

HHS RAC Conflict of Interest Policy

Piloted AY 19-20; Reviewed and Formally Adopted 4/14/20

Purpose:

The below guidelines are designed to address and reduce real or perceived conflicts of interest related to internal funding and award decisions made/informed by the HHS Research Advisory Committee (RAC) and HHS Associate Dean for Research (ADR).

Background:

HHS RAC members advise the ADR about a number of matters including the use of resources, research policies, and researcher needs. They also review internal grant applications and serve as the selection committee for HHS Research Excellence Awards (3 categories: Junior Research Excellence, Senior Research Excellence, and Community Engaged Scholar).

The ADR reviews internal grant applications and award nominations and participates in discussion but does not provide a formal rating/vote. For HHS Faculty grants and Top-Off Grants, the ADR makes final decisions regarding funding.

For HHS Graduate Research Assistantship (GRA) awards, the RAC's ratings (averaged across reviewers) are shared with the Associate Dean for Graduate Programs and the Dean who ultimately make funding decisions.

Nominees for Research Excellence Awards are solicited from all faculty in HHS. Nomination materials are shared with RAC members who then vote for the individual they believe is most deserving of the award. The nominee with the majority of votes receives the award. In the event of tie, a spin off vote occurs just among those tied for first. If the spin off results in another tie, the ADR acts as the tiebreaker.

Overarching principles:

1. In order to maintain an active, well-informed RAC, it is important to not disincentivize membership by undermining the potential for internal funding or research recognition. Therefore, members of the RAC are eligible and encouraged to seek internal funding where appropriate.
2. Neither RAC members nor the ADR should have the possibility of unduly influencing the outcome of decisions that could potentially benefit them.
3. Likewise, it is important that the ADR maintain a working research program. Therefore, in those instances where the ADR is a collaborator on a submission s/he will refrain from deliberations.

Guidelines on eligibility:RAC members are eligible:

- a) to be nominees for Research Excellence Awards and in such a case would be recused from reviewing/voting on nominees for the same award category as further described below.
- b) to apply for all HHS funding mechanisms, but will be recused from the review of any mechanism for which they apply as described in more detail below

The HHS Associate Dean for Research:

- a) is NOT eligible to apply for any competitive HHS OOR funding in which he or she makes final funding decisions (e.g., Faculty Research Grants, Top Off Funds, etc)
- b) IS eligible to apply for non-competitive, eligibility-based funding such as Scholar's and International Travel. In this event, the HHS Dean will review the application to confirm eligibility and make the funding decision.
- c) IS eligible to apply for HHS GRA awards given final decisions are made by the Associate Dean for Graduate Programs and Dean
- d) is NOT an eligible nominee for HHS Research Excellence Awards during his/her term. (May be nominated for university research awards).

Procedures to avoid conflict:**General:**

- Early in the year, and prior to planning each review, the ADR will ask RAC members to disclose any possible conflicts of interest and plan accordingly.
- The ADR will disclose her/his potential conflicts of interest to the RAC and the Dean.
- RAC members may review and discuss applications from and nominations for faculty in their own department. Their content knowledge is often valuable for the review process. In doing so, RAC members should remember their role is as an objective reviewer not advocate for their colleague or department.

Specific Programs:Research Excellence Awards:

- RAC members who nominated a faculty member for a Research Excellence Award will not participate in the selection of a recipient for that category of award (Junior, Senior, or Community Engaged) given it may affect objectivity but may participate in the selection of a recipient for other categories of awards given they are different competitions.
- RAC members who are nominated for a Research Excellence award will not participate in the selection of a recipient for that category of award (Junior, Senior, or Community Engaged) but may participate in the selection of a recipient for other categories of awards given they are different competitions.

HHS Faculty Research Awards, Top Off Funds, or other TBD Competitions for Funding:

- If a RAC member applies for an HHS OOR funding mechanism (as sole or co-investigator), he or she must recuse themselves from the entire review of the mechanism. The ADR will try to identify an appropriate substitute if needed. For example, if a RAC member applies for Top-Off funding, she will not review any Top-Off Applications. RAC members may review applications on which they are named as an expert advisor as long as they would not benefit financially (i.e., be paid salary via the award).

HHS GRA Funding:

- If the ADR applies for or could benefit from an application submitted by someone else (e.g., is a co-investigator on a project for which the GRA is being requested), the most senior eligible RAC member (i.e., the member with the most years of prior service on the committee with no conflicts of interest) will manage the review process. She or he will collect the ratings from all RAC members and collate them with assistance from the Assistant Dean. Once summarized, they will be shared with the ADR. Thus, the ADR will be blind to who made specific ratings. The merits of specific applications will not be discussed. Rather, the group will look at the spread of scores, and simply recommend which tiers should be funded—typically identifying a top-tier and a second-tier based on the ratings and available funds.
- If a RAC member applies, he or she will be recused from reviewing all HHS GRA applications. A substitute may be identified.
- If a RAC member could in some way benefit from someone else's application (e.g., is a co-investigator on a project for which the GRA is being requested), they will not rate that specific application but will rate the others. They will be blind to how other RAC members voted.