

## The NCI Peer Review Process: Conflict of Interest, Confidentiality, and Lobbying

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What do I need to know about conflict of interest?

### Definition: Conflict of Interest

A conflict of interest is a situation when you, a family member, friend, or other associate is in a position to gain or lose personally, professionally, or financially from an action that might be taken by NCI.

### Actual Conflict of Interest

An *actual* conflict of interest arises when a CARRA member has or would have official responsibilities (such as an NCI peer review) involving an outside organization with which the CARRA member has an affiliation or a financial interest (his/her own or an interest that would impact the CARRA member). Such a situation puts the CARRA member in the position of having an official responsibility or action that could directly influence his or her own financial interests or those interests that are imputed to him or her (financial interests of spouse, minor children, outside employers, and other entities).

### Apparent Conflict of Interest

An *apparent* conflict of interest arises when a CARRA member is involved in a particular matter involving specific outside parties (including individuals and corporate entities) and the circumstances are such that a reasonable person with knowledge of the relevant facts would question the CARRA member's impartiality in the matter.

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At the start and finish of your participation in peer review, you will be asked to sign forms confirming your adherence to conflict of interest and confidentiality policies. These are important documents.

Reference pages in this binder section describe several categories of peer review-related conflict. If you have any question at all about whether your participation in a peer review would constitute a real or apparent conflict of interest – after your initial scan of an application or later after a detailed reading – please immediately inform the Scientific Review Administrator (SRA) for that review. He or she can help make a determination about potential conflict.

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### What do I need to know about confidentiality?

CARRA activities involve both public and confidential information. While public information can be shared with anyone, confidential information must be treated carefully.

- Confidential information **cannot** be shared with anyone other than the NCI staff directly involved in that activity.
- Confidential information includes—
  - **Any** information submitted to NCI for review, such as
    - Grant applications
    - Contract proposals
    - Renewal/status reports
  - **Any** financial, professional, or personal information related to an individual or organization, such as
    - Salaries
    - Performance reports
    - Health information
  - Recommendations or discussions related to funding decisions by NCI

It is your responsibility to comply with all restrictions regarding confidential information. You must ask the NCI staff member you are working with to specify the confidential information of each activity. Also, do not hesitate to ask any other questions about confidentiality.

Confidentiality is often unknowingly violated when individuals seek assistance in understanding technical or scientific issues. Do not consult anyone outside the immediate project for technical assistance. Once again, you should contact the NCI staff person you are working with for direct assistance or referrals to other staff members.

Depending on the nature of a confidentiality breach, you could void a contract or create a protest that would severely delay or ruin a possible research project. If you think that you have breached confidentiality, alert your NCI staff activity contact immediately.

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Is it appropriate for CARRA members to lobby?

Lobbying is any activity intended to influence public officials, involving legislative or other policy decisions. Lobbying is prohibited during **any** CARRA-related activity, including local meetings and travel events.

The prohibition against lobbying includes the full timeframe of the activity, from the moment the activity starts until it is officially adjourned. For peer review meetings, no lobbying or lobby-related activities can take place between the time the meeting begins until it is adjourned.

### ***Also, as always:***

- CARRA members should not attempt to further their own agendas, or the agendas of the advocacy or constituency groups they belong to, while participating in CARRA-related activities.
- NCI is a government agency, and by law **cannot** lobby or influence Congress. As a private citizen, a CARRA member can choose to prepare a letter to Congress or other officials. In any communication to a public official, however, the CARRA member cannot in any way claim to – or appear to – represent or speak for NCI or for the CARRA program.
- The purpose of the CARRA program is to ensure that the advocate voice is brought to the National Cancer Institute. CARRA members are selected to help represent the patient and caretaker perspectives to NCI's research and related activities – not to be a representative of NCI or the CARRA program to other organizations or activities.

Adhering strictly to the standards and guidelines above has an additional advantage for CARRA members participating in peer review: the CARRA member is seen by scientists on the review panel as someone who is focused only on the merit of the proposal – not on other agendas. The result is increased respect for the CARRA member's participation, and in a broader sense for advocate participation in general.