



General Conflicts of Interest Guidance for Big Data Hubs and Spokes

COI Identification

1. Members of a HUB steering/advisory committee
 - Outside experts
 - NOT in COI with HUB lead institution
 - Potential appearance COI with fellow committee members
 - A member may serve on the panel and review a proposal involving a fellow member if an abundance of caution waiver documented in a diary note with concurrence of the local COI Official
2. Members of a HUB Executive Committee
 - PIs of the HUB institutions
 - COI with HUB lead institution
 - Collaborator COI with fellow committee members
3. HUBS with lead institution and separate subawardee institutions
 - Subawardee institutions have coi with lead
 - Subawardee institutions do not have a coi with other subawardee institutions
4. HUBS with collaboratives
 - Separate award to each institution
 - Institutions are not in COI with each other
 - However, individual PIs are in COI with other collaborative PIs
 - A subawardee of a collaborative institution is in coi with that collaborative institution
5. SPOKES proposal with HUB approval letter
 - NO panelists from any of the HUB lead institutions
 - Individuals from HUB subawardee institutions may serve on the panel but step out of the room when the proposal with their HUB lead is discussed
6. Individuals who received \$1,500.00 or less in travel/honoraria within the last year from any HUB institution may serve on the panel and review the proposal from the institution that paid them.

7. Individuals who are unfunded but appear on long lists of senior personnel (50 or more on the list) merely because they are interested in attending a workshop may serve on the panel but step out of the room when the proposal in which they are listed is reviewed unless an abundance of caution waiver is documented in a diary note with concurrence of the local COI official.
8. SPOKES proposal from University A
Proposal lists an individual from University B who will participate – University B is not involved in the proposal and University B receives no funds under the proposal. That individual may serve on the panel but must step out of the room when the proposal in which they are listed is reviewed.
9. SPOKES proposal from University A
University B will be contributing an individual (funded), services, computer time, etc. An individual from University B (other than the contributing individual) may serve on the panel and may review the proposal from University A provided an affiliate waiver from OGC is in place.

Approved OGC February 29, 2016

Conflict of interest for NSF resulting from participation in Big Data Regional Hubs and/or Spokes activities:

Participants in the Big Data Hubs and/or Spokes (BD Hubs/BD Spokes) may be asked to participate in NSF reviews in the future. Depending on their role and the structure of the Hub, their participating may create some conflicts of interest (COI) that should be reported to the Program Officer in charge of the review or panel. The attached document outlines the different kinds of conflicts of interest that result.

Note that there are two types of COI—1) conflicts with an institution and 2) conflicts with an individual.

A funded individual is one that receives funding of \geq \$1500 over the last year including honoraria and reimbursement. And unfunded individual is one that receives $<$ \$1500 over the last year including honoraria and reimbursement.

Rules 1-4 apply to reviewers to any NSF review panel

1. Rule 1 applies to unfunded representatives of the Big Data Hub steering committee and subcommittees (i.e. those receiving honoraria/reimbursement of $<$ \$1500 over the last year).
 - a. Such representatives DO NOT have an institutional conflict with any of institutions involved in a Hub.
 - b. Such representatives have an appearance of a conflict with other members of the steering council, but this potential conflict can be waived by NSF and the representative can review proposals involving their fellow committee members. Please inform your PD so they can get the appropriate waiver attached to your review
2. Rule 2 applies to members of the Hub executive committee (e.g. PIs, Co-PIs, Executive Directors) and other funded collaborators who lead and organize the day to day activities of the Hub.
 - a. Such members have individual COI with other executive committee members.
 - b. For single awardee Hubs (i.e. the NE Hub at Columbia), all members of the executive committee also have an institutional conflict with Columbia. For other Hub awardee structures, see Rules 3 and 4.
3. Rule 3 applies to Hubs with subawardee institutions (i.e. the MidWest Hub).
 - a. Funded individuals from the subawardee institutions have an institutional COI with the lead, UIUC.
 - b. Funded individuals DO NOT have an institutional COI with the other subawardee institutions.
4. Rule 4 applies to Hubs with collaborative institutions (i.e. the South and West Hub)
 - a. Individual PIs and Co-PIs have individual conflict with other PIs and Co-PIs across all the collaborative institutions.
 - b. Funded individuals have an institutional conflict with their collaborative institution but not others. For example, the South Hub consists of RENCi and GTech. An individual funded through RENCi's portion of the budget has an institutional conflict only with RENCi, not GTech)
 - c. Similarly for subawards, individuals funded via a subaward is has an institutional conflict only with the collaborative institution that funds the subaward from their portion of the

budget.

Rules 5-6 apply to reviewers to a BD Spokes review panel

5. Because Spokes proposals all collaborate with one Hub, no individual with an institutional conflict with any of the Hub institutions (i.e. UCSD, UW, UC Berkeley, UIUC, Columbia, RENCI, GTech) can participate in the Spokes panel.
 - a. Individuals from subawardee institutions may serve on the panel by must step out of the room when the proposal with their Hub lead is discussed. (Note that funded individuals from subawardee institutions have an institutional COI with the Hub, so cannot participate. However unfunded individuals from sub awardee institutions can participate).
6. Individuals who receive <\$1500/year in travel and honorarium from any of the seven Hub awardee institutions can serve on the panel for all proposals. This rule exists to prevent broad reviewers who might have had a little funding from the Hub awardee institutions (for any number of workshops, affiliated or not affiliated with the Hubs) from being excluded as reviewers.
7. Unfunded individuals who are listed as senior personnel at a Hub whose primary activity is participating in Hub events rather than leadership of Hub activities may review proposals but must step out of the room when proposals involving their Hub is discussed.
8. This rule applies to unfunded individuals involved in Spoke proposals where their University is not broadly committing resources (e.g. services, computer time) to the Spoke project. Such individuals can participate on the panel but must step out of the room when their proposal is being discussed.
9. This rules is in effect if there are Universities that are not an awardee or subawardee of a Spoke proposal but is contributing individuals, services, or computer time, etc. Individuals from that University who are not affiliated with the Spoke proposal can participate in the review for all proposals, but they must tell their PD so that the PD can get an affiliate waiver attached to their review.