University of Colorado
Denver | Anschutz Medical Campus

IACUC
Institutional Animal Care and Use Committee

Subject:	**Conflict of Interest**
Source:	Institutional Animal Care and Use Committee (IACUC)
Effective Date:	06/09/2025
Replaces:	08/08/2022
Applies to:	Personnel involved in Research or teaching studies involving animals.
Reference:	Animal Welfare Act; PHS Policy on Humane Care & Use of Laboratory Animals. Guide for the Care & Use of Laboratory Animals

The Institutional Animal Care and Use Committee (IACUC) maintains oversight review for federally mandated rules and regulations with regard to animal research, ethics, misconduct and biomedical research for the University of Colorado Denver | Anschutz Medical Campus (CU Denver | Anschutz).

Policy Statement

The purpose of this policy is to define what constitutes a conflict of interest. Per this policy and consistent with PHS policy, no IACUC member may participate in the review or approval of an animal protocol, non-compliance issue, or report of concern in which the member has a conflicting interest, except to provide information requested by the IACUC; nor may a member who has a conflicting interest contribute to the constitution of a quorum. In this circumstance, the IACUC member will recuse himself/herself from the review and the vote.

To prevent a conflict of interest (COI), other reasons for recusal include:

- IACUC member is a researcher listed on the protocol
- IACUC member is listed on the grant that supports the protocol
- IACUC member works for the PI of the protocol
- IACUC member has a spouse/domestic partner, dependent children and/or immediate family members on the study team
- IACUC member holds significant financial interest in the project
- IACUC member has any other personal interest or role that leads the IACUC member, in their own best judgment, to believe that they lack impartiality

Ultimately it is up to the IACUC member to determine if there is a COI. If the IACUC member feels that they can give an unbiased review, then there is no conflict of interest. If an IACUC member feels that they cannot give an unbiased review, then there is a conflict of interest.

Here are some examples where there may or may not be a COI depending on circumstances:

- IACUC member collaborates with the PI on other research projects
- IACUC member is from the same department as the Principal Investigator being reviewed and feels he/she cannot provide an impartial vote
- IACUC member holds either a subordinate or supervisory role relative to the Principal Investigator being reviewed

The IACUC Office does not always know when there is conflict of interest and relies on the IACUC members to inform the IACUC Office of all conflicts as soon as they are identified.

Procedures

- If the IACUC member determines that they have a COI or the potential or appearance of a COI they must inform the IACUC Office as soon as possible.
    - IACUC members should also notify the IACUC Office if they have been assigned to the same review group as a conflicted protocol, even if they are not a reviewer.
- The IACUC Office will remove the IACUC member from the review of the protocol and reassign them to another protocol and/or review group.
- During the meeting, every effort will be made by the IACUC Office to place the IACUC member into the other review group than the one with the COI protocol. If that is not possible, the IACUC in
- During the final, full committee vote, the IACUC member must abstain from voting on the COI protocol.
- If the IACUC member is involved in a non-compliance issue, or report of concern for which that member is personally involved, then the IACUC member must let the Chair know of the COI at the beginning of the meeting. The IACUC member must then remove themselves from the meeting during deliberation on this report. The IACUC member may provide information requested by the IACUC.
- The IACUC member cannot be the only IACUC member to perform a site inspection that includes animals on their IACUC protocol(s).

Per regulatory requirements, failure to comply with this policy may result in notification of your funding agency (e.g. NIH) and regulatory agencies (e.g. USDA) that your research has violated federal and/or local policies regarding the humane use of animals. This notification may affect continuous funding of your animal-related research. Further, depending on the violation, you may be required to take additional training and/or your privilege to conduct animal research at CU Denver | Anschutz might be temporarily suspended or even completely revoked.