

**Policy on Relations with Corporate Sponsors and Vendors**  
**College of Veterinary Medicine, Cornell University**  
Last revised: April 9, 2013

**Introduction**

The purpose of this policy is to outline an ethical framework and organizational structure for formal relationships between the Cornell College of Veterinary Medicine (including faculty, house and administrative staff, and students) and commercial interests, including health related companies and other businesses, as well as non-profit organizations desiring interactions with animal health educators and students. The College recognizes the value to students and faculty of these interactions, and the importance to our educational, outreach, and research missions of the expertise and resources that attend external partnerships and collaborations. It is the intent of this policy to establish oversight of these relationships to assure that the presentation of information to veterinary students, veterinarians, and the public, and the use of College facilities, meet the highest ethical standards, and to eliminate direct gifts of goods, benefits, or services between commercial interests and faculty, staff, and students of the Cornell University College of Veterinary Medicine.

**A. Gifts and Compensation**

It is the general policy of the Cornell University College of Veterinary Medicine to eliminate direct financial relationships between faculty and staff, and commercial interests that are not part of disclosed and transparent relationships involving teaching, outreach, or research activities of benefit to both parties. Similarly, it is the responsibility of the College to oversee the interactions between students and these entities in a way that effectively manages potential conflicts of interest and effectively communicates the highest ethical standards. At the same time, the College wishes to preserve for faculty, staff, and students, the important value that many of these relationships bring to organized health care education. To that end:

**1. Personal Gifts:**

- Faculty, staff, and students should not accept personal gifts related to their professional activities from for-profit companies, with the exception of awards or prizes that are part of an open competition. This policy includes pet food, medical supplies, or other gifts for personal use, except as outlined below.
- Discounted or free pet food is often made available to veterinary staff and students as part of company marketing programs. The College will provide the opportunity for companies to donate or discount food to College organizations and entities, such as the Student Chapter of the AVMA (SCAVMA), the Cornell University Hospital for Animals (CUHA), etc., which will in turn be made available to all College employees and students. The External Activities Oversight Committee (composition defined in FAQ #18 below) will oversee the pricing and distribution of pet food to College faculty, staff, and students in a manner that ensures the equivalent discounting of all

products so that individuals may choose the products that best meet their needs. Donations and discounts will be made available on the College Website.

- Discounted or free vaccines and other medical supplies are often made available to veterinary staff and students as part of company marketing programs. The College will provide the opportunity for companies to donate or discount medical supplies to College organizations and entities, such as SCAVMA, CUHA, etc. The External Activities Oversight Committee will oversee the pricing and distribution of medical supplies to College faculty, staff, and students in a manner that ensures the equivalent discounting of all products so that individuals may choose the products that best meet their needs. Donations and discounts will be made available on the College Website.
- Faculty may accept travel compensation and honoraria as part of their educational and outreach activities, and provide consulting services within the guidelines of the University Consulting Policy. These activities are disclosed as part of Cornell University's annual conflict of interest process. Faculty who make presentations containing information about specific commercial products should disclose any related commercial support as a part of their presentation.
- Prizes and awards from bona fide competitions in which the awardees are selected by the College are excluded from the definition of a gift.

## 2. Food Policy

- Meals may be provided at informational events in the College at which multiple vendors are represented, but may not be provided by a single sponsor. Such events will be scheduled through the Office of Student and Academic Services and will be limited to events deemed by the External Activities Oversight Committee to be of broad informational/instructional value. For events featuring one speaker, food may be served provided the following criteria are met: 1) the club or sponsoring college representative(s) select the presenters; 2) the topic of the presentation is not related to products or services, and 3) the expenses associated with food for the event are paid using university or student/faculty/staff organization funds exclusively. Events not meeting these criteria may be held at the College if they are registered (see below), and do not provide food or other gifts.
- Faculty, staff, and students may participate in sponsored meals or banquets at professional meetings and scientific conferences in which multiple groups are represented, at comparative presentations of multiple products hosted by the College, or as part of an honorific event or celebration, but should not accept direct personal gifts of food and meals provided by industry representatives in situations where they are the sole beneficiary. Industry

representatives may meet with students or faculty in the College at mealtimes, but they may not provide food.

