


WCM Administrative Policy and Procedure		
	Policy Title	Commercial Endorsement and Promotion
	Policy Number	COI-220.01
	Department/Office	Office of Conflict of Interest (COI Office)
	Effective Date	June 16, 2026
	Last Reviewed	N/A
	Approved By	WCM-Executive Policy Review Group
	Approval Date	June 16, 2026
	Foundational University Policy	4.10 - Use of Cornell's Name, Logos, Trademarks, and Insignias

Preamble

This policy supplements Cornell University Policy 4.10 - *Use of Cornell's Name, Logos, Trademarks and Insignias* and establishes Weill Cornell Medicine (WCM)-specific requirements for Workforce Members participating in external activities involving Industry products, services, or commercial entities and potential conflicts that may arise from such engagements.

Purpose

The purpose of this policy is to establish WCM's rules and restrictions on Industry (commercial and non-commercial) endorsements or promotions when participating in external activities such as speakers bureaus, self-promotion of a personal venture, publications, event sponsorships, continuing medical education (CME) events, and other related activities.

Scope

This policy applies to all WCM Workforce Members as defined in this document.

This policy is written primarily for WCM Workforce Members who may be asked by Industry to promote or endorse products, or who may seek to market, solicit, or advertise personal/outside commercial ventures in connection with WCM roles, premises or programs, or using WCM affiliation or title. It also applies to WCM offices that review and approve these activities. WCM-Q Workforce Members must seek review and approval through WCM-Q offices.

Policy

A. Endorsement and Promotional Speaking Prohibitions

WCM generally restricts Workforce Members from engaging in certain external activities involving Industry Endorsement and Promotion to avoid bias in their professional, clinical, or scientific judgment. In limited exceptions when such Industry engagements are permitted, the Workforce Member must adhere to the rules, restrictions, and processes herein for use of WCM Branding and appropriate management of resulting conflicts of interest (COI), if necessary.

WCM Workforce Members may not provide commercial Endorsements or participate in promotional speaking/Speakers' Bureau arrangements for Industry businesses, products, or services. Workforce Members are also prohibited from marketing, soliciting, or advertising any personal/outside business, website, product, or service (including the Workforce Member's own commercial venture) in connection with WCM roles, premises or programs, including interactions with patients, research participants, trainees, or their families, or through WCM channels. The prohibition on self-promotion applies regardless of whether the outside venture is commercial, non-profit, or otherwise, and is not limited to Industry relationships. Limited exceptions may be considered only when permitted under this policy and only after advance written

approval by the COI Office and the Office of External Affairs, and other required WCM offices (e.g., NYP) as applicable.

B. Ghostwriting

Workforce Members must maintain editorial independence over any content associated with an approved endorsement or promotional activity. Workforce Members may not lend their name or institution to any content they did not write or over which they did not exercise final editorial control. Collaborations that include Industry investigators, medical writers, or technical experts must attribute those contributors appropriately.

C. WCM Branding

WCM Branding shall not be used in connection with any endorsement or promotional activity. COI Office approval of an activity does not constitute permission to use WCM Branding. Any use of WCM Branding requires separate written approval from the Office of External Affairs.

D. Review Process

The COI Office and the Office of External Affairs conduct reviews concurrently. COI Office approval constitutes a determination on the activity and the financial and commitment dimensions of the relationship only. External Affairs approval constitutes a determination on content and brand use only. Either office may independently decline to approve an activity within its respective scope.

E. Exceptions

Participation on Guideline, Federal, or other Review Panels is not considered a Product Endorsement for purposes of this policy. Qualifying panels include advisory committees and review panels convened by:

- Federal, state, or local government agencies;
- Non-profit U.S. institutions of higher education (as defined at 20 U.S.C. 1001(a));
- Academic teaching hospitals;
- Medical centers; or
- Research institutes affiliated with an institution of higher education.

