

## **Weill Cornell Office of CME Policy and Procedures for Addressing the Perception of Commercial Bias**

### **Policy**

1. Weill Cornell CME program shall offer each of its CME activity participants the opportunity to indicate whether he or she perceived commercial bias in the content or presentation of the activity. WCM may also employ other review mechanisms as it sees fit (e.g., staff, faculty member, or expert review).
2. WCM shall establish a process by which the perception of commercial bias shall be measured. Such a process shall include, at a minimum, a standardized question or item on every participant evaluation survey and an opportunity to provide narrative comments. The required language for the standardized question/item shall appear in an evaluation template available from the CME Office. The question or item shall result in quantifiable data, and the CME Committee shall establish a benchmark for success in achieving freedom from commercial bias.
3. The CME Office shall regularly review the evaluations of all CME activities.

### **Procedures**

4. Should the benchmark set by the CME Committee not be achieved for a particular activity (or, at the discretion of the Committee, a presentation within an activity), the following procedures shall be executed.
  - 4.1. The Dean for CME shall inform the [department] [activity] manager that an investigation of the activity or presentation is warranted.
  - 4.2. The Dean for CME and the [department] [activity] manager shall meet and prepare a preliminary report for the CME Committee.
  - 4.3. The CME Committee shall discuss the issue to determine whether the activity or presentation was truly commercially biased. If the CME Committee determines that there was no commercial bias, its written decision and rationale shall be placed in the activity file.
5. If the CME Committee determines that the activity or presentation may have been commercially biased, the following procedures shall be executed.

- 5.1. The Director of CME and the [department] [activity] manager (or his or her designee) shall contact the course director, course faculty members, and/or external expert(s) for their comments on the issue.
- 5.2. If the course director, course faculty member, or external expert agrees that commercial bias is or was present, a remediation plan shall be developed. That remediation may include, but is not limited to, one or all of the following:
  - 5.2.1. Revision and reprinting of activity materials.
  - 5.2.2. Contacting participants with clarification or modifications of materials.
  - 5.2.3. Distribution of corrections for an enduring material or journal-based activity.
  - 5.2.4. Direction to one or more faculty members to revise his or her presentation.
  - 5.2.5. Prohibition of one or more faculty members from presenting as part of current or future WCM CME activities.
  - 5.2.5. Rescinding credits for part of all of the activity.
6. Documentation of final disposition of commercial bias investigations shall become part of the activity file.