



BROWN

Institutional Animal Care and Use Committee (IACUC)

Member Conflict of Interest Policy

Date of IACUC Review and Approval: May 4, 2018

I. 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 policy 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.

II. 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 policy, an IACUC member's spouse or domestic partner and children.

III. Policy & Procedures

A. 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.

- B.** 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.
- C.** 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.
- D.** 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 policy. 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.
- E.** 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.
- F.** 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.

G. Applicable Regulations

1. Animal Welfare Act (AWA, Public Law 89-544, 7 U.S.C.)
2. Animal Welfare Act Regulations (AWAR, 9 CFR, Chapter 1, Subchapter A, §2.31 (d) (2))
3. Health Research Extension Act of 1985 and Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals
4. National Research Council Guide for the Care and Use of Laboratory Animals, Eighth Edition. National Academy of Sciences, 2011
5. The Federation of Animal Science Societies Guide for the Care and Use of Agricultural Animals in Research and Teaching, 2010
Additional Information/Guidance
6. NIH Frequently Asked Questions: Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought (42 CFR Part 50 Subpart F).