



Member Societies

The American Physiological Society

American Society for Biochemistry and Molecular Biology

American Society for Pharmacology and Experimental Therapeutics

American Society for Investigative Pathology

American Society for Nutrition

The American Association of Immunologists

American Association of Anatomists

The Protein Society

Society for Developmental Biology

American Peptide Society

Association of Biomolecular Resource Facilities

The American Society for Bone and Mineral Research

American Society for Clinical Investigation

Society for the Study of Reproduction

Teratology Society

The Endocrine Society

The American Society of Human Genetics

Society for Gynecologic Investigation

Environmental Mutagen Society

International Society for Computational Biology

American College of Sports Medicine

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Federation of American Societies for Experimental Biology

---Quality Life Through Research---

March 25, 2008

Ada Meloy, Esquire
General Counsel
American Council on Education
One Dupont Circle NW
Washington, DC 20036-1193

Dear Ms. Meloy:

I am writing on behalf of the Federation of American Societies for Experimental Biology (FASEB), an organization comprised of 21 scientific societies collectively representing more than 80,000 biomedical researchers. FASEB has been proactively addressing the issue of conflicts of interest (COI) since 2005 and appreciates the opportunity to comment on ACE's "Working Paper on Conflict of Interest."

The working paper provides guidance to trustees, presidents, administrators, and faculty on institutional COI policies and practices, and the guidance covers a wide variety of institutions. Considering the broad scope, we agree that not one COI program would fit all of these institutions or components within a single institution. However, FASEB recommends that the institutional community continue to work towards harmonization of some elements of its policies and practices. Institutions would benefit from implementation of tested and effective practices. Industry and other external partners would have more clearly defined guidelines, allowing more efficient and transparent collaboration for the public good. Investigators would benefit from more consistent and clearer messages, particularly at a time of increased interdisciplinary research and collaboration between institutions.

While FASEB's work on COI focused on financial COI in biomedical research from the investigators' perspective, our principles are broadly applicable. Our major recommendations can be found in the COI Toolkit referenced in the ACE paper. FASEB promotes the principles of objectivity, transparency, and accountability as the basis for policies and practices. In addition to investigators, the Toolkit provides resources for institutions and other stakeholders. The basic precepts and considerations in the ACE paper provide a good resource for institutions and a link to the paper has been added to our Toolkit.

We applaud ACE's involvement in addressing this important issue and encourage further work with the institutional community and other stakeholders to promote more consistent policies and practices whenever possible.

Sincerely,

Robert E. Palazzo, Ph.D.
FASEB President