

FAQ

Dear MSPH Faculty/Researcher,

Based on a recent review of all CUMC Conflict of Interest policies, the following revisions have been made to the MSPH Conflict of Interest (COI) Policy to form a COI policy to address potential conflicts of interest in the area of education and service.

These changes are:

- **Annual disclosure:** the policy now states that some disclosed information may be made publicly available, replacing the statement that all information would remain confidential. This decision was based upon the fact that pharmaceutical and devices companies are making such information public, that legislation may, in the near future, require public disclosure of financial relationships and the increasing prevalence of this practice by peer institutions.
- **Consultation:** disclosure is now required for all commercial payment in any amount, removing the \$10k threshold for disclosure. This new “zero threshold” for disclosure is congruent with C.U.’s research COI policy and with the policies of peer institutions.
- **Speaker’s Bureau:** there is now clarification of the requirement that individuals must be fully responsible for any material they present.
- **Ghost writing:** (this practice is now described as “Ghost writing and ghost authorship”) and is specifically forbidden. Faculty and researchers are now required to notify journals, edit CVs, etc. to correct for uncredited commercial writers.
- **Compliance:** disclosure is required for renewal of annual appointments.

To view the revised MSPH COI policy, please use the link below:

<http://www.mailman.columbia.edu/faculty-staff/administrative-offices/faculty-affairs-human-resources/policies-procedures-and-tools>

Please remember to file your annual MSPH COI Disclosure available at:

<https://www.rascal.columbia.edu/>

HOW TO FILE YOUR CONFLICT OF INTEREST DISCLOSURE:

- Go to the Columbia Rascal Web Site: www.rascal.columbia.edu
- Click the 'Conflict of Interest' button
- Log in using your Columbia University ID (UNI) and password. [UNIs and their passwords are managed by Columbia University Information Technology (CUIT). Please call their help-line at 212.854.1919 if you have problems logging in.]
- If you have never logged into Rascal, you may be presented with a Personal Information page to complete. Fill in the required fields (marked in red) and save.
- Complete the disclosure (please note that guidelines and definitions are provided) by answering each question.
- Click the 'Certify' button at the bottom of the page

- Close your browser

NOTE: It is against University policy to conduct School business with third-party, non-Columbia e-mail accounts. This includes using an email account, such as Gmail or hotmail, as your de facto work e-mail, or even forwarding your Columbia e-mail to an outside e-mail provider. (See [full policy](#)). In keeping with this policy, all COI communication will take place via your Columbia University ID (UNI) e-mail. Further information and instructions on activating your UNI e-mail are available at:

<https://uniapp.cc.columbia.edu/acctmanage/activation;jsessionid=5F5F258C5D73B55BC61E41171F08DDA2?execution=e1s1>

FAQs for the MSPH COI Policy on Education and Service

NOTE: These FAQs are subject to changes/additions over time, reflecting more experience with the policy and evolving professional standards.

GENERIC FAQs

1. **Why is there a MSPH COI Policy on Education and Service (“MSPH COI Policy”)?** As of 2011, the MSPH COI Policy specifically addresses two critical areas particularly relevant to MSPH: education and service, while reinforcing the general principles set forth in University policies.
2. **How can I access the policy?** The policy is posted on the MSPH website: <http://www.mailman.columbia.edu/faculty-staff/administrative-offices/faculty-affairs-human-resources/policies-procedures-and-tools>
3. **How does our policy compare with those of other major academic medical centers?** The MSPH policy is comparable to recently developed policies at other higher education health research centers.
4. **Does this policy replace other COI policies?** No. This policy adds to the existing University COI policies set forth in the Faculty Handbook (2008), Appendices E, F and G. These other University policies address issues including COI in research, self-dealing, and other areas.
5. **How is the policy being implemented?** This policy is overseen by the Vice Dean for Faculty Affairs. The Vice Dean for Faculty Affairs will consult with the CUMC-COI Committee on an as needed basis.
6. **What is the role of Department chairs and other supervisors in oversight of the MSPH COI Policy?** Chairs and other supervisors are charged with maintaining institutional standards within their departments or other areas of responsibility.
7. **Does this policy pertain to faculty at the other CUMC schools – i.e., P&S, Dental, Nursing?** This policy pertains only to MSPH. Other CUMC schools will be implementing their own COI policies addressing education, and service and clinical care where applicable. These newly revised policies were developed in conjunction with each of the four schools of CUMC. The University policies on COI in research and other areas apply to all of CUMC.
8. **Under the MSPH COI Policy, who needs to file an annual COI disclosure?** All full- and part- time MSPH faculty and researchers must adhere to the policy and complete the annual disclosure.

