AVOIDING CONFLICTS OF INTEREST

AVOIDING CONFLICTS OF INTEREST DURING SCIENTIFIC REVIEW GROUP MEETINGS

Prior to the review meeting and at the beginning of each review meeting, the Scientific Review Officer (SRO) orients the review panel by explaining the NIH conflict of interest policy. An individual must leave the room when an application is being discussed that was submitted by his/her own organization, a recent (within three years) or immediate future collaborator, or an immediate family or close professional associate(s) in which the reviewer has a financial or vested interest, even if no significant involvement is apparent in the application being considered.

If a reviewer is a provider of fee-for-service or writes a letter of reference/support for an application, that panel member must be absent from the room during the review of that application. However, if the reviewer is a provider of universally available services (e.g., operates an NIAID supported resource center), cell lines, reagents or other materials, then that reviewer is not in conflict with that application.

The term "own organization" includes the entire system in which the reviewer is an employee, consultant, officer, director, or trustee in which the reviewer has a financial interest, or with which the reviewer is negotiating or has any arrangement concerning prospective employment. Recent NIH policy considers all separate organization components/schools of multi-component academic institutions, hospitals, health centers, and research institutes sufficiently independent such that an employee of one component can review an application from another component without a conflict of interest, as long as any other real or apparent conflict of interest is resolved. For example:

- The separate campuses of the California State system are considered separate components in the same way that the separate campuses of the University of California system are so noted in the Federal Register.
- The separate campuses of the Harvard system are considered separate components.
- The Johns Hopkins Bayview Medical Center, the School of Arts and Sciences, and the Homewood Campus are separate components.
- The Departments of Biology and Chemistry within the School of Arts and Sciences are not separate components.

Reviewers are also urged to avoid any actions that might give the appearance that a conflict of interest exists, even though he/she believes there may not be an actual conflict of interest. For example, a member should not participate in the deliberations and actions on any application from a recent student, a recent teacher, or a close personal friend. Judgment must be applied on the basis of recency, frequency, and strength of the working relationship between the member and the PD/PI as reflected, for example, in publications. Another example might be an application from a scientist with whom the member has had longstanding differences that could reasonably be viewed as affecting the member's objectivity. Another example that might be
considered is the review of a project that closely duplicates ongoing work in the member's laboratory.

A reviewer must leave the room during the discussion of an application if he/she is a member of or has a financial interest in a for-profit organization that is submitting the application. This includes ownership of stock in or being a consultant for a for-profit organization. A reviewer should also leave the room during the discussion of an application if being present would give the appearance of a conflict of interest. An example of this would be an application from a for-profit organization that provides substantial financial funding to the reviewer's organization or laboratory.

Prior to the scientific review group meeting, each reviewer will complete a certification of Conflict of Interest and Confidentiality after examining a list of investigators and institutions associated with the applications to be reviewed. Reviewers must notify the SRO of any conflict of interest prior to the meeting and certify that the confidentiality of the review proceedings will be maintained.

At the end of the review meeting, the SRO will obtain written certification from all members that they have not, in fact, participated in the review of any applications in which their presence would have constituted a real or apparent conflict of interest and that the confidentiality of actions will be maintained.

For additional information, please refer to:
