


| WCM Administrative Policy and Procedure | | |
|-----------------------------------------------------------------------------------|--------------------------|---------------------------------------------------------------|
|  | Policy Title | Conflict Disclosures for CME Activities |
| | Policy Number | CME-920.01 |
| | Department/Office | Office of Continuing Medical Education (OCME) |
| | Effective Date | May 7, 2026 |
| | Last Reviewed | N/A |
| | Approved By | Continuing Medical Education Committee |
| | Approval Date | May 7, 2026 |
| | Endorsement | Endorsed by WCM-Executive Policy Review Group on May 19, 2026 |

Purpose

As a provider accredited by the Accreditation Council for Continuing Medical Education (ACCME), Weill Cornell Medicine (WCM) is committed to ensuring that all continuing medical educational (CME) activities approved by WCM are evidence based, free of Commercial Bias and demonstrate fair balance, independence, objectivity, and scientific rigor.

This policy establishes standards for disclosure and management of conflicts of interest (COI) related to CME activities to ensure alignment with ACCME guidelines as well as WCM and Cornell University COI policies and procedures.

Scope

This policy applies to all Workforce Members participating in CME activities and those who can influence the content of CME activities.

This policy does not apply to WCM-Qatar. WCM-Q faculty, staff, and learners should contact the WCM-Q Division of Medical Education and Division of Continuing Professional Development (CPD) for guidance on local accreditation standards, applicable program requirements, and education-related COI processes specific to the Qatar campus.

Policy

A. CME Activity Conflict of Interest Overview

In accordance with ACCME Standards for Integrity and Independence in Accredited Continuing Education, unless approved by the WCM CME committee, WCM prohibits its Workforce Members from participating in the planning or controlling the educational content of an accredited CME activity if the Workforce Member has an irresolvable COI with an Ineligible Company. In addition to ACCME guidelines, WCM requires all Workforce Members participating in or involved in CME activities to also adhere to the institutional COI policies which may require further COI disclosures to the WCM Conflict of Interest Office (Conflicts Office). Approved WCM CME activities must comply with both ACCME and WCM COI standards/policies as well as any institutional conflict management policies and procedures.

Regardless of compliance with ACCME or WCM policies, the WCM CME Committee reserves the final right to deny approval of any activity on WCM premises or a Workforce Member's involvement in an approved CME activity.

B. Disclosure of Relevant Financial Relationships

To ensure all CME activities at WCM are independent of Industry influence, Workforce Members who will participate in the planning and/or will be able to control the educational content of the CME activity shall disclose to the WCM CME Committee those disclosures required by both WCM and the ACCME. These include but are not limited to:

1. All Relevant Financial Relationships with Ineligible Companies within the past twenty-four (24) months to WCM; and
2. For Faculty, any discussions of unlabeled or investigational uses of any commercial products or devices not yet approved in the United States.

Workforce Members are also required to disclose a Family member's financial relationship with an Ineligible Company where the educational content the Workforce Member controls is related to the business lines or products of the Ineligible Company in which the Family member has an interest. Family member interests disclosed under this provision are subject to the same CME Committee review and, where applicable, COI Office referral requirements that apply to the Workforce Member's own Relevant Financial Relationships.

Such disclosures will be reviewed by WCM's CME Committee as part of an application for credit approval in order to determine whether the Financial Relationship is relevant to the educational content of the CME activity. Disclosure and identification of Relevant Financial Relationships do not preclude involvement or participation in the planning and implementation of the CME activity, however, may require management of the relationship to ensure the CME activity is free of Commercial Bias prior to the Workforce Member engaging in the activity.

Workforce Members with a COI arising from a Relevant Financial Relationship (e.g. ownership interest or employee relationship) with an Ineligible Company cannot control the educational content or participate as planners or faculty in an accredited CME activity, unless one of the following exceptions is met and approved by the CME Committee:

1. The content of the activity is not related to the business lines or products of the Ineligible Company;
2. The content of the accredited activity is limited to basic science research, such as preclinical research and drug discovery, or the methodologies of research, and the Workforce Member does not make care recommendations; or
3. The Workforce Member participates as a technician to teach the safe and proper use of medical devices and does not recommend whether or when a device should be used.

