

**NIH Conflict of Interest Rules:  
Information for Reviewers of NIH Applications and 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 grant applications, and technical evaluation of R&D contract proposals, are based on federal regulations ([42 CFR Part 52h](#)) and presented in detail in NIH Guide Notices [NOT-OD-13-010](#) and [NOT-OD-14-069](#), as clarified and revised in [NOT-OD-21-005](#) and [NOT-OD-21-019](#).
- In order to participate in the review meeting, you must:
  - Review the appropriate set of rules below and screen the applications or proposals for real or apparent COI for yourself.
  - Notify the Designated Federal Officer/Scientific Review Officer *immediately*:
    - If you have a COI that prevents you from serving on that review panel (see below), or
    - If you identify an application or proposal with which you have a COI or appearance of COI.
  - Electronically certify (see [sample certifications](#)):
    - On the ***pre-meeting Conflict of Interest Certification*** that you have identified any application or proposal with which you have a COI or appearance of COI, prior to the peer review meeting.
      - If you do not certify the pre-meeting COI, you will not be able to submit critiques, criterion scores, or preliminary scores.
      - A recertification will be required if an additional conflict is discovered before the meeting or under other scenarios (meeting date changes and certifications reflect the previous date, etc.)
    - On the ***post-meeting Conflict of Interest Certification*** that you recused yourself from the review of any application or proposal where your participation would have constituted a real or apparent COI. In addition, the NIH may have determined that a particular situation involves a COI and required that you not be involved in the review of the application(s) or proposal(s) in question.
      - The post-meeting COI certification must be electronically signed at the time you complete your participation in the meeting.
- 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, federal employees participating in NIH peer review in any capacity are subject to NIH policy regarding their selection and use in the peer review process and must complete the Employment Certification for Participation in a NIH Peer Review Committee prior to serving.

## Review of Applications for Grants, Cooperative Agreements, and Fellowships

You **may not be** on the Scientific Review Group (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.
- You have a direct financial interest: you or your close family member would receive a direct financial benefit if an application is funded.
- You are a Federal employee not reviewing in your official Federal capacity, but you used official duty time or the resources or supplies of your employing agency beyond what is permitted under your employing agency's applicable de minimis use policies.

You **may be** on the SRG but may not review certain applications, and **must leave 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, participated 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.

## Technical Evaluation of R&D Contract Proposals

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

- You are named on a proposal in a **major professional role**.
- You are a member of an NIH Advisory Council/Board.
- 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 offerer organization.
- You are from an organization that is included as a subcontractor 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 or been involved in the preparation of an application or proposal) 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 Council/Board for a project under review.
- You have an indirect financial interest from the offerer organization 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 are a Federal employee not reviewing in your official Federal capacity, but you are using official duty time or the resources or supplies of your employing agency beyond what is permitted under your employing agency's applicable de minimis use policies.

## Grant Application and R&D Contract Reviews

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

- An application/proposal originates from an organization where you have collaborators, but your collaborators are not listed on the application or 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- or multi-authored publication with a person with a major role on the proposed project.