

Conflict of Interest (COI)

Please read the COI guidelines in Fastlane under Proposal Review, under Instructions for Proposal Review.

Statutory COI:

A panelist cannot review a proposal, where he/she is "affiliated" with an institution involved in any way in the proposed project.

This COI is also called an institutional COI.

Definition:

"Affiliated" applies to the panelist, spouse or dependent child and the institution where he/she:

- Hold a position, are an employee, student, ...
- Are seeking employment
- Have a re-employment agreement
- Are serving on a Visiting Committee, Advisory Board or similar body
 - Conflict is with part of the institution that is advised by committee

You have an institutional conflict with a proposal when you...

- Own stock worth over the de minimus
 - \$15,000 or less in each proposal
- Serve as an Officer, Governing Board, Councilor, Trustee
 - Fiduciary positions
- Received payment* within the last year

** Includes an honorarium (in addition to travel expenses)*

Please be extremely careful about statutory COIs. (Not declaring it is a felony.)

Non-statutory COI:

You have an individual (non-statutory) conflict with a proposal which involves

- Business or professional partner
- Former employer (within one year)
- Present or past PhD advisor/student
- Collaborator within the past 48 months
- Co-editor within the past 24 months

"Catch All"

- Any other circumstances where your impartiality could be questioned

- Use "Reasonable Person Test" - Would a reasonable person with all the relevant facts question your impartiality?

NOTE:

Collaborative Research proposals:

You have a conflict of interest with the entire proposal if you have any type of institutional conflict with any institution or individual conflict with any person involved in any component of the collaborative proposal.

Please let the PD know of any COI situations you may not be sure about, and they will give you the "official ruling" on the situation.

All COIs must be declared.

Panelist must leave the room for all discussion of proposals with which they are conflicted.

Checking for COI:

- Please check the proposal carefully, including Biosketches (where you could be named as a collaborator), Budget Notes (that may include additional senior personnel, contractors, subawards, etc.), and Special Information/Supplementary Documentation (that includes List of Personnel, and may include Letters of Collaboration/Support, etc.)
- Do a Search in the PDF proposal file for your name to determine if you are named as a collaborator, potential member of an advisory committee for the project, etc. (It's OK if your work is referenced, but it's a COI if you are a co-author with any PI, co-PI, etc. within the past 4 years)
- Do a Search in the PDF proposal file for your organization/institution and check if there is a collaboration planned with your organization, there is a letter of collaboration/support from your institution, or somebody from your institution serves on an advisory board for the proposed projects.

NOTE:

If you suspect plagiarism or other form of academic dishonesty, please declare a COI with that proposal and contact the PD. The situation will be investigated by the NSF Office of Inspector General, but the allegation must not be mentioned during the proposal's evaluation. Remember that everybody is presumed innocent until proven guilty.

IMPORTANT:

Please provide your COIs via email to the Program Director moderating the panel.

CONFIDENTIALITY

All reviews and the panel summaries will be sent to the investigators verbatim (therefore, it will be important to provide useful comments). However, your name will not be disclosed. However, NSF must report the names of reviewers in response to the Freedom of Information Act request. The names of all panelists and ad-hoc reviewers are aggregated for the entire division, per year. (For example, in our Information and Intelligent Systems Division we use approximately 2,000 reviewers per year.)

You will be expected to keep all information regarding the proposals, the fact that you served on the panel, names of other panelists, all panelists' reviews and panel proceedings CONFIDENTIAL. It is fine to put this valuable service to NSF on your resume, but without specifying the program and the panel date. You can put on your resume that you served on a panel in the Information and Intelligent Systems Division in 2012 (i.e., the same granularity of information provided to the Freedom of Information Act.)

[Return to Information for Panelists](#)

Additional Resources

[GPG Potentially Disqualifying COI](#)