Under WCM and Cornell University COI policies, Workforce Members may be subject to additional COI disclosure requirements (i.e., from a Family member's Relevant Financial Relationship with an Ineligible Company and other non-financial conflicts related to the CME activity).

C. Institutional Conflict of Interest Disclosure Obligations

Disclosure to the CME Committee does not substitute for, and does not satisfy, a Workforce Member's parallel obligations under institutional COI policies (i.e., WCM COI Procedures and University Policies 1.7 and 4.14), unless otherwise specified. It is the Workforce Member's responsibility to ensure compliance with institutional COI rules and procedures (i.e., financial and non-financial COI disclosure requirements and conflict management plans, when applicable), even if they are more restrictive than ACCME standards.

Workforce Members must attest to their compliance with WCM COI policies prior to the CME Committee's review for approval of the CME activity regardless of whether they have completed their annual WCM attestation to the COI Office. Workforce Members who are uncertain whether their current relationship(s) constitute a violation of policy or are irreconcilable should contact the COI Office directly at conflicts@med.cornell.edu.

D. Speakers' Bureaus

Regardless of where they are presenting, Speakers' Bureau participation, and acceptance of related honoraria, is prohibited for WCM Workforce Members under WCM COI rules and procedures. Workforce Members who are uncertain whether a speaking opportunity constitutes a Speakers' Bureau should complete WCM's Speakers' Bureau Identification Checklist or contact the WCM Conflicts Office at conflicts@med.cornell.edu before accepting the engagement. Any identified Speakers' Bureau arrangement disclosed to the CME Committee shall be referred immediately to the Conflicts Office.

For non-WCM participants or planners presenting at WCM-accredited CME activities, Speakers' Bureau participation is governed by ACCME standards. It is a financial relationship that must be disclosed and managed in accordance with this policy. Non-WCM speakers with an active Speakers' Bureau arrangement must disclose that relationship, and the CME Committee will apply its standard mitigation and disclosure procedures prior to the activity.

Definitions

Commercial Bias: When the CME activity's content or materials promote an Ineligible Company's product or service.

Family*: As defined in university policy 4.14, a Workforce Member, and that Workforce Member's spouse, domestic partner, parent, sibling, child, or any other blood relative, if that other blood relative resides in the same household.

Ineligible Companies: Companies whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients.

Relevant Financial Relationships: A Workforce Member's financial relationship with an Ineligible Company in which the Workforce Member benefits by receiving a salary, royalty, intellectual property rights, consulting fee, honoraria for speaking or educational activities, ownership interest (e.g., stocks, stock options or other ownership interest, excluding diversified mutual funds), or other financial benefit, with no minimum dollar amount. A financial relationship is "relevant" if the educational content that the Workforce Member can control is related to the business lines or products of the Ineligible Company.

Speakers' Bureau: An arrangement in which a for-profit drug, device, or biologic company controls the content of a presentation, including slides and supporting materials, and retains final approval authority over content or edits.

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

Procedure

A. Conflict Disclosures

Workforce Members who are required to disclose relationships and circumstances that give rise to actual or potential COIs relating to CME activities shall report the disclosure by completing the Full Faculty Disclosure Form prior to approval for the course and/or presentation. The Full Faculty Disclosure Form must be submitted to the Course Director for disclosure to the OCME. The information disclosed must include:

1. The name of the ineligible company with which the person has a financial relationship; and
2. The nature of the financial relationship.

Examples of financial relationships include employee, researcher, consultant, advisor, speaker, independent contractor (including contracted research), royalties or patent beneficiary, executive role, and ownership interest. Individual stocks and stock options must be disclosed; diversified mutual funds do not need to be disclosed. Research funding from Ineligible Companies should be disclosed by the principal or named investigator even if that individual's institution receives the research grant and manages the funds.