Additionally, this policy does not apply to good-faith identification of products, equipment, reagents, technologies, or services used in the conduct of research, clinical care, or scholarly work, when such identification serves a legitimate scientific, educational, or methodological purpose (e.g., methods sections in publications, descriptions of experimental protocols in presentations, or acknowledgment of service providers in scholarly communications). This exception does not apply where the Workforce Member has a financial relationship with the identified entity that has not been disclosed and reviewed under University Policies 1.7 or 4.14.

Definitions

Conflict of Interest (COI): An actual, apparent, or potential conflict of interest may arise when the interests, activities, or relationships of any WCM Workforce Member compete with or are perceived to compete with the interests, activities, or concerns of the university such that the individual's actions or decisions on behalf of the university, or related to the individual's employment responsibilities, are compromised, or appear to be compromised.

Conflict Oversight Board (COB): The faculty committee empowered to create procedures for identifying conflicts related to research, approving Conflict Management Plans, and declaring conflicts unmanageable.

Ghostwriting: The practice of writing material—such as articles, books, speeches, reports, or other content—on behalf of someone else who is credited as the author.

Industry: Entities in the pharmaceutical, biotechnology, medical device, diagnostics, digital health, consumer health, wellness, cosmetic or other healthcare sectors. Industry “products” are consumer products or services manufactured, distributed, licensed, sold, or promoted by Industry that is marketed for health, medical, therapeutic, preventive, cosmetic, or wellness purposes.

Product Endorsement: Any statement, appearance, or communication (audio or visual) that promotes or supports a commercial business, product, or service.

Speakers’ Bureau: Arrangements where a company has a contractual right to dictate or control the content of a presentation or talk, including slides and presentation materials, and holds final approval of the content and edits.

WCM Branding: The WCM name, logos, facilities, titles, or other identifiers connected to Weill Cornell Medicine.

Workforce Members: Faculty; Non-Faculty Academics; Staff; Students; Volunteers; and other persons whose conduct, in the performance of work for WCM, is under the direction and control of WCM, whether or not they are paid by WCM.

Procedure

A. COI Review Process

Workforce Members must contact the COI Office before (i) agreeing to endorse or promote any product or service on behalf of an external entity, or (ii) marketing, soliciting, or advertising a personal/outside business, website, or other commercial venture in connection with WCM roles, premises, programs, or channels. The COI Office will review the request to determine whether the activity is allowed under this policy.

The COI Office reviews proposed activities for conflicts of interest and conflicts of commitment in accordance with [University Policy 1.7](#) and [University Policy 4.14](#). Where a Workforce Member is uncertain whether review is required, they should contact the COI Office before committing to the activity.

The COI Office will promptly acknowledge receipt of complete requests and provide estimated timelines. Reviews may take longer when additional information is required, when External Affairs review is needed, when the activity warrants Conflict Oversight Board (COB) review, and/or when agreement terms require negotiation. Requesters may contact the COI Office for status updates or to flag time-sensitive needs.

Approval may include conditions that must be followed to reduce Conflicts of Interest and/or to clarify WCM’s separation from the activity.

Note: The Product Endorsement prohibition applies to commercial entities. However, the prohibition on marketing, soliciting, or advertising outside ventures in connection with WCM roles, premises, or programs applies regardless of whether the outside venture is commercial or non-profit. Where a proposed activity involves promotion of a non-profit organization and does not raise a financial Conflict of Interest, the activity may still require review by the Office of External Affairs for reputational and branding considerations. Workforce Members with questions about non-profit engagements should contact the COI Office, which will coordinate with External Affairs as appropriate.

B. Content Review Process – External Affairs

For any promotional activity that includes scripted, prepared, edited, or produced content, the Workforce Member must obtain written approval from the Office of External Affairs before any content is recorded, finalized, or released. External Affairs content review occurs concurrently with COI review and does not require COI approval as a prerequisite.

