

CONFLICT OF INTEREST (COI) IN PEER REVIEW

A COI in peer review exists when a reviewer or a close relative (a parent, child, sibling, spouse, or domestic partner) or professional associate (any colleague, scientific mentor, or student with whom an individual is conducting research or other significant professional activities currently or with whom the individual has conducted such activities within 3 years) of the reviewer has a financial or other interest in an application that is known to the reviewer and is likely to bias the reviewer's evaluation of the application as acknowledged by the reviewer or as determined by the Scientific Review Officer (SRO) or would cause a reasonable person to question the reviewer's impartiality if he or she were to participate in the review. Regardless of the level of financial involvement or other interest, if a reviewer feels, or may be perceived as being, unable to provide an objective evaluation, he or she may not participate in the review of the application.

The peer review system relies on the professionalism and integrity of each reviewer to identify any real or apparent COI that is likely to bias his or her evaluation of an application or create the perception of bias. All efforts should be made to identify real or apparent COIs as early as possible in the review process.

For COI purposes, applicant and investigator include the roles listed below.

Applicant: Principal Investigator (PI) (including subaward PI) or, if applicable, Initiating and Partnering PIs, listed in the application

Investigator: All active participants (PI, Partnering PI, Co-PI or coinvestigator, collaborator, consultant, subcontractor, and other senior/key personnel) listed in the application

Based on the nature of the COI, it can be handled at the program, panel, or application level. The following are examples of the circumstances that would constitute a COI and how the COI will be handled at each level.

Program Level COI

If any of the following types of conditions apply, the reviewer cannot serve on any panels of the program.

- The reviewer is a (full or ad hoc) member of the programmatic panel of the program.
- The reviewer is the applicant of an application of the program.
 - *Exception: For some programs, the reviewer can serve on a panel where applications submitted to the same funding opportunity are not reviewed.*
 - *Exception: For some programs, the reviewer can serve on a panel where the application is not reviewed.*

Panel Level COI

If any of the following types of conditions apply, the reviewer cannot serve on the panel or the application cannot be reviewed by the panel.

- The reviewer or a close relative is an investigator in an application reviewed by the panel.

- The reviewer is the mentor for the applicant (eg, as a predoctoral or a postdoctoral fellow on a career development award application) of an application reviewed by the panel.
- The reviewer has provided a letter of recommendation for the applicant of an application reviewed by the panel.
- The reviewer or a close relative would receive a direct financial benefit if an application reviewed by the panel is funded, eg, he or she will receive salary, other compensation (in whole or in part), or financial support from the funded application.

Application Level COI

If any of the following types of conditions apply, the reviewer can serve on the panel but will not have access to that application or participate in the discussion or scoring of the application, and a record of the recusal will be documented.

- The reviewer has a close professional relationship with an investigator in an application reviewed by the panel.
 - The reviewer and the investigator
 - Are actively collaborating (in research other than that described in the application) or conducting other significant professional activities.
 - Have collaborated (in research other than that described in the application) or conducted significant professional activities within the past 3 years.
 - Have agreed to collaborate (in research other than that described in the application) or conduct significant professional activities in the future.

Exception: *If the reviewer is a member of a research network that involves the investigator, then the reviewer is not considered a COI.*

Exception: *If the reviewer and the investigator contribute data, reagents, specimens, etc, to the same repository or database, then the reviewer is not considered a COI.*

- Have coauthored research publication(s) within the past 3 years.

Exception: *If the reviewer is a coauthor of a nonresearch publication (eg, review and commentary) or a mega-multiauthored publication with the investigator, then the reviewer is not considered a COI.*

- The reviewer and the investigator have had a mentor/mentee relationship (other than that described in the application).
- The reviewer provides technical assistance to the investigator in any of the following ways:
 - Helps prepare or submit the application.
 - Provides a particular resource that is not freely available to anyone in the scientific community; eg, reagents, equipment, specialized data analysis.

***Exception:** If the reviewer is a provider of a particular resource that is freely available to anyone in the scientific community (eg, letter of support, service, equipment, data, or other material) then the reviewer is not considered a COI.*

- The reviewer has a professional relationship with the applicant's institution.
 - The reviewer is employed (including adjunct positions) at the applicant's institution, organization, company, or governmental agency.

***Exception:** For multicampus state institutions, a reviewer who is primarily employed at one campus of the institution is not considered in conflict with an application submitted by another campus of the same institution provided that the reviewer does not have multicampus responsibilities.*

***Exception:** For private institutions and affiliates, a reviewer who is primarily employed at one affiliate of the institution is not considered in conflict with an application submitted by another affiliate of the same institution provided that the reviewer does not have affiliatewide responsibilities.*

- The reviewer is negotiating or has any arrangement concerning prospective employment at the applicant's institution, organization, company, or governmental agency.
- The reviewer may receive professional gain from the outcome of the review of the application reviewed by the panel.
 - The reviewer or a close relative has an indirect financial interest in the outcome of the review of the application reviewed by the panel, e.g., he or she will receive honoraria, stocks and fees during the project period.
- The reviewer has scientific or personal differences with an investigator of the application reviewed by the panel that could reasonably be viewed as affecting objectivity.
- The reviewer is on the external advisory board of the application reviewed by the panel.
- The reviewer is named by the applicant as having a COI.