



CONFLICT OF INTEREST POLICY FOR RESEARCH

Research Independence and Integrity:

NCAC seeks to identify and eliminate (or, at the very least, mitigate) potential personal or financial conflicts of interest on the part of our staff, consultants, and/or sub-recipients for research. To that end, all personnel named on a research project are required to review the definitions of "significant financial interest" and "conflict of interest" and are asked to complete a "[Conflict of Interest Disclosure Form for Research](#)" to certify in writing that they do not have any conflict of interest with respect to their duties on the project. This includes specifying that no immediate family members of project staff have any conflict or interests or any financial interests in the outcomes of the study.

All personnel will update the disclosure form annually and notify the project leader of any change in their conflicts of interest within 30 days of the change. If a conflict of interest is identified, these will be resolved by modification of one association or the other that is in conflict and no personnel will conduct any activities on the project until the conflict is appropriately mitigated or resolved.

If a significant interest is disclosed and upon review appears that it could give the appearance of a conflict of interest, the following management steps will be considered to mitigate the conflict:

- Public disclosure of financial conflicts of interests (e.g., when presenting or publishing the research; to staff members working on the project; to the Institution's Institutional Review Board(s), Institutional Animal Care and Use Committee(s), etc.);
- For research projects involving human subjects research, disclosure of financial conflicts of interest directly to participants;
- Appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the Financial Conflict of Interest;
- Modification of the research plan;
- Change of personnel or personnel responsibilities, or disqualifications of personnel from participation in all or a portion of the research;
- Reduction or elimination of the financial interest (e.g., sale of an equity interest); or
- Severance of relationships that create financial conflicts

The Research Project Director will be the responsible NCAC personnel for reviewing potential conflicts of interest.