

## CONFLICT OF INTEREST (COI) IN CONGRESSIONALLY DIRECTED MEDICAL RESEARCH PROGRAMS (CDMRP) 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 of that reviewer) has a professional, personal, and/or financial interest in an application that may bias the reviewer's evaluation of the application or may lead a reasonable person to question the reviewer's impartiality in the review.

The peer review process relies on the professionalism and integrity of each reviewer to identify any real or apparent COI that could bias their 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 professional, personal, and/or financial interest, if a reviewer believes they are or may be perceived as being unable to provide an objective evaluation, they must not participate in the review of the application.

Definitions
For purposes of identifying COI, the following definitions are used: <b>Applicant:</b> Principal Investigator (PI) (including subaward PI) or, if applicable, Initiating and Partnering PIs, listed in the application <b>Investigator:</b> All active participants (PI, Partnering PI, Co-PI, or Coinvestigator, collaborator, consultant, subcontractor, and other senior/key personnel including consumer advocates or lived experience consultants, eg, patients, their family members, caregivers, and patient advocates) listed in the application <b>Close Relative:</b> A parent, child, sibling, spouse, or domestic partner

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, an individual cannot serve on any peer review panels for the program:

- The individual is a member of the programmatic panel or being considered as an ad hoc for the program during the same fiscal year.
- The individual has a current application submitted to the same program.

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

***Possible Exception*** (upon concurrence of the CDMRP program manager): *The individual may serve on a panel that is not reviewing their own application.*

### ***Panel-level COI***

If any of the following types of conditions apply, an individual cannot serve on the panel:

- The individual (or a close relative) is an investigator in an application reviewed by the panel.
  - The individual (or a close relative) is a consumer advocate or lived experience consultant in an application reviewed by the panel.

- The individual is the mentor for the applicant (eg, a postdoctoral fellow on a career development award application) of an application reviewed by the panel.
- The individual has provided a letter of recommendation for an applicant of an application reviewed by the panel.
- The individual (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 conditions apply, a 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 has collaborated within the last 3 years or has agreed to collaborate or conduct significant professional activities in the future with an investigator in the application.
 

***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.
 

***Possible Exception:*** *Coauthorship of a nonresearch publication (eg, review and commentary) or a mega-multiauthored publication with an investigator may not give rise to a COI.*
- The reviewer has provided technical assistance to an investigator in any of the following ways:
  - Helping prepare (involved intellectually in the design, development, or data analysis) or submit the application
  - Providing a particular resource that is not freely available to anyone in the scientific community, eg, reagents, equipment, specialized data analysis
- The reviewer is a professional associate of an investigator involved in an application reviewed by the panel. Examples of professional associations include, but are not limited to the following:
  - The reviewer is a current colleague (eg, works in the same department/division) of an investigator in the application
  - The reviewer is a previous or current mentor/student of an investigator in the application.
  - The reviewer is a previous (within the last 3 years) or current patient of an investigator in the application.
  - The reviewer is nominated by a consumer advocate or lived experience consultant from a patient advocacy organization in the application.

***Exception:*** *Membership in a professional network that involves the reviewer and an investigator does not in and of itself give rise to a COI.*
- The reviewer has a professional relationship with an applicant institution.
  - The reviewer is employed (including adjunct positions) at an applicant 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 serves on an external advisory board of the application reviewed by the panel.