

**ARS** □ **ERS** □ **NASS** □ **NIFA**

*Bulletin*

**Title:** Conflict of Interest Certification

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This Bulletin is issued to notify ARS-PIs and Location administrative personnel of the requirement to complete Form SEB-102, Conflict of Interest Certification, **prior** to the award of an Extramural Agreement.

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## **1. Purpose**

This purpose of this Bulletin is to notify ARS-PIs of the requirement to complete Form SEB-102, Conflict of Interest Certification, prior to the award of an extramural agreement.

## **2. Background**

In 2007, the USDA Office of Ethics, Science Ethics Branch (SEB) obtained approval from the U.S. Office of Government Ethics (OGE) to use the SEB-102 as an alternative form of financial disclosure for employees serving as PI's on extramural agreements. In February 2012, staff members of SEB, the Extramural Agreements Division, and AFM determined that the Conflict of Interest Certification would become a required step in the pre-award approval process for extramural agreements. Historically, ARS-PIs/ADODRs had 30 days following the award of an extramural agreement to complete and submit the conflict of interest certification to the USDA Office of Ethics, Science Ethics Branch.

## **3. Policy**

Effective October 1, 2012, ARS-PIs shall complete Form SEB-102 prior to the award of all incoming and outgoing, funded or non-funded, extramural agreements.

The completed SEB-102 form will be uploaded into and maintained in ARIS in the "Dealings/Ethics" tab for extramural research projects conducted with non-Federal partners/cooperators.

## **4. Responsibilities**

ARS Line Management will ensure the ARS-PIs' compliance with the policies and procedures stated herein.

Location Administrative personnel will assist the ARS-PI with completion and uploading of the SEB-102, as necessary.

The USDA Office of Ethics, Science Ethics Branch, will maintain primary responsibility for monitoring this requirement and determining if a conflict of interest is apparent.

## **5. Authorities**

[5 CFR Part 2634 – Executive Branch Financial Disclosure, Qualified Trusts, and Certificates of Divestiture, Subpart I – Confidential Financial Disclosure Reports, § 2634.901 – 2634.909.](#)

## 6. Glossary

[Click here for a comprehensive glossary of grants and agreements terminology.](#)

/s/ Sherri L. Carroll

9/28/12

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Date