**COMPLIANCE & DISCLOSURE FORM**

**FOR GRANT APPLICATIONS TO THE FEDERAL GOVERNMENT**

If you are applying for a **federal grant** which would be administered by the College,

complete and return this form to the Grants Office, Laird 6.

**Title of your proposal**

**Funding Agency**

**Submission Date Grant Period Start & End Dates**

**I. Conflicts of Interest**

1. Do you or a member of your family have a financial interest – exceeding $5,000 in payments or equity interest –

in any company or organization related to the research proposed in this grant application?

\_\_\_\_**No**, I/we do not. \_\_\_\_**Yes**, I/we do, and explain this conflict in the attached statement.

\_\_\_\_I have read the College’s **Policy on** **Conflict of Interest** (COI - see reverse or <http://go.carleton.edu/3z>), which applies to all members of Carleton’s faculty or academic staff who are involved in projects supported by grants from the federal government. *Federal regulations require Carleton faculty and staff to renew this certification annually or as new reportable significant financial interests are obtained.*

**II. Human or Animal Subjects**

1. Does your research involve *human subjects*?

\_\_\_\_ **No**, it does not. \_\_\_\_ **Yes**, it does, and I already \_\_\_\_have or \_\_\_\_have not yet sought approval for my project from Carleton’s Institutional Review Board (IRB). (More at <http://go.carleton.edu/7zz>.)

2. Does your research involve animal subjects?

\_\_\_\_ **No**, it does not. \_\_\_\_ **Yes**, it does, and I have already \_\_\_\_have or \_\_\_\_have not yet applied for review and approval from Carleton’s Institutional Animal Care and Use Committee (IACUC - <http://go.carleton.edu/ee>).

**III. Responsible Conduct of Research**

1. Does your research involve research by undergraduate students, graduate students, or postdoctoral scholars?

\_\_\_\_ **No**, it does not. \_\_\_\_ **Yes**, it does, and I already \_\_\_\_have or \_\_\_\_have not yet made plans to certify that I will provide the federally-mandated training and oversight in the responsible conduct of research.

Information about Carleton’s RCR training is available at <http://go.carleton.edu/9c4>.

**IV. Environmental Health and Safety**

1. Does your grant project raise environmental and safety concerns such as radiation, fire, or chemical safety; workplace safety in studios and shops; or environmental regulation and compliance?

\_\_\_\_ **No**, it does not. \_\_\_\_ **Yes**, it does, and I already \_\_\_\_have or \_\_\_\_have not yet discussed these concerns with Elisabeth Haase, Manager of Environmental Health and Safety Compliance (x4146 or [ehaase](mailto:ehaase@carleton.edu)).

**V. Vendor Selection Form**

1. Does your grant, if from a federal funder, ask for a purchase or services that will cost more than $10,000 each? (Exception: Computing devices with cost of up to $5,000 are supplies and Vendor Selection Form is not needed)

\_\_\_\_ **No**, it does not. \_\_\_\_ **Yes**, it does, and I already \_\_\_\_have or \_\_\_\_have not yet filed the Carleton Business Office’s “Vendor Selection Form”

(Go to the Grants Office [Forms & Templates page](https://www.carleton.edu/grants-office/forms/) to access the form and document the selection process.

I certify that the foregoing and proposal application information is true, complete, and accurate to the best of my knowledge; that I understand that any false, fictitious, or fraudulent statements may subject me to criminal, civil, or administrative penalties; and that I agree to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant is awarded as a result of the application.

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**Signature**

**Printed Name Date**

*For* ***GO use*** *only: check of SAM database (for debarment/suspension, & FAPIIS if sub)***:** Signature \_ Date

**Conflict of Interest Policy For Faculty and Academic Staff**

**Applying for Carleton-Administered Federal Grants** *As set by relevant federal regulations, including*

(originally approved July 2002, revised 4/11, 8/12, 1/15)

National Science Foundation: <http://www.nsf.gov/pubs/manuals/gpm05_131/gpm5.jsp#510>

National Institutes of Health: <http://grants.nih.gov/grants/compliance/42_CFR_50_Subpart_F.htm>

Federal Register: <http://www.gpo.gov/fdsys/pkg/FR-2011-08-25/pdf/2011-21633.pdf>

**1. SCOPE**. The following statement of policy applies to each member of the faculty or academic staff (Investigator) applying for a Carleton-administered grant from a federal agency or foundation. The policy was developed in response to 1995 federal rules and revised to meet 2011 regulations that govern institutional and researcher responsibilities in identifying and monitoring conflicts of interest. By assuming this responsibility for themselves, colleges and universities may avoid outside monitoring and regulation by the federal government.

**2. FIDUCIARY RESPONSIBILITIES**. Employees, officers, and members of the board of the College serve the public trust and have a clear obligation to fulfill their responsibilities in a manner consistent with this fact. All decisions of the board and officers of the administration and the faculty and academic staff are to be made solely on the basis of a desire to promote the best interests of the College and the public good. The College’s integrity must be protected and advanced at all times.

College faculty or academic staff applying for grants may be involved in the affairs of other organizations. It is unlikely that an effective faculty will consist of individuals entirely free from at least perceived conflicts of interest. Although most such potential conflicts are and will be deemed to be inconsequential, everyone is responsible for ensuring that the College is made aware of situations that involve business relationships that could represent a conflict of interest with respect to an outside grant. ***Thus the College requires that applicants for a grant of College-administered funds from a federal agency (1) review this policy; (2) disclose any possible business relationships that reasonably could give rise to a conflict of interest for the investigator and/or his or her spouse/dependent children; and (3) acknowledge by his or her signature that he or she is in accordance with the letter and spirit of this policy. In addition to making this statement at the time of application, investigators must renew this statement a) within 30 days of identification of a new conflicting interest, and b) annually for previously identified FCOI.***

**3. DISCLOSURE**. Faculty or academic staff are required to list on the Compliance & Disclosure Form only those substantive business relationships (in federal parlance, “significant financial interest”) that could directly affect the design, conduct, or reporting of federally funded research. “Significant financial interest” or SFI\* includes any payments or equity interests in the 12 months preceding the disclosure that, when aggregated, exceed $5,000 in renumeration and/or in equity interest in any publicly traded entity ***AND/OR*** $5,000 in renumeration or *any* equity interest in a non-publicly traded entity that might affect the investigator or the research. In the event that a faculty member is uncertain as to the appropriateness of listing a particular relationship, the Dean of the College, as Institutional Grants Administrator, should be consulted. This policy per federal guidelines applies to the investigators responsible for the design, conduct, or reporting of federally-funded research; ***and*** *their spouses and dependent children*. This policy also applies to subgrantee investigators.

Conflicts of interest frequently are matters of degree and judgment, and the College expects faculty and academic staff to be alert to the possible effect of outside activities on the integrity of their decisions and on their ability to fulfill their obligations to the institution and/or to funding agencies. As potential or actual conflicts of interest arise, the Institutional Grants Administrator will determine which conditions or restrictions might be imposed to manage, reduce, or eliminate actual or potential conflicts of interest. Records of financial disclosures will be maintained for at least three years from the date of submission of final expenditures reports. The College will make conflict information available, upon request, to federal agencies.

\* SFI - Carleton’s revised full FCOI policy is available via request from CFR, and online

https://apps.carleton.edu/handbook/research/?a=faculty&policy\_id=867902

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**Debarment and Suspension Certification:** (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals: (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from a covered transaction by any Federal department or agency; (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property; (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall include an explanation with this proposal.