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Number: 001-0072
Title: Federal Grants/Cooperative Agreements Personal Conflicts of Interest
Revision Date: February 11, 2026
Responsible Party: Ethics & Compliance Office

Policy Statement: This document defines reporting obligations for APL staff members proposing to perform or performing under federal grants, cooperative agreements, or sub-grants/sub-agreements (“sub-awards”) [collectively “grant opportunities”].

Persons Affected: All APL staff proposing to perform or performing under federal grants, cooperative agreements, or sub-awards.

Policy

1. APL staff conduct business with a high degree of objectivity, integrity, and trust. In addition to all other applicable APL Guidance & Policies (G&Ps), APL staff proposing to perform or performing under grant opportunities have additional disclosure obligations.
2. These obligations are imposed by the National Aeronautics and Space Administration (NASA); the Public Health Service (PHS) agencies, including the National Institutes of Health (NIH) and the U.S. Centers for Disease Control (CDC); the National Science Foundation (NSF); the U.S. Department of Energy (DOE); and other government agencies.
3. To comply with these federally mandated reporting requirements, APL adopts Johns Hopkins University’s (“JHU’s”) Policy GOV033, available at [Conflict of Interest and Conflict of Commitment \(jhu.edu\)](#), and adapts it for the limited purpose of conflicts of interest and conflicts of commitment related only to grant opportunities at APL.
4. For APL purposes, the Laboratory considers the following substitutions and provisos when using JHU’s Policy GOV033 for grant opportunities:
 - a. “Covered Individuals” shall include APL staff who are the Principal Investigator (“PI”); Co-PIs/Co-Is; 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 the federal agency (key personnel);
 - b. the “divisional or school deans” or “relevant dean” or “relevant University official” or “applicable dean or official” or similar shall be the staff member’s Sector or Department Head or their delegate(s);
 - c. “eDisclosure system” shall be APL’s ETHOS system and the Grant Disclosure Forms described in the Procedures section below;
 - d. “faculty staff” includes all APL personnel who are required to submit ETHOS disclosures;
 - e. “intellectual property that has been licensed by Johns Hopkins Technology Ventures” shall be “any intellectual property interest created at APL”;
 - f. “Johns Hopkins Technology Ventures” shall be APL’s Tech Transfer Office;
 - g. “Office of General Counsel” shall be the APL Office of the General Counsel (OGC);

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- h. “Provost” shall be the APL Director;
 - i. “University” shall be APL; and
 - j. All APL staff are covered by “a division or unit policy,” which is described in the Procedures section below.
- 5. The following provisions of JHU’s Policy GOV033 do not apply to APL:
 - a. the JHU “non-faculty staff” and “Business Development Staff” policy provisions;
 - b. the sentence, “University officers and officials shall comply with the disclosure and reporting procedures of the Johns Hopkins University and the Johns Hopkins Health System Corporation Policy on Institutional Conflicts of Interest.”;
 - c. any reference to Human Resources having responsibility for reviewing disclosures, making determinations of conflicts of interest and conflicts of commitment, and monitoring mitigation plans for staff and personnel. Sector/Department Heads or their delegee(s) will execute these functions in consultation with APL’s OGC;
 - d. Section V(B), University Officers and Officials;
 - e. Section V(C), All Other Covered Individuals; and
 - f. Section XI, Appeals.
- 6. All Covered Individuals shall follow the PHS-funded disclosure instructions in JHU’s Policy GOV033 (as implemented by this G&P and the procedures described in this policy) for all federally funded grant opportunity work, including with non-PHS agencies, except that for grant opportunities from NASA and the NSF the threshold amounts requiring disclosure are the prescribed amounts in those agencies’ respective rules and regulations.

Procedures

- 1. Prior to submitting a proposal for a grant opportunity (or prior to starting work on an awarded grant, for covered individuals not included in the submitted proposal), Covered Individuals shall ensure their current ETHOS disclosures are up to date and answer additional questions in ETHOS Grants related to significant financial interests corresponding to the funding agency. The [Ethics and Compliance Office \(E&C Office\)](#) is available to answer staff members’ questions, including whether a disclosure is required under a particular grant.
- 2. The Sector/Department Head or their delegee(s) shall review Covered Individuals’ disclosures prior to the expenditure of any federal funds on grant opportunities. The corresponding Sector/Department Head or their delegee(s) shall determine whether any conflicts of interest exist, and, if so, in consultation with [E&C Office](#), shall seek to manage the actual conflicts of interest in accordance with this G&P and the procedures in the applicable grant opportunity. The Sector/Department Head or their delegee(s) shall report their determinations to the [Grants Office](#).
- 3. All APL staff members have an obligation to update their disclosures, as necessary, maintain the confidentiality of disclosed information under this policy, and only share it on a need-to-know basis in order to execute this policy.
- 4. For each grant opportunity, PIs shall also complete a PI FIBI Questionnaire Certification, and Co-PIs/Co-Is/key personnel shall complete a FIBI Personnel Certification. These FIBI certifications will be uploaded into the ETHOS Grants record.

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Revision Log		
Date	By	Description
12/18/2024	A. Patel, E. Johnson	Initial release; Note – all subsequent releases should also include updates to the external pdf version
2/9/26	A. Patel	Minor updates for ETHOS-Grants process