



COI Guidance: Chair Approval for Academic Employee External Relationships

Weill Cornell Medicine (WCM) academic employees are required to obtain prior approval from their department chair, department head, or division chief to engage in external activities, such as consulting. Please note that Senior Associate Deans must obtain the prior approval for external activities from the Dean of WCM. WCM Department Chairs must obtain prior approval for external activities from the Dean's designee, the Senior Associate Dean for Research.

To assist with such approvals, WCM's Conflicts Oversight Board (COB) has developed a set of criteria to be considered when evaluating academic employee's requests for approval of external activities, as outlined below.

Department and division heads should consider the following:

1. The value of the relationship to the academic employee's department or division and WCM (i.e., potential for positive impact on the department or division).
2. Whether the proposal aligns and forwards the academic employee's department or division's goals for research and patient care.
3. Whether the academic employee can maintain their decision-making independence free from company influence (e.g., decisions to refer patients to use company products are based on patients' best interest and plan of care and not based on or influenced by financial gain).
4. Whether there is a reliable process that ensures COI disclosure to patients (i.e., disclosure of the referring academic employee's relationship with the company). In the event a WCM academic employee has a financial relationship with a company, there must be a reliable process that ensures disclosure.
5. The complications of the potential conflict do not outweigh the benefit to WCM.
6. The relationship does not pose a risk to WCM or its reputation.
7. The external activity does not negatively impact access of care to patients.
8. An appropriate conflict management plan is implemented, when deemed necessary.

In addition to obtaining department or division head approval, WCM academic employees must also:

1. Incorporate [Cornell's Non-Negotiable Addendum](#) to all external agreements;
2. Ensure that the total effort for all external activities does not exceed 20%; and
3. Disclose the activity on WCM's Conflicts Survey within 30 days of signing the agreement or starting the activity, whichever is earliest.

Any academic employee who intends to spend more than 20% effort on non-WCM activities **OR** hold an employee position with an external entity must receive prior approval from the COB.

For more directed guidance, please contact the COI Office at conflicts@med.cornell.edu. Additional information can be found on [WCM's COI Office Website](#).