

PPO – Conflict of Interest Standards

The PPO will remain scrupulous in preventing conflicts of interest throughout the PAWR program, with such conflicts as defined by federal guidelines. The PPO will use NSF Col standards (as defined in the PAPPG, Exhibit II-2) to screen for potential conflicts within the PPO and identify disqualifying Cols for potential reviewers of each proposal. In addition to these NSF Col guidelines, reviewers will be explicitly asked to disclose any pending or existing contracts with PAWR Industry Consortium members, states or local municipalities. The PPO will maintain secure records of all reviewer disclosures. The management of the screening will be the responsibility of the Program Director. As noted above, selection of proposals for award would be by the determination of the PPO using the results of the proposal review process. At that point, the Cols of both program staff and reviewers will have been addressed previously and will not influence platform selection. A non-exhaustive set of examples of potential conflicts and how they are being mitigated are outlined below.

- Industry representatives seek advantage by actively participating in community-university teams proposing to become a PAWR platform: Industry Consortium members of the PAWR program have been prohibited from being named in community-university RFP responses. Informal consultation has been permitted.
- Industry members of the Proposal Review Committee have had a working relationship with the proposal personnel: Industry members of the Committee will be asked to recuse themselves from reviewing such proposals, even if they may not have published outcomes from such working relationships.
- Industry members of the Proposal Review Committee seek advantage by judging proposals in cities where they have active outdoor testbeds or where they have a significant corporate presence: Industry members of the Committee will be asked to recuse themselves from judging proposals from communities where their companies have active, outdoor testbeds or have a significant corporate presence.
- Academic members of the PPO team favor proposals from their universities: Home universities for academic members of the PPO team are prohibited from proposing to become one of the PAWR platforms.
- Academic members of the Proposal Review Committee seek advantage by judging proposals from their home universities: Members of the Proposal Review Committee will be selected from universities that have not submitted a proposal in response to the currently issued RFP.
- Proposing community-university teams seek advantage through communication with the PPO or NSF after the RFP is released: PPO and NSF communication with potential proposers after the

RFP is released will be strictly limited to answering questions outlined in the RFP. Continually updated FAQs posted on the RFP website will serve as an additional vehicle to communicate PPO responses to questions on the RFP.

- Industry or university researchers seek advantage in scheduling research on the platforms: Scheduling guidelines ensuring 50/50 industry and academic platform participation and explicit time allocations within each 50% shall be defined by the PAWR Research Committee (with the industry component determined by the relative proportion of cash and in-kind contributions made).

- PPO team members seek to benefit inappropriately from selected community-university teams: All team members must follow the federal government's General Procurement Standards (2 CFR 200.318). The PPO will ensure that platforms perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders (2 CFR 200.318 (b)). These standards require that:

- A PPO team person will not participate in the selection, award, or administration of a contract under a grant if the PPO team person, any of the person's family members or partners, or an Organization which employs or is about to employ any of these persons, has a financial or other interest in the Organization selected for the contract as this would give rise to an inappropriate conflict of interest.

- A PPO team person will not solicit or accept gratuities, favors, or anything of monetary value from any partners or contractors unless of de minimis value as defined by the IRS code. If any person violates the code, they will be subject to disciplinary action.

- Platform sub-awardees seek to benefit inappropriately from selected community-university partners: All sub-awardee team members must follow the federal government's General Procurement Standards (2 CFR 200.318). The sub-awardee will ensure that platforms perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders (2 CFR 200.318 (b)). These standards require that:

- Sub-awardee employees, officers or agents will not participate in the selection, award, or administration of a contract under a grant if the employee, any of the employee's family members or partners, or an Organization which employs or is about to employ any of these persons, has a financial or other interest in the Organization selected for the contract as this would give rise to an inappropriate conflict of interest.

- Sub-awardee employees will not solicit or accept gratuities, favors, or anything of monetary value from the PPO contractors unless of de minimis value as defined by the IRS code. If any employees violate the code, they will be subject to disciplinary action.