

Number: 001-0072
Title: Federal Grants/Cooperative Agreements Personal Conflicts of Interest
Revision Date: December 18, 2024
Responsible Party: Ethics & Compliance Office

Policy Statement: This document defines reporting obligations for APL staff members proposing to perform or performing under federal grants, cooperative agreements, or sub-grants/sub-agreements (-) [].

Policy

1. APL staff conduct business with a high degree of objectivity, integrity, and trust. In addition to all other applicable APL Guidance & Policies (G&Ps), APL staff proposing to perform or performing under grant opportunities have additional disclosure obligations.
2. These obligations are imposed by the National Aeronautics and Space Administration (NASA); the Public Health Service (PHS) agencies, including the National Institutes of Health (NIH) and the U.S. Centers for Disease Control (CDC); the National Science Foundation (NSF); the U.S. Department of Energy (DOE); and other government agencies.
3. To comply with these federally mandated reporting requirements, APL adopts Johns Hopkins Policy GOV033, available at [Conflict of Interest and Conflict of Commitment \(jhu.edu\)](#), and adapts it for the limited purpose of conflicts of interest and conflicts of commitment related only to grant opportunities at APL.
4. For APL purposes, the Laboratory considers the following substitutions and provisos when opportunities:
 - a. APL staff who are the Principal Investigator ; Co-PIs/Co-Is; Project Director, and any other person, regardless of title or position, identified on the proposed project who is responsible for the design, conduct, or reporting of research funded or proposed for funding by the federal agency (key personnel);
 - b. the shall be the Department Head or their delegee(s);
 - c. ETHOS system and the Grant Disclosure Forms described in the Procedures section below;

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certifications shall be included in the proposal package submitted via the Electronic Routing Tool (ERT) for review.

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