

CASE STUDY # 7: IC Directors with Intramural Laboratories Collaborating with Extramural Organizations

The Director of the NHLBI, Dr. Ford, has an intramural laboratory in the NIA. In her intramural capacity, Dr. Ford is collaborating with scientists at Johns Hopkins University. Dr. Grant, an investigator from Hopkins with whom Dr. Ford collaborates, submits an application in response to an NHLBI RFA.

Can Dr. Ford be involved in the review or funding of Dr. Grant's application?

Dr. Ford is recused from any matters related to Dr. Grant's application. In this particular situation, Dr. Ford is in conflict with the entire RFA and must be recused from any matters related to the RFA, including signing off on any funding decisions for any of the applications in response to this particular RFA.

For official documentation, who approves in cases where Dr. Ford is recused?

As with any IC Director conflicts, all signature and actions for grants resulting from this RFA must be sent to the DDER for action.

What about other applications that Hopkins submits that are assigned to the NHLBI? Is Dr. Ford in conflict with these applications?

Dr. Ford should discuss the collaboration with the NIH Director, NIH Deputy Director and/or NIH Deputy Ethics Counselor. Typically, the conflict is person-specific and limited to all of the individual collaborator(s). Dr. Ford provides a benefit to the collaborators, and not a direct substantial benefit to Hopkins. Therefore, Dr. Ford is not in conflict with other applications from Hopkins in which Dr. Grant is not a named participant.

Should Dr. Ford continue to establish research collaborations with PIs that are supported by or will submit applications to NHLBI?

Clearly, as an IC Director, Dr. Ford should carefully consider all collaborations into which she enters in her intramural capacity because of how these may impact her extramural responsibilities. Should her collaborations expand, more recusals may be necessary.