

March 18, 2026

Alison Singer
On behalf of
Independent Autism Advisory Committee
Via email asinger@autismsciencefoundation.org

Dear Ms. Singer:

You requested an opinion by Scholz Nonprofit Law on whether the members of the Independent Autism Coordinating Committee (I-ACC) (the “Members”) have a conflict of interest that would preclude their participation on the I-ACC or otherwise undercut the authority of the I-ACC.

By way of background, I am the principal attorney of Scholz Nonprofit Law, which focuses on tax and corporate issues for nonprofits and other social enterprises. Through our decades of experience in this field and personal experience in academia, my colleague, Laurie Hauber, and I have significant experience addressing conflict of interest issues and navigating duality of interests, particularly in the university context.

To prepare this opinion, we base our analysis and determination solely on the information contained in the I-ACC Annual Conflict of Interest Disclosure Forms (“Disclosure Forms”) that the thirteen Members completed between March 6 - March 12, 2026. We have not conducted an independent review to confirm the information provided in each Member’s Disclosure Form. We also have relied on the I-ACC website to understand the mission of the I-ACC and the role and expectations of each Member.

In the Disclosure Forms each Member disclosed (i) their employment and professional roles, including with pharmaceutical companies and “wellness” companies; (ii) research funding and grants related to autism research; (iii) financial interests that may relate to autism research, products, diagnostics, services, or policy; (iv) autism-related organizational affiliations and advocacy; and (v) whether the foregoing relate to I-ACC matters currently under consideration.

Based on our review of the I-ACC website, we understand that the I-ACC intends to coordinate work among non-governmental autism research funders to fulfill the Autism CARES Act objective of developing a coordinated scientific agenda for the autism community. Specifically, it seeks to bring:

“together accomplished scientific experts and stakeholders with research expertise, with the goal of accelerating scientific discovery, improving care, and for autism research that reflects the rapid progress and growing promise of autism science, and will report annually on the key advances in autism research across the translational continuum, including basic research on genes and cells, environmental causes, early detection, therapeutics, and services.” [I-ACC Press Release](#)

Furthermore, we understand that the role of the I-ACC is advisory only and the Members will not have any decision-making authority. Thus, to make our determination, our analysis focused on the fundamental concepts underlying “conflict of interest”: whether a Members’ financial, professional, or other personal interests may directly or indirectly affect – or have the appearance of affecting – the Member’s professional judgment in carrying out their advisory responsibilities of IACC.

Subject to all limitations set forth in this letter, for the reasons stated below, we conclude that none of the Members have an actual or apparent conflict that would necessitate removal from the I-ACC or limit their ability to fulfill their responsibilities to this advisory committee and no Member would be disqualified under the federal criminal financial conflict of interest statute, 18 U.S.C. § 208(a), or other federal statutes that relate to ethical conduct of Federal advisory committees, pursuant to 5 C.F.R. Part 2635.

Analysis

In our analysis we considered conflict of interest issues from the perspective of both a private nonprofit organization and from a federal advisory committee.

Analysis - Private Nonprofit Standards

As a non-governmental entity, I-ACC in practice will be subject to the conflict of interest framework applied to private nonprofit organizations, such as that attached as **Exhibit A** (a “Nonprofit COI Framework”). Under this framework, a conflict of interest may exist where a Member has a personal or professional financial interest, whether through employment, board membership, equity ownership, or other professional capacity, that could affect the outcome of a particular matter related to their service on I-ACC. As such, Members must disclose a potential conflict, I-ACC must evaluate those interests, and if a conflict exists, the Member(s) must recuse themselves from participation in the discussions and deliberations pertaining to the matter in question.

Based on our review of the current Members’ Disclosure Forms, we note that the Members have significant national expertise and connections within the field of autism research and advocacy. *Such expertise is relevant to the purpose of I-ACC and does not create an impermissible conflict. Instead, it creates obligations to disclose on an issue by issue basis and possibly recuse themselves from voting or participation in the discussion, consistent with I-ACC’s Conflict of Interest Policy.* For example, receiving private or public funding for research related to autism, such as through a position at a university or affiliated center, does not on its own create a conflict but must be disclosed and I-ACC must determine whether an actual or apparent conflict exists as specific issues arise for the committee. Such relationships are not illegal but they must be managed.

