



NORTH PACIFIC RESEARCH BOARD

"Building a clear understanding of the North Pacific, Bering Sea, and Arctic Ocean ecosystems that enables effective management and sustainable use of marine resources."

CONFLICT OF INTEREST POLICY NORTH PACIFIC RESEARCH BOARD

Revised Policy – May 2021

The **mission** of the NPRB is to develop a comprehensive science program of the highest caliber that will provide a better understanding of the North Pacific, Bering Sea, and Arctic Ocean ecosystems and their fisheries. NPRB's enabling legislation establishes board membership representing federal, state, fishery, academic, environmental, Alaska Native, and oil and gas perspectives. Panel members, peer reviewers and staff are selected for the insights they offer based on their experience and expertise. It is the duty of the Board to maintain the public trust in the full process of all aspects of funding decisions.

The conflict of interest (COI) policy serves to prevent actual and perceived conflicts through transparency and consistency with national standards for scientific proposal review. The board's intent committed to review this policy every three years.

The COI is applied in the following ways:

- A copy of the COI is provided to all individuals (Board, Panel member, peer reviewer or staff) involved in any aspect of funding decisions.
- Staff provide a brief review of the policy at the beginning of the first Board and panel meeting of the calendar year.
- **All participants are expected to declare all professional and personal relationships that would lead a reasonable person to question the neutrality of a decision, at the level of disclosure or recusal (Appendix 1).**
- Board, panel and staff members are provided a list of principal investigators associated with proposals under consideration for funding in order to identify all potential conflicts, including considerations of personal, organizational (Appendix 1) or collaborative relationships. Staff maintain records of all declared conflicts for three years.
- Proposal content, reviewer identities, peer review content and proposal discussions are confidential.
- Proposal details or ideas must not be used by any participant for personal gain or be made available to others outside of the programmatic notification process. ¹

¹ Proposals are considered proprietary and confidential until approved for funding by the U.S. Secretary of Commerce Board. Summary pages for all funded proposals will be made public as part of NPRB's online project search function. Proposals that indicate their willingness to be considered for co-funding opportunities may also be reviewed by the board and advisory bodies of funding partners with which NPRB has an established formal agreement for the purpose of co-funding proposals (e.g. Oil Spill Research Institute). The board and staff may also consult with NOAA and other federal and state agencies, the North Pacific Fishery Management Council, and other entities, as appropriate, who may be affected by or have knowledge of a specific proposal

- Board, panel and staff members sign a statement asserting that they have read, understand and agree to comply with the policy. Statements include an agreement to uphold confidentiality. Signed statements are kept on record for one year.

Declaration level (disclosure or recusal)

All participants are expected to declare all professional and personal relationships that would lead a reasonable person to question the neutrality of a funding decision. There are two categories of declaration – Disclosure and Recusal. Each category is defined below and further qualified in Appendix 1 & 2. It is up to the participant to self-declare for each set of program funding decisions at an individual proposal level.

Disclosure. Disclosure does not preclude review, discussion or voting. Participants should declare a *disclosure* if they fall under any of the below relationships or circumstances:

- member of an organization that has written a letter of support for a proposal.
- member or reviewer has a past association with an applicant as thesis student, thesis advisor, or member of a graduate student committee.
- adjunct, emeritus or visiting professor, consultant, or member of an advisory body at the proposing organization.
- employed by the proposing organization within past 12 months.
- received an honorarium or award from the proposing organization within last 12 months, for less than \$10,000.
- holds a current membership on a committee or advisory body of the proposing institution.
- part of a collaboration on a project, book, article, report, and/or paper within the last 24 months (includes collaboration on a proposal, paper, or project that has not yet been submitted or published).
- co-editing of a manuscript, compendium, or conference proceedings within last 24 months related to the proposal.

Recusal. Recusal precludes review, discussion and voting on the proposal in question. Recusal may also require leaving the room depending on the circumstances or relationships outlined below. Recused individuals may not discuss with any person the content or rating of that proposal during the review process or afterward. Participants should declare a *recusal* if they fall under any of the below relationships or circumstances:

a. Indirect Relationship: Participants may stay in the room, answer direct questions, and may not vote on the proposal (except on motions involving a slate of proposals) if they are/have:

- currently employed by or directly associated with the organization on the proposal.
- on the governing board of an institution or organization.
- own securities involved in the proposal.
- are currently employed with an organization associated with the proposal (including adjunct, emeritus or visiting professor, consultant, advisor, student, or similar

documented or formal relationship if involving significant financial interest²).

- currently being considered for employment or contractual arrangement with an organization associated with the proposal.
- have a formal or informal reemployment arrangement with an organization associated with the proposal.

b. Direct Relationship: Participants must leave the room, not engage in any discussion, and may not vote on the proposal (even if included on a motion involving a slate of proposals) if they are/have:

- a PI, co-PI, or a significant direct financial interest in a proposal.
- an unfunded collaborator or signed a letter of support.
- a family relationship (spouse, legal partner, significant other, child, sibling, parent, or person living in the member's or reviewer's household).
- a financial or professional partnership.
- current association as thesis student, thesis advisor, or member of a graduate student committee.
- substantial positive or negative relationship, such as a close personal friendship or exceptionally adversarial relationship.

Enforcement: The Board Chair is responsible for enforcement of the policy at the board level. If a conflict precludes the chair from carrying out the enforcement, the responsibility will fall to the Vice Chair and then to the Executive Committee. Panel chairs are responsible for enforcement of the policy during specific situations involving the Science Panel or Advisory Panel. Should there be disagreement about whether a conflict exists, the chair may decide based upon the guidelines in this policy or, if necessary, call for discussion and a vote to resolve the matter.

NPRB's Executive Director is responsible for enforcement of the policy in situations involving staff or peer reviewers. Should there be disagreement about whether a conflict exists, the Executive Director may decide based upon the guidelines in this policy or, if necessary, consult with the board and panel chairs to resolve the matter.

NOTE: NPRB has an established Memorandum of Understanding with the Alaska SeaLife Center (ASLC) and the National Oceanic and Atmospheric Administration (NOAA) as well as an office tenancy relationship with the Alaska Ocean Observing System (AOOS), and Alaska Sea Grant/University of Alaska Fairbanks.

²Significant financial interest is defined as anything of monetary value over \$10,000 including but not limited to salary or payment for services, equity interest or intellectual property rights.

Appendix 1: Organizational Units for Board Members

The organizations below are considered one unit. Non-listed organizations will be considered as needed.

- Alaska Department of Fish and Game
- Alaska SeaLife Center
- Oregon State University
- Prince William Sound Science Center
- U.S. Department of Commerce
- U.S. Department of the Interior
- University of Alaska
- University of California
- University of Washington

Appendix 2: Organizational units for Panel, Staff and Peer Reviewers

For organizations other than those named below, a similar unit designation will be identified as needed.

- Alaska Department of Fish and Game – division
- Alaska SeaLife Center – one unit
- Oregon State University – school
- Prince William Sound Science Center – one unit
- U.S. Department of Commerce:
 - NOAA Alaska Fisheries Science Center
 - NOAA Northwest Fisheries Science Center
 - NOAA Pacific Marine Environmental Laboratory
- U.S. Department of the Interior:
 - National Parks Service
 - U.S. Fish and Wildlife Service
 - U.S. Geological Survey
- University of Alaska Anchorage – school or college
- University of Alaska Fairbanks – school or college
- University of Alaska Southeast – school or college
- University of California - school or college
- University of Washington – school or college