

CASE STUDY # 3: Scientific Officers on Cooperative Agreements

An extramural Program Officer has been significantly involved with a cooperative agreement, attending monthly phone conferences and annual meetings with the PIs. The cooperative agreement includes three primary institutions (with six investigators in close collaboration) plus a network of more than 50 investigators who use the core facilities at the primary institutions from time to time. This Program Officer has been designated as the Scientific Officer (SO) for the grant.

A second extramural HSA has been selected to handle the Program Officer responsibilities.

Should the SO recuse herself from programmatic oversight of any application submitted by the six PIs?

By virtue of her assignment as SO, the extramural staff member has taken on the scientific role for this cooperative agreement, beyond the administrative responsibilities of a Program Officer. This implies that she has substantial scientific involvement that, among other things, could result in publishing with the group. Essentially, she now is considered a collaborator and she should recuse herself from handling grants from the six PIs and other coauthors on the papers. In some cases, it may be necessary for the SO to assume some programmatic responsibilities as well. In such cases, a waiver must be obtained (see Manual Chapter 54815 [draft]).

Should she recuse herself from any application submitted by the primary institutions?

Even if substantially involved, the SO could serve as Program Officer for other applications from the PIs' institutions, unless another conflict exists.

Should the SO recuse herself from any application submitted by the 50 other investigators or their institutions?

Unless there is another conflict, this would not be necessary.

What should the SO's role be for initial or second-level review of the cooperative agreement application?

The SO cannot attend the closed session of study section review for competing submissions, nor can she attend the Council discussion for that application; only the Program Officer can attend, however. The SO could attend an open session of the initial review meeting, if one is held. Inasmuch as the SO would not have had any involvement with the development of the initial (type 1) application, she could attend the initial review meeting.