CONFLICT OF INTEREST (COI) IN PEER REVIEW

The integrity of scientific peer review depends on processes that are free of bias or COI. A COI in peer review exists when a reviewer (or a close relative or a professional associate of that reviewer) has a financial or other interest in an application that may bias the reviewer’s evaluation of the application or a reasonable person would have cause to question the reviewer’s impartiality if he or she were to participate in the review.

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. 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.

**Definitions**

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<th><strong>Definitions</strong></th>
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<td>For purposes of identifying COI, the following definitions are used.</td>
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<td><strong>Applicant:</strong> Principal Investigator (PI) (including subaward PI) or, if applicable, Initiating and Partnering PIs, listed in the application</td>
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<td><strong>Investigator:</strong> All active participants (PI, Partnering PI, Co-PI or coinvestigator, collaborator, consultant, subcontractor, and other senior/key personnel) listed in the application</td>
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<td><strong>Close Relative:</strong> A parent, child, sibling, spouse, or domestic partner</td>
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<td><strong>Professional Associate:</strong> 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</td>
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Handling of COI will depend on the nature and level of the conflict. The following guidelines are used for handling COIs at the program, panel, or application level.

**Program Level COI**

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

- The reviewer is a (full or ad hoc) member of the programmatic panel for the program.
- The reviewer has a current application submitted to the same program.

**Possible Exception** (upon concurrence of the CDMRP program manager): The reviewer may serve on a panel that is not reviewing applications submitted in response to the same funding opportunity (e.g., program announcement or broad agency announcement).

**Possible Exception** (upon concurrence of the CDMRP program manager): The reviewer may serve on a panel that is not reviewing the reviewer’s application.
**Panel Level COI**

If any of the following types of conditions apply, the reviewer cannot serve on 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 (e.g., 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 an 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.

**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 and will be recused from participation in any discussion or scoring of that application.

- The reviewer is a professional associate of an investigator in an application reviewed by the panel, or has agreed to collaborate or conduct significant professional activities in the future.
  
  **Exception:** Membership in a research network that involves an investigator does not in and of itself give rise to a COI.

  **Exception:** Contribution of data, reagents, specimens, or other material to the same repository or database as an investigator does not give rise to a COI.

- The reviewer and an investigator have coauthored research publication(s) within the past 3 years.
  
  **Exception:** Coauthorship of a nonresearch publication (e.g., review and commentary) or a mega-multiauthored publication with an investigator does not give rise to a COI.

- The reviewer provides technical assistance to an 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; e.g., 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 (e.g., 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 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.