Saint Mary's College of California
Office of Research and Sponsored Projects (ORSP)
Combined Compliance Form

Complete the sections that pertain to your project, sign, and return to the ORSP at orsp@stmarys-ca.edu:

- **All Investigators:** Complete section 1 and any other sections as indicated by SMC grant staff. Sign as indicated.
- **NSF and NSF-compliant Investigators:** Complete sections 1, 2, and 3.
- **NIH and PHS-compliant Investigators:** Complete sections 1, 2, and 4.

1. Project Information

Investigator:	**Email:**	
Investigator's Title:	**Phone:**	
Role on Project *(PI, Project Director, Co-I, Faculty Associate, etc.)*	**Project Start Date:**	**Project End Date:**
Project Title:		
Sponsor Name *(list the Prime Applicant if this is a subaward):*	**This submission is for (check one):** ☐ New Proposal ☐ Change in Financial Interest	
Sponsor of the Prime Applicant *(only populate this field if this is a subaward):*		

2. General Certifications for All Investigators

2.1 Responsible and Ethical Conduct of Research

This statement complies with National Science Foundation (NSF) and National Institutes of Health (NIH) requirements for an institutional program of education in the responsible and ethical conduct of research (RECR).

- NSF requires responsible and ethical conduct of research (RECR) training for undergraduate students, graduate students, postdoctoral fellows, faculty and other senior personnel involved in any NSF-funded research grant. All institutions submitting applications must certify, at the time of application submission, that plans are in place to provide appropriate training and oversight of the RECR training, and that the training will include mentor training and mentorship. NSF's statement can be found online at: https://www.nsf.gov/bfa/dias/policy/rcr.jsp.
- Similarly, NIH requires that all trainees, fellows, participants, and scholars receiving support through any NIH training, career development award (individual or institutional), research education grant, or dissertation research grant must receive RCR training. This requirement also applies to all faculty, including new faculty, mid-career faculty and senior faculty, and professional and scientific employees receiving funding from these sources. Plans to meet the RCR requirements must be specified in the principal investigator's proposal application. NIH's statement can be found online at: https://oir.nih.gov/sourcebook/ethical-conduct/responsible-conduct-research-training

Certification: As grant personnel on the proposed project named on this form, I acknowledge that I have read and understood the applicable agency requirements regarding Responsible and Ethical Conduct of Research (RECR) Training under NSF and NIH grants. For all categories of grant-funded project personnel that are named in the applicable agency regulations, I will require and oversee completion of training in RECR.	
Signature of Investigator:	
Typed Name:	**Date:**

2.2 U.S. Government Policy for Institutional Oversight of Life Sciences Dual Use Research of Concern (DURC)

Saint Mary's College is committed to conducting life sciences research in a responsible manner, recognizing that certain types of beneficial research can be utilized for harmful purposes. To help ensure that such research is conducted

responsibly and in compliance with federal regulations, life sciences research that meets the scope of ***dual use research*** of specified in the U.S. Government Policy for Institutional Oversight of Life Sciences DURC is subject to institutional oversight. The list of DURC agents, toxins and categories of research experiments is found on the Federal Select Agent Program site.

Certification: As grant personnel on the proposed project named on this form, I acknowledge that I have read and understood the applicable Federal regulations regarding the use of select agents and toxins. I hereby assure that I am not working with any of the listed agents or toxins identified under these regulations.	
Signature of Investigator:	
Typed Name:	**Date:**

2.3 Compliance with Malign Foreign Talent Recruitment Prevention Procedures

The Creating Helpful Incentives to Produce Semiconductors (CHIPS) & Science Act of 2022 prohibits participation in any foreign talent recruitment program by personnel of federal research agencies and prohibits participation in a Malign Foreign Talent Recruitment Program (MFTRP) by covered individuals involved with research and development awards from those agencies. In accordance with federal regulations, Saint Mary's College prohibits individuals working on federally-funded research and development awards from participating in MFTR Programs. This statement establishes the College's compliance with the requirements set forth in section 10632 of the CHIPS and Science Act of 2022.

