

## **AOOS Conflict of Interest and Confidentiality Policies**

Adopted May 11, 2010

### **BACKGROUND**

As a general rule, AOOS is not intended to be an organization that regularly provides competitive grants for coastal and ocean monitoring. Rather, AOOS staff and the board have used the ocean observing community and stakeholders to identify needs for observations, models and products, worked with those investigators and entities that are most likely to be able to do the work, and included a suite of investigators into a comprehensive proposal that seeks funding through an open competition managed by NOAA. The final projects included in that comprehensive program are reviewed by advisory panels and eventually approved by the AOOS board.

As the program matures and certain components of the program become more established, the AOOS Board may decide to hold open competitions for certain components of the program, especially if there are a variety of investigators and entities which could do the actual work. Such is the case with the AOOS data management services, for which an open competition was held in 2010.

To guide advisory committee and review panel recommendations and final decision-making by the AOOS Board, the following conflict of interest and confidentiality policies were adopted by the Board on May 11, 2010. They are similar to ones adopted by the North Pacific Research Board and the North Pacific Fishery Management Council.

### **Conflict of Interest Policy for AOOS Board Members**

AOOS Board Members must recuse themselves from voting under three circumstances:

- 1) On approval of funding for a project for which the Board Member is a principal investigator or collaborator whose resume is included as a part of the project;
- 2) If the decision would have a significant and predictable effect on their financial interest;  
or
- 3) If the Board member believes he/she has a conflict of interest.

AOOS Board Members who recuse themselves from voting are still permitted to participate in discussion of the issue.

Examples of instances covered under 3) above include

- Current employment with the institution of the applicant receiving funds;
- Ownership of the institution's securities or evidence of debt;
- Known family or marriage relationship, if relationship is with investigator or collaborator whose resume is included as part of project; and
- Business or professional relationship with investigator or collaborator whose resume is included as part of project.

The organizational level of involvement in the institution described above would affect the potential for conflict, but should be determined by the individual Board Member. For example, if the Alaska Sea Grant Program Board Member, an employee of the University of Alaska, was

voting on a decision affecting funding for the University of Alaska, the potential for conflict should be noted, but the Board Member should determine if it is sufficient to result in recusal.

The AOOS Board may determine by majority vote if the Board Member does or does not have a conflict if the conflict is not clear.

### **Conflict of Interest Policy for AOOS Advisory Committee Members and Independent Reviewers**

AOOS Advisory Committee members and independent reviewers should consider potential conflict situations that may arise in their review of projects being considered for funding and in other activities related to their activities. An individual may serve on advisory committees despite a personal conflict, but must recuse him/herself from voting under three broad affiliations characterized below. The member may remain in the meeting for discussion purposes for all affiliations except item 2, bullet 4, wherein the member must leave the room during discussions and voting. Independent reviewers should recuse themselves from evaluating proposals if any of the following circumstances apply.

#### 1. Affiliation with an Applicant Institution or Institution Proposed to Receive Funding

- Current employment at the applicant institution or agency within the specific department of the applicant, or being considered for employment in that department
- Ownership of the institution's securities or other evidences of debt
- Current membership on a visiting committee or similar body that directly relates to the proposal.
- Current enrollment as a student at a department or school submitting a proposal if the proposed project will be of direct professional or financial benefit.
- Received and retained an honorarium or award related to work or activities in the specific department of the applicant within the last 12 months

#### 2. Affiliation with an Investigator, Project Director, or Other Person with Personal Interest in the Proposal or Project Proposed to Receive Funding

- Known family or marriage relationship, if relationship is with a principal investigator, collaborator (if curriculum vitae is included in proposal) or project director
- Business or professional partnership
- Past or present association as major thesis/dissertation advisor or thesis/dissertation student to one of the principal investigators
- Advisory committee member is a principal investigator on a proposal or is listed as a collaborator and a curriculum vitae is included in the proposal package (for this case only, the panel member must leave the room during discussion and voting on that particular proposed project)
- Reviewers who have submitted a proposed project may be called on to review other proposals, but only if there is a shortage of available reviewers.

#### 3. Other Affiliations or Relationships

- Interests of the following persons must be treated as if they were that of the Advisory Committee member or technical reviewer: any affiliation or relationship of member's spouse or minor child or sibling, of a relative living in the immediate household or of

anyone who is legally a partner of the member, that would be covered by the affiliations listed above

- Other relationship, such as a very close personal friendship or open antagonism that might tend to affect a member's judgment or be seen as doing so by a reasonable person familiar with the relationship

### **Confidentiality of Documents and Restriction on Contact Policy for AOOS Board Members, Advisory Committee Members, and Reviewers**

Following any open competition, unfunded project proposals will remain proprietary and confidential, though the title, author, requested funding amount, performance period, and proposal summary page will be made available to the public. Proposals and materials from unfunded proposals must not be copied, quoted or otherwise disclosed by committee and board members and any reviewers outside official review panels, advisory committee or board meetings. Committee and board members and reviewers must not retain copies of proposals in full or part, after completing the review process. They must not contact the originators of proposals under review concerning any aspect of the contents, without AOOS approval.

Once a project proposal has been approved by the AOOS board, the final approved version of the full proposal shall be made public.