



Institutional Animal Care and Use Committee (IACUC) Directive 20.0: IACUC Member Conflict of Interest

1.0 Directive Purpose

Federal regulations do not permit an Institutional Animal Care and Use Committee (IACUC) member to participate in the review of research in which he/she has a conflicting interest, except to provide information requested by the IACUC. This requirement helps to ensure that financial or other personal interests do not compromise the welfare of animals used in research or the objectivity of the IACUC review process. This directive describes when IACUC members are considered to have conflicts of interest and the procedures that must be followed for disclosure and IACUC review of research when such conflicts exist.

2.0 To Whom the Directive Applies

This directive applies to all IACUC members at Brown University.

3.0 Directive Statement

Conflicts of interest must not compromise the welfare of research animals or the integrity of the research review process. Federal animal care and use regulations do not provide flexibility in the management of an IACUC member's conflicting interest. Specifically, the regulations require that IACUC members not participate in the review of research in which they have a conflicting interest, except to provide specific information requested by the IACUC.

Financial relationships with entities involved in research and the financial interests these relationships create (e.g., equity interests, payments for services, etc.) may lead to financial conflicts of interest. The financial interests that are considered conflicting interests for IACUC members are the same as those for Investigators involved in research as defined in [Brown University Conflicts of Interest Policy for Officers of Instruction and Research](#). In brief, they must be related to the research protocol under review.

Conflicts of interest may also be non-financial, such as when an IACUC member is asked to review research in which he/she is participating as a member of the research team. Other "personal or professional" conflicting interests may include any of the following:

- An IACUC member (or member of his/her immediate family) is a member of the research team or advisory committee involved in the design, conduct, or reporting of the research
- An IACUC member (or member of his/her immediate family) is related to a member of the research team or advisory committee involved in the design, conduct, or reporting of the research
- Other conflicting interests that appear to preclude objective assessment, at the IACUC member's or Chair's discretion. Examples may include:
 - The Principal Investigator of the research protocol is the IACUC member's immediate supervisor or the supervisor of the member's immediate family member

- The IACUC member (or member of his/her immediate family) has an interest in competing research or is competing directly for resources such as funding or sponsorship
- A Principal Investigator (PI) submitting a protocol may make a written request that an IACUC member be excluded from review if the PI provides a written justification regarding why the IACUC member has a conflict.

Any IACUC member may recuse him/herself from review of a specific protocol for any reason, including a conflicting interest not specifically described by this directive. School, Departmental or Center affiliation is not automatically considered to be a conflicting interest, except as described above. Veterinary consultation is not considered a conflicting interest.

When a conflict of interest is identified, an IACUC member may not participate in any type of review of the specific research protocol conducted by the IACUC with which he or she has a conflict. This includes initial or continuing reviews, review of amendments, or other reviews (e.g., event reports, potential noncompliance, etc.). This requirement applies to reviews conducted by the convened IACUC and those performed by designated member procedures. Any member with an identified conflict of interest at a convened meeting will be asked to leave the room during the discussion and voting, unless asked to be present to answer questions or provide information to the IACUC.

Office of Research Integrity (ORI) staff are responsible for documenting that an IACUC member did not participate in the convened review of an IACUC protocol in which the member had a conflicting interest. IACUC minutes will record when the member left the room, with the reason noted as being because of a "conflict of interest." IACUC members out of the room due to a conflict of interest are not counted toward the meeting quorum. ORI staff are responsible for monitoring IACUC meeting attendance to ensure that quorum is maintained. If an alternate is present for the IACUC member with the conflict, that person can vote and be counted toward the meeting quorum for that review item only.

4.0 Definitions

Conflict of Interest: A financial interest or other opportunity for tangible personal benefit of an individual (or his/her immediate family) to exert a substantial influence on the individual's professional judgment in exercising his/her role as an IACUC member.

Financial Conflict of Interest: An interest of an IACUC member (or his/her immediate family) of monetary value that would reasonably appear to be affected by the research under review, or an IACUC member's interest in any entity whose financial interests would reasonably appear to be affected by the research. Financial interests may include (but are not limited to) salary or other payments for services (e.g., consulting fees or honoraria), equity interests (e.g., stocks, stock options, or other ownership interests), and intellectual property rights (e.g., patents, copyrights, and royalties from such rights).

Non-Financial Conflict of Interest: An interest, other than monetary, of an IACUC member (or his/her immediate family) in the design, conduct, or reporting of the research under review, or other interest that competes with an IACUC member's obligation to protect the welfare of the animals and potentially compromises the objectivity and credibility of the research review process.

Immediate Family: For the purpose of this directive, an IACUC member's spouse or domestic partner and children.

5.0 Responsibilities

All IACUC members are responsible for becoming familiar with and following this directive. IACUC members must report any COI to the ORI team as soon as possible.

6.0 Consequences for Violating this Document

Violation of this document may be considered a serious event of noncompliance that is reportable to the IACUC, funding and accrediting agencies, as well as other regulatory agencies. Violations of this document are a serious matter that may adversely affect both the ability to perform animal work and acquire funding sources.

7.0 Related Information

Brown University is a community in which employees are encouraged to share workplace concerns with University leadership. Additionally, [Brown's Anonymous Reporting Hotline](#) allows anonymous and confidential reporting on matters of concern online or by phone (877-318-9184).

The following information complements and supplements this document. The information is intended to help explain this document and is not an all-inclusive list of policies, procedures, laws and requirements.

7.1 Related Policies/Directives/SOPs:

7.2 Related Procedures: N/A

7.3 Related Forms:

7.4 Frequently Asked Questions (FAQs): N/A

7.5 Other Related Information: References:

- Animal Welfare Act (AWA, Public Law 89-544, 7 U.S.C.)
- Animal Welfare Act Regulations (AWAR, 9 CFR, Chapter 1, Subchapter A, §2.31 (d) (2))
- Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals

8.0 Document Owner and Contact

8.1 Owner: IACUC

8.2 Approved by: IACUC

8.3 Subject Matter Contact: Brown University Animal Research Compliance (ARC)

- Telephone: 401-863-3050
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9.0 Document History

9.1 Effective Date: May 4, 2018

9.2 Last Reviewed: May 3, 2024

9.3 Update/Review Summary: This document is not new; it was pulled out of the University Compliance Policy format and converted to a Directive May 2024.