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Office of the President Harvard University Massachusetts Hall Cambridge, MA 02138 USA Fax: (617) 495-8550

Dear President Bok,

As you know, the Washington, D.C.-based Environmental Working Group (EWG) has raised very disturbing allegations about the conduct of Professor Chester Douglass of the Harvard School of Dental Medicine.

EWG has presented evidence to suggest that Professor Douglass misrepresented his graduate student's PhD thesis, which found an association between fluoridated water and an increased risk of osteosarcoma in young boys, a frequently fatal disease.

In response to the EWG allegations, the Harvard Medical School (HMS) and School of Dental Medicine (HSDM) earlier this month issued a short statement exonerating Professor Douglass of all charges of misconduct. The statement was a disappointment. It gave no explanation as to why the evidence presented was dismissed and Professor Douglass's behavior considered acceptable.

I am writing to urge a further review from your office, and a fuller and more open public accounting. This is not to urge that Professor Douglass's legitimate privacy interests be overridden, or to contend that any allegation of misconduct requires an expanded response. But EWG has made substantive, well-documented claims relating to matters of public importance and the use of public research funding. In this case, it seems to me that more is plainly required from Harvard than the HMS/HSDM statement.

The Environmental Working Group reported that Professor Douglass, in a written statement to the National Research Council panel investigating the safe drinking water standard for fluoride, cited his student Dr. Elise Bassin's thesis to support his claim of no significant association between fluoridation and osteosarcoma, when in fact the thesis contradicted this contention.

According to the EWG, at the time the NRC panel members did not have ready access to Bassin's thesis and were obliged to take Douglass's claims at face value.

There thus seems to be a serious question as to whether this communication delivered at a critical moment in the NRC's deliberation should be considered "intentional misrepresentation."

There is nothing in the HMS/HSDM statement that responds to the substance of this concern, and there is no way to know whether, or to what extent, the inquiry panel and standing committee on faculty conduct actually examined this issue.

Moreover, it is disturbing that EWG was never contacted by those reviewing the matter for HMS/HSDM. It is hard to see how a thorough investigation could have been conducted without contacting the organization that uncovered Professor Douglass's alleged misconduct and first raised the issue with Harvard.

As you have long noted, the intersection of corporations and universities poses grave challenges for the maintenance of universities' independence and best academic traditions. Professor Douglass is the editor of an oral care journal funded by Colgate-Palmolive, which raises further issues about his conduct in the matter -- and makes it all the more important that Harvard conduct a thorough review of this matter, and give a full public accounting.

The HMS/HSDM statement asserts that his editorship of the newsletter does not constitute a conflict of interest under university or federal guidelines. Considered on its own, this is quite likely true. Missing however from the HMS/HSDM statement was any sense of context -- that his ties to a major toothpaste company constitute a relationship that might give him incentive to, at least, shade findings related to the potential health risks of fluoride, and possibly to engage in far worse conduct, if the EWG allegations are correct.

The HMS/HSDM statement says that "the [review] committees did not examine and took no position on the question of whether or not there is a correlation between fluoride in drinking water and ostesarcoma." That seems to be the right posture. But it is precisely because the committees did not need to referee the underlying scientific dispute that they should have been able to issue a fuller and reasoned explanation of the basis for their conclusion, in the face of publicly available evidence to the contrary, that Professor Douglass did not engage in misconduct.

I look forward to your reply.

Sincerely,

Robert Weissman, '88-'89, HLS '95

P.S. I should add that I was quite pleased that the Corporation decided to call on your steady hand after the recent tumultuous times at the university, and that you saw fit to accept the transitional appointment.