

July 1, 2009

Dear Colleagues,

It has long been the University's policy to require officers of instruction and officers of research to file an annual conflict-of-interest disclosure form. The disclosure requires officers to provide information about outside financial interests and activities that relate to an individual's professional activities at Columbia, including research, University administration, and other activities. It is of utmost importance that you complete your annual conflict of interest disclosure form accurately and fully.

Revised Form

The annual disclosure form for officers of instruction and officers of research has now been revised (and renamed the "Financial Interest Report"). With respect to research, the revised disclosure implements the new University-wide Policy on Financial Conflict of Interest and Research. With respect to other University activities, such as procurement and other administrative activities, the updated questions reflect current requirements. And, as those of you in the College of Physicians and Surgeons know, P&S faculty are asked additional questions that relate to conflict of interest with respect to medical education and clinical care.

Process for Filing

The process for filing the disclosure form will remain the same. Shortly before the anniversary of the filing of your last disclosure form, you will receive an email message with instructions for filing the annual disclosure through the on-line Rascal system. If you have not previously filed a disclosure form (or have not filed a form in the past year), you will need to do so through the Rascal system at www.rascal.columbia.edu/coilogin.html. After your first filing, Rascal will remind you by email on an annual basis to file a new form. Under the University's policies, you also need to update your form throughout the year, whenever your financial interests or activities change, and this can be done through Rascal as well. Finally, because of the recent implementation by P&S of its Conflict of Interest Policy Regarding Education and Clinical Care, P&S faculty who have not yet filed a Rascal disclosure form this year must do so now, as set forth on the P&S Academic Affairs website at <http://www.cumc.columbia.edu/faculty/COI>. Thereafter, the process will be as described above, with annual email reminders through Rascal.

We are continuing to enhance the University's conflict of interest disclosure process and to improve the technology through which forms are filed. To the extent possible, we have sought to limit the number of forms required. However, certain officers of instruction or research, including those with significant administrative responsibilities, may need to file a separate form concerning their administrative responsibilities. In addition, as is currently the case, those conducting human subjects research will continue to be required to file a separate, project-specific form for each project.

Training and Resources

A new online training module concerning the new Policy on Financial Conflict of Interest and Research is now available in the Rascal Training Center at <https://www.rascal.columbia.edu>. If you have questions about conflict of interest and research, please visit the research compliance

conflict of interest page at <http://www.researchcompliance.columbia.edu>, email research-compliance@columbia.edu, or call the Office of Research Compliance and Training at 212-851-1996. For questions about the P&S Policy on Conflict of Interest in Clinical Care and Education, visit <http://www.cumc.columbia.edu/faculty/COI>, or call the P&S Office of Academic Affairs at 212-305-4601. Finally, for questions about other conflict of interest issues, please contact your dean's office.

Sincerely,
Alan Brinkley
David Hirsh