



Conflicts of Interest - Grants

Effective Date: 1/6/2026

Sponsoring Organization: Advanced Energy Delivery

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1) Policy

Employees and Contingent Workers who are designated as Investigators in connection with a Project funded by federal funds must disclose any Significant Financial Interests as required by this policy. PGE will manage all such disclosures in accordance with this policy. This includes implementing plans to address any actual or potential Financial Conflict of Interest that may result from an Investigator's Significant Financial Interests. Investigators must comply with any such plans that apply to them.

For projects funded by the U.S. Department of Energy (DOE), PGE must disclose any actual or potential Organizational Conflict of Interest in any application for funding or before engaging in a procurement using federal funds with a parent, affiliate, or subsidiary organization of PGE.

2) Scope

This policy applies to all employees and Contingent Workers who are designated as Investigators in connection with a Project funded by federal funds. It also applies to any other employees and Contingent Workers who have responsibilities related to the disclosure, management, or reporting of Significant Financial Interests, Financial Conflicts of Interest, and Organizational Conflicts of Interest.

This policy is an addition to, and does not replace, PGE's Conflict of Interest policy found in its [Code of Business Ethics and Conduct](#). Employees must comply with both policies.

3) Definitions

- a) Contingent Worker:** Any non-PGE employed worker engaged to provide services to PGE on a contract basis.
- b) Financial Conflict of Interest (FCOI):** A situation in which PGE's Grant Controls Analyst (GCA) reasonably determines that an Investigator, or the Investigator's spouse, domestic partner or dependent children, has a Significant Financial Interest (SFI) that could directly and significantly affect the purpose, design, conduct, or reporting of a Project.
- c) Funder:** The organization that funds a Project.
- d) Investigator:** Individuals responsible for the design, conduct, or reporting under the terms of award, including but not limited to Key and Senior Personnel as defined by PGE and/or as required by the Funder.
- e) Management Plan (MP):** A plan developed and overseen by PGE's GCA that includes the actions an Investigator must take to eliminate, reduce or manage an FCOI.
- f) Organizational Conflict of Interest (OCI):** As used in this policy and defined by 2 CFR 200.318(c)(2), a situation where, because of relationships with a parent company, affiliate, or subsidiary organization, a recipient or subrecipient of federal funds is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.
- g) Principal Investigator (PI):** Employee or Contingent Worker who is primarily responsible for the design, conduct, reporting, or integrity of a Project.
- h) Project:** A set of interdependent activities funded wholly or in part by federal funds. Some Funders use the term 'research' while others use 'Project' to describe these activities. When used in this policy, "Project" covers both.



- i) **Senior/Key Personnel:** The PI and any other person who significantly influences the design, conduct, or reporting of a Project; and any other person identified by PGE as Senior/Key Personnel in the application for financial assistance, approved budget, or any report PGE submits to a Funder.
- j) **Significant Financial Interest (SFI):** Anything of monetary value held or received by the Investigator or their spouse, domestic partner, or dependent children, whether or not the value is readily attainable, that reasonably appears to be related to the Investigator's professional responsibilities at PGE.

In addition, the following are considered to be SFIs:

- 1) For federal agencies including DOE and Public Health Service (PHS):
 - (a) With regard to any foreign or domestic publicly traded entity, an SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, (i) "remuneration" includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); and (ii) "equity interest" includes any stock, stock option, or other ownership interest, whose value is determined through reference to public prices or other reasonable measures of fair market value.
 - (b) With regard to any foreign or domestic non-publicly traded entity, an SFI exists if the value of any remuneration, not otherwise disclosed as current, pending, or other support, received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or their spouse, domestic partner, or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest) in the entity.
 - (c) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

Any travel for which an Investigator is reimbursed and any sponsored travel (i.e., paid on the Investigator's behalf so the exact monetary value may not be readily available) related to their institutional responsibilities that is not otherwise disclosed in current and pending or other support disclosures, **except** travel that is reimbursed or sponsored by a federal, state, or local government agency of the United States; a domestic Institution of Higher Education (as defined in 20 U.S.C. § 1001(a)); or a domestic research institute that is affiliated with a domestic Institution of Higher Education.
- 2) For NSF and other federal funders (not DOE or PHS agencies):
 - (a) An equity interest that when aggregated for the Investigator and their spouse, domestic partner, or dependent children meets both the following tests: (i) exceeded \$5,000 over the last 12 months, and/or is expected to exceed \$5,000 in value over the next 12 months as determined through reference to public prices or other reasonable measures of fair market value; and (ii) represents a 5% or greater equity interest (e.g., partnership, ownership, stock, stock option, or other ownership interest) in a single publicly traded entity or any equity interest in a non-publicly traded entity.



