

Administrative Panel on Biosafety (APB) Policy

Guidelines for APB Members on Conflicting Interest

Date: August 2024

POLICY

Any APB member must disclose a conflicting interest in a project to the APB Chairs or Biosafety Officer and must leave the room during the discussion of and voting on a project, except if the APB member is providing information at the APB's request.

DEFINITION OF CONFLICTING INTEREST

A conflicting interest of an APB member (or consultant) generally includes the following. The aggregate interest of the member (or consultant) and his/her immediate family is considered.

1. Participation in a project (APB member is listed as an investigator on the project or is a member of the research team);
2. Supervision of a project (APB member is an academic sponsor of the Principal Investigator, or a situation in which any investigator must report to or is under the professional supervision of the APB member);
3. Financial Interest when it reaches the level of a Financial Conflict of Interest (FCOI) as defined in [RPH 4.1 "Faculty Policy on Conflict of Commitment and Interest and Conflict of Commitment"](#).
4. Personal relationship with investigator (APB member has an immediate family relationship or other close personal relationship with the investigator);
5. Fiduciary relationship to sponsor (APB member serves as an executive to a company sponsoring the research or serves on the company's board of directors);
6. Other nonfinancial interests that may be conflicting interests, such as if
 - a. The APB member has an interest that he/she believes conflicts with the member's ability to review a project objectively; or
 - b. The APB member is in direct competition with the investigator for limited resources, funding, sponsorship, or research subjects, or the APB member is considered a personal or professional adversary of the investigators (for (b), the APB member must disclose the circumstances to the APB Chairs or Biosafety Officer for a determination of whether a conflicting interest exists).
7. Any other reason for which the APB member believes he or she has a conflicting interest with the research.

PROCEDURES FOR PROTOCOL REVIEW AND ATTENDANCE AT THE APB MEETING

1. APB members should review the list of protocols for an upcoming meeting with the conflicts issue in mind and should disclose a conflicting interest as soon as possible to the APB Chairs or Biosafety Officer.
2. If an APB member recognizes a conflicting interest in a project at the APB meeting, the APB member must inform the APB Chairs of the conflicting interest and leave the room during the discussion of and vote on the project.
3. If other APB members need to request information about the project from the APB member with the conflicting interest, the APB member may remain in the room during the presentation of the project. The APB member must then leave the room during the APB's discussion and vote.
4. Biosafety staff will record in the minutes a recusal based on a conflicting interest. The APB member will not be counted as part of the quorum for the project. (Should the quorum fail, the APB may not take further action or vote on the project.)

Note: An abstention may be acknowledged at any time when an APB member has any other concerns that in his or her own judgment warrant abstaining from review, deliberation, and voting on a project.