C. Continuing Medical Education (CME) Events

CME activities accredited by WCM are subject to the Standards for Integrity and Independence in Accredited Continuing Education (ACCME Standard 4) and applicable WCM CME Office policies with respect to commercial support, independence, and separation of promotional activity from CME content. The event sponsorship and endorsement requirements of this policy do not apply to those activities. However, faculty participating in accredited CME remain subject to: (i) institutional COI disclosure and management obligations under University Policies 1.7 and 4.14; and (ii) the prohibition on Speakers' Bureau arrangements, which applies regardless of whether an activity is accredited for CME credit. Refer to WCM Policy CME-920.00 – *Approval of CME Activities*.

D. Non-CME Events

Event sponsorships by outside commercial entities for events hosted at or in concert with WCM, whether on premises or off-site must be approved by the relevant Department Chair and thereafter reviewed concurrently by the Office of External Affairs and the COI Office before any commitment is made.

All sponsorship arrangements must comply with the WCM Event Sponsorship Guidelines (Non-CME Events), which establish substantive requirements for permissible sponsor activity.

E. General Endorsement Guidance

1. No filming on WCM premises for promotional purposes, by or on behalf of any Workforce Member or external party, without prior written approvals from both the COI Office and the Office of External Affairs.
2. Workforce Members must not make statements or offer opinions on behalf of WCM. Instead, they must only speak in their individual capacities (i.e., use language such as “I believe” instead of “we believe”).
3. Workforce Members may reference their affiliation and/or appointment at WCM, provided such references do not state or imply Cornell or WCM endorsement of a non-university project, product, or service, consistent with University Policy 4.10.
4. In all approved endorsement or promotional activities, Workforce Members must have final control over any scripted or prepared language.

Compliance with this Policy

All WCM Workforce Members are responsible for adhering to this policy. Failure to comply with this policy will be evaluated on a case-by-case basis and could lead to corrective action, up to and including termination, consistent with other relevant WCM and University Policies. Examples of corrective action may include, but are not limited to, requiring removal of WCM Branding from unapproved materials, cessation of unapproved promotional activity, cessation of participation via selected channels such as an outside company's website or social media platforms, mandatory COI training, or referral to the relevant Department Chair. Instances of non-compliance that potentially involve a lapse of professionalism may lead to engagement of the Office of Professionalism for evaluation and intervention.

Contact Information

WCM Office of Conflict of Interest

- **Email:** conflicts@med.cornell.edu
- **Website:** <https://research.weill.cornell.edu/compliance/office-conflict-interest>

For WCM-Qatar:

- **Email:** researchcompliance@qatar-med.cornell.edu
- **Website:** <https://qatar-weill.cornell.edu/research/research-administration/research-compliance/conflict-of-interest>

Office of External Affairs

- **Email:** pr@med.cornell.edu
- **Website:** <https://externalaffairs.weill.cornell.edu>
- **For WCM-Qatar:** nns4002@qatar-med.cornell.edu

Office of Continuing Medical Education

- **Email:** cme@med.cornell.edu
- **Website:** <https://teach.weill.cornell.edu/medical-education/programs/continuing-medical-education>
- **For WCM-Qatar:**
 - **Email:** cpd@qatar-med.cornell.edu
 - **Website:** <https://qatar-weill.cornell.edu/continuing-professional-development/>

References

- [Speakers' Bureau Identification Checklist \(2026\)](#)
- [Weill Cornell Medicine Event/Meeting Sponsorship Guidelines](#)
- WCM Policy CME-920.00 – Approval of CME Activities
- [Research-Related Conflicts of Interest & Commitment Policy \(University Policy 1.7\)](#)
- [Use of Cornell's Name, Logos, Trademarks, and Insignias \(University Policy 4.10\)](#)
- [Non-Research Conflicts of Interest & Commitment Policy \(University Policy 4.14\)](#)

Policy Approval

This policy was reviewed and approved by the WCM-Executive Policy Review Group (WCM-EPRG) on June 16, 2026.

Version History

Date	Author	Revisions
06/16/2026	Office of Conflicts of Interest	Original date of issue.

Appendix

N/A