Appendix
Requirements for U.S. Department of Energy Proposals and Awards

This Appendix establishes rules that apply when the University of Pittsburgh ("University") is an applicant to or recipient of U.S. Department of Energy ("DOE") Federal financial assistance award on or after August 17, 2026, including any research, project, or activity supported in whole or in part by such an award (grant, cooperative agreement, or technology investment agreement), consistent with 2 CFR Part 910, Subpart C. Where this Appendix and the body of the Policy differ, the terms of this Appendix govern DOE proposals and awards; the body of the Policy continues to govern in all other respects.

I. Definitions

The following definitions apply to the terms used in this Appendix and supplement those in Section II of the body of the Policy:

A. Covered Individual - Any individual, regardless of title or position, who (1) contributes in a substantive, meaningful way to the development or execution of the scope of work of a project funded by DOE or proposed for funding by DOE, and (2) is designated as a Covered Individual by DOE.

   DOE designates as Covered Individuals any Principal Investigator (PI), project director (PD), co-principal investigator (Co-PI), co-project director (Co-PD), project manager, and any individual regardless of title that is functionally performing in such a role, and individuals designated in the applicable Notice of Funding Opportunity (NOFO) or terms and conditions of the Federal financial assistance award. Submission of a current and pending support disclosure or biosketch/resume for an individual serves as acknowledgement that DOE designates them as a covered individual.

B. Conflict of Commitment - A situation in which an individual accepts or incurs conflicting obligations, whether foreign or domestic, between or among multiple employers or other entities. This may include conflicting commitments of time and effort, including obligations to dedicate time in excess of institutional or DOE policies or commitments or obligations to improperly share information with, or withhold information from, the University or DOE.

C. Conflict of Interest - A situation in which a covered individual or the spouse or a child of that covered individual has a significant financial interest or financial relationship, whether with a domestic or foreign entity, that could directly and significantly affect the design, conduct, reporting or funding of a project or other Federal financial assistance award-related activities.

D. Financial Interest – Anything of monetary value, whether or not the value is readily ascertainable.

E. Significant Financial Interest - A financial interest consisting of one or more of the following interests of the Covered Individual (and those of the Covered Individual's spouse and dependent children) that reasonably appears to be related to the covered individual's Institutional Responsibilities:

   1. For a publicly traded entity, the aggregate of any remuneration received from the entity in a 12 month period and the value of any equity interest in the entity, when aggregated, exceeds $5,000;

2. For a non-publicly traded entity, the aggregate of any remuneration, not otherwise disclosed as current, pending or other support, received from the entity in a 12 month period exceeds $5,000, or any equity interest in the entity; or

3. Intellectual property rights or interests, upon receipt of related income, including income from the University.

4. Any reimbursed or sponsored travel related to the Covered Individual's Institutional Responsibilities that is not otherwise disclosed in current and pending or other support disclosures.

F. Other Support - All resources made available to a Covered Individual in support of or related to their professional research, development, demonstration, or deployment efforts, including resources provided directly to the Covered Individual rather than through the University, and regardless of whether or not they have monetary value.

G. Organizational Conflict of Interest (OCI)- An OCI has the meaning given in 2 CFR 200.318(c)(2) and is a situation in which the University, because of its relationships with a parent, affiliate, or subsidiary organization, is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

II. Designated University Official

The Senior Vice Chancellor for Research (SVC-R) is the designated University Official responsible for this Appendix as it relates to Conflict of Interest (COI) and Conflict of Commitment (COC) requirements. In addition to the authorization outlined in the body of the Policy, Section V, the SVC-R has authorized the Conflict of Interest Committee (COIC) to receive COC disclosures and to collaborate with the appropriate University supervisors to review and manage the risks associated with the disclosed interests.

III. Disclosure of New Actual, Apparent or Potential COI or COC

A Covered Individual must disclose to the University as soon as practicable, and in no event later than 15 days, after any new actual, apparent or potential COI or COC arises. This supersedes the 30 day requirement included in the body of the Policy, Section IV.A.

IV. Subrecipients

Any subaward from the University to a subrecipient must incorporate as part of a written agreement terms that establish whether the COI and COC policies of the University or that of the subrecipient will apply to the subrecipient's Covered Individuals.

If the subrecipient's Covered Individuals must comply with the subrecipient's COI and COC policies, the subrecipient shall certify as part of the agreement that it has a policy that complies with 2 CFR Part 910, Subpart C. If the subrecipient cannot provide such certification, the agreement shall state that subrecipient's Covered Individuals are subject to this Policy and Appendix.

All such written agreements shall specify the reporting, timing, and compliance obligations of the subrecipient to the University. The time periods shall be sufficient to enable the University to comply timely with its review, management, and reporting obligations to DOE.

V. Training Requirements

All Covered Individuals must complete COI and COC training on appointment and prior to engaging in University research. Covered Individuals must complete a refresher COI and COC training at least every two years thereafter. This supersedes the four-year training requirement included in the body of the Policy, Section VII.

Additionally, Covered Individuals must complete COI and COC training within 30 days when the University revises this Appendix or Policy or COI or COC procedures in a way that affects the responsibilities of the Covered Individual or the University finds that a Covered Individual is not in compliance with this Appendix, Policy, or an applicable CMP.

VI. University Reporting to DOE

A. COI and COC Reports

The Office of Research Protections' (ORP) COI Division, on behalf of the designated University official, must:

1. Disclose to DOE in writing any actual, apparent, or potential COI or COC, including any actual, apparent, or potential COI or COC reported to the University by the subrecipient, that cannot be eliminated or appropriately managed or reduced in accordance with this Appendix and Policy. The COI or COC must be clearly and explicitly disclosed in the application. If a Covered Individual is added after the time of application, their COI or COC must be clearly and explicitly disclosed prior to the individual participating in the project.
2. Disclose to DOE in writing any actual, apparent, or potential COI or COC, including any actual, apparent, or potential COI or COC reported to the University by a subrecipient, involving any foreign governments, their instrumentalities, or any other entities owned, funded, or otherwise controlled by a foreign government, as well as any measures the entity has taken to eliminate or, where appropriate, manage or reduce the COI or COC. The COI or COC must be clearly and explicitly disclosed in the application. If a Covered Individual is added after the time of application, their COI or COC must be clearly and explicitly disclosed prior to the individual participating in the project.
3. Provide an annual COI/COC report that addresses the status of the COI or COC and, if applicable, any changes to the management plan for the duration of the DOE Federal financial assistance award. Alternatively, the annual COI/COC report must explain why the COI or COC no longer exists.
4. Promptly notify DOE in writing when a Covered Individual fails to comply with this Appendix or Policy or an executed conflict management plan. The notification must include the corrective action taken or to be taken.

B. OCI Reports

ORP's COI Division, on behalf of the designated University official, must disclose to DOE in writing any potential or actual OCI within 15 business days of learning of the conflict.

The OCI must be disclosed in the application and prior to engaging in a procurement or other transaction to acquire services or property using DOE funds. The disclosure must include the name, address, and website of the entity that presents a potential or actual OCI, the relationship between the University and the entity at issue, the nature and anticipated value of the anticipated procurement or other transaction, the basis for making the procurement or other transaction, the basis for the University's determination regarding the existence of an OCI, and how the University will avoid, eliminate or mitigate the OCI.

If the University cannot avoid, eliminate or mitigate the effects of a potential or actual OCI, the procurement or other transaction may not be made using DOE or cost share funds.