- (b) Salary, royalties or other payments not from PGE for services (e.g., consulting fees or honoraria) that when aggregated for the Investigator and their spouse, domestic partner, or dependent children over the last 12 months exceeded \$5,000 or are expected to exceed \$5,000 over the next 12 months.

For all Funders, the following **are not** considered to be SFIs:

- (a) salary, royalties, or other remuneration paid by PGE to the Investigator, including intellectual property rights assigned to PGE and agreements to share in royalties related to such rights, if the Investigator is currently employed or otherwise appointed by PGE;
- (b) any ownership interest in PGE held by the Senior/Key Personnel;
- (c) income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator, their spouse, and/or dependent children, do not directly control the investment decisions made in these vehicles;
- (d) income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency of the United States, a domestic Institution of Higher Education, or a domestic research institute that is affiliated with a domestic Institution of Higher Education; or
- (e) income from service on advisory committees or review panels for a federal, state, or local government agency of the United States, a domestic Institution of Higher Education, or a domestic research institute that is affiliated with a domestic Institution of Higher Education.

4) Practice

a) SFI Disclosures and Reviews

- i) Each Investigator must have a current SFI disclosure on file before engaging in work on a Project.
 - 1) Initial Disclosure Prior to Application Submission: An Investigator who is planning to participate in a Project must submit a completed [SFI Disclosure Form](#) when an application is being prepared.
 - 2) Initial Disclosure During Negotiation or Execution Stages: An Investigator who is added to a Project after the application has been submitted must complete an [SFI Disclosure Form](#) before engaging in work on the Project.
 - 3) Initial Disclosure for New Investigator: An Investigator who is added to an ongoing Project must complete an [SFI Disclosure Form](#) within 30 days of joining the Project.
 - 4) Annual Disclosure: Investigators must file updated [SFI Disclosure Forms](#) annually during the term of the Project on which they are working.
 - 5) Ad Hoc Updates: An Investigator must complete an updated [SFI Disclosure Form](#) within 30 days of acquiring a new SFI (e.g., through marriage, inheritance, purchase, sale or travel), or if there is a change in a previously disclosed SFI (e.g. stock sale, leaving a board position, change in the Project).
 - 6) Human Subjects Research: When a Project involves research on human subjects (as defined in [45 CFR 46.102\[e\]](#)), the Investigator must also disclose SFIs to the Institutional Review Board (IRB) and complete Human Subjects Research training.



- ii) The Grant Controls Analyst (GCA) will send Initial and Annual SFI Disclosure Forms to the Investigators. Ad hoc disclosures must be initiated by the Investigator by completing the [SFI Disclosure Form](#) and emailing it to the GCA.

PGE's SFI Disclosure form includes the DOE's required certification, which must be signed and dated by the Investigator at the time of submission for DOE-funded Projects.

- iii) Disclosures of travel that are required under section 3(j)(1)(d) above must include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration of the trip. PGE's GCA will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI with the Project.
- iv) The GCA will review all SFI disclosures and make a written determination as to whether an FCOI exists. The GCA may consult with, or request review by, Legal, Ethics, or others, as appropriate.

