

Purpose of the Conflicts Policies

All members of the Cornell University community are expected to conduct the affairs of the university in a manner consistent with their primary commitments to the university, and the performance of their professional responsibilities must be free from real or apparent bias motivated by self-interest.

Relationships and collaborations with industry are of vital importance to the Weill Cornell Medicine community because these exchanges of scientific information foster innovation.

The conflicts policies' goals are to maintain the highest possible standards of medical education, clinical care, and scientific integrity, as well as to protect your and the university's reputation and credibility when interacting with external entities.

Prohibited Activities

Speakers' Bureaus

Speakers' bureaus are typically 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. **Employees are prohibited from participating in such arrangements and may not act as a spokesperson or agent to disseminate a company's product information.**

Ghostwriting

You must maintain editorial independence of content and have final approval of the version to be published. Collaborations must attribute industry investigators, medical writers, and/or technical experts.

Meals

Industry sponsored meals are not permitted on WCM premises. Meals are also restricted at non-WCM events.

*Food restrictions do not prohibit departments from accepting unrestricted gifts from industry.

*Reasonable travel, food and lodging are permissible with consulting relationships and training activities.

Gifts

Accepting gifts is prohibited. This includes, but is not limited to

- Food & Beverage
- Equipment
- Supplies
- Books
- Industry marketing materials such as pens, pads, bags, and other trinkets.

~ Contact the University Development Office to Advancement Services regarding questions on gifts.



Weill Cornell Medicine

Conflicts of Interests Policies

Contact the Conflict of Interest Office at conflicts@med.cornell.edu.

To Report Relationships & Conflicts, visit the Weill Research Gateway (WRG): <http://wrg.weill.cornell.edu/>

WCM Conflicts Policies
<https://research.weill.cornell.edu/conflict-interest-office>

Significant Financial Interests (SFI)

The following financial interests from a non-Cornell entity are considered SFIs and will be evaluated for financial conflicts of interests (FCOI) related to your Cornell responsibilities:

- Consulting fees, honoraria, or gifts > \$5,000
- Equity interests or options > \$5,000 ownership in a publicly traded company
- Equity interests of any amount in a non-publicly traded company
- Any intellectual property rights, regardless of value, upon receipt of income related to such rights and interests.

The following are not considered an SFI for FCOI evaluations:

- Payments or transfer of value made to you from Cornell, including travel.
- Investment vehicles that you do not directly control the investment decisions (e.g., mutual funds).
- Income from service on advisory committees or review panels for a United States government agency, non-profit U.S. institution of higher education, teaching hospital, medical center or research institute affiliated with a U.S. institution of higher education.

What you DO NOT need to report

- Mutual funds, pensions, institutional investments, or other investment vehicles where you have no ability to control what shares you buy (this includes blind trusts).
- Salary, stipend or payments to you from WCM or Cornell (HOWEVER, you should disclose royalty payments made to you from Cornell due to a licensing agreement with a third party).
- Travel paid or sponsored by Cornell.

WHAT YOU NEED TO REPORT

Irrespective of dollar amount you are required to disclose all payments or equity from an external entity (non-WCM or WCM-Q) for activities that are related to your institutional responsibilities for yourself and family members (the term family is meant to include spouses, siblings, parents children, and any other blood relatives if that other blood relative resides in the same household).

Such transfers of value include, but are not limited to, honoraria, salary, royalties, consulting fees and other transfers of value. Examples of such activities and relationships include, but are not limited to:

- Advisory Board Membership
- Board of Directors Membership
- Commissioned Writings
- Equity
- Expert Witness Testimony
- Lectures/ Speaking Engagements
- Medical Legal Consulting
- Propriety Interests – patents, provisional patents, trademarks, copyrights, licensing agreements
- Travel*

*Any travel sponsored by a for profit entity regardless of amount. Travel sponsored by a non-profit needs to be disclosed where the aggregate amount from a single entity is \$5000. This means that you only have to report sponsored or reimbursed travel from that nonprofit if the travel was \$5,000 or more, you receive \$5,000 or more from the nonprofit for services, or a combination of the two is \$5,000 or more.

Additional Guidance

- Remember to receive prior approval from your chair for your external activities, such as with consulting relationships.
- Consulting agreements should include an addendum recognizing your primary duties to WCM & protecting University IP Rights.
- Equity and Stock Holdings - For entities that have licensed technology developed at WCM through agreement with the Cornell Center for Technology Licensing (CTL), WCM representatives holding equity/stock with an entity that also supports his/her research are **required** to speak with the Conflicts of Interest Office prior to entering into any research agreements with such an entity.
- Holding an executive position with an external entity will receive increased scrutiny by the Conflicts Advisory Panel.
- Refrain from purchasing decisions for WCM when you have a relevant relationship with the external entity.

When in doubt, disclose!

You must keep your Conflicts Survey current all year long. You must update your survey within 30 days of any material changes to your financial interests.