Certification: As grant personnel on the proposed project named in section 5 of this form, I certify that I have read and understand the procedures outlined in the Prevention of Malign Foreign Talent Recruitment document. I assure that I am not participating in or collaborating with any foreign talent recruitment programs that are deemed malign under U.S. federal regulations, as defined in institutional and governmental policies.	
Signature of Investigator:	
Typed Name:	**Date:**

3. Certifications for the National Science Foundation and NSF-Compliant Agencies

3.1 National Science Foundation Sexual Harassment Notice No. 144

Completion of this form is mandatory for all Investigators on awards funded by the National Science Foundation (NSF). This form is required to comply with the NSF's Sexual Harassment Notice No. 144 which states, in part:

> *The National Science Foundation (NSF) does not tolerate sexual harassment, or any kind of harassment, within the agency, at grantee organizations, field sites, or anywhere NSF-funded science and education are conducted. The 2,000 American colleges, universities and other institutions that receive NSF funds are responsible for fully investigating complaints and for complying with federal non-discrimination law.*
>
> *As the primary funding agency of fundamental science and engineering research in the United States, NSF is committed to promoting safe, productive research and education environments for current and future scientists and engineers. We consider the Principal investigator (PI) and any co-PI(s) identified on an NSF award to be in positions of trust. The PI and co-PI and all grant personnel must comport themselves in a responsible and accountable manner, including during the performance of award activities conducted outside the organization, such as at field sites or facilities, or during conferences and workshops.*
>
> *To bolster our commitment to a safe research environment, NSF is taking the following steps:*
>
> *1. New Award Requirements: NSF has developed a new award term and condition that will require grantee organizations to report findings of sexual harassment, or any other kind of harassment regarding a PI or co/PI or any other grant personnel. The award term and condition also will require the grantee to report the placement of the PI or co-PI on administrative leave relating to a harassment finding or investigation. This term and condition will make it clear that NSF may take unilateral action as necessary to protect the safety of all grant personnel, to include suspending or terminating an award or requiring the grantee to replace or remove personnel . . . .*
>
> *2. Harassment-Free Research Workplaces: NSF expects all awardee organizations to establish and maintain clear and unambiguous standards of behavior to ensure harassment-free workplaces wherever science is conducted, including*

notification pathways for all personnel, including students, on the primary and supplemental awards. This expectation includes activities at all research facilities and field sites and during conferences and workshops. All such settings should have accessible and evident means for reporting violations and awardee organizations should exercise due diligence with timely investigations of allegations and corrective actions.

3. Enhanced Web Resources: The NSF Office of Diversity and Inclusion (ODI) is tasked with seeking to ensure that NSF-funded programs and projects are free of discrimination. ODI . . . launched a dedicated web portal to consolidate policies and procedures, promising practices, and frequently asked questions relating to sexual and other forms of harassment. . .

NSF's complete statement can be found online at: https://www.nsf.gov/pubs/issuances/in144.pdf. The ODI portal can be found at: https://www.nsf.gov/stopping-harassment

Acknowledgment: As grant personnel proposed NSF-funded project named on this form, I am acknowledging that I have read and understood the National Science Foundation statutory requirement regarding Sexual Harassment Notice No. 144.	
Signature of Investigator:	
Typed Name:	**Date:**

3.2 Disclosure Form for Saint Mary's National Science Foundation (NSF) Conflict of Interest Policy

Completion of this form is mandatory for all Investigators on proposals to the NSF or other sponsors that follow NSF requirements for financial disclosure. This information is required to comply with the NSF's Investigator Financial Disclosure Policy as stated in the NSF Grant General Conditions posted at https://www.nsf.gov/awards/managing/general_conditions.jsp.

DISCLOSURE AND CERTIFICATION

Saint Mary's College Investigators: Each Investigator has the responsibility to provide a complete disclosure of all reportable financial interests prior to award receipt and when new reportable significant financial interests are obtained.

