

NIH/OER (Approved for implementation by October 2018)

NIH POST-REVIEW CERTIFICATION REGARDING  
CONFLICT OF INTEREST FOR  
NON-FEDERAL REVIEWERS  
OF NIH R&D CONTRACT PROPOSALS

Reviewer Name: \_\_\_\_\_ (Lastname, Firstname M)

Address (employment): \_\_\_\_\_

Address Line 1 \_\_\_\_\_

Address Line 2 \_\_\_\_\_

City, State Zip Code \_\_\_\_\_

Scientific Review Group: \_\_\_\_\_

Date(s) of review: \_\_\_\_\_

**NIH Conflict of Interest Rules:  
Information for Reviewers of NIH R&D Contract Proposals**

The NIH peer review system relies on the professionalism of each reviewer to identify any conflict of interest (COI) or apparent COI that may affect or appear to affect the integrity of the NIH peer review process.

- The NIH COI rules for initial peer review for technical evaluation of R&D contract proposals are based on federal regulations ([42 CFR Part 52h](#)) and presented in detail in NIH Guide Notice [NOT-OD-14-069](#).
- In order to participate in the review meeting, you must:
  - Review the rules below, and screen the proposals for real or apparent COI for yourself.
  - Notify the Scientific Review Officer *immediately* if you have a COI or apparent COI with any proposal in this meeting.
  - Certify:
    - On the *pre-meeting* Conflict of Interest Certification that you have identified any proposal with which you have a COI or appearance of COI.
    - On the *post-meeting* Conflict of Interest Certification that you recused yourself from the review of any proposal pending review in the Scientific Review Group where your participation constitutes a real or apparent COI. In addition, the NIH may determine that a particular situation involves a COI and require that the potential reviewer not be involved in the review of the proposal(s) in question.

You **may not be** on the technical evaluation panel if:

- You are named on a proposal in a **major professional role** (Program Director/Principal Investigator [PD/PI], Senior/Key Personnel, Other Significant Contributor, Project/Site/Core Director, collaborator, consultant).
- You are a member of an NIH Advisory Council.
- You have a direct financial interest: you or a close family member would receive a direct financial benefit if a proposal is funded.
- You are employed by an offeror institution.
- You are from an institution that is included as a subcomponent of a proposal.

- Within the past three years, you have been a collaborator or have had any other professional relationship (e.g., served as a mentor) with any person who has a major role on a proposal.
- A proposal includes a letter of support or reference letter from you.
- You serve as a member of the Advisory Board for a project under review.
- You have an indirect financial interest from the offeror institution or person with a major professional role of over \$10,000 in honoraria, stocks, and fees during the last year or during the contract period.

You **may be** on the technical evaluation panel and **may review** specific proposals (not considered a COI) if:

- A proposal originates from an institution where you have collaborators, but your collaborators are not listed on the proposal.
- You have an indirect financial interest of less than \$10,000.
- You freely donate reagents or other materials to the proposed project, and these reagents or materials would also be available to other researchers.
- You, as well as a person with a major role on the proposed project, contribute data, reagents, specimens, etc., to the same repository or database.
- You are a member of a research network that involves a person with a major role on the proposed project.
- You are a co-author of a non-research publication (e.g., review, commentary) or a mega-multi-authored publication with a person with a major role on the proposed project.

### Post-Meeting Certification: Reviewer Who Is Not A Federal Employee

I certify that in the review identified above, I did not participate in an evaluation of any proposal: (1) from an offeror where I am a full- or part-time salaried employee or where I am negotiating for such employment; (2) from an offeror where I have received or could receive a direct financial benefit in relation to the proposal under review or have received or could receive a financial benefit from the offeror or principal investigator valued at \$10,000 or more per year that is unrelated to the proposal under review; (3) submitted by, or involves in a major professional role, a close personal relative, a member of my household, or professional associate, or if such person receives financial benefits from or provides financial benefits to an offeror; or (4) in which I had any other interest in the proposal that is likely to bias my evaluation of that proposal. If there was an appearance or real conflict of interest, I recused myself from the review meeting evaluating the proposal, or was granted an appropriate waiver.

#### CERTIFICATION

Consistent with my understanding of potential consequences, including the prospect of penalties for falsification, concealment, fraud, and other actions as authorized by US Code Title 18 chapter 47 section 1001 (<https://www.gpo.gov/fdsys/pkg/USCODE-2011-title18/pdf/USCODE-2011-title18-partI-chap47.pdf>), I fully understand the confidential nature of the review process and certify that in the review above I did not participate in an evaluation of any proposal with which I knowingly had a conflict of interest unless an appropriate waiver was granted.

Signature: \_\_\_\_\_

PI Lastname, Firstname M

Printed name: \_\_\_\_\_

Electronically signed by \_\_\_\_\_ [Lastname, Firstname M]

on \_\_\_\_\_ (Date and Time)