

**GIFT ACCEPTANCE EVALUATION CHECKLIST**

NIH Policy Manual 1135 – GIFTS ADMINISTRATION

## Appendix 2

Issuing Office

OFM 443-7836

Issuing Office E-Mail

[OFMPolicySupport@mail.nih.gov](mailto:OFMPolicySupport@mail.nih.gov)

This survey will help to determine whether NIH is in compliance with the statutory and delegated authorities to accept gifts (including grants) from non-federal donors, conditional and unconditional, monetary and nonmonetary, and whether there may be any potential for a conflict of interest.

1. Yes No Will acceptance of the gift, to a reasonable person, compromise the integrity of or the appearance of the integrity of a Governmental program or of any official involved in that program? Note: For purposes of this analysis, you must consider the identity of the immediate donor of the gift to the agency, and the identity of any entity that may have funded the donor.
2. Yes No Will the acceptance of the gift and any of its conditions require the expenditure of funds not covered by the gift itself or income from the gift? For example, in the case of a research grant, is the grant alone insufficient to carry out the research activity, such that appropriated funds will also be required to conduct the activity?  
NOTE: The requirement of appropriated funds to conduct the activity must take into consideration the costs of e.g., employee resources, infrastructure, etc., in addition to the costs of the science/research.\*\*
3. Yes No If the answer to the prior question was "Yes," is the project an articulated priority of the NIH/IC such that NIH or the IC would conduct the activity in the absence of the gift?\*
4. Yes No Will the acceptance of the proposed gift create an actual or apparent conflict of interest for the IC or NIH?
5. Yes No Is there any matter pending before your Institute or Center, or to your knowledge, before NIH, that would affect the interest of the donor, e.g., approval of a grant or award or a contract? If so, what? Indicate the nature of the matter.
6. Yes No Does your Institute or Center, or to your knowledge, NIH, control activity in which the donors have an interest or the potential for an interest, such as Cooperative Research and Development Agreements, research and development or other contract programs, grant programs, or clinical trials? If yes, indicate which activities.
7. Yes No Will the amount/value, or the nature of the gift alone raise a significant concern with a reasonable person?
8. Yes No Is the gift being offered for endorsement purposes?
9. Yes No Would acceptance of the gift appear reasonable to a member of the public?
10. Yes No Is the gift reasonable to administer?
11. Yes No Will the principal beneficiary of the gift be the NIH?
12. Yes No Are there donor imposed restrictions or conditions that undermine the integrity of the NIH's scientific/administrative review process or research mission?
13. Yes No Is the gift being offered to the NIH to support the activities of a specific employee?
14. What is the practical impact of the gift within the NIH or IC?

**\* NOTE:** If the gift is from a determined "prohibited source" as defined in Section H. of this manual chapter, please ensure that you follow the applicable procedures outlined in (section C, Gift Acceptance, item 3.). If your answer was "Yes" to any one of Question Nos. 1–8; or "No" to Question Nos. 9–11, careful scrutiny should be given to any unfavorable responses and the Office of the General Counsel should be consulted for advice.

**SIGNATURES**

IC Preparer	Date (mm/dd/yyyy)	IC Recommending Official	Date (mm/dd/yyyy)
IC Ethics Official	Date (mm/dd/yyyy)	IC Authorizing Official (See <i>Delegation of Authority Finance No. 5</i> )	Date (mm/dd/yyyy)

\*\* In accordance w/ Questions No. 2 and 3 above, I hereby acknowledge that all IC budgetary priorities and requirements will be followed.

IC Budget Officer Signature	Date (mm/dd/yyyy)
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