

Guidelines for Research Administrators Regarding DOE Proposals

Summary

On July 16, 2026, the Department of Energy released a final rule regarding its conflict of interest and conflict of commitment policy. [2 CFR 910, Subpart C](#) sets forth requirements for Conflicts of Interest, Conflicts of Commitment, Organizational Conflicts of Interest, and Other Matters of Concern. Several requirements are new relative to the 2021 Interim DOE policy on conflict of interest. To comply with the new requirements, the Northwestern Conflict of Interest Office (NUCOI) must review all DOE proposals at the time of submission.

What is asked of Research Administrators?

- **Please route all DOE proposals (DOE direct and flowthrough) to NUCOI through CERES ancillary review (“COI same-day”).**
 - NUCOI appreciates as much review time as possible, at a minimum, the 5-day proposal deadline set by Sponsored Research. *If a reportable COI is identified and we did not receive the proposal at least 5 business days before the sponsor deadline, we cannot guarantee approval by that deadline.*
 - NUCOI will review the proposal for conflicts of interest and conflicts of commitment.
 - NUCOI reviews the science, including at least the abstract, specific aims, and budget justification
 - Organizational conflict of interest review is also required in virtually all DOE funding opportunity announcements, and research administrators may combine COI/COC review with OCOI review in the same ancillary review request.
 - Individual funding announcements can vary in terms of COI reporting requirements. Please attach the NOFO so we can review it. We always appreciate you flagging unusual terms as well!

New to the 2026 Policy

- Reporting of actual, apparent, or potential conflicts of interest or conflicts of commitment is required at the time of **proposal** (not JIT or award as required by NIH/NSF), if such conflict cannot be eliminated or properly managed. Additionally, conflicts involving foreign entities must be reported at the time of proposal and/or within 15 days of learning of a new conflict.
- Conflict of interest training must be taken every two years (prior policy allowed for training every four years). NUCOI will manage reviewing investigator records for this requirement.
- Increased focus on defining and identifying conflicts of commitment.