, that either (a) may be affected by the research being conducted on this project, or (b) is in an organization that would reasonably appear to be affected by or benefit from the research being conducted?

☐ Yes ☐ No

This is a relatedness test, not a dollar-threshold test. Answer "Yes" even if the interest falls below the dollar thresholds in Questions 2 through 4 below.

2. For research NOT funded by PHS, DOE, or NSF: in the preceding 12 months, have you or your Family Members been paid combined remuneration of $10,000 or greater from, or held any equity interest in, an entity related to your institutional responsibilities? **[OTHER]**

☐ Yes ☐ No ☐ N/A

Mark N/A if PHS, DOE, or NSF funded (see Questions 3 and 4 instead).

3. For PHS (including NIH) or DOE-funded research: (a) for any publicly traded entity related to your institutional responsibilities, does the remuneration you or your Family Members received from it in the preceding 12 months, added to the current value of any equity interest you or your Family Members hold in it, exceed $5,000; or (b) for any non-publicly-traded entity related to your institutional responsibilities, did you or your Family Members receive remuneration from it exceeding $5,000 in the preceding 12 months? **[PHS / DOE]**

☐ Yes ☐ No ☐ N/A

Mark N/A if neither PHS nor DOE funded. Remuneration includes salary and any payment for services, such as consulting fees, honoraria, and paid authorship. Equity includes stock, stock options, and other ownership interests, valued by public prices or another reasonable measure of fair market value. Any equity in a non-publicly-traded entity is reported in Question 6 regardless of value. Threshold: 42 CFR 50.603; 2 CFR 910.200 (definition of significant financial interest).

4. For NSF-funded research: do you or your Family Members have remuneration aggregating $10,000 or more from a single entity in the preceding 12 months, OR an equity interest exceeding $10,000 in value, OR a 5% or greater ownership interest in any single entity, whose financial interests would reasonably appear to be affected by this NSF-funded work? **[NSF]**

☐ Yes ☐ No ☐ N/A

Mark N/A if not NSF funded. Threshold: NSF PAPPG, Chapter IX.A. This is NSF's own policy, not a Code of Federal Regulations provision.

5. Do you own a 5% or greater ownership interest in a publicly traded entity related to your institutional responsibilities (applies regardless of funding source)?

☐ Yes ☐ No

6. In the preceding 12 months, have you or your Family Members held any equity interest in a non-publicly-traded entity related to your institutional responsibilities (applies regardless of funding source)?

☐ Yes ☐ No

Section C. Foreign Interests, IP Income, Outside Activities, Participant Support and Travel

7. In the preceding 12 months, have you or your Family Members received any financial interest (salary, consulting fees, gifts, license fees, royalties, research support, grants, or other remuneration, not affiliated with NMT) from a foreign institution of higher education, or the government of another country?

☐ Yes ☐ No

Relevant to all sponsors under NSPM-33 research security expectations. DOE and DoW additionally require this be flagged for possible agency reporting (2 CFR 910.240; DoW Component Decision Matrix).

8. In the preceding 12 months, have you or your Family Members received income from intellectual property rights or interests (for example, patents, copyrights) related to your institutional responsibilities? **[PHS / DOE / NSF]**

☐ Yes ☐ No ☐ N/A

For PHS/DOE-covered work, disclose regardless of amount; there is no de minimis for intellectual property under DOE or PHS (42 CFR 50.603; 2 CFR 910.200; 91 FR 43514). For NSF-covered work this is already captured in Question 4's threshold.

9. Are you engaged in non-university professional or income-producing activities involving NMT students, other staff, or facilities?

☐ Yes ☐ No

If you answered "Yes," also see Section D, Question 11, and confirm whether the Employee Handbook Part 40 Application to Undertake Private Consulting Activity is required.

10. If this project involves PHS or DOE funding, have you received externally reimbursed or sponsored travel related to your institutional responsibilities? (Excludes travel funded by NMT, another domestic Institution of Higher Education, an affiliated domestic research institute, or a federal/state/local government agency.) **[PHS / DOE]**

☐ Yes ☐ No ☐ N/A

Mark N/A if not PHS or DOE funded. Neither DOE nor PHS sets a dollar threshold for travel (2 CFR 910.200, definition of significant financial interest, paragraph (2); 42 CFR 50.603). For each trip, report the purpose, the sponsor or organizer, the destination, and the duration; SPD may request the monetary value if needed to evaluate the travel (2 CFR 910.230(b)(7)). NSF and DoW do not separately require travel disclosure on this form; report per your Current and Pending Support Common Form instead.