### 3. College Charitable Gifts:

- Charitable Gifts from companies, other organizations, and individuals may be made to the College to support educational activities or programs, social events or student activities, fundraising activities such as the SCAVMA Auction, or outreach programs, consistent with the gift policies of Cornell University. All decisions regarding the content of supported programs are the responsibility of the College. Programmatic financial support, and any personal financial relationships of speakers with companies whose products are represented, must be fully disclosed by the College on an annual basis.
- Charitable Gifts may be made to support research programs. Such gifts, as well as sponsored grants and contracts, are subject to standard university gift and research policies [<http://www.dfa.cornell.edu/treasurer/policyoffice/policies/volumes/governance/other.cfm>].
- Supplies or equipment may be donated or provided to the College by healthcare vendors for general educational, diagnostic, or clinical use. All such gifts will be managed centrally by the Hospital Director, Section Head, Pharmacist, AHDC Executive Director, or other appropriate College designee. The determination of the use of specific products in any educational or clinical setting is the sole responsibility of the College. Aggregate annual donations of retail value greater than \$500 will be disclosed by the College annually. It will be the policy of the College to manage such donations or discounts in a manner in which the choice of an individual product is not influenced by the gift or discount, such as through the negotiation of equivalent relationships with multiple vendors and/or sponsored events that allow a comparison of similar products. Company representatives may provide technical details of their products to individual clinicians, or small groups of clinicians, regardless of whether the product is made available to the college at a discount.

### 4. Gifts at College Events:

- As part of College sponsored events, individual vendors are encouraged to display and represent specific products. All such activities will be registered with the Office of Student and Academic Services.
- As is customary at these events, promotional or sample items may be made available to University faculty, staff or students who visit a booth or presentation, if the give-away items are made available to all participants. Samples of prescription products will be managed by the Pharmacy.

- Gifts or donations made to cohorts of students or student organizations must be directed to the Student Activities Account. Any gift or donation in a form other than money is not permitted unless it has been approved by the External Activities Oversight Committee and is available to all participants.

### **B. Extra-Curricular Educational and Informational Events**

Numerous educational and informational events outside of the formal teaching program are held at the College of Veterinary Medicine. These programs add richness and practical value to our teaching program and it is the intent of the College to preserve these valuable student/industry interactions in a way that eliminates real or perceived conflicts of interest.

1. All informational events held at the College in which commercial product information is presented must be registered and scheduled in the Office of Student and Academic Services. The timing and number of these activities will be determined by a External Activities Oversight Committee appointed by the Dean, consisting of students, SCAVMA representatives, faculty, and Office of Student and Academic Services staff, so as to enhance the overall educational goals of the College. It will be the policy of the College to schedule programmatic events in a manner in which multiple commercial entities are present, and faculty oversight is provided. Approved events can be advertised within the school to attract participation.
2. Student clubs arranging presentations by academic speakers, other individuals, or representatives of non-profit organizations may not be directly sponsored by a commercial entity. Support for informational programs by commercial or external entities is encouraged, however, through donations to the College of Veterinary Medicine that are restricted to student educational activities. Such gifts will be directed to a College Student Activities Account that will be overseen by the Office of Student and Academic Services. Student Activities Fund monies will be allocated through the MEOW Fund process, under the direction of SCAVMA. Contributions may not be earmarked for a particular event or student club. Eligibility for funding through MEOW as well as application policies, deadlines, and procedures may be obtained from SCAVMA and are in accordance with the intent of this policy.

Registered student organizations receiving funds from their national chapter may deposit those funds directly into their club accounts. These funds may be used for any club activity, including the purchase of food.