9. **Is annual disclosure the only mandatory aspect of the MSPH policy?** No. Some commercially supported activities will no longer be permitted, as described in the revised MSPH COI policy.
10. **How do I file my annual COI disclosure form?** The disclosure form is filed in RASCAL (www.rascal.columbia.edu) under the module, "Conflict of Interest."
11. **What if questions on the disclosure form do not pertain to me?** You must answer all of the primary questions (yes or no). As of April 2012, two questions have sub-parts; for those questions (8 and 9), if you answer "No" to the primary question, you may skip the sub-part. For all "yes" answers, you must provide an explanation and additional information, as specified on the form. Definitions of the terms used in the form are posted on the RASCAL COI module.
12. **If I disclosed a Significant Financial Interest in response to one question, and the same interest also is relevant to another question, do I need to disclose the interest again?** You need to answer "Yes" to all relevant questions. Then, in the explanation that you include at the bottom of the form, you must make clear how the financial interest relates to all of the relevant Columbia activities. Thus, if the financial interest relates to sponsored research, service activities and education, you should explain the relationship with respect to each of these of these activities.
13. **Do I need to disclose salary or other payments I receive from Columbia-affiliated entities for clinical services performed on behalf of Columbia?** No, you do not need to disclose salary or other payments received for service on behalf of Columbia.
14. **What do I need to disclose if I or my spouse has a non-salaried appointment at Columbia?** All MSPH faculty/researchers with a Columbia appointment are required to file an annual COI disclosure, including those with a non-salaried Columbia appointment. However, a salaried MSPH faculty/researcher with a non-salaried spouse may answer "no" to the question about whether their spouse is *employed by* Columbia.
15. **What if I have already recently filed an annual disclosure form in RASCAL?** CUMC Policy requires that all MSPH faculty/researchers file an annual COI disclosure via RASCAL (form updated April 2012), regardless of when/if a disclosure form has been previously filed, as questions relevant to the policy were not included on the previous disclosure forms.
16. **Are there now 2 annual COI disclosures, one each for research and another for education/service/clinical care?** No. Most faculty/researchers will only need to submit one annual form for CU/MSPH. NY-P (or other hospitals) may also require filing a hospital-specific COI disclosure form for individuals with hospital appointments. Individuals conducting human subjects research will continue to be required to file a protocol-specific disclosure in addition to the annual disclosure.
17. **What will happen with my disclosed information?** Information disclosed in connection with the MSPH Policy will be reviewed by the MSPH Vice Dean for Faculty Affairs and the MSPH Office for Faculty Affairs for appropriate action. Correspondence will be archived in RASCAL. Information pertaining to other conflict of interest policies will be handled in accordance with existing COI procedures. Faculty responses to COI inquiries are deemed acceptable by fulfilling both of two criteria:
 - Responses to questions posed on behalf of the Vice Dean for Faculty Affairs are clear and complete;

- There is clear and believable separation between the disclosed commercial interests and his/her professional duties in education and service.

18. **Is my disclosure confidential?** As the 2011 revision to the MSPH policy states, some disclosed information may be made publicly available. This decision was based upon the fact that pharmaceutical and devices companies are making such information public, that legislation may require public disclosure of financial relationships and the increasing prevalence of this practice by peer institutions.
19. **Do I need to disclose relevant commercial income from my spouse?** Yes, that aspect of the policy has not changed. Commercial income from oneself or one's spouse will be reviewed for possible conflict for that individual's educational, service and clinical duties where applicable.
20. **What if I don't submit the annual COI disclosure form?** Non-submission is a breach of academic duties and may be subject to non-renewal of academic appointment. Also, a current annual disclosure form in RASCAL remains a prerequisite for submission of sponsored project proposals and IRB protocols.
21. **With respect to the MSPH Policy, is there oversight of COI for students?** The Office of Education provides oversight for COI involving MSPH students. Where relevant, oversight will be performed jointly with the Office of Education.
22. **Where can I obtain additional information?** For more information regarding the MSPH COI, contact the Vice Dean for Faculty Affairs. For additional information and links to the University's other COI policies, including COI in research, please visit the Research Compliance and Training website at: www.researchcompliance.columbia.edu or call 212-851-2898.
23. **How do I get help with RASCAL?** For RASCAL technical assistance, you can email rascal@columbia.edu or call the Rascal Helpline: (212) 851-0213. If you have never logged into RASCAL, you may be presented with a Personal Information page to complete. Fill in the required fields (marked in red) and save.

CONTENT FAQs

1. **What financial interests/revenues need to be disclosed under the MSPH COI Policy? Do revenues from consultation, presentations and committees need to be disclosed?** The requirement of disclosure pertains to financial interests in any Business related in any way to your clinical or teaching responsibilities at Columbia. For example:
 - Consulting income and Speaker's Bureau fees **must** be disclosed.
 - Income from a CME presentation **must** be disclosed if the presentation is directly commercially financed by a commercial source (or its agent). Faculty are responsible for the intellectual integrity of their presentations and materials, and thus are encouraged to identify the funding source for their external presentations.
 - Fees for medical-legal expert consultation **must** be disclosed.
 - Equity holdings **must** be disclosed if valued at or above the level of "Significant Financial Interest" – see definitions on the disclosure form.
 - Mutual funds do **not** require disclosure or review if they are managed by a third party, if the faculty member or members of his/her immediate family do not make investment decisions for the fund.

- Income from academic/governmental/non-profit service functions, such as serving in an advisory capacity and giving non-commercially supported presentations, does **not** need to be disclosed.
 - Income from personal activities that are completely unrelated to a faculty member's professional activities or identity does **not** need to be disclosed.
2. **Does reimbursement for travel expenses need to be disclosed?** Commercial support for travel expenses, if for legitimate professional activities, do not require disclosure. Commercial support of travel should be reasonable and of a modest standard (i.e., not lavish). Travel must be in accordance with Columbia's Travel and Entertainment Policy.
 3. **Can slides or materials generated by commercial entities be used in public presentations?** Slides, materials or data should be independent of commercial influence, except where prescribed by law (e.g. FDA requirements for the presentation of materials or data relevant to approval of drugs and/or devices prepared by commercial entities). Presentations using commercial sources must indicate those slides, tables, data or other materials that are provided by commercial entities or their agents.