1. Income	
Have you, your spouse or registered domestic partner, and/or dependent children received income or payment for services in the past 12 months **directly related** to this research project** exceeding $10,000 when **aggregated**? This does not include income from seminars, lectures, teaching engagements, or service on advisory committees or review panels for public or non-profit entities.	
☐ **YES** ☐ **NO**	
2. Equity Interests	
Do you, your spouse or registered domestic partner, and/or dependent children currently own any equity interest in the form of stock, stock options, real estate, or any other investment or ownership interest exceeding $10,000 in value (current market value if publicly traded; internal estimate of value if not publicly traded) or have more than 5% ownership interest in a single entity **directly related** to this research project**?	
☐ **YES** ☐ **NO**	
3. Intellectual Property Rights and Interests	
Do you, your spouse or registered domestic partner, and/or dependent children have any intellectual property rights on a patent, patent application, or a copyright of software assigned or to be assigned to a party other than Saint Mary's College of California that is **directly related** to this research project**?	
☐ **YES** ☐ **NO**	
****For a definition of "related financial interest," please refer to the DEFINITIONS section on page 2 of this form.**	
I certify under penalty of perjury that this is a complete disclosure of all my significant financial interests related to this research project and I have used all reasonable diligence in preparing this Financial Interest Disclosure, and to the best of my knowledge it is true and complete. I also acknowledge that by signing my name below that it is my responsibility to disclose any new significant financial interests obtained during the term of the above proposed project.	
Signature of Investigator:	
Typed Name:	**Date:**

INSTRUCTIONS

1. Any person who is responsible for the design, conduct, or reporting of the proposed project to NSF must submit the Disclosure Form for NSF National Science Foundation Conflict of Interest Policy ("Disclosure Form") at the time of application.
2. At the just-in-time or notice of award, ORSP staff will contact Investigators who have disclosed any Significant Financial Interests to request the submission of the Investigator's Addendum for All Positive Disclosures ("Investigator's Addendum").
3. Please allow for sufficient time for compliance review by Saint Mary's College's Designated Official or Conflict of Interest Committee.

DEFINITIONS

Who is considered an "Investigator," and therefore required to disclose?

"Investigator" means the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of the sponsored research, which may include collaborators or consultants.

What is an entity?

"Entity" means any domestic or foreign, public or private, organization (excluding a Federal agency) from which an Investigator (and spouse and dependent children) receives remuneration or in which any person has an ownership or equity interest.

What is a "Significant Financial Interest"?

Anything of monetary value, including, but not limited to:

1. Income exceeding $10,000 when aggregated for an Investigator, Investigator's spouse, and dependent children from a single Entity (Business, Public or Nonprofit) including salary, consultant payments, honoraria, royalty payments, dividend, loan, or any other payments or consideration with value during the prior twelve months. Income from a Public or Nonprofit Entity for seminars, lectures, teaching engagements, or service on advisory committees or review panels is exempt;
2. Equity in the form of stock, stock options, real estate, loan to, or any other investment or ownership interest exceeding $10,000 (current market value) or a 5% ownership interest for any one Entity when aggregated for an Investigator, Investigator's spouse, and dependent children;
3. Intellectual property interest held by the Investigator, or Investigator's spouse or dependent children on a patent, patent application, or a copyright of software assigned or to be assigned to a party other than Saint Mary's College of California.
4. **Exception:** Financial Interest does **not** include: (1) payments made by Saint Mary's College of California (salary, royalties, honoraria, expense reimbursement or any other remuneration); or (2) an investment by a mutual fund, pension fund or other investment fund over which the investigator or his/her immediate family member does not exercise management of fund investment.

What is a "Related Financial Interest"?