The choice of individual speakers would be made by the individual clubs in the case of club sponsored events, or by the appropriate college representatives organizing larger events intended for a broader audience. Decisions regarding presentations sponsored by funds from SCAVMA programs or dues will be made by SCAVMA. Allocated funds from the Student Activities Account may be used to cover the costs of food for academic presentations unrelated to specific commercial products, club activities, as well as any costs associated with

materials and/or the use of College facilities. The Committee will annually report all events sponsored by the fund and disclose all contributors. An acknowledgement of the donations from all vendors, such as a banner with the names or logos of all donors, may be displayed at all events, in a manner consistent with the policies and practice of Continuing Education events (see Section E. item 8., below)

3. Any activity sponsored by a non-profit (501(c)(3) organization must be reviewed by the External Activities Oversight Committee and scheduled through the Office of Student and Academic Services. Funding for these events will be handled in the same manner as other events: any organization may donate to the Student Activities Fund, and student groups may apply for funding in support of events they would like to host.

### **C. Student Representatives**

Students have traditionally been employed by commercial interests with the intent of increasing the exposure of their products to veterinary students. To a great extent the purpose of this policy is to manage this exposure and provide a consistent and appropriate context for this valuable information. While the College discourages the hiring of individual students to represent external commercial interests, it is acknowledged that some graduates may choose to pursue careers in industry for which this experience may be valuable, the College cannot proscribe students from accepting external employment, and that students play an important role in facilitating the scheduling and organization of presentations that add valuable professional information and adhere to College guidelines. Therefore:

1. Commercial interests may employ student representatives. All student representatives must register with the Office of Student and Academic Services. A standard form will be provided that discloses the extent of activities expected and the degree of compensation provided.
2. Students are not permitted to directly market any commercial products to other students, staff, or faculty on University property or using University resources. The direct dissemination of product materials to students in College mailboxes, College bulletin boards, or through the University email system is prohibited.

### **D. Curriculum Materials**

The veterinary curriculum is enriched by the participation of external professionals, including those associated with corporate interests. It is the goal of the curriculum policy to manage any real or potential conflicts through transparency, and to enhance the education of Cornell Veterinary students in the area of professional ethics, critical thinking, and appropriate disclosure policies.

1. Course syllabi will disclose any donations to, or other sponsorship of, a course within the veterinary curriculum (e.g. product donations, speakers, course materials, etc.). Course syllabi will be submitted to the Curriculum Committee as part of periodic course reviews.

2. Presentations by external speakers or industry representatives in the CUCVM curriculum are included at the discretion of the course leader(s) in an effort to enhance the curriculum. Presenters must have professional qualifications appropriate for the material they are covering; presentations must support legitimate educational objectives; and, such presentations should not substitute for available and qualified university personnel. Sponsorship and the affiliation of outside presenters should be clearly identified in the introduction to the presentation. Course materials and presentations should be appropriate for an academic presentation and contain evidence based product descriptions.
3. Sponsorship of course materials supplied by external organizations (handouts, guides, visual presentations, software, devices) should be clearly acknowledged on these materials.
4. Faculty members who have financial interest in products/services about which they lecture are required to disclose this at the start of the lecture.
5. CUHA will establish and annually update a website available to students and others in the college community listing product/equipment donations of value greater than \$500.
6. Students will be made aware of college policies on corporate sponsorship during orientation and be referred to the relevant guidelines in the student handbook.
7. The VTMED 5702 Course (“Veterinary Practice: Ethics and Animal Care”) will include discussions on evaluating products/services and provide the necessary tools for students to make evidence-based decisions and critically evaluate the scientific basis of marketing materials.

### **E. Continuing Education**

The Continuing Education Office of the College seeks corporate sponsorship to help defray conference expenses for veterinarians and licensed veterinary technicians, and to increase the quality and attraction of the event. Attendance by exhibitors adds value to the conference by making veterinarians aware of new products and services, and corporate sponsorship. The primary purpose of for-profit corporations in sponsoring events is assumed to be a means of assuring speaker quality, good conference attendance and satisfaction in order to meet marketing goals (name and product recognition, and enhanced business relationships with practitioners and veterinary staff).