Participant Support Certification: Required if the project budget includes participant support costs

For any participant support costs (stipends, subsistence allowances, travel allowances, registration fees, or temporary dependent care) on the project identified in Section A, I certify that:

(a) I will not select, or take part in selecting, as a participant any of my Family Members, any member of my household, or any person with whom I have a business or financial relationship, and I will not direct participant support payments to any such person or to an entity in which any of us holds a financial interest, unless the relationship has first been disclosed to Sponsored Projects Development and reviewed, and managed or eliminated, under NMT's Conflict of Interest policy;

(b) participants will be selected using documented, objective criteria consistent with the proposal and award;

(c) participant support will not be paid to anyone who performs work on the project, including NMT employees, instructors, speakers, student workers, interns, consultants, or Co-PIs, who must instead be budgeted as personnel or consultants; and

(d) if a relationship described in (a) arises after this disclosure, I will notify Sponsored Projects Development before the person is selected or paid.

I understand that participant support costs charged contrary to this certification may be questioned or disallowed by the sponsor, and that NMT relies on this certification when proposing and administering participant support costs.

Sources: 2 CFR 200.1 and 200.456; NMT Business Office, Budgeting, Pricing, and Charging Sponsored Agreements, Section III.R. Participants themselves do not complete this form.

Section D. Conflict of Commitment and Foreign Talent Recruitment Programs

Conflict of Commitment, defined. A conflict of commitment (COC) is a situation in which you accept or incur conflicting obligations, whether foreign or domestic, between or among NMT and one or more other employers or entities. This includes, but is not limited to: commitments of time or effort in excess of NMT policy or the effort you have represented to a sponsor; obligations to improperly share information with, or withhold information from, NMT or a sponsor; and current, pending, or applied-for outside appointments, positions, or affiliations, whether paid or unpaid, full-time, part-time, adjunct, honorary, or voluntary. This definition is drawn from DOE's regulatory definition of conflict of commitment (2 CFR 910.200), which NMT applies as its working institutional standard across all sponsors on this form, because DOE's definition is the most fully developed among NMT's covered federal sponsors. PHS, NSF, and DoW do not each separately codify their own conflict of commitment definition.

11a. Do you hold any outside appointment, consulting arrangement, affiliation, or employment relationship that could conflict with the time, effort, or obligations you owe this project?

☐ Yes ☐ No

11b. If yes to 11a: is this outside arrangement private consulting or outside employment, as opposed to work that will be performed using NMT facilities, personnel, students, or data, or that involves a sponsor requiring an institutional agreement?

☐ Yes, private consulting / outside employment only ☐ No, this involves NMT resources or an institutional sponsor relationship
☐ Unsure

If you answered Yes or Unsure to 11b, you must also complete the Application to Undertake Private Consulting Activity (Employee Handbook Part 40) and submit it to your Department Head before the arrangement begins. Sponsored Projects Development, not the employee, makes the final determination of whether the arrangement is private consulting or must instead be processed as a sponsored project agreement. Completing this disclosure does not substitute for the Part 40 application, and completing the Part 40 application does not substitute for this disclosure. Both are independently required.

12. Are you currently, or have you ever been, a party to a foreign government-sponsored Talent Recruitment Program of any kind (malign or non-malign)?

☐ Yes ☐ No

13. Do you, or does any collaborator, subcontractor, or partner named on this project, have, or have had within the past five years, an affiliation with, funding from, or research collaboration with any entity on the Prohibited Entity Lists compiled in the 2026 DoW Component Decision Matrix (March 9, 2026), including the Section 1260H list of Chinese military companies? **[DoW]**

☐ Yes ☐ No ☐ N/A

Mark N/A if this project is not DoW funded. The 2026 Matrix consolidates 13 federal lists and applies a five-year look-back. Contact SPD if you are unsure whether an entity appears on one of the lists.

14. Have any lobbying activities been conducted regarding the proposal for this project?

☐ Yes ☐ No

MFTRP Certification: Required for all federally funded proposals and awards

I certify that I am NOT currently a party to a Malign Foreign Talent Recruitment Program, as defined in Section 10638(4) of the CHIPS and Science Act of 2022 and prohibited for covered individuals under Section 10632 (42 U.S.C. § 19232). I understand that if this certification is false, I am ineligible to serve as senior/key personnel on the federally funded proposal or award identified in Section A; that DoW is prohibited from funding a fundamental research proposal on which a covered individual participates in such a program; and that NMT's Authorized Organizational Representative relies on this certification when submitting proposals. This certification supplements, and does not replace, the individual certification I make on my Common Forms in SciENcv or Research.gov.

