



Cornell University
Office of
Research Integrity and Assurance

395 Pine Tree Road, Suite 320
Ithaca, NY 14850
Phone: 607-255-6439
Fax: 607-255-0758
www.oria.cornell.edu

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Dear Colleagues:

We are writing to inform the Cornell Community about the implementation of the University's recently updated policies regarding financial conflict of interest (fCOI) as it relates to research. This implementation is now beginning under the oversight of the newly constituted campus-wide fCOI Committee.

As previously communicated to you, these changes in Cornell's approach to managing fCOI are the result of recent audits and reviews by the NIH and the NSF Inspectors General and several internal Cornell audits, all of which found that the University was not in full compliance with federal regulations regarding the identification and management of financial conflicts of interest related to research. Those federal regulations have recently become even more stringent.

While the federal regulations define many of the details of our approach to handling research-related fCOI, the University would be expected by its many stakeholders and our Board of Trustees, even in the absence of external regulations, to identify and properly manage all situations when the personal financial interests of its researchers intersect with their Cornell activities. Certainly we believe that it is essential in an increasingly transparent world that Cornell research not be impugned by any such conflicts. We also believe that the value of protecting the integrity of Cornell research and researchers cannot be underestimated.

The University's goal, and charge to its newly created fCOI Committee, is to balance the freedoms and entrepreneurial spirit of the faculty with established federal reporting requirements for sponsored research, bearing in mind public perceptions of situations where fCOI might be a real or perceived influence on research outcomes. We intend to do our best to meet the new regulatory requirements while fully supporting and respecting the activities of our colleagues involved in the commercialization of Cornell research and other related entrepreneurial pursuits.

The fCOI Committee, whose voting members consist of faculty listed on the COI website, has devoted much time and thought to recognizing and understanding the situations wherein such real or perceived financial conflicts might arise. The Committee has also tried to simplify and streamline its approach to managing fCOI situations with minimal intrusion into the financial circumstances of the personnel and entities involved. The Committee is also bound by strict confidentiality in every aspect of its work.

We trust that all members of the University community, who each have a clear obligation to abide by the policies and guidelines disclosed herein governing fCOI, will take the time to familiarize themselves with the new policies.

Signed:

Handwritten signature of Robert A. Buhman in black ink.

Robert Buhman
Senior Vice Provost for Research

Handwritten signature of Bruce Ganem in black ink.

Bruce Ganem
Chair, fCOI Committee