b) Management of FCOIs

- i) If the GCA determines that an actual or potential FCOI exists, the GCA will take the following steps:
 - 1) If the FCOI is found with a new Project: If the GCA is not able to resolve the conflict by elimination or mitigation, the GCA will, in collaboration with the Investigator and the Ethics Team, as needed, develop and implement a Management Plan (MP).
 - 2) If the FCOI is found with an ongoing Project: If the GCA is not able to resolve the conflict by elimination or mitigation, the GCA will implement, at least on an interim basis, an MP. Depending on the nature of the FCOI, the GCA may require additional interim measures with regard to the Investigator's participation in the Project between the date of disclosure and completion of the GCA's review. The review, establishment of an MP, and notification to the Funder must be done within 60 days of the GCA's receipt of the SFI disclosure.
- ii) An FCOI MP must include the following:
 - 1) The role and main duties on the Project of the Investigator with the FCOI.
 - 2) Conditions or restrictions of the MP, which could include, without limitation:
 - (a) Public disclosure of SFIs, including disclosure on manuscripts submitted for publication, on abstracts and posters submitted for presentation, and on informed consent documents related to human subjects research (required);
 - (b) Monitoring of the Project by independent reviewers;
 - (c) Modification of the Project;
 - (d) Disqualifying the Investigator from participation in all or a portion of the activities that could be affected by the FCOI;
 - (e) Divestiture or reduction of the SFI;
 - (f) Severance of relationships that create actual or potential conflicts.
 - 3) How the MP is designed to safeguard objectivity in the Project.
 - 4) Written agreement by the Investigator to the conditions of the MP.
 - 5) Details of how the MP will be monitored to ensure compliance.



c) FCOI Reports to the Funder

- i) If an FCOI exists on a particular Project, PGE must submit an FCOI Report to the Project's Funder.
 - 1) FCOI Reports will be submitted prior to expenditure of funds and within 60 days of determining there is an FCOI.
 - 2) The process and content for reporting FCOIs will be adjusted based on the funder's requirements and/or terms and conditions.
 - 3) The Grant Program Manager (GPM) will submit FCOI Reports on PGE's behalf.
- ii) The content of FCOI Reports may vary, based on the requirements of the Funder or the terms and conditions of an award; however, the FCOI Report must contain the following items, at a minimum:
 - 1) Award number.
 - 2) PI or Contact PI if a multiple PI model is used.
 - 3) Name of the Investigator with the FCOI.
 - 4) Name of the entity with which the Investigator has a FCOI.
 - 5) Nature of any applicable Financial Interest (e.g., equity, consulting fee, travel reimbursement, honorarium) and/or applicable external relationships or activities.
 - 6) Value of any applicable Financial Interest (dollar ranges are permissible: \$0-\$4,999; \$5,000-\$9,999; \$10,000-\$19,999; amounts between \$20,000-\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000), or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value.
 - 7) A description of how the Financial Interest relates to the Project and the basis for PGE's determination that there is a conflict with such Project.

PGE will comply with any additional reporting requirements specified by the Funder or in the terms and conditions of an award.

iii) Funder-Specific Requirements for FCOI Report:

Federal agencies may have different requirements for FCOI Reports. Current agency-specific requirements are listed below, but always check the Terms and Conditions of an award to determine if there are additional or different FCOI-related requirements.

- 1) Department of Energy (DOE): If a DOE-funded award requires that PGE include all Investigator FCOIs - including managed and unmanaged/ unmanageable FCOIs - in FCOI Reports, such Reports must contain descriptions of the key elements of the relevant MPs, including:
 - (a) Role and principal duties of the conflicted Investigator in the Project;
 - (b) Conditions of the MP;
 - (c) How the MP is designed to safeguard objectivity in the Project;
 - (d) Confirmation of the Investigator's agreement to the MP;
 - (e) How the MP will be monitored to ensure Investigator compliance; and



