

## CONFLICT OF INTEREST POLICY

To ensure an objective selection process for limited submission competitions, the Office of Research Initiatives has implemented the following policy.

Advisory committee members are required to disclose by email any potential conflict or direct conflicts, such as a mentor relationship or joint publication or funding within the last three years. Unlike a tenure process, members of a limited competition committee are expected to be evaluators rather than advocates. If while further reviewing the internal proposals one finds that a particular conflict is so substantial, we ask that faculty member to recuse him or herself from reviewing the applicant(s) with whom a conflict exists.

By way of guidance, below are four examples of conflicts from the NIH's Conflict of Interest definition:

- **Professional Associates:** Professional associate means any colleague, scientific mentor, or student with whom the peer reviewer is currently conducting research or other significant professional activities or with whom the member has conducted such activities within three years of the date of the review, including publications.
- **Longstanding Disagreements:** A conflict of interest may exist where a potential reviewer has had longstanding scientific or personal differences with an applicant.
- **Financial Benefit:** A reviewer shall have a real conflict of interest if he/she or a close relative or professional associate of the reviewer:
  - Has received or could receive a direct financial benefit of any amount deriving from an application or proposal under review;
  - Has received or could receive a financial benefit from the applicant institution, offeror or principal investigator that in the aggregate exceeds \$10,000 per year (for reviewers who are federal employees the amount is \$15,000 per year); this amount includes honoraria, fees, stock or other financial benefit, and additionally includes the current value of the reviewer's already existing stock holdings, apart from any direct financial benefit deriving from an application or proposal under review; or,
  - Has any other interest in the application or proposal that is likely to bias the reviewer's evaluation of that application or proposal.
- **Personal Relationships (Relatives):** A close relative means a parent, spouse, sibling, son or daughter or domestic partner. A conflict of interest exists if a close relative of a reviewer submits an application or proposal, or receives or could receive financial benefits from or provides financial benefits to an applicant or offeror. In such case, it will be treated as the reviewer's financial benefit.