

## **GCC CONFLICT OF INTEREST, CONFIDENTIALITY, AND NON-DISCLOSURE RULES: INFORMATION FOR REVIEWERS OF GRANT APPLICATIONS**

As reviewers themselves are most familiar with their own situations, it is their personal responsibility: (1) to alert the GCC Program Director to any possible conflict of interest situation, whether real or apparent, that may impact the review, and (2) to identify and certify on the Conflict of Interest Certification Forms associated with this information sheet, (a) any application where they have a conflict of interest, and (b) that they will not be, and have not been, involved in the review of any application where their participation constitutes a conflict of interest. Reviewers must also certify that they will maintain the confidentiality of the proceedings and associated materials and that they will not disclose to another individual any matter or information related to the review proceedings. In addition, the GCC may determine that a particular situation involves a conflict of interest and require that the potential reviewer not be involved in the review of the application(s) in question.

All reviewers are covered by this information sheet and associated Certification Forms. Membership on a scientific review group does not make an individual an employee or officer of the GCC.

There are several bases for a conflict of interest: employment, financial benefit, personal relationships, professional relationships or other interests. If applicable, any one condition may serve to disqualify a reviewer from participating in the review of an application. A conflict of interest may be real or apparent.

The following guidance and definitions will assist you in determining whether you are faced with a real or apparent conflict of interest. The guidance is not all-inclusive, due to the variety of possible conflicts of interest. Therefore, it is important that you should consult the GCRC Program Director when there is any question about your participation in a review.

### **GUIDANCE AND DEFINITIONS**

A **Conflict Of Interest** in scientific peer review exists when a reviewer has an interest in a grant application that is likely to bias his or her evaluation of it. A reviewer who has a real conflict of interest with an application may not participate in its review.

**Real Conflict Of Interest** means a reviewer or a close relative or professional associate 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 that application as determined by the GCRC Program Director, as acknowledged by the reviewer, or as prescribed as follows:

A reviewer shall have a real conflict of interest if he/she or a close relative or professional associate of the reviewer: (1) has received or could receive a direct financial benefit of any amount deriving from an application under review; (2) has received or could receive a financial benefit from the applicant institution or principal investigator that in the aggregate exceeds \$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 under review; or (3) has any other interest in the application that is likely to bias the reviewer's evaluation of that application.

Regardless of the level of financial involvement or other interest, if the reviewer feels unable to provide objective advice, he/she must recuse him/herself from the review of the application at issue. The peer review system relies on the professionalism of each reviewer to identify to the GCRC Program Director any real or apparent conflicts of interest that are likely to bias the reviewer's evaluation of an application.

**Employment:** A reviewer who is a salaried employee, whether full-time or part-time, of the applicant institution or principal investigator, or is negotiating for employment, shall be considered to have an apparent conflict of interest with regard to an application from that organization or principal investigator. The GCRC Program Director may determine there is no conflict of interest or an appearance of a conflict of interest where the components of a large or multi-component organization are sufficiently independent to constitute, in effect, separate organizations, provided that the reviewer has no responsibilities at the institution that would significantly affect the other component. Membership on a scientific review group does not make an individual an employee or officer of the GCC.

**Financial Benefit:** See definition of Real Conflict of Interest above.

**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 receives or could receive financial benefits from or provides financial benefits to an applicant. In such case, it will be treated as the reviewer's financial benefit.

**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.

**Standing Review Group Membership:** When a scientific review group meets regularly, a relationship among the individual members exists; therefore, the group as a whole may not be objective about evaluating the work of one of its members. In such a case, a member's application will be reviewed by another qualified review group to insure that a competent and objective review is obtained.

**Longstanding Disagreements:** A conflict of interest may exist where a potential reviewer has had longstanding scientific or personal differences with an applicant.

**Multi-Site or Multi-Component Project:** An individual serving as either the principal investigator or key personnel on one component of a multi-site or multi-component project has a conflict of interest with all of the applications from all investigators or key personnel associated with the project. The individual should be considered a professional associate when evaluating applications submitted by the other participants in the project.

**Request for Applications (RFA):** Persons serving as the principal investigator or key personnel on an application in response to an RFA are generally considered to have a conflict of interest with all of the applications submitted in response to the RFA. However, if no other reviewer is available with the expertise necessary to ensure a competent and fair review, then a waiver may be granted by the GCRC Program Director that will permit an individual to review only those applications with which he/she has no conflict of interest that is likely to affect the integrity of the advice to be provided by the reviewer.

**Appearance of a Conflict of Interest** means that a reviewer or close relative or professional associate of the reviewer has a financial or other interest in an application that is known to the reviewer or the GCRC Program Director and would cause a reasonable person to question the reviewer's impartiality if he or she were to participate in the review. The GCRC Program Director will evaluate the appearance of a conflict of interest and determine whether or not the interest would likely bias the reviewer's evaluation of the application. Where there is an appearance of conflict of interest, but not sufficient grounds for disqualifying the reviewer, the GCRC Program Director will document: (1) that there is no real conflict of interest; and (2) that, at the time of the review, no practical alternative exists for obtaining the necessary scientific advice from the reviewer with the apparent conflict.

**Waivers:** If no other reviewer is available with the expertise necessary to ensure a competent review, a waiver may be granted by the GCRC Program Director to allow participation in the review.

#### **CONFIDENTIALITY AND NON-DISCLOSURE OF MATERIALS AND PROCEEDINGS**

The applications and associated materials made available to reviewers, as well as the discussions that take place during review meetings, are strictly confidential and must not be disclosed to or discussed with anyone who has not been officially designated to participate in the review process.

#### **CERTIFICATION**

By signing this document, I, \_\_\_\_\_, certify that I have read these instructions on "GCC Conflict of Interest, Confidentiality, and Non-Disclosure Rules and Information for Reviewers." I certify that, to the best of my knowledge, I will disclose all conflicts of interest that I may have with the applications and I fully understand the confidential nature of the review process and agree: (1) to destroy or return all materials related to it; (2) not to disclose or discuss the materials associated with the review, evaluation, or the review meeting with any other individual except as authorized by the GCRC Program Director; and (3) to refer all inquiries concerning the review to the GCRC Program Director.

**Signature:**

**Date:**

**Reviewer Program:** 2020 John S. Dunn Collaborative Research Awards