1. Conference, laboratory or seminar content, and presenter selection will be at the sole discretion of the program committee or organizing faculty member.
2. Speaker and laboratory presentations shall be based on evidence-based, scientific analysis. Products, services and equipment should be discussed as generic whenever possible.

3. Presentation of a new or unique product in a lecture or laboratory will be considered on a case-by-case basis by the CE Director in collaboration with the organizing faculty member and the college CE committee.
4. Vendor- or sponsor-supplied materials must be acknowledged if included in a speaker's presentation or laboratory.
5. All presenters are required to complete a disclosure statement of financial support and to show a disclosure slide at the beginning of their presentation with any financial interest or relationships relevant to the presentation. If no financial support has been received, notation on the title slide of "no financial interest or relationship relevant to the presentation" is sufficient.
6. All speaker payments will be made by the College (or partner organization such as NYSVMS).
7. Corporate support of continuing education events sponsored by the College will be accepted in three main categories: i) unrestricted funds to support speaker and other educational costs, which may include support of theme-based speaker tracks (e.g. dentistry, ultrasound, emergency medicine); ii) donation of supplies and equipment to vendor-supported laboratories; and iii) support for other conference non-educational activities such as social events in which greater corporate specific marketing will be possible. It will be the policy of the College to manage product or equipment donations in a manner in which the choice of an individual product is not influenced by the gift or discount, such as through the negotiation of equivalent relationships with multiple vendors and/or sponsored events that allow a comparison of similar products.
8. Recognition of unrestricted gifts to support educational programming and equipment/supply donations typically will be limited to listing of sponsors in conference publications, conference and college websites, and other advertisements. Sponsors of non-educational activities can be recognized more directly as part of the event at the discretion of the program committee.
9. Corporate logos on conference publications, advertising, and in conference handouts are acceptable, but the size and layout of logos and acknowledgements are the decision of the College (and partner non-profit 501 (c)(3) or 501 (c)(6) organizations).
10. Product advertisements will not be allowed in or at the entrances to lecture halls or laboratory spaces.
11. Corporate contracting of facilities, animals and personnel for non-college sponsored educational events will be considered on a for-fee, case-by-case basis by the college administration. The college will expect the contracting sponsor to be qualified as a NYS State Education Department (SED) and/or RACE approved CE sponsor without college oversight or involvement in the credit-granting process.

12. All college-sponsored CE events will be reviewed by the college CE committee (faculty and technician members) for accordance with these guidelines.

### **F. Policy Oversight**

Student compliance with these guidelines is intended to be governed by the Student Honor Code; violations of the policy will be addressed by the Honor Board. (This will require an amendment to the Honor Code.)

Faculty and Staff compliance is the responsibility of appropriate supervisors.

### **Frequently Asked Questions**

**1. My club would like to invite Dr. Smith, whose presentation will be underwritten by the ABC Corporation. Is this OK?**

No. Under the new policy, the ABC Corporation's interest in supporting educational events at the veterinary college would be directed toward a donation to the External Activities Account, from which educational activities are planned and prioritized. If a student club has prioritized a presentation using SCAVMA funds from sales or events, the talk may be scheduled with the Office of Student and Academic Services. If the ABC Corporation wants to underwrite a Continuing Education event, or a session in a Continuing Education meeting, it would donate to that meeting and the program committee will determine the speaker.

**2. My club would like to invite Dr. Smith, whose presentation will be underwritten by a national professional 501 (c)(6), or non-profit charitable 501 (c)(3), organization. Is this OK, and can we serve food?**

Yes, provided the event complies with the criteria in section A. 2, above and is scheduled and registered in the Office of Student and Academic Services.

**3. Under what conditions may food be provided at a specific event?**

Food will not be permitted at events unless they comply with the criteria in section A.2, above. Specifically, food is not permitted if the event is funded by a single external company or group.