When the work to be performed under the sponsored project and the results of the undertaking would reasonably appear to affect the Investigator's Significant Financial Interest, the interest is regarded as Related to the sponsored project and must be disclosed. Related financial interests may include, but are not limited to, the following:

1. The Investigator is conducting a project where the results could be relevant to the development, manufacturing, or improvement of the products or services of the entity in which the Investigator has a financial interest;
2. The Investigator has a financial interest in an entity which might manufacture or commercialize a drug, device, procedure or any other product used in the project or that will predictably result from the project;
3. The Investigator has consulting income in his/her professional field that exceeds $10,000 from a single entity during the prior twelve months. Saint Mary's College's Conflict of Interest Committee will provide an assessment for the Provost as to whether any of that entity's financial interests, or the Investigator's financial interests related to consulting for that entity, would reasonably appear to be affected by the federally-sponsored research;
4. The Investigator has a financial interest in an entity and the sponsored project proposes to subcontract a portion of the work, or lease property, or make referral of participants to, or make purchases from the entity; or
5. The Investigator has a financial interest in an entity that is part of a consortium or that will otherwise participate in the sponsored project.

REVIEW PROCESS

- ORSP staff will review the Disclosure Form at the time of application to ensure completeness and consistency.
- At the just-in-time or notice of award, ORSP staff will contact any Investigators who have disclosed Significant Financial Interests to request submission of the Investigator's Addendum for All Positive Disclosures.
- The Office of Research and Sponsored Projects will forward to the Provost and to the COI the information provided in the Disclosure Form and the Investigator's Addendum.
- The COI will review the Disclosure Form, Investigator's Addendum, and relevant features of the sponsored project(s) and, on the basis of the review, will recommend to the Provost whether funding for the project(s) should be accepted and, if so, whether any modifications or conditions are needed.
- The Provost will determine what conditions or restrictions, if any, should be imposed by the institution to manage, reduce or eliminate any conflict of interest, and will communicate such conditions or restrictions to the Investigator.

RECORDS

The information provided herein may be released or transmitted to the sponsor, including federal agency representatives. These records will be retained for 3 years after termination of sponsored project or until resolution of any action by the sponsor, whichever is greater. The Office of Record is the Office of Research and Sponsored Projects.

CONTACT INFORMATION

For more information, please contact the Office of Research and Sponsored Projects at orsp@stmarys-ca.edu.

4. Certifications for the National Institutes of Health and PHS-Compliant Agencies

4.1 Disclosure Form PHS- or PHS-Compliant Sponsored Projects

To document compliance with the Policy on Disclosure of Financial Interests and Management of Conflicts of Interest for Public Health Service and PHS-compliant Sponsored Research Awards

REQUIREMENT

Saint Mary's College Investigators: Each Investigator has the responsibility to provide a complete disclosure of all reportable financial interests at the time of the proposal; prior to award receipt; annually; and when new reportable significant financial interests are obtained. Please review page 2 for detailed definitions and instructions.

DISCLOSURE AND CERTIFICATION

Have you, your spouse, your registered domestic partner, and/or your dependent child(ren) had any of the following financial interests enumerated 1-4 below, related to your institutional responsibilities? Please respond to all four questions.

1. Receipt of income or other payment for services from and/or equity interest(s) in a **publicly traded entity** totaling more than $5,000 over the past 12 months: ☐ **YES** ☐ **NO**
2. Receipt of income or other payment for services from and/or equity interest(s) in a **non-publicly traded entity** totaling more than $5,000 over the past 12 months: ☐ **YES** ☐ **NO**
3. Receipt of payments for any **intellectual property rights and interests** (e.g., from patents, copyrights assigned to any entity other than Saint Mary's College of California) totaling more than $5,000 during the past 12 months: ☐ **YES** ☐ **NO**
4. **Reimbursed or sponsored travel** that exceeded $5,000 per entity (excluding U.S. governmental agencies or U.S. institution of higher education) during the past 12 months: ☐ **YES** ☐ **NO**
Certification: I certify under penalty of perjury that this is a complete disclosure of all my significant financial interests related to this research project and I have used all reasonable diligence in preparing this Financial Interest Disclosure, and to the best of my knowledge it is true and complete. I also acknowledge that by signing my name below that it is my responsibility to disclose any new significant financial interests obtained during the term of the above proposed project.
Signature of Investigator:

