



Conflicts of Interest Policy Update

Weill Cornell Medical College has updated its Conflicts of Interest (COI) policies for faculty, employees as well as those engaged in research at WCMC.

Why was this done?

Increasing partnerships between academia and industry present both opportunities for the advancement of science and health, but also the potential for financial conflicts of interest. In addition, financial interests held by both practicing clinicians and basic researchers have come under increased scrutiny, as substantial literature has shown that pharmaceutical and device industry gifts, meals and payments may impact clinical care and research.

In response, WCMC formed a Task Force to undertake a comprehensive review and assessment of the WCMC conflicts of interest policies and to identify and define areas of potential financial conflicts of interest for those involved in clinical care, teaching and research. The COI Policy Task Force consisted of members of the Conflicts Advisory Panel, the clinical and research community of WCMC, and representatives from senior administration, WCMC Office of University Counsel and the Offices of Research Integrity. The resulting policy changes were approved by the WCMC Executive Faculty Council, General Faculty Council, and the Dean's office.

WCMC CONFLICTS OF INTEREST POLICY UPDATES IN BRIEF

This is a brief summary of recent updates only. Links to full text of the policy as well as answers to Frequently Asked Questions about these policy changes can be found on the [WCMC Conflicts Management Office webpage](#). A full text of the COI policies can be found on the [Cornell University website](#). [Policy 4.14](#) relates to conflicts of interest and commitment but excludes financial conflicts related to research. [Policy 1.7](#) addresses financial conflicts of interest specifically related to research. If you need further information about these policies, please contact the Conflicts Management Office at (646) 962-8200 (Option #5) or conflicts@med.cornell.edu.

Participation in Speakers' Bureaus

Employees are prohibited from participating in external relationships commonly referred to as 'Speakers' Bureaus.' This includes any arrangement in which the outside entity has the contractual right to dictate or control the content of a presentation or talk, and/or the company creates the slides or presentation material and has final approval of the content and edits, and/or the employee is expected to act as a company's agent or spokesperson for the purpose of disseminating company or product information. Speakers Bureaus are distinct from CME-educational events, which are permitted under this policy. Please refer to the full policy and FAQ's for more details and clarification. (NOTE – Speaker's bureau events contracted prior to the date of this announcement and occurring before December 31, 2016 will be permitted in a 6-month transition period.)

Ghostwriting

WCMC representatives are prohibited from engaging in the practice commonly referred to as ghostwriting, or honorary authorship. This refers to the practice in which a manuscript is developed principally by a for-profit business directly or through a third party vendor such as a medical education company and then attributed to an academic researcher who did not contribute meaningfully. This policy does not refer to attribution determination. Further, this policy does not prohibit instances in which an author's own work is shared with an outside entity for purely editorial assistance. WCMC representatives are expected to follow the rules of authorship as defined by the International Committee of Medical Journal Editors.

Industry-Sponsored Meals in non-WCMC-Controlled Space

Employees are prohibited from accepting meals from external entities whose interests may represent an actual or perceived conflict of interest to the individual and/or institution. This does not include off-campus CME events in which it would not be reasonable to attribute individual consumption, e.g. large conferences featuring buffet-style meals. Meals associated with consulting activities or WCMC business may be allowable – please see full policy for details.

Industry-Sponsored Meals in WCMC-Controlled Space

Meals or drinks directly funded by industry are not permitted at non-CME events in WCMC-controlled space.

Gifts

Employees are prohibited from accepting gifts, of any variety or value, from external entities whose interests may represent an actual or perceived conflict of interest to the individual and/or institution. Gifts are defined as any remuneration not made in exchange for services rendered. Employees are, however, permitted to accept educational materials if the material does not include the logo or brand of the external entity. Educational materials, including academic journals, intended to promote the product(s) of the external entity are not permitted.

Industry or Vendor Representatives in WCMC-Controlled Spaces

Industry or vendor representatives visiting the WCMC campus must have a scheduled appointment with a WCMC representative. Industry or vendor representatives are prohibited from entering any patient care areas or at meetings and/or functions in which patient-specific information is discussed. Any literature provided by the industry or vendor representative, particularly those including a company or logo or brand and intended to market a particular drug or company, must be given directly to an employee and not left by the industry or vendor representative in patient areas. Industry or vendor representation refers to the physical presence of individuals or groups, representing for-profit, non-WCMC entities, including but not limited to, employees, officers and consultants of pharmaceutical manufacturers, in any WCMC-controlled space for the purpose of product marketing and/or promotion. This policy does not refer to industry or vendor representatives on campus for previously scheduled and faculty-approved educational purposes including, but not limited to, product and/or device demonstrations.

Private Consulting Agreements

For purposes of this policy, a consulting agreement is defined as a financial relationship between a WCMC representative and an external entity in which the faculty member is compensated for providing his/her expert advice and/or opinion for the benefit of that entity. Agreements covered by this policy include, but are not limited to, participation on Advisory Boards, Scientific Advisory Boards and Data Safety Monitoring Boards. This policy does not relate to Speaker's Bureau participation or to sponsored research agreements between WCMC and research sponsors.

- Private consulting may be undertaken with notification and permission of the Department Chairperson if the consulting enhances the value of the individual to the University, does not interfere with University duties and does not include services that are otherwise provided by WCMC or the WCMC representative in the course of his/her usual duties.
- WCMC representatives are expected to include the 'Addendum to Consulting Agreement' document as part of all private consulting agreements. The Addendum can be obtained by contacting the [Conflicts Management Office](#).
- WCMC representatives considering entering into a consulting agreement with an entity that also supports his/her research should consult the Conflicts of Interest Office, as these agreements may be subject to disclosure and increased scrutiny by the WCMC Conflicts Advisory Panel (CAP). In such cases, the CAP will determine whether or not the arrangement should be allowed, monitored or modified.
- [Cornell University Policy 4.10](#), 'Use of Cornell's Name, Logos, Trademarks and Insignias' outlines specific guidelines on allowable use and required disclaimers.
- Reasonable use of WCMC resources as part of consulting agreements may be permitted with Chairperson approval but may be subject to service charges.
- WCMC faculty members are not permitted to use WCMC employees or students to promote, advance, assist or participate in private consulting.

Executive Positions

Executive positions are defined as those that imply managerial or supervisory roles in external entities based on faculty technologies, or similar start-up entities. This policy does not refer to membership on Scientific Advisory Boards. While executive positions in external entities may be permissible, these types of relationships will be subject to increased scrutiny by the Conflicts Advisory Panel for potential conflicts of interest and conflicts of commitment and will require the implementation of a Comprehensive Conflicts Management Plan (cCMP).

Equity and Stock Holdings

Equity and stock holdings are defined as monetary investments held by a WCMC representative or his/her family tied to the financial standing of an external entity. Such holdings may constitute a financial conflict of interest, the presence of which may require disclosure and could limit the engagement of both WCMC and its representatives in the performance of related research, especially

when human subjects are involved. WCMC representatives knowingly holding equity/stock with an entity that also supports his/her research are required to speak with the Conflicts Management Program staff prior to entering into any research agreements with such an entity.

This policy does not refer to diversified mutual funds not under the control of the WCMC representative.

Purchasing Authority of Conflicted WCMC Representatives

WCMC representatives must disclose relevant relationships and refrain from participating in procurement decisions in which he/she has a relationship with the potential entity, or a competing entity. The disclosure of external relationships in purchasing are required as part of an annual survey of external relationships and as part of conflicts management plans.

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