B. Relationship to WCM's Annual Conflicts Survey

Submission of a Full Faculty Disclosure Form to the Course Director satisfies disclosure requirements specific to the CME activity but does not substitute for the annual Conflicts Survey that WCM Workforce Members are separately required to maintain in the Weill Research Gateway (WRG). The CME Committee may cross-reference a Workforce Member's CME disclosure against their WRG Conflicts Survey to verify consistency. Where a material discrepancy exists between the two, or where a Workforce Member subject to WCM's annual disclosure obligations has not filed a current Conflicts Survey, the CME Committee shall notify the Conflicts Office.

C. CME Committee Review

WCM's CME Committee is responsible for reviewing each disclosure for potential conflicts that may bias educational content in order to determine if and how the conflict can be appropriately managed. When required, the CME Committee shall implement mitigation actions to prevent Workforce Members with Relevant Financial Relationships from inserting Commercial Bias into educational content prior to the Workforce Member assuming his or her role in the activity.

Mitigation activities may include, but are not limited to:

1. Prohibiting the conflicted Workforce Member's involvement in the educational activity;
2. Denial of the educational activity on WCM premises;
3. Oversight of the activity by an Independent Clinical Reviewer at the course's expense
4. Escalation to the WCM Conflicts Office for further review and management;
5. Planners: When a planner is identified as having a Relevant Financial Relationship that cannot be mitigated through content-based measures, the CME Committee shall require the removal of the planner from any portion of the activity development or review process over which they would otherwise exercise content control.
6. Faculty: When a faculty member is identified as having a Relevant Financial Relationship, the CME Committee shall require mitigation measures prior to the faculty member's participation in the activity. Mitigation measures will be specific to the nature of the financial relationship in order to comply with ACCME standards and WCM policies.

7. Disclosure to Learners

Upon approval of a CME activity by the CME Committee, disclosures regarding Relevant Financial Relationships, or the absence thereof, shall be made to learners of the CME activity. As required by ACCME, disclosures to learners must include all planners and educators involved in the activity and must be disclosed prior to the commencement of the activity. These include, but are not limited to:

1. The names of the individuals with Relevant Financial Relationships;
2. The names of the Ineligible Companies with which they have relationships;
3. The nature of the relationships;
4. A statement that all Relevant Financial Relationships have been mitigated. Identify Ineligible Companies by their name only. Disclosure to learners must not include Ineligible Companies' corporate or product logos, trade names, or product group messages;
5. Disclose absence of Relevant Financial Relationships. Inform learners about planners, faculty, and others in control of content (either individually or as a group) with no Relevant Financial Relationships with Ineligible Companies. Learners must receive disclosure information, in a format that can be verified at the time of accreditation, before engaging with the accredited education; and
6. If applicable, a statement disclosing off-label or investigational uses of products that may be included in the presentation.

Compliance with this Policy

WCM Workforce Members are responsible for adhering to this policy. Failure to disclose a relevant financial relationship, or any other non-compliance with this policy will be evaluated on a case-by-case basis and may result in corrective action up to and including postponement or cancellation of the CME activity, extension of the probation period, and/or denial of CME credit. Serious or egregious non-compliance will be escalated to the Workforce Member's Department Chair, Office of Faculty Affairs, and/or the Conflicts Office for evaluation on a case-by-case basis and may lead to corrective action up to and including termination in accordance with other institutional policies. 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

For additional information and guidelines, please contact the Office of Continuing Medical Education at

- Telephone: 646-962-6931
- Email: cme@med.cornell.edu.

References

- WCM COI-220.00 – Conflict of Interest Procedures
- [University Policy 1.7](#) – Research Related Conflicts of Interest and Commitment
- [University Policy 4.14](#) – Non-Research Conflicts of Interest and Commitment
- [University Policy 4.6](#) – Standards of Ethical Conduct

Policy Approval

This policy was reviewed and approved by the CME Committee on May 7, 2026.

This policy was reviewed and endorsed by the WCM-Executive Policy Review Group on May 19, 2026.

Version History

| Date | Author | Revisions |
|------------|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 05/07/2026 | Office of Continuing Medical Education | Transfer to standardized policy template. Consolidated content from "Guidelines for Printed Materials" and "Guidelines on Faculty Disclosure" into a formal policy. |

Appendix

N/A