



National Aeronautics and  
Space Administration  
Washington, DC 20546

## Grant Information Circular

**GIC 23-07**  
**August 21, 2023**

**PURPOSE:** The purpose of this Grant Information Circular (GIC) is to inform NASA personnel and grant and cooperative agreement recipients of changes to section 3.3, Conflicts of Interest Policy, and Appendix D, Award Terms and Conditions, in NASA's [Grant and Cooperative Agreement Manual](#) (GCAM).

**BACKGROUND:** Through this GIC, NASA is effectuating revisions to the GCAM that implement



agreement.

- d. 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.
2. All recipients of NASA research grants and cooperative agreements (hereinafter “award”) shall maintain a written and enforced policy addressing COI. Pass-through entities shall be responsible for ensuring that (1) subaward recipients have their own policies in place that meet the requirements of NASA’s COI policy or (2) investigators working for subaward recipients follow the COI policies of the pass-through entity.
  3. Institutions’ COI policies shall:
    - a. Designate an official(s) to solicit disclosures of significant financial interests (including those of the investigator’s spouse and dependent children) of investigators that would reasonably appear to be affected by research funded or proposed to be funded by NASA or in entities whose financial interests would reasonably appear to be affected by such activities.
    - b. Ensure that investigators who are planning to participate in NASA-funded research disclose to the institution’s designated official(s) the investigator’s significant financial interests no later than the time of application for NASA-funded research. Institutions must also require that disclosures are updated during the award’s period of performance, either on an annual basis, or as new reportable significant financial interests are obtained.
    - c. Prior to an institution’s expenditure of any funds under a NASA-funded research award, institutions shall require the designated official(s) to review investigators’ disclosures of significant financial interests, determine whether a COI exists, and, if so, determine what conditions or restrictions, if any, should be imposed by the institution to manage, reduce, or eliminate such COI. Examples of conditions or restrictions that an institution or subrecipient might impose to manage, reduce, or eliminate a conflict include, but are not limited to:
      - i. Public disclosure of the COI (e.g., when presenting or publishing the research),
      - ii.

- vi. Divestiture of significant financial interests that create the COI (e.g., sale of an equity interest), or
  - vii. Severance of relationships that create the COI.
- d. Establish adequate enforcement mechanisms and provide for employee sanctions or other administrative actions to ensure investigators' compliance as appropriate.
  - e. Institutions may apply COI disclosure standards that are more stringent than section 3.3 of this Manual (e.g., standards that require more extensive disclosure of financial interests).
4. Institutions shall adhere to the following notification requirements:
- a. Prior to the expenditure of any funds under a NASA-funded research award, institutions shall notify the NASA Grant Officer(s) listed on the related award(s) in writing of any COI that cannot be satisfactorily managed, reduced, or eliminated in accordance with the institution's policy. In cases in which an institution identifies a COI and manages, reduces, or eliminates it prior to the expenditure of NASA-awarded funds, the institution shall not submit a COI notification to NASA.
  - b. After the expenditure of award funds, institutions shall notify NASA within 60 days of any subsequently identified COI that cannot be managed, reduced, or eliminated.
  - c. Notifications shall include sufficient information to enable NASA to understand the nature and extent of the COI (e.g., award number, name of investigator with the COI, nature of the significant financial interest, etc.).
5. When an institution notifies a NASA Grant Officer(s) of a COI that cannot be eliminated, managed, or reduced, the cognizant Grant Officer or one of their delegates will report the conflict to the Office of the General Counsel (OGC) as follows:
- a. Grant Officers will report the conflict to the NASA Shared Services Center's (NSSC) OGC and copy the award's Technical Officer. The NSSC OGC then will inform HQ OGC of the reported conflict. In consultation with OGC and the relevant Technical Officer, the Grant Officer must review the COI and take appropriate action, as necessary.
    - i. When an institution notifies NASA of a COI that involves any foreign governments, their instrumentalities, or any other entities owned, funded, or otherwise controlled by a foreign government, the cognizant Grant Officer must review the COI and take appropriate action, as necessary, in consultation with the award's Technical Officer, OGC, and the NASA Office of International and Interagency Relations (OIIR).
    - ii. If fraud, misrepresentation, or related misconduct is suspected in relation to any COI notification submitted to NASA, then the Grant Officer or Technical Officer also will refer the matter to the NASA Office of Inspector General and OGC's

