

**\*\* High Priority \*\***

June, 11, 2008

TO: School of Medicine Full-time Faculty

FROM: Edward Miller, M.D.

SUBJECT: An Important Message on Unreported Conflicts of Interest

Dear Colleagues:

Moving ideas from discovery to the patient's bedside requires effective and responsible partnerships among academia, government and the private sector. Transparency concerning relationships with industry is essential to retaining the public's trust in our research, education and clinical care.

As the renewal of appointments for the 2008-2009 academic year is fast approaching, I'm reminding you of your obligation to report outside activities and interests to your department directors and to the dean's office in accordance with the School of Medicine's policies on conflict of interest and commitment. There also are federal requirements relating to possible conflict of interest in connection with federally-sponsored research. The policies, details of reporting requirements, citation to the federal regulations, and our online reporting system, called eOPC, are available via the Office of Policy Coordination (OPC) Web site, <http://www.hopkinsmedicine.org/Research/OPC/index.html>. The School launched eOPC a year ago to allow you to report outside activity and interests quickly and easily and to amend your reports. In fact, reports have doubled since the launch of the system. The system is being enhanced so you can report at the time of annual appointment renewals and as circumstances change.

You also should be aware of departmental and divisional disclosure requirements. If you are in doubt about what must be reported or if you have any questions, contact OPC or err on the side of complete disclosure.

The failure to disclose properly has resulted in heightened scrutiny. Congress, the press and the public increasingly are insisting on full transparency and accountability in our stewardship of federal funds. In a June 4, 2008, letter to NIH Director Elias Zerhouni, U.S. Senator Charles Grassley criticized the NIH and Harvard Medical School in connection with the failure by three prominent physician-researchers to fully report their income from pharmaceutical companies. Senator Grassley's letter is at [http://frwebgate.access.gpo.gov/cgi-bin/multidb.cgi?WAISdbName=2008\\_record+Congressional+Record%2C+Volume+154+%282008%29&WAIQueryRule=%28%24WAIQueryString%29&WAIQueryString=%22Grassley%22+and+%22Zerhouni%22&WAIStemplate=multidb\\_results.html&Submit.=Submit&WrapperTemplate=crecord\\_wrapper.html&WAIStmaxHits=40](http://frwebgate.access.gpo.gov/cgi-bin/multidb.cgi?WAISdbName=2008_record+Congressional+Record%2C+Volume+154+%282008%29&WAIQueryRule=%28%24WAIQueryString%29&WAIQueryString=%22Grassley%22+and+%22Zerhouni%22&WAIStemplate=multidb_results.html&Submit.=Submit&WrapperTemplate=crecord_wrapper.html&WAIStmaxHits=40).

The June 8, 2008, front-page New York Times report on Senator Grassley's investigation into the researchers' failure to report their financial interests is at [http://www.nytimes.com/2008/06/08/us/08conflict.html?\\_r=1&hp=&adxnnl=1&oref=slogin&adxnnlx=1212952875-H97rsUhKxdAIZhPQPOdk5g](http://www.nytimes.com/2008/06/08/us/08conflict.html?_r=1&hp=&adxnnl=1&oref=slogin&adxnnlx=1212952875-H97rsUhKxdAIZhPQPOdk5g).

I recently authorized a review of the policy on conflict of commitment that may result in changes to the reporting process and requirements. However, the principles of transparency and accountability will not change; they will remain essential to the credible transfer of technology and to teaching and practicing evidence-based medicine.

Thank you for your attention to these very important policies.

Sincerely,

Edward D. Miller, M.D.  
Dean of the Medical Faculty/CEO  
Johns Hopkins Medicine