

The amendments clarify the scope of professional conflicts to ensure that the recusal requirement applies to research collaborations and other significant professional relationships, but not to more remote connections, such as when the reviewer and an applicant are two of many authors of a review article or where the reviewer and applicant each contributed a chapter to a book.

Personal Conflict of Interest

Under the existing GWG policy, a member is deemed to be in conflict if he or she “has had long-standing personal differences” with the applicant. As with long-standing professional differences, this provision is very difficult to apply because it is so subjective. Short of a formal dispute, it is often difficult to determine whether personal differences exist. Furthermore, the NIH does not have an analogous provision. The amendments modify this provision to apply it to situations in which the reviewer and an applicant have been on opposing sides of a formal legal dispute. In addition, as discussed above, the revised policy addresses the concerns regarding personal differences by requiring members to recuse themselves when they believe their objectivity may be compromised and by allowing applicants to identify up to a total of three individuals (including labs and companies) whom the applicant believes may be biased (whether for personal, professional, competitive, or any other reasons).

Requested Action

Recommend approval of the amendments to the Grants Working Group Conflict of Interest Policy and forward to the Office of Administrative Law for final approval.

Attachment