**4. Is food the only "benefit" for attending presentations that is affected by this policy?**

No. Any other items such as coffee mugs, stress balls, t-shirts, etc. are considered to be personal gifts, and are not permitted.

**5. Can a sales representative take residents and faculty to dinner while visiting the College?**

This activity is discouraged. Although the College does not seek to control private activities, the guidelines indicate that the most appropriate behavior is for individuals to buy their own food.

**6. My club would like to invite Dr. Jones, an academic speaker from Cornell or another school, to give a presentation to students where we would provide dinner using GPSAFC and/or MEOW funds. Is this permitted?**

Yes, provided the event has been scheduled through the Office of Student and Academic Services and complies with the criteria listed in Section A.2, above. All food for approved events must be purchased using club, MEOW, or GPSAFC funds.

**7. In the example above, if the event has been approved by the External Activities Oversight Committee, can the travel expenses of our invited speaker be paid by an outside (commercial) source?**

Yes.

**8. How will this policy affect distribution of items we currently receive for free, such as heartworm and flea and tick preventatives, or pet food?**

The intent of this policy is to ensure that the relationships members of the college community have with corporate entities are free from undue influence, bias, or the perception of such. The aim is to eliminate direct transactions between an individual corporate entity and individual students, faculty, or staff, and to replace these with more transparent, balanced, and objective relationships. One good example of this kind of relationship is the current model used for evaluating heartworm preventatives: multiple products made by different manufacturers are presented, a discussion is facilitated by a faculty member, and students choose the products they feel are best based upon scientific information. We anticipate a similar process for pet food, such as a common food donation program to SCAVMA, which in turn would allow College personnel to choose from equivalently discounted products.

**9. Invited speakers on business topics often are affiliated with corporate entities. Are they permitted to give presentations provided the content of their talk does not promote any specific products?**

Yes, provided the event has been approved by the External Activities Oversight Committee and scheduled through the Office of Student and Academic Services.

**10. How will donations in support of special educational events that currently rely on external sponsorship such as Large Animal Symposium, Special Species Symposium, Open House, Feline Follies etc. be handled?**

These activities add value to the academic environment and to the larger community. Organizers of these events, when approved by the External Activities Oversight Committee, may solicit donations and sponsorship from external entities. Donations may be deposited directly into the college account designated for the event. Sponsors may be recognized at the event in a manner that is consistent with the policy for sponsors of Continuing Education events.

**11. My club receives funding directly from a national organization. A portion of the funding that organization distributes comes from commercial sources. Can we still accept the gift?**

Yes, these may be deposited directly into your club account.

**12. What kinds of donations or gifts to cohorts of students or student organizations are permitted?** The College welcomes gifts that support student professional

development. All gifts to student organizations must be disclosed and approved by the External Activities Oversight Committee. In order to facilitate small, routinely made gifts and avoid a tedious reauthorization process, the Committee may authorize continuing annual gifts or donations that are unchanged. Examples of such small gifts include computer memory sticks sponsored by the NYSVMS, Dog Books sponsored by the American Kennel Club, food donated to support students participating in the College's Open House, etc.

**13. I receive a scholarship that is supported by a corporate entity. Does this policy prohibit me from accepting these funds?**

No. Scholarships are excluded from the definition of a gift.

**14. My club wants to plan activities that will comply with the policy. What criteria must our event meet in order to be approved by the External Activities Oversight Committee?**

Activities that will be approved by the External Activities Oversight Committee will meet the following criteria:

- The activity or event will be free from direct sponsorship by a commercial entity
- Any invited speakers will be chosen by the student organization or other College host, and approved by that organization's Faculty Advisor
- The event will be scheduled through the Office of Student and Academic Services
- If the topic relates to a product or line of products, food will not be served unless the activity presents product information from more than one company
- All presenters will disclose their affiliations and sponsors will be acknowledged
- Events that have been previously reviewed and approved by the External Activities Oversight Committee may be repeated, but must be scheduled through the Office of Student and Academic Services.

