

## **NRAO Conflicts of Interest and Confidentiality Policies**

Peer-reviewed proposals to use NRAO facilities for scientific investigations are the bedrock on which observing time is allocated to the community. The NRAO proposal review and time allocation process is described in detail in the *Guide to NRAO Proposal Evaluation and Time Allocation*. The process relies on the scientific community to evaluate proposals based on their scientific merit and to make recommendations regarding time allocation. The process must be robust and free of real or perceived conflicts of interest and must maintain confidentiality. This document details AUI/NRAO conflicts of interest and confidentiality policies associated with the proposal evaluation and time allocation process.

### **1 Conflicts of Interest**

For the purposes of the NRAO proposal evaluation and time allocation process, an individual is considered to have a potential conflict of interest if one or more of the following is true:

1. They are a PI or a co-I on a proposal under consideration.
2. They are affiliated with the same institution and department as the PI or a co-I on a proposal under consideration.
3. They are a spouse, partner or other family member of a proposal author.
4. They are a current or recent collaborator of a proposal author.
5. They are a former student or advisor of a proposal author.
6. They have any other reason to believe they cannot render a fair and impartial judgment on the scientific merit of the proposal.

In order to ensure that all proposals are treated fairly and without bias, such potential conflicts must be identified and declared. The response to a conflict depends on the role of the participant. The following participants in the NRAO proposal evaluation and time allocation process must declare conflicts of interest:

- Members of Science Review Panels (SRPs)
- NRAO staff responsible for technical reviews of proposals
- Members of the Time Allocation Committee (TAC)
- NRAO staff that support SRP and TAC meetings
- NRAO staff that participate in the Directors Review

#### **1.1 Members of Science Review Panels**

Science reviewers are external to NRAO and are subject to all conflict criteria enumerated above. The NRAO automatically captures conflicts of types (1) and (2) with the software tools used to manage the proposal review process. Members of SRPs are expected to otherwise declare those proposals on which they believe themselves to be conflicted. Conflicts of type (4) and (5) are in force if a given

reviewer has collaborated with the proposal author, or has been a student of the author, or the thesis advisor of the author, within the last five years. Conflicted panelists will not be allowed to access or review the proposal(s) in question. During the course of SRP discussions, conflicted panelists will not hear or participate in discussion of the relevant proposal(s).

## **1.2 Technical Reviewers**

Technical reviews are performed by NRAO staff. Technical reviewers are subject to all conflict types except for those of type (2). Proposals on which a technical reviewer is conflicted are assigned to another reviewer.

## **1.3 Members of the Time Allocation Committee**

Each TAC member is the Chair of one of the eight SRPs. As such, they are subject to the same conflicts of interest policy as other SRP members during the science review of proposals. During the face-to-face TAC meeting, rigorous enforcement of all conflict types is impractical. Nevertheless, conflicts of types (1) and (6) are always enforced. TAC members may otherwise collectively identify proposals on which a member is believed to be conflicted. A conflicted TAC member must remove himself or herself from the room when the proposal in question is discussed and recommendations made.

## **1.4 NRAO Support Staff**

NRAO staff support the SRP and TAC meetings. They are subject to all conflict types with the exception of type (2). If an NRAO staff member is conflicted during the course of an SRP discussion, they are prevented from hearing discussion of the proposal in question. NRAO staff members do not, in any event, participate in the discussion of the scientific merits of proposals under evaluation. If an NRAO staff member is conflicted during the course of a TAC meeting, they are subject to the same conflict criteria as TAC members.

## **1.5 Directors Review**

The Directors Review is intended to review the time allocation process each semester to ensure that all relevant NRAO policies and procedures have been followed, resulting in a fair and transparent allocation of telescope time. NRAO staff members participating in the Directors review are subject to all conflict types except for type (2). Any participant of the Directors review that has a potential conflict must withdraw from discussion of the proposal(s) in question. If such conflicts involve the Director, the Director, too, must withdraw from discussion of any proposal(s) in question. To ensure that appropriate consideration is given to Observatory programmatics and priorities, the Head of Observatory Science Operations will lead the Directors Review in lieu of the Director in such cases. If the Directors Review results in changes to the science program recommended by the TAC, such changes must be recorded. An account of the Directors Review, a description of the changes made to the science program, and the justification for

such changes will be prepared by the OSO Head and forwarded to the AUI President for review.

## ***2 Confidentiality***

Both NRAO staff and external members of the scientific community participate in the NRAO proposal evaluation and time allocation process. They will regularly be exposed to confidential information and proprietary data and ideas. The information, data, and ideas must be held in confidence and not disclosed to others. However, several exceptions apply according to the role of the individuals in question.

- Members of a given SRP may disclose and discuss the contents of any proposal assigned to them with one another, consistent with the conflicts of interest policy.
- Members of the TAC may disclose and discuss the contents of any proposal under consideration with each other, consistent with conflicts of interest policy.
- NRAO staff serving as technical reviewers may need to consult with each other to ensure a fair and complete assessment of technical elements of the proposal. Hence, technical details may be disclosed and discussed internally by relevant NRAO staff as needed.
- NRAO staff members that participate in the Directors Review may disclose and discuss the contents of any proposal under consideration with each other, consistent with the conflicts of interest policy.

The following individuals must comply with NRAO policies on confidentiality:

- Members of Science Review Panels
- Members of the Time Allocation Committee
- NRAO staff responsible for:
  - technical reviews of proposals
  - proposal management software tools and associated data bases
  - providing SRP and TAC support
  - scheduling approved proposals on NRAO telescopes
- NRAO staff that participate in the Directors Review of TAC recommendations

Proposals printed out for technical or science review must be disposed of by SRP and TAC members in a manner consistent with NRAO policy on confidentiality. Proposals and associated information (source conflicts, proposal rankings, pressure plots, etc.) printed out and made available to TAC members during NRAO TAC meetings must remain at the NRAO. NRAO staff will dispose of these materials in a manner consistent with NRAO policy on confidentiality.

### ***3 Compliance***

To ensure that all participants in the NRAO proposal evaluation and time allocation process are aware of, understand, and agree to comply with observatory policy regarding confidentiality and conflicts of interest, they will receive a copy of the policy for review prior to participation in the process. They are required to acknowledge receipt of the policy and agree to comply with its terms.