- (f) Other information as needed.
- 2) National Science Foundation (NSF): FCOI Reports must also indicate when PGE is unable to satisfactorily manage an FCOI.
- 3) DOE, NSF, and PHS: If an FCOI exists
 - (a) PGE must submit an FCOI Report to the Funder (or the NSF General Counsel, if funded by NSF) prior to the expenditure of funds.
 - (b) The GCA must implement an MP and submit FCOI Reports annually, or as otherwise specified by the Funder.
 - (c) If an FCOI is identified and eliminated prior to PGE's expenditure of funds, PGE does not need to submit an FCOI Report.
- iv) Updating Reported FCOIs
 - 1) PGE must submit annual FCOI Reports to applicable Funders for any previously reported FCOIs. The annual report is a follow-up report to the initial FCOI Report and must specify how PGE is managing the FCOI or explain why it no longer exists.
 - 2) The report must be submitted to the Funder annually throughout the duration of the Project period, including any extensions (with or without funds), even if PGE eliminates the FCOI during that time.
 - 3) The GPM submits this report with any other annual progress reports or at the time of an extension.
- v) Funder-Requested Reports: At any time before, during, or after an award, the Funder may inquire about an Investigator's SFI disclosure, PGE's review and response to an SFI, and whether it was determined that an FCOI existed. PGE must submit all information requested by the Funder and allow the Funder to review the relevant records.
- vi) Subrecipient FCOI Reports: Subrecipient FCOI disclosures must follow PGE's format, be provided prior to expenditure of funds, and be submitted within 60 days of any identified FCOI.

d) Failure to Disclose/Review; Retrospective Review; Mitigation Report:

If, during an ongoing Project, the GCA identifies an SFI that was not disclosed timely by an Investigator, or not previously reviewed or managed as required, PGE must complete a retrospective review within 120 days of identifying the non-compliance. The purpose of the review is to determine whether an FCOI exists, and any work conducted on the relevant Project during the time of non-compliance was biased in the purpose, design, conduct, or reporting. The GCA may also implement an interim MP during the review period, before determining whether an FCOI exists.

- 1) If the retrospective review shows that an FCOI exists, the GCA will implement an MP. The GCA will also revise any previously submitted FCOI Report to include the actions that will be taken to manage the newly discovered FCOI, and the GPM will submit the revised FCOI Report to the Funder.
- 2) If the retrospective review shows that any of the work conducted on the Project was biased by the newly discovered FCOI, the GPM will promptly notify the Funder and also submit a Mitigation Report to that Agency. The Mitigation Report must include the following elements:



- (a) A description of the impact of the bias on the Project.
- (b) PGE's plan of action or actions to eliminate or mitigate the effect of the bias (e.g., impact on the Project, extent of harm, including any qualitative and quantitative data to support any actual or future harm; and an analysis of whether the Project is salvageable).
- (c) Award number.
- (d) Project title.
- (e) PI or contact PI if a multiple PI model is used.
- (f) Name of the Investigator with the FCOI.
- (g) Name of the entity in which the SFI that creates the FCOI is held.
- (h) Reason(s) for the retrospective review.
- (i) Detailed methodology used for the retrospective review (e.g., methodology of the review process, composition of the review panel, documents reviewed).
- (j) Findings of the review.
- (k) Conclusions of the review.

e) Subrecipient Requirements for FCOIs

i) Subrecipients of PGE

- 1) PGE's subrecipients may elect to follow their own FCOI policy or this policy. Regardless of whose policy a subrecipient follows, PGE will take all reasonable steps to ensure that they comply with applicable FCOI regulations and Funder requirements. (See the PGE Grants Management team's [Federal Grant Subrecipient Monitoring Policy](#) for information on how PGE will manage its subrecipients to maintain compliance.)
- 2) PGE will include information on subrecipient FCOIs in the FCOI Reports it submits to the Funder. FCOI Reports will be submitted to the Funding Agency prior to the expenditure of funds and within 60 days of an identified FCOI.

ii) PGE as a Subrecipient:

When PGE is a subrecipient of federal funds, PGE will certify to the prime recipient that it will follow this Financial Conflicts of Interest Policy. PGE will disclose any FCOIs and MPs to the prime recipient if required, in accordance with the terms of the subaward agreement.

f) Organizational Conflicts of Interest

- i) If PGE has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, PGE must maintain written standards of conduct covering OCIs. PGE employees and Contingent Workers engaged in Project-related procurements must follow the [Procurement Manual](#) which includes the requirements of 2 CFR 200.318.
- ii) For DOE-funded Projects, PGE must disclose in writing any potential or actual OCI to the DOE program office in an application for financial assistance, or before engaging in a procurement or transaction using DOE funds with a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe. The disclosure must include:



