Publishing faculty's external relationships in VIVO, the Library-maintained researcher profile system

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Memorial Sloan Kettering Leaders Violated Conflict-of-Interest Rules, Report Finds

Memorial Sloan Kettering Cancer Center in Manhattan. The center announced an overhaul of its policies on Thursday after an outside review found that top officials repeatedly violated conflict-of-interest rules.  

As a result, Mr. Goodman said, “conflicts were allowed to persist without formal firewalls in place.”

Hospital leaders also did not always disclose to faculty and staff when they had relationships to companies whose research was being conducted at Memorial Sloan Kettering, Mr. Goodman said.

The policy changes that Memorial Sloan Kettering announced on Thursday include the creation of a board committee to focus on...
Conflicts of Interest (COI) system

- All Cornell employees must complete a conflicts statement on an annual basis.
- Must disclose all financial relationships outside WCM work.
- The Conflict of Interest Office may contact users with a determination of a disclosed relationship(s) or request additional information.

POLICY: You are required to update your Conflicts Survey any time you develop a new outside commitment and/or financial interest that is related to your institutional/WCM responsibilities or if there is a material change to an activity that you previously reported. WCM responsibilities are activities that are related to or arise from an area of Cornell expertise and activities.

Referenced Policy: 4.14 Conflicts of Interests and Commitment

SURVEY INSTRUCTIONS
- The survey consists of a few primary questions.
- Your answers will determine whether you are required to complete the Entities and related details sections in the survey.
- To save an in progress survey, click the Save button at the top right corner of the screen.
- To submit the survey, check the "I certify" box under the Certification section at the bottom of the page then click the Submit button.

EXAMPLES OF REPORTABLE INTERESTS
- Services for which you receive direct payment. Do not report WCM sponsored research support or payments received through WCM.
- Funded or reimbursed travel
- Honoraria or income from: seminars, lectures, serve on advisory committees or review panels. Honoraria from a US academic entity, "non-profit" entity, governmental agency, or professional society, only needs to be disclosed when the amount in aggregate exceeds $5,000 per year.
- Service as a consultant or an independent contractor
- Intellectual property rights (patents, copyrights, and an executive or officer in an Non-WCM or non-Cornell University entity royalties from rights)
- Equity Interests (e.g., stocks, stock options, or other ownership interests) EXCEPT income from passive investment vehicles, such as mutual funds and retirement accounts
- Salary received as an employee of an external entity (salary from a non-WCM or non-Cornell University entity)

PRIMARY QUESTIONS

Q1. Are you involved in the design, conduct, or reporting of any research at WCM?
   - Yes □ No □

Q2. Non-US Collaborators/Appointments/Funding and Other Support: Within the past 12 months, have you had a relationship with any entities that you have directly received any form of consideration including funding, compensation, or in-kind support from non-US entities (including governments, non-governmental entities, academic institutions and private foundations)?
   - Yes □ No □
<table>
<thead>
<tr>
<th>Group</th>
<th>Description</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Advisory/Scientific Board Member</td>
<td>Advisory/Scientific Board Member refers to a group of individuals who have been selected to advise a business regarding any number of issues</td>
<td>Scientific advisory board member, medical advisory board member</td>
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<tr>
<td>Consultant</td>
<td>Consultant refers to an individual who provides expert advice to a business or entity</td>
<td>Consulting on medical devices or pharmaceuticals</td>
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<tr>
<td>Leadership Roles</td>
<td>Leadership Roles refer to an individual with decision-making responsibility to an outside company</td>
<td>Board of directors, officer, trustee</td>
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<tr>
<td>Other Interest</td>
<td>Other Interests refers to miscellaneous financial interests not covered in other categories</td>
<td>Stipends, anything of monetary value</td>
</tr>
<tr>
<td>Ownership</td>
<td>Ownership refers to any financial stake an individual owns in any company</td>
<td>Stock options, equity interest</td>
</tr>
<tr>
<td>Professional Services</td>
<td>Professional Services refers to a service requiring specialized knowledge and skill usually requiring a license, certification, or registration</td>
<td>Expert witness, commissioned writing</td>
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<tr>
<td>Proprietary Interest</td>
<td>Proprietary Interest refers to ownership of intellectual property rights</td>
<td>Trademarks, patents, royalty income</td>
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<tr>
<td>Speaker/Lecturer</td>
<td>Speaker/Lecturer refers to an individual who conducts professional lectures, speeches, or presentations</td>
<td>Educational speaking engagement, company sponsored speaker</td>
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Legacy method for requesting conflicts info

- Not ideal as it requires a wait and the purchase of a “stamp”

Public Requests for Information

WCM is committed to overseeing the conduct of research in a manner that ensures the integrity of the research process and maintains the public trust and that of sponsors in the integrity and credibility of its faculty, its staff, and its research programs. Cornell's policy 1.7, Financial Conflict of Interest describes WCM's commitment and procedures related to the identification and management of real or apparent conflicts of interest that arise from the intersection of personal financial interests and research activities.

