

# Conflict of Interest Procedures for Extramural NIH Employees in the Conduct of their Official Duties

Extramural Employee or IC Director

Goal is to enable employees to perform their official duties without compromising ethical standards or creating unmanageable COIs

Complete and submit appropriate annual Financial Disclosure form

For organizations with whom you have a personal **outside** interest, please contact your DEC.

Identify potential professional associations that may cause a COI **during the course of your official duties**. Examples include:

1. Organizations with whom you have a financial interest
2. Individuals and organizations with whom you are: currently collaborating, have recently published, or will have future collaboration.
3. Organizations with whom you have been recently employed
4. Individuals you have recently mentored or been mentored by

For IC directors:  
If you have an intramural laboratory in another IC, you should identify yourself as affiliated with that IC in all all collaborations and resulting activities (writing letters of recommendations, authorship, etc).

PLEASE REFER TO CHART FOR MORE EXAMPLES AND POSSIBILITIES

Refer to COI chart to determine who must be consulted or give approval for you to engage in the identified activity established above. Engaging in certain activities may generate situations where recusals are necessary.

Always consult with your supervisor before proceeding and/or obtain the needed approvals from the appropriate party as indicated on the Chart. Your supervisor most often will be the approving official. Working with your supervisor, you will establish any potential situations when recusals are necessary.

A number of individuals could be involved in approving your official duty activities and giving advice on how to manage COIs. This team will consist of your supervisor, the IC DEC and DEA. OER and the OD Ethics Office are also available if additional consult is necessary.

Establish a recusal document that explains the nature of the COI and the process for handling activities for which you are recused.

For those activities for which you are recused, an individual in direct line above you must assume your responsibilities (or that person must delegate to an appropriate other individual). In the case of an IC director, activities for which you are recused should be sent to the DDER for sign off.

Follow the recusal document during the conduct of all future business

Update recusal document as necessary when professional relationships are established or change.