Typed Name:	**Date:**

INSTRUCTIONS

1. Any person who is responsible for the design, conduct, or reporting of the proposed project to the Public Health Service or a PHS-compliant agency must submit this Disclosure Form at the time of application, and again at the just-in-time or notice of award stage.
2. At the just-in-time or notice of award stage, ORSP staff will contact Investigators who have disclosed any Significant Financial Interests to request the submission of the Investigator's Addendum for All Positive Disclosures ("Investigator's Addendum").
3. Please allow for sufficient time for compliance review by Saint Mary's College's Designated Official or Conflict of Interest Committee.

DEFINITIONS

Institutional responsibilities. An Investigator's professional responsibilities on behalf of the Institution, and as defined by the Institution, which may include activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or other boards.

Research means a systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug).

Significant Financial Interest (SFI), abridged definition (please see SMC's Policy on Disclosure of Financial Interests and Management of Conflicts of Interest for Public Health Service and PHS-compliant Sponsored Research Awards for full definition). A Significant Financial

Interest means a financial interest consisting of one or more of the following interests of 1) the Investigator or 2) the Investigator's spouse, domestic partner, and/or dependent children that reasonably appears to be related to the Investigator's institutional responsibilities:

- Receipt of income or other payment for services from and/or equity interest(s) in a publicly traded entity totaling more than $5,000 over the past 12 months; included are salary (other than salary described in the exceptions below), consulting fees, honoraria, paid authorship, and the equity interest value at the date of disclosure as determined by public prices or other reasonable measure of fair market value;
- Receipt of income or other payment for services from and/or equity interest(s) in a non-publicly traded entity totaling more than $5,000 over the past 12 months;
- Receipt of payments for any intellectual property rights and interests (e.g., from patents, copyrights assigned to any entity other than Saint Mary's College of California) during the past 12 months totaling more than $5,000;
- Reimbursed or sponsored travel that exceeds $5,000 per entity (excluding U.S. governmental agencies or U.S. institution of higher education) during the past 12 months.

  Exceptions: The term **Significant Financial Interest** does not include the following types of financial interests:
  - Salary, royalties, or other remuneration paid by SMC to an Investigator who is currently employed or otherwise appointed by SMC;
  - Income from seminars, lectures, teaching engagements, or service on advisory committees or review panels sponsored by a government agency of the United States (including federal, state, or local government), a U.S. institution of higher education, or a research institute, academic medical center or hospital affiliated with a U.S. institution of higher education;
  - Income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control investment decisions.

Financial conflict of interest (FCOI) means a significant financial interest that could directly and significantly affect the design, conduct, or reporting of research funded by PHS or other PHS-compliant sponsor.

REVIEW PROCESS

- ORSP staff will review the Disclosure Form at the time of application to ensure completeness and consistency.
- At the just-in-time or notice of award stage, ORSP staff will contact any Investigators who have disclosed Significant Financial Interests to request submission of the Investigator's Addendum for All Positive Disclosures. The ORSP will forward the information provided in the Disclosure Form and the Investigator's Addendum to the Provost and the COI Committee.
- The COI Committee will review the Disclosure Form, Investigator's Addendum, and relevant features of the sponsored project(s) and, on the basis of the review, will recommend to the Provost whether funding for the project(s) should be accepted and, if so, whether any modifications or conditions are needed.
- The Provost will determine what conditions or restrictions, if any, should be imposed by the institution to manage, reduce or eliminate any conflict of interest, and will communicate such conditions or restrictions to the Investigator.

RECORDS

The information provided herein may be released or transmitted to the sponsor, including federal agency representatives. These records will be retained for 3 years after termination of sponsored project or until resolution of any action by the sponsor, whichever is greater. The Office of Record is the Office of Research and Sponsored Projects.

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