To comply with the Public Health Service (PHS) regulations on Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought [(42 C.F.R. Part 50, Subpart F) and Responsible Prospective Contractors (45 C.F.R. Part 94)], Weill Cornell Medicine will make available within 5 business days upon receipt of a request as described below, of information concerning Significant Financial Interest (SFI) disclosed to WCM that meets the following criteria:

- The individual for whom information is sought, is identified by WCM in the grant application, progress report, or any other required report submitted to the NIH as a senior/key personnel on an NIH grant or cooperative agreement for which a notice of award was issued on or after August 24, 2012;
- The SFI is still held by the senior/key personnel for the NIH-funded research project;
- WCM has determined that the SFI is related to the NIH-funded research; and
- WCM has determined that the SFI is a Financial Conflict of Interest.

If your request meets the conditions outlined above, please follow these instructions:
- Complete this [form](#) for each SFI for which you are seeking information. Incomplete forms will not be considered and will not be responded to.
- Please print the completed form, sign and send it by regular mail to:
  Conflict of Interest Office – Office of Research Integrity
  Weill Cornell Medicine
  575 Lexington Avenue, 9th Floor
  New York, NY 10022

[Weill Cornell Medicine logo]
Goal from the Dean

- Become more transparent about existing external relationships / conflicts
- Publish relationships in WCM’s two profile systems
  - VIVO (researcher profile system)
  - POPS (clinical profile system)

Hospital for Special Surgery’s “Industry Relationships” section of its profile system
Key roles involved

• Information Technologies
  • Director, Research Admin Computing
  • Project manager for Research Administration
  • Developers for VIVO (researcher profiles), POPS (clinical profiles)
  • Database administrators, research administration system and academic staff management system
  • Analysts, Research Administration and Faculty Data

• The Business
  • Director, Human Research Compliance
  • Exec Dir, Research Business Operations
  • Director, Environmental Health & Safety
  • Executive Dir, Clinical Trials
# Timeline

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<thead>
<tr>
<th>Milestone</th>
<th>Timing</th>
<th>Updated plan</th>
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<tr>
<td>Leadership approval</td>
<td>Nov. 2020</td>
<td>same</td>
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<tr>
<td>Conflicts Advisory Panel (CAP) approval</td>
<td>Nov. 2020</td>
<td>same</td>
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<tr>
<td>Development work</td>
<td>May - Jul. 2020</td>
<td>same</td>
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<tr>
<td>QA &amp; testing</td>
<td>Aug. - Oct. 2020</td>
<td>same</td>
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<tr>
<td>Initial communication to faculty</td>
<td>Dec. 2020</td>
<td>same</td>
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<tr>
<td>More communications</td>
<td>Aug. - Dec. 2021</td>
<td></td>
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<tr>
<td>Move to production</td>
<td>Apr. 2021</td>
<td>Jan. 2022</td>
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Demonstration
Possible outcomes

• Best case scenario
  - Improve patients’ confidence in their physicians
  - Provide a disincentive for faculty to make poor decisions
  - Help third parties to surface and effectively criticize bias in research
  - Sets a tone that this institution cares about conflicts and their effects on decision-making

• Some caveats
  - Transparency is a necessary but not sufficient condition for ethical action by physicians and researchers
  - Needs to be pushback for unethical behavior both from inside and outside the institution
  - We don’t want to create a CYA system which affords plausible deniability without accountability
Abstract

At Weill Cornell Medicine (WCM), all faculty members and staff are required to complete a Conflicts of Interest Survey at least once annually. These disclosures include the following types of external relationships: Advisory/Scientific Board Member, Consultant, Leadership Roles, Ownership, Professional Services, Proprietary Interest, and Speaker/Lecturer. Until recently, these disclosures of external relationships were not easily accessible by the general public. WCM began in January 2022 to publish all external relationships on its clinical (POPS) and researcher (VIVO) profile systems. VIVO is managed by the Samuel J. Wood Library. This change was made by WCM as part of a larger strategy of improving the transparency of its researchers' conduct. This is especially relevant at a time when the integrity of research is under greater scrutiny in society at large.