- 1) The name, address, and website (as applicable) of the entity that presents a potential or actual OCI;
 - 2) The relationship between PGE and the entity at issue;
 - 3) The nature of the anticipated procurement or other transaction with the parent, affiliate, or subsidiary organization; the anticipated value of the procurement or other transaction; and the basis for making the procurement or other transaction with a parent, affiliate, or subsidiary organization;
 - 4) The basis for PGE's determination regarding the existence of an OCI; and
 - 5) How PGE will avoid, neutralize, or mitigate the OCI.
- iii) If there is an OCI that cannot be avoided, neutralized, or mitigated, PGE must complete the anticipated procurement or other transaction with other sources when using DOE funds.

g) Public Accessibility

- i) PGE will make this policy publicly available by publishing it on the company's public-facing website.
- ii) Public Disclosure of FCOIs

PGE will ensure that information related to FCOIs on Projects funded by PHS or DOE is made available as required by those agencies before spending any funds on those Projects. This means that the information will be made available via a publicly accessible website or in a written response to a requestor within five (5) business days of PGE's receipt of the request for the information.

- 1) PGE will make the following information available for any relevant FCOI:
 - (a) Investigator's name.
 - (b) Investigator's title and role with respect to the Project.
 - (c) The name of the entity in which the SFI that creates the FCOI is held.
 - (d) The nature of the FCOI.
 - (e) The approximate dollar value of the SFI (dollar ranges are permissible: \$0-\$4,999; \$5,000-\$9,999; \$10,000-\$19,999; amounts between \$20,000-\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000), or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value.
- 2) When PGE provides written responses to requests for the purposes of this subsection, it must note in its written response that the information provided is current as of the date of the correspondence and is subject to updates on at least an annual basis, and within 60 days of the GCA's identification of (i) an Investigator's FCOI that was not previously disclosed, (ii) an Investigator new to a Project with an FCOI, or (iii) applicable funder requirements. PGE is not responsible for updating previous requests for information; the requestor is responsible for requesting any updates.
- 3) Whether provided through a website or through a written response, the information will be updated at least annually and within 60 days of the GCA's identification of an Investigator's FCOI that was not previously disclosed, an Investigator new to a Project with an FCOI, or as required by a Funder.
- 4) The information shared under this subsection 4(g) will remain publicly available for three (3) years from the date that PGE last updated the information.



g) Training Requirements

- i) Investigators, the GCA, and the PGE Ethics Team member(s) with responsibilities under this policy must complete and pass CITI Conflicts of Interest training prior to engaging in any work related to a Project. Investigators who are included in a grant proposal must complete the training before the proposal may be submitted.
- ii) After completing their initial training, Investigators, the GCA, and the PGE Ethics Team member(s) with responsibilities under this policy must renew their training every four years. Investigators must also take the training within 30 days of substantive changes to the requirements of this policy or if they fail to comply with this policy or the terms of an MP.

h) Compliance Monitoring and Non-Compliance

- i) At any time before, during, or after an award, a Funder may request information on any Investigator's SFI disclosures and PGE's review of and response to such disclosures. PGE will submit, or permit on-site review of, all records requested by the Funder that are relevant to the specified SFI disclosure(s) and PGE's compliance with this Policy.

If, based on its review of the records and other information that may be available, a Funder determines that PGE has not complied with this Policy or other applicable FCOI requirements, or that further corrective action is necessary to avoid, neutralize, or manage an FCOI, the Funder may impose additional award conditions under 2 CFR 200.208, or take one or more of the actions specified under 2 CFR 200.339, that it deems necessary. PGE will comply with any such award conditions or actions.