☐ I certify to the above statement ☐ N/A, this project has no federal funding

Section E. NSPM-33 Common Forms Acknowledgment

I acknowledge that for NSF, NIH, DOE, and DoW proposals and awards, I am responsible for preparing, updating, and personally certifying my Biographical Sketch and Current and Pending (Other) Support in the NSPM-33 Common Forms format through SciENcv, as each agency requires (NIH: NOT-OD-26-018, for due dates on or after January 25, 2026; DOE: funding opportunities released after January 1, 2026). This NMT disclosure does not substitute for those requirements.

This form covers individual COI/COC/FTRP disclosures only. Organizational conflicts of interest (2 CFR 200.318, 2 CFR 910.250) are addressed under NMT's separate OCI written standards of conduct, maintained by Sponsored Projects Development.

Section F. Certifications

Check each box to certify. All apply regardless of funding source unless noted otherwise.

☐ I certify that the information submitted within this disclosure is true, complete, and accurate to the best of my knowledge, and that any false, fictitious, or fraudulent statement or claim may subject me to criminal, civil, or administrative penalties.

☐ I certify that I have read and will comply with NMT policies on patents and intellectual property, and will provide prompt full disclosure of inventions made during performance of this project.

☐ I certify that I have read and will comply with NMT's financial interest disclosure policy and have disclosed above any significant financial interest reasonably related to my institutional responsibilities.

☐ I certify that I have read and will comply with NMT policies on research misconduct/scholarly integrity, the drug-free workplace policy, and (as applicable) human subjects, live vertebrate animals, and export control notification requirements.

☐ I certify that I have read and will comply with NMT Employee Handbook Part 40 regarding outside consulting and employment, and have submitted an Application to Undertake Private Consulting Activity if required under Section D of this form.

☐ I acknowledge my obligation to update this disclosure annually and as soon as practicable after any new conflict or affiliation arises: no later than 15 days for DOE-funded work (2 CFR 910.230(b)(4)); no later than 30 days for PHS-funded work (42 CFR 50.604(e)(3)); no later than 30 days for NSF-funded work under NMT's COI Policy (NSF PAPPG Chapter IX.A requires updates annually or as new reportable interests are obtained but does not state a day count); or by the next required reporting milestone for DoW-funded work. Where more than one sponsor applies, the shortest deadline controls.

☐ For DOE-funded work, I acknowledge my obligation to complete COI/COC training before engaging in the project and at least every two years thereafter (every four years for PHS-only work), and within 30 days if NMT revises its COI/COC policy in a way that affects my responsibilities, if I am new to NMT, or if I am found out of compliance with the policy or a management plan (2 CFR 910.230(b)(6)). No comparable federal COI training cycle applies to NSF or DoW funding. COI/COC training is separate from the research security training federal agencies require of senior/key personnel under the CHIPS and Science Act, although DOE allows research security training that covers COI and COC to satisfy its COI/COC training requirement (91 FR 43516).

DOE Disclosure Certification Statement: Required if DOE-funded (2 CFR 910.230(b)(5); Appendix A to 2 CFR Part 910, Subpart C)

I understand that this Disclosure is required to obtain funding from the U.S. Government. I 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. 287, 1001, and 1031, and 31 U.S.C. 3729–3733 and 3801–3812). I further understand and agree that:

(1) The statements and representations made herein are material to the U.S. Government's funding decision, and

(2) I have a responsibility to update the disclosures during the period of performance of the Federal financial assistance award should circumstances change which impact the responses provided above.

☐ I make the above certification ☐ N/A, this project has no DOE funding

☐ I acknowledge that Sponsored Projects Development will report to the relevant sponsoring agency, as required, any conflict that cannot be eliminated or satisfactorily managed, any conflict involving a foreign government, and (for DoW-funded work) any unmitigable risk-matrix finding, potentially before proposal submission, not only at time of award.

Section G. Signature

Signature: _____ **Date (mm/dd/yyyy):** _____

By typing your name above and submitting this form, you are providing your certification signature for the MFTRP certification and the Participant Support Certification (Section D, if applicable), the DOE Disclosure Certification Statement (Section F, if applicable), and all certifications checked in Section F.

This disclosure reflects an actual, apparent, or potential COI/COC that cannot be eliminated or adequately managed under NMT policy. For DOE-funded work, this must be disclosed to DOE in the application itself (2 CFR 910.240(a)). For DoW-funded work, escalate per the Component Decision Matrix before submission. For DoW-funded work: a Section 1260H entity affiliation or malign FTRP participation was identified. Escalate to the Vice President for Research before proposal submission or award acceptance.