

Outside Interest / Conflict of Interest Disclosures for Sponsored Programs

ALL faculty, staff, and graduate assistants have to complete an OID form, in accordance with [UT policy](#). However, grant & contract sponsoring agencies often require additional disclosures as part of the application process. Along with the information below, please also review the UT Policy Guidance document [Disclosures for Research Activities](#) which includes information about Public Health Service agencies as well as other organizations who have adopted or adapted PHS regulations.

The legal requirement to disclose funding sources in applications for federal research and development awards is codified in Section 223(a)(1) of the [William M. Thornberry National Defense Authorization Act](#). The law requires that each individual listed on the proposal take the following steps: (A) disclose the amount, type, and source of all current and pending research support received by, or expected to be received by, the individual as of the time of the disclosure; (B) certify that the disclosure is current, accurate, and complete; and (C) agree to update such disclosure at the request of the agency prior to the award of support and at any subsequent time the agency determines appropriate during the term of the award. The law also requires that each entity authorizing proposals must certify that each covered individual who is employed by the entity and listed on the application has been made aware of the disclosure requirements. As part of UT/UTC's effort to ensure that all investigators are aware of this, the Cayuse PI Certifications includes the statement that, "For federal proposals, I am aware of disclosure requirements in Section 223(a)(1) of the William M. Thornberry National Defense Authorization Act."

While it is impossible to anticipate every possible disclosure scenario, the links below include disclosure requirements for UTC's most frequent sponsors. Please note that the landscape of sponsored guidelines is constantly changing, so this is not meant to be an exhaustive list but a guidance document. **Most importantly, when in doubt, always disclose an outside interest or activity.**

National Science Foundation

Charts available [here](#) show NSF pre-award and post-award disclosure requirements.

National Institutes of Health

This [chart](#) shows NIH pre-award and post-award disclosure requirements.

Department of Defense

This DOD [Memorandum](#) from March 20, 2019 details disclosure requirements for proposals for grants, cooperative agreements, and other non-procurement funding instruments.

Department of Energy

This DOE [document](#) outlines DOE's interim COI policy and standards for eliminating bias in the design, conduct, and reporting of projects.