WCM Conflict of Interest Guidelines: External Executive Positions

Executive positions ("EPs") in external entities are subject to scrutiny by the Medical College, and in most cases, are not permissible. For the purposes of these guidelines, EPs are defined as those that imply managerial or supervisory roles within an external entity (commercial or non-profit) including external entities based on faculty technologies. These titles include, but are not limited to:

- President
- Vice-President
- Chief Executive Officer
- Chief Medical Officer
- Senior Scientific Officer
- Scientific Director
- Medical Director

To serve in an executive or managerial capacity for any company while a WCM employee, you must obtain prior approval from your department chair or head <u>and</u> the Conflicts Advisory Panel ("CAP"). If approved, you will be placed on a conflicts management plan ("CMP") listing the safeguards to oversee your EP. Generally, faculty with a WCM effort of 50% or greater are prohibited from holding EPs for external entities, outside of an early stage uncapitalized start-up company.

WCM supports the efforts of its faculty to foster productive relationships with the entities outside of the Medical College. To this end, the CAP supports faculty engagement with senior titles, such as Chief Medical Advisor and Senior Scientific Advisor, after a brief review process.

In addition to any requirements outlined on a CMP, faculty must adhere to WCM's general external consulting requirements. Faculty members must:

- 1. Receive approval from their department chair or head.
- 2. Incorporate the Non-Negotiable Addendum to their company agreement.
- 3. Disclose the relationship on WCM's Conflicts Survey within 30 days of signing the agreement or starting the activity, whichever is earlier.
- 4. Abide by external activity time/effort limitations:

	Faculty with 100% WCM Effort	Part-time Faculty	Faculty with 49% or less WCM Effort
Limitations on External Activities on WCM Time	No more than one (1) 8-hour day per week / 20% effort on external activities.	Must perform all	
Limitations on External Activities on Non-WCM Time	Faculty with 100% WCM effort must conduct external professional activities on WCM time up to a total of 100% effort.	external activities outside of WCM time, up to a total of 100% effort.	None

These guidelines do not refer to advisors or members of Scientific Advisory Boards. Additionally, EPs for Start-up Companies are also reviewed differently (see <a href="https://www.wcm.nc.numbers.com/wcm

For more directed guidance or to start the EP CAP review process, please contact the Conflict of Interest ("COI") Office at conflicts@med.cornell.edu. WCM-Q faculty, please contact Dr. Amal Robay, Director of Research Compliance, at amr2018@gatar-med.cornell.edu. More information can be found on wCM's COI Office Website.

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