

*Congressionally Directed Medical Research Programs (CDMRP)
Conflict of Interest (COI) Policies and Practices for
Programmatic Panel (PP) Members and Ad Hoc Programmatic Reviewers*

1. Individual/Personal Conflicts

- a) **PP members** *may not* submit applications or be named as a Principal Investigator (PI), co-investigator, collaborator, current mentor, or have any other form of substantial contribution on applications that are being considered for research support through grants awarded under the program in which they are serving. This includes applications for any mechanism offered during any fiscal year for which the **PP member** was a sitting panel member.

Substantial contributions include those that entail input into the design or writing of the applications, intellectual involvement in data interpretation or analysis, or those in which the **PP member** would reap **monetary, professional, or personal gain** from the involvement in the application. **PP members** *may* provide reagents, animals, or patients for applications under review, as long as they do not participate in data interpretation or analysis or receive any financial, professional, or personal benefit or compensation and as long as they are or would provide the same access to other investigators.

- b) **Ad hoc programmatic reviewers** may participate in programmatic review despite being named on applications (as the PI, co-investigator, collaborator, or mentor) only if:
- their application(s) is not being reviewed by their assigned subgroup;
 - the submission is not for a large, institutionally based award. Examples of such awards include Program Project, Research or Clinical Consortia, and Institutional Training Grants); and
 - they have not served as a peer reviewer in the same fiscal year (regardless of the award mechanism(s) being reviewed).

2. Institutional Conflicts

PP members and **ad hoc programmatic reviewers** will not be allowed to review any applications submitted from their home institutions or from an institution where they have an appointment of any kind (e.g., officer, director, trustee, partner, consultant, employee). They should recuse themselves from the room during such deliberations. For institutions with multiple sites, only the reviewer's home site(s) will be considered a conflict, unless the reviewer holds appointments at multiple sites. For example, if a reviewer is from Massachusetts General Hospital, he/she would recuse him/herself from the room during any discussion of applications submitted from Massachusetts General Hospital; however, he/she could participate in the review of applications from Brigham and Women's Hospital or any of the other Harvard affiliates, unless he/she also holds an appointment at the operative affiliate(s). Institutions of named application collaborators (e.g., co-investigator, consultant) do not constitute an institutional conflict but may present a perceived conflict (see Section 3).

CDMRP COI Policies and Practices for PP Members and Ad Hoc Programmatic Reviewers

- a) **PP members** and **ad hoc programmatic reviewers** should recuse themselves from deliberations and evaluations of applications involving institutions or organizations:
- where the **PP member** or **ad hoc reviewer**, his/her spouse, minor child, or partner has financial or intellectual interest;
 - where the **PP member** or **ad hoc reviewer** is an officer, director, trustee, partner, consultant, employee, or otherwise similarly associated; or
 - where there exists any arrangement concerning prospective employment, financial interest, or other similar association.

The term “financial interest” means any interest of monetary value that may be directly and predictably affected by his/her official action as a **PP member** or **ad hoc reviewer**.

- b) On occasion, a **PP member** may be listed on an application by virtue of his/her role in the institution or department (e.g., as the director of the cancer center, chair of the department). In such cases, the **PP member** will be contacted and asked:
- whether he/she is aware of the listing, and
 - whether he/she would prefer to contact the PI and be removed from the application or have the application withdrawn from consideration.
- c) For large, institutionally based award mechanisms, **PP members** and **ad hoc programmatic reviewers** from any of the participating institutions (submitting or collaborating) will not be allowed to participate in the review of ANY application in the subject award mechanism.

3. Perceived Conflicts

- a) **PP members** and **ad hoc programmatic reviewers** will avoid any actions that might give the appearance that a conflict of interest exists or could reasonably be viewed as affecting objectivity in application review. Examples that give the appearance of a conflict of interest include but are not limited to participating in the deliberations and actions on any application from a:
- personal friend, advisor, business associate, or family member;
 - current or recent student or teacher (within the past three years);
 - professional collaborator with whom the **PP member** or **ad hoc programmatic reviewer** has worked closely;
 - an individual with whom the **PP member** or **ad hoc programmatic reviewer** has long-standing scientific or personal differences; and/or
 - collaborator with whom the **PP member** or **ad hoc programmatic reviewer** has shared co-authorship on a research manuscript published within the past three years.

CDMRP COI Policies and Practices for PP Members and Ad Hoc Programmatic Reviewers

- For a non-research publication (e.g., review article) or large multi-authored publication, within the past one year.
- b) Any citing of a **PP member's** name in an application submitted to that program gives the appearance of an unfair advantage for the applicant. Examples of inappropriate citings include, but are not limited to the following:
- PP member named in budget forms, even if uncompensated;
 - PP member's biosketch included;
 - letter of reference or support from a PP member, unless specifically allowed in the solicitation;
 - notation of a current or former collaboration with PP member in the project narrative body;
 - reference to PP member's mentorship, unless specifically allowed in the solicitation; or
 - referencing a lab or departmental meeting headed by a PP member.

4. Other Situations

From time to time, individual cases may arise that are not covered by these guidelines. In such cases, the **PP member** or **ad hoc programmatic reviewer** should contact the programmatic review contractor or CDMRP Program Manager directly regarding the specific issue or potential conflict. As necessary, the programmatic review contractor and/or CDMRP will seek legal consult and may consult other PP members regarding the matter before determining whether this is an actual or perceived conflict of interest and/or the prescribed course of action.