- ii) If an Investigator fails to comply with this Policy or an MP, and the non-compliance appears to have biased the purpose, design, conduct, or reporting of a Project, the GPM will promptly notify the Finding Agency of the situation and the corrective action(s) taken or to be taken. The Funder will consider the situation and, as necessary, take appropriate action, or refer the matter to PGE for further action. PGE will comply with any directives from the Funder on how to maintain appropriate objectivity in the relevant Project.

iii) For PHS and DOE-Funded Projects

- 1) In the event of non-compliance with [42 CFR 50 subpart F](#) (for PHS-funded Projects) or the [DOE Interim COI Policy](#) (for DOE-funded Projects), PGE will conduct a retrospective review of the Investigator's activities on the Project to determine whether any of the Project work conducted during the time of non-compliance was biased in the design, conduct, or reporting.
- 2) If PGE fails to disclose an organizational COI prior to engaging in a procurement or transaction using federal funds with a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the costs of such procurement or transaction may be disallowed.
- 3) If PGE fails to disclose an organizational COI to the DOE prior to engaging in a procurement or transaction using DOE funds with a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, and the organizational COI is not avoided, neutralized, or managed, the DOE may impose specific award conditions under 2 CFR 200.208, and/or take one or more actions specified under 2 CFR 200.339. PGE will comply with any such conditions or actions.

- iv) Any person who submits false, fictitious, or fraudulent information, or omits any material fact, on a disclosure, report, or other record required by this Policy may be subject to



criminal, civil, or administrative penalties for fraud, false statements, false claims or otherwise.

- i) **Records Retention:** Records related to this policy, including Investigator SFI disclosures and actions taken, will be retained in accordance with [PGE's Records Management Policy](#), the Grant Management [Records Retention Procedure](#), federal and other applicable regulations, and Funder requirements. If you have questions about retaining records related to this policy, contact the GCA.

5) Responsibilities:

a) Investigators and Principal Investigators (PIs)

- i) Understand and comply with this policy.
- ii) Complete the [SFI Disclosure Form](#) and submit it to the GCA before submitting a proposal or participating in a Project.
- iii) Submit an updated [SFI Disclosure Form](#) to the GCA annually during the period of the award.
- iv) Submit ad-hoc [SFI Disclosure Forms](#) to the GCA within thirty days of discovering or acquiring a new SFI (e.g., through marriage, inheritance, or purchase).
- v) Comply with any Management Plan that is developed to mitigate an FCOI.
- vi) Complete required CITI Program Conflict of Interest training as required by this policy.
- vii) For PIs only: Provide to the GCA and the GPM a list of Investigators working on each Project where you are the assigned PI.

b) Grant Controls Analyst (GCA)

- i) Sends [SFI Disclosure Forms](#) to Investigators identified by the PI.
- ii) Conducts initial review of all SFI disclosures to determine if an FCOI exists.
- iii) Completes CITI Program Conflict of Interest training required under this policy.
- iv) Registers Investigators identified by the PI for CITI Program Conflict of Interest training required under this policy.
- v) Tracks CITI Program Conflict of Interest training to verify Investigators have met initial and ongoing training requirements.
- vi) Completes the following responsibilities with assistance from PGE's Ethics Team, as needed:
 - Additional review and inquiry related to SFI disclosures
 - Develops, implements, and monitors compliance with Management Plans (MPs) related to any Investigator FCOIs, and
 - Conducts retrospective reviews

c) Grant Program Manager (GPM)

- i) Ensures that the list of Investigators completing SFI disclosures is accurate and updated as needed.
- ii) Submits Mitigation Reports, as needed, to Funders.



- iii) Manages public disclosures and requests, as outlined in this policy.
- iv) Works with PGE Legal to ensure subrecipient agreements and/or amendments include clauses related to FCOI compliance, as needed.

d) PGE's Ethics Team

- i) As needed, assists the Grant Controls Analyst (GCA) in SFI review, and Management Plan (MP) implementation and monitoring.
- ii) Completes all training required under this policy before performing any work under subsection (d)(i) above.

6) Acronyms

- a) **DOE:** Department of Energy
- b) **FCOI:** Financial Conflict of Interest
- c) **GCA:** Grant Controls Analyst
- d) **GPM:** Grant Program Manager
- e) **MP:** Management Plan
- f) **NSF:** National Science Foundation
- g) **OCI:** Organizational Conflict of Interest
- h) **PHS:** Public Health Service
- i) **PI:** Principal Investigator
- j) **SFI:** Significant Financial Interest

7) Sponsoring Organization: Advanced Energy Delivery