Analysis - Government Standards

In addition to analyzing the Disclosure Forms within a Nonprofit COI Framework, we considered the ethics rules for advisory committees of federal government agencies, including advisory committees of the Department of Health and Human Services (HHS) pursuant to the Federal Advisory Committee Act (FACA) 41 CFR § 102-3.30(a) and additional standards of ethical conduct regulations pursuant to 5 C.F.R. Part 2635.

Most relevantly, we focused on the criminal statutes prohibiting conflicted financial interests applicable to federal advisory committee members. *See* §18 U.S.C. 208(a). Under this statutory provision, Members are disqualified from participating "personally and substantially as a government employee through decision, recommendation, the rendering of advice, investigation, or otherwise in any particular matter in which to his knowledge, he, his spouse, minor child, partner, or organization has a financial interest." *Conflict of Interest Requirements for Federal Advisory Committees*, Administrative Conference of the United States, June 15, 1989. Per the statute, the disqualifying financial interest might arise from ownership of certain financial instruments or investments or it might derive from a salary, indebtedness, or any similar interest that may be affected by the matter. Disqualifying financial interests also arise in relation to an organization or entity for which a Member serves as officer, director, trustee, general partner, or employee.

Given I-ACC's intention to develop a strategic plan for autism research for nonprofit sector funders, this policy-setting function with broad applicability likely does not create a potential conflict of interest for Members. Based on the relevant statutory authority, federal guidelines and their interpretations, *where a particular matter of general applicability is one that involves an identifiable class of persons or entities rather than specific parties, there is no conflict. However, if a matter under consideration by the I-ACC would uniquely benefit a Member, under such circumstance the Member must disclose the potential benefit and recuse themselves from the discussion and deliberation regarding the matter.* For example, in establishing a research agenda, simply having research funding related to autism would not disqualify such Member's participation in setting the agenda.

Another notable consideration involves ownership of stock, options or other forms of equity. Based on the information provided in the Disclosure Forms, *certain Members hold equity interests in public and private companies that are unrelated to autism research and, therefore, do not create a potential conflict of interest.* One Member owns stock in a publicly traded pharmaceutical company that currently has an active trial related to autism treatment. *Such interest is too inconsequential to affect the integrity of his role on the I-ACC and does not present a potential conflict.* One Member, Matthew State, has an equity interest as the founder of Mreza Therapeutics, a company that focuses on using protein interaction data to develop targeted therapies for genetic forms of autism, intellectual disability and epilepsy. *While this does not present a conflict in the primary functions of the I-ACC, he would need to recuse*

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himself from any discussions about directing funding to such therapies. Another Member, Tom Insel, is the co-founder of Grey Matter, a venture platform investing in companies that improve access to care for underserved populations, including investments in autism startups. He does not have an equity interest in this company, nor is he involved in the company's autism related investments. *Similar to Mr. State, while the company's investments currently do not create a conflict of interest for Mr. Insel, because of his affiliation with Grey Matter, he would need to recuse himself from discussions where Grey Matter could directly benefit with respect to their autism related investments.*

Finally, as noted on the Disclosure Forms, several Members receive honoraria and or reimbursement for travel expenses for a range of speaking engagements, such as academic and other conferences, and grand rounds. We understand these speaking engagements are on topics within the Member's discipline or area of expertise and not because of their service on the I-ACC and, thus, *such compensation does not pose a conflict of interest.*

Conclusion

Whether analyzed through the lens of private nonprofit conflict of interest guidelines, such as the one to be adopted by I-ACC, or through the FACA framework, we have determined that none of the Members have an impermissible conflict with fulfilling their obligations to I-ACC. However, to maintain the integrity of I-ACC's work it will be essential that the Members comply with the I-ACC Conflict of Interest Policy, including disclosure and recusal as required. The Members appropriately acknowledged in their Disclosure Form their responsibility to promptly notify a designated Member or designee of any changes to their financial or professional interests that create a conflict of interest and their intentions to comply. A Member must then disqualify themselves from participation in all matters that specifically and uniquely affect their financial interests.

Please let us know if you have questions or seek additional information on any aspect of our analysis. The determinations expressed in this letter are limited to the matters set forth above, and no opinion may be inferred or implied beyond the matters expressly contained in the letter.

Sincerely,



Melissa Auchard Scholz

SCHOLZ NONPROFIT LAW, LLC

cc: Laurie Hauber