

NIH POST-REVIEW CERTIFICATION REGARDING CONFLICT OF INTEREST FOR
FEDERAL EMPLOYEES WHO ARE REVIEWERS* OF APPLICATIONS FOR NIH GRANTS,
COOPERATIVE AGREEMENTS, AND FELLOWSHIPS

(*Reviewers who are Federal employees and are serving in their official Federal capacity)

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 Applications for NIH Grants, Cooperative Agreements, and Fellowships
(Federal Employees)**

The NIH peer review system relies on the professionalism of each reviewer to identify any conflict of interest (COI) or the appearance of 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 grant applications, cooperative agreements, and fellowships are based on federal regulations ([42 CFR Part 52h](#)) and presented in detail in NIH Guide Notice [NOT-OD-13-010](#), as clarified and revised in NIH Guide Notices [NOT-OD-21-005](#) and [NOT-OD-21-019](#).

At the conclusion of the Scientific Review Group (SRG) meeting, you must certify on the *post-meeting* Conflict of Interest Certification below that you recused yourself from the review of any application where your participation would have constituted a COI or the appearance of COI. In addition, the NIH may have determined that a particular situation involves a COI or the appearance of COI and required that you not be involved in the review of the application(s) in question.

Federal employees participating in NIH peer review as part of official duties are subject to a comprehensive set of statutes and regulations governing their conduct, in addition to NIH policy regarding their selection and use in the peer review process. A Federal employee serving as an NIH peer reviewer is responsible for obtaining any clearance required by his/her employing institute, agency, or office.

You **may not have been** on the SRG if:

- You are named on an application in a **major professional role** (Program Director/Principal Investigator[PD/PI], Senior/Key Personnel, Other Significant Contributor, Project/Site/Core Director collaborator, consultant, sponsor, mentor, or conference organizer).
- You are a member of an NIH Advisory Council/Board.

- You have a direct financial interest: you or your close family member would receive a direct financial benefit if an application is funded.

You **may have been** on the SRG but may not have reviewed certain applications, and **must have left the room** when:

- The PD/PI or anyone else on the application with a **major professional role** is from your organization or for multicomponent organizations, from your organizational component.
- You are planning a collaboration with anyone with a **major professional role** on the application.
- Within the past three years, you have published with, have collaborated with, been involved in the preparation of an application or proposal with, or have been in a mentoring relationship with any person on the application who has a **major professional role**.
- The application includes a letter of support or reference letter from you.
- You serve as a member of the Advisory Council/Board for the project under review or for a grant held by anyone playing a **major professional role** on the application.
- You have an indirect financial interest: you will have received more than \$10,000 (in the form of honoraria, stocks, or fees) from the PD/PI or the submitting organization over the period from one year ago through the end of the proposed project.

You **may have been** on the SRG and **may have reviewed** specific applications (not considered a COI) if:

- An application originates from an organization where you have collaborators, but your collaborators are not listed on the application.
- 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 a Federal Employee*

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.govinfo.gov/content/pkg/USCODE-2014-title18/pdf/USCODE-2014-title18-part1-chap47-sec1001.pdf>), I certify that in the review identified above, I did not participate in an evaluation of any application in relation to which I had a conflict of interest or the appearance of conflict of interest under applicable government ethics standards, including submissions: (1) from any organization with which I have an outside activity; (2) from any organization I serve or am seeking to serve as an officer, director, trustee or partner; (3) from any organization with which I am seeking employment; (4) from or evaluating a product of any organization in which I, my spouse, and/or my minor child hold, in aggregate, more than \$15,000 worth of stock; (5) that would affect my spouse's employment, compensation, or benefits; (6) submitted by or that involves in a major professional role a close relative, a member of my household, an individual or entity with which I have a business or contractual relationship, or the employer of my spouse, parent, or dependent child; or (7) from my former (within the past year) non-Federal employer. I recused myself from the review of any application if I had a conflict of interest or the appearance of a conflict of interest, unless a waiver or authorization, as appropriate, was granted by or in consultation with my ethics official and/or the NIH Deputy Director for Extramural Research, as appropriate. I fully understand the confidentiality of the review process.

Printed Name: _____

Lastname, Firstname M

Signature: _____

Electronically signed by _____ **[Lastname, Firstname M] via Internet Assisted**

Review on _____ **(Date and time)**