

INTEGRATED CONFLICTS DISCLOSURE POLICY FOR GOVERNMENT-FUNDED ACTIVITIES

Responsible Office: Office of Grants
Responsible Senior Leader: Senior Vice President & Provost
Revision Date: June 23, 2026

I. Policy Statement

This Integrated Conflicts Disclosure Policy ensures the integrity and objectivity of research, educational, and administrative activities funded by external governmental granting agencies.

II. Policy Purpose

The policy aims to prevent actual, potential, or perceived conflicts of interest and conflicts of commitment that could compromise or appear to compromise the judgment, responsibilities, or decision-making processes within Government-Funded Activities, as defined below. This policy provides comprehensive guidelines to manage and mitigate conflicts of interest, ensuring the integrity and transparency of organizational activities.

III. Policy

A. Definitions

1. **Conflict of Commitment (COC):** A situation where an individual's external activities interfere with their primary responsibilities to the Government-Funded Activities. This can include activities such as consulting, speaking engagements, or personal business. Conflicts of commitment are often related to time allocation issues. In addition, internal conflicts of commitment can occur when an investigator has claimed or reported the same work to more than one grant or other Museum work commitments, including any supplemental compensation.
2. **Conflict of Interest (COI):** A situation where an individual's personal, professional, or financial interests may compromise or bias their responsibilities in the design, conduct, or reporting of research, educational activities, or administrative decisions funded by external governmental sources. Though the Museum does not have a history of funding companies which in turn sponsor research by Museum staff, or substantial history in patenting research outcomes, other types of conflicts may arise if either of those situations occur.
3. **Government-Funded Activities:** Activities, including Sponsored Research, funded, in whole or in part, by an external governmental funding source, including local, state, and federal governmental agencies. Activities include, but are not limited to, education programs, travel, shows projected in the planetarium, etc.

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4. **Immediate Family:** Individuals whose financial, fiduciary, or personal relationships with an investigator could reasonably create a potential conflict of interest or commitment. Family means any member of the Investigator's Immediate Family, specifically, any dependent children and spouse or domestic partner.
5. **Investigator:** Any individual responsible for the design, conduct, or reporting of research or other activities funded by external sources, including the Principal Investigator (PI), Co-PIs, and other personnel involved in the project.
6. **Foreign Collaboration:** An Investigator working with, sponsored by, or otherwise supported by a non-U.S. entity or individual, including but not limited to a company, government, or educational institution.
7. **Foreign Talent Recruitment Program (FTRP):** A program that recruits science and technology professionals or students from any country, regardless of citizenship or national origin. FTRPs are organized, managed, or funded by foreign governments, entities, or companies, and may offer financial incentives to relocate to the host country.
8. **Institutional Responsibilities:** Investigator's responsibilities on behalf of the Museum, which are defined as research, research consultation, teaching, professional practice, institutional committee memberships, service on panels such as institutional review boards (IACUC, IBC, and IRB), or any other responsibilities that may be related to the Government-Funded Activities.
9. **Malign Foreign Principal:** A foreign government, non-state actor, or their proxy that uses subversive, coercive, or criminal methods to influence the United States. The goal is to harm the United States, its institutions, or its political system. The Office of Grants will make a determination if a Foreign Collaboration or FTRP is a Malign Foreign Principal based on federal guidance and regulations.
10. **Significant Financial Interest (SFI):** Any financial interest in an enterprise which might reasonably appear to affect the Investigator's Institutional Responsibilities. These financial interests may be anything of monetary value, including but not limited to, non-Museum salary, payments for services (e.g., consulting fees, honoraria), equity interests (e.g., stocks, stock options, private equity), venture capital, and intellectual property rights (e.g., patents, copyrights, and royalties). This also includes the value of any in-kind contributions, including but not limited to covering travel costs, donating equipment, or providing lab time at no cost. SFIs may not include:
 - Salary or remuneration from the Museum.
 - Income from investments where the individual does not directly control investment decisions.
 - Income from seminars, lectures, or limited teaching engagements sponsored by a federal, state, or local government agency located in the United States, a United States Institution of Higher Education¹, an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of Higher Education¹.
 - Income from service on advisory committees or review panels for a federal, state, or local government agency located in the United States, a United States

¹ As defined in 20 USC 1001: General definition of institution of higher education - <https://uscode.house.gov/view.xhtml?req=granuleid:USC-2010-title20-section1001&num=0&edition=2010>

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Institution of Higher Education¹, an academic teaching hospital, a medical center, or a research institute that is affiliated with a United States Institution of Higher Education¹.

- Equity interests and payments that meet certain thresholds as outlined by the sponsoring agency.

11. **Sponsored Research:** Research funded, in whole or in part, by an external governmental funding source, including local, state, and federal governmental agencies.