As above, to facilitate this process, the External Activities Oversight may choose to authorize events on a continuing basis that meet the above criteria, so as to avoid repeated reauthorization of the same event.

**15. I am a student representative for Company X. What should I tell them about our plans to implement this policy, and how this will affect us?**

Feel free to share a copy of the policy with the company you represent. They will then be able to determine if or how they'd like to modify their relationship with the College.

**16. The company I work for is interested in hiring veterinary students for summer jobs. Are these permissible, and if so, how may I bring these opportunities to the attention of the students?**

Any employment opportunities may be posted on the students' website under "Job Listings" (<http://www.students.vet.cornell.edu/>)

**17. How will the External Activities Oversight Committee work, and how will it be comprised?**

The External Activities Oversight Committee will be comprised of:  
SCAVMA President and Treasurer

Student- elected Class representatives (1 each from the first- and second-year classes, 2 from each of the third- and fourth-year classes)  
 SCAVMA Faculty Advisor  
 Director of Student Services and Multicultural Affairs  
 Director of Veterinary Curriculum  
 Hospital Director  
 Assistant Dean for Learning and Instruction  
 Director of Continuing Education  
 Course Leader for Veterinary Practice: Professional Ethics  
 A representative from the College's Accounting Services Center  
 2 technicians from the CUHA

The committee will be empowered to act when a majority of members is present. (A quorum will be defined as 2/3 of the members of the committee.)

The charge of the External Activities Oversight Committee will be to:

- Help determine the balance and type of extracurricular and co-curricular activities held in the College
- Ensure that these events are free from undue bias or influence, based upon current research and scientific information, and disclose any relationships with commercial entities
- encourage clubs to collaborate in planning and coordinating activities
- help allocate funds from the Student Activities Account
- establish communication guidelines for students who are employed as Company Representatives
- communicate endorsement, once activities have been reviewed

**18. How will the review process be implemented so that it is as efficient as possible and does not create obstacles to planning?**

It will be very important to develop a process that is timely and efficient. The details of the process have yet to be defined, but the goal is to create a process that is not unduly onerous.

**19. Do all events sponsored by student clubs and those funded by GPSAFC need review, and can they serve food?**

All events should be reviewed so that they may be considered in the context of the activities for that term and scheduled accordingly. Activities sponsored using club or GPSAFC funds may serve food. Please see section A. 2, above.

**20. Will it be possible to earmark donations to the Student Activities Fund for specific clubs and/or activities?**

No. Any club may solicit sponsorship from external companies or groups, but all forms of financial support must be deposited into the Student Activities Fund. Clubs may apply for these funds through the MEOW process.

**21. Will there be a special process for seeking financial support or sponsorship of Senior Week activities?**

Yes. The external Activities Oversight Committee will set aside monies each year for Senior Week Activities, which, at a minimum, will cover the cost of the Senior Picnic.

Members of the Fourth Year Class may engage in fund raising activities (such as t-shirt sales, bake sales, etc.) to supplement this annual allocation.

**22. There are different types of non-profit organizations. Does this policy apply to all non-profits in the same way?**

No. Any mention of a “non-profit” organization in this policy refers to a designation of 501 (c)(3), or a charitable organization. Non-profit organizations with any other designation (such as 501 (c)(6) are treated under this policy as any other corporate entity.

**Continuing Education FAQ:**

**1. Can a vendor sponsor an individual speaker?**

No, vendors may sponsor a laboratory or themed conference track with speaker selection at the discretion of the organizing faculty member or conference committee.

**2. Can a corporate logo appear on the title slide of a CE presentation?**

No, a corporate logo may only appear on the financial disclosure slide.

**3. I am a faculty member talking at a regional VMA with corporate sponsorship. Am I required to follow these regulations?**

You are required to abide by these regulations only if the Cornell University College of Veterinary Medicine will be acting as the official NYS/RACE sponsor locally or for distant programs– see CE SOP for further details.