

NEW
ARRIVAL

NASA

COI Policy

COI Team Natalie Godfrey
 Iris Ortega
 Brian Warshawsky
SPO Angela Ford

RAC Forum
November 29, 2023

What: New NASA COI Policy

The National Aeronautics and Space Administration (NASA) new conflict of interest (COI) disclosure policy.

This disclosure policy will be required for all new NASA Assistance (grants and cooperative agreements) awards. As the disclosure requirements are very similar to the existing National Science Foundation (NSF) COI process, the same [Non-PHS Screening and Disclosure forms](#) will be utilized and are updated to reflect NASA. Please see the UC Berkeley Conflict of Interest website for more information: <https://researchcoi.berkeley.edu/nonphs.html>

What is disclosed?

- A **significant financial interest** that could directly and significantly affect the design, conduct, or reporting of NASA-funded research.
- “The term ‘**significant financial interest**’ means anything of monetary value, including, but not limited to, salary and any payment for services not otherwise identified as salary (e.g., consulting fees or honoraria), equity interest (e.g., stock, stock options, private equity, or other ownership interests), venture or other capital financing, and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).”

Not a Significant Financial Interest?

Same as NSF except for the exclusion of income from “mutual funds” and “retirement accounts.”

“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;”

Why?

NASA did not have an existing COI policy. This new policy aligns with the policies of other federal agencies, specifically NSF's COI policy.

When:

The NASA COI disclosure requirements will go into effect
December 1, 2023

Meeting Schedule

Submission Deadline for All Final Documents	COI Committee Full Review Meeting Date
December 11, 2023	December 18, 2023
January 04, 2024	January 08, 2024

Who:

These requirements apply to Investigators participating in NASA funded projects that are Assistance (grants and cooperative agreements), either directly from NASA or when UCB is a subrecipient. Anyone meeting the following definition of “Investigator” is subject to the NASA COI requirements.

The term “Investigator” means the principal investigator, **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 NASA.

This policy does not apply to NASA contract funded projects.

For the policy details please visit NASA Grant Information Circular (GIC 23-07).

How will this policy be implemented?

- The existing **Non-PHS forms** (both the Non-PHS Financial Screening Questions and the Non-PHS Financial Disclosure forms) will be updated to include **NASA**.
- Review process for positive disclosures will remain the same, with review at proposal stage for new awards
 - Subsequent review as new Significant and Related Financial Interests are obtained throughout the period of the award.

Frequency

- At proposal stage
- Institutions must require that disclosures are updated during the award's period of performance as new reportable significant financial interests are obtained.

Summary of Differences from NSF

For the most part, there is no material difference

- NASA omits “the reviewer(s) reasonably determines”
- Includes “Project Director” amongst investigators
- Exclusion of certain income from “investment vehicles, such as mutual funds and retirement accounts...”

Where:

- Policy guidance, disclosure forms, and additional information can be found on the Berkeley Conflict of Interest webpage: <https://researchcoi.berkeley.edu/>
 - Committee meeting schedule: <https://researchcoi.berkeley.edu/committee.html>
- Specific information regarding NASA and non-PHS disclosures can be found at:
 - <https://researchcoi.berkeley.edu/nonphs.html>
 - <https://researchcoi.berkeley.edu/nonphsguidance.html>
 - https://researchcoi.berkeley.edu/policy_guidance.html
- UCOP: [NSF-NASA_COIDisclosure](#)
- NASA: <https://www.nasa.gov/wp-content/uploads/2023/09/gic-23-07-conflict-of-interest-policy-0.pdf>

SPO Implementation - Proposal Stage

- Effective December 1, 2023
- Applies to direct and flow-through NASA applications for assistance funding (grants and cooperative agreements)
- Does not apply to NASA contracts
- COI Screening questions will populate in the Phoebe proposal record based on certain criteria to capture most assistance funding
- COI Screening questions will **not** populate for sponsor codes that are primarily contract funding (e.g. STScI, JPL, NASA facilities or centers)

SPO Implementation - Proposal Stage




Tips:

- If the PI is submitting in NSPIRES use sponsor code 005105 (NASA National Aeronautics and Space Administration Shared Services Center)
- All ROSES solicitations and when in doubt use sponsor code 005105 (NASA National Aeronautics and Space Administration Shared Services Center)

SPO Implementation - Proposal Stage

- Enter the CFDA/ALN if you see it (CFDA/ALN = Assistance), e.g. 43.001
- When there is a CFDA/ALN use sponsor code 005105 (NASA National Aeronautics and Space Administration Shared Services Center)

Sponsor & Program Information hide

Prime Sponsor ID:
Sponsor Proposal ID: NA
Sponsor Name: NASA National Aeronautics and Space Administration Shared Services Center
Sponsor Contact:
 CFDA Number: 43.001
Solicitation/RFP: NASA MMS Early Career
Opportunity Title:
SBIR/STTR:
Sponsor Deadline Type: Receipt
Sponsor Deadline Date: 7/21/2023
Local Time of Deadline: 5:00 PM (Pacific)
This proposal includes subaward(s): No

SPO Implementation - Proposal Stage

More tips:

- For any Investigator with a “Yes” response, upload the Disclosure Form as a Person Attachment in Phoebe **and** mark Financial Disclosure - Pending on the Special Review tab
- Subrecipients: Use the new subrecipient commitment [form](#) dated Dec 2023 to capture the sub’s compliance with the NASA COI requirements
- SBIR/STTR Phase II funding is subject to the NASA COI requirement

SPO Implementation - Proposal Stage



Note:

- There may be situations where the COI screening questions do not populate
- If the CGO reviews the proposal and determines it will be for assistance funding, they may ask you to submit a screening question form
- Rollout 2.0 of the process in Phoebe will include enhanced criteria for capturing NASA assistance proposals - Stay tuned!

SPO Implementation - Award Stage

- Effective December 1, 2023
- For NASA Grants and Cooperative Agreements, CGOs will check if screening questions were completed at proposal stage
- If not, the CGO will request a financial conflict of interest screening questions form and Non-PHS Financial Disclosure Form(s) when applicable
- Positive disclosures: NASA grants and cooperative agreements will be released after COI Coordinator/Committee approval is received

Questions?

Website: <https://researchcoi.berkeley.edu/>

Email: coi-team@berkeley.edu

[SPO contact list](#) for C&G Officers

Angela Ford: arford@berkeley.edu