B. Policy Requirements

1. Disclosure Obligations:

- Each individual responsible for the design, conduct, or reporting of Government-Funded Activities must complete a disclosure form, including but not limited to post-doctoral fellows, research assistants, educators, and sub-award recipients. It is the responsibility of the PI or Co-PIs to inform the Office of Grants of all individuals who need to complete a disclosure form.
- Investigators must disclose any potential conflicts that could directly and significantly affect the design, conduct, or reporting of the Government-Funded Activities. Disclosures must include the financial interests of the Investigator's Immediate Family if they could directly and significantly affect the design, conduct, or reporting of the Government-Funded Activities.
- Disclosures must be made at the time of proposal submission, time of award, and updated annually, or if new reportable potential conflicts that could directly and significantly affect the design, conduct, or reporting of the Government-Funded Activities arise during the period of the award (e.g., changes in financial interests or changes in project roles or collaborations during the fiscal year).
- **NOTE:** Disclosure obligations are ultimately subject to the requirements of the sponsoring agency. The Museum may modify disclosure requirements based on the Investigator's award as needed.

2. Review and Management of Conflicts:

- The Office of Grants will review all disclosures to determine whether a potential SFI, COI, or COC exists and, if so, working with the appropriate manager and in consultation with the Office of General Counsel, decide on the necessary actions to manage, reduce, or eliminate the conflict.
- Possible management strategies include, but are not limited to, one or more of the following:
 - Public disclosure of the COI.²
 - Monitoring by an independent reviewer.
 - Modification of the research plan.
 - Change of personnel or responsibilities.
 - Disqualification from participation in the conflicted portion of the research.

² Examples of public disclosure may include the Investigator disclosing the conflict when presenting or publishing the research; to staff members working on the project; to the Institution's Institutional Review Board(s), or the Institutional Animal Care and Use Committee(s).

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- Divestiture of the conflicting financial interest.
 - Severance of the relationship that creates the conflict.
3. **Review and Management of Foreign Collaboration**
- The Office of Grants will review all disclosures to determine whether a Foreign Collaboration is with a Malign Foreign Principal or part of a Malign FTRP. Sources include, but are not limited to:
 - U.S. Department of Treasury, [Office of Foreign Assets Control](#)
 - U.S. General Services Administration Federal Government computer system
 - If a Malign FTRP is identified, the Office of Grants will work with the appropriate manager and in consultation with the Office of General Counsel, decide on the necessary actions to manage, reduce, or eliminate the conflict.
 - Possible management strategies include one or more, but are not limited to:
 - Independent reviewer monitoring
 - Modification of the research plan
 - Disqualification from participation in the collaboration
 - Severance of relationship
4. **Restrictions and Enforcement:**
- No individual may participate in any financial decision regarding a project if the decision is likely to benefit them or a member of their Immediate Family, or if the individual has a family or business relationship with the sponsoring agency.
 - Individuals must not use their position for personal financial gain or for the financial benefit of others.

C. Notification and Record-Keeping

1. Before expending any funds, the Office of Grants must notify the relevant funding agency if a potential SFI, COI, or COC cannot be satisfactorily managed. Notifications must include sufficient detail to enable the agency to understand the nature of the conflict and the proposed management actions.
2. After the commencement of expenditure of award funds, the Office of Grants must notify the relevant funding agency within 60 days of identifying a new disclosure of a potential SFI, COI, or COC that occurred during the term of the award and which was not or cannot be managed, reduced, or eliminated.
3. The Office of Grants must maintain records of all disclosures and actions taken to resolve any matters. Records of disclosures and any resulting action will be maintained by the Museum for at least three years from the date of submission of the final expenditures report or, where applicable, from other dates specified in 2 C.F.R. 200.334 for different situations.

D. Non-Compliance

Failure to comply with this policy may result in a retrospective review of the Investigator's disclosures for up to the prior three (3) years. Reviews may be initiated if an Investigator fails to complete a disclosure request made by the Office of Grants; by a request from a sponsoring agency, in response to a report made to the Office of Grants; or by any other legal requirement. If

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a failure to comply has been determined, the Office of Grants may notify the sponsoring agency of the non-compliance if it is determined to be material to the Investigator's Institutional Responsibilities, Government-funded Activities, or both. The sponsoring agency may:

- Send a letter of reprimand to the Investigator
- Require special certifications or assurances of compliance
- Impose restrictions on any grant awards involving the Investigator
- Withhold payments
- Disallow costs associated with the activity
- Suspend or terminate awards
- Refer the Investigator for suspension or debarment proceedings

In addition, the Museum may pursue appropriate disciplinary action.

IV. Questions or Feedback

If you have questions about the process or any existing policies or any other matter related to this Policy, please contact the Office of Grants.

V. Related Resources

- AMNH Disclosure Form
- AMNH Proposal Certification Form
- [U.S. National Science Foundation \(NSF\) Conflict of Interest Policies](#)
- [National Aeronautics and Space Administration \(NASA\) Conflict of Interest Policies](#)
- [NIH Decision Matrix for Assessing Potential Foreign Interference for Covered Individuals or Senior/Key Personnel](#)

VI. Revision History

VERSION	DATE	DESCRIPTION
5.0	6/2026	Updated to be more explicit to agency requirements
4.0	1/2025	Updated to incorporate new regulations
3.0	8/2012	
2.0	4/2010	
1.0	1/2003	