

informed if the institution finds that it is unable to satisfactorily manage a conflict of interest.

g. Institutions must maintain records of all financial disclosures and of all actions taken to resolve conflicts of interest for at least three years beyond the termination or completion of the grant to which they relate, or until the resolution of any NSF action involving those records, whichever is longer.

#### **What Would Be Required in Proposals**

##### *Grant Proposal Guide*

Section II.C.1, INSTRUCTIONS FOR PROPOSAL PREPARATION, at the end of the *Certification for Authorized Institutional Representative or Individual Applicant*, will be revised to add:

A new certification will be added that requires an institutional representative to certify that the institution has implemented a written and enforced

policy on conflicts of interest consistent with the provisions of *Grant Policy Manual* Section 510; that to the best of his/her knowledge, all financial disclosures required by that conflict of interest policy have been made; and that all identified conflicts of interests will have been satisfactorily managed, reduced or eliminated prior to the institution's expenditure of any funds under the award, in accordance with the institution's conflict of interest policy. Conflicts which cannot be satisfactorily managed, reduced or eliminated must be disclosed to NSF.

Page 2 of the NSF Form 1207, *Cover Sheet for Proposal to the NSF*, will be revised to add the following to the end of the section on Certification for Authorized Institutional Representative or Individual Applicant:

In addition, if the applicant institution employs more than fifty persons, the authorized official of the

applicant institution is certifying that the institution has implemented a written and enforced conflict of interest policy that is consistent with the provisions of *Grant Policy Manual* Section 510; that to the best of his/her knowledge, all financial disclosures required by that conflict of interest policy have been made; and that all identified conflicts of interest will have been satisfactorily managed, reduced or eliminated prior to the institution's expenditure of any funds under the award, in accordance with the institution's conflict of interest policy. Conflicts which cannot be satisfactorily managed, reduced or eliminated must be disclosed to NSF.

Dated: May 17, 1995.

**Lawrence Rudolph,**

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