FINANCIAL CONFLICT MANAGEMENT PLAN

Professor

Consistent with the principles outlined in Cornell Policy 1.7, Financial Conflict of Interest Related to Research, this management plan addresses the external financial interests of Professor NAME and their intersection with his Cornell research as specified below. It defines requirements that when met will ensure the integrity of Cornell research by eliminating any reasonable expectation that the research results are biased by Professor NAME’s financial self-interest, protect academic freedom and the academic best interests of Cornell students, allow for the pursuit of his entrepreneurship interests, and fulfill regulatory and policy requirements.

1. Background
   - Describes Prof NAME’s association with and title at Cornell University
   - Describes the nature of the external relationships related to Cornell research and the intersection with Cornell responsibilities as applicable: including company funding, licensing activity, consulting or other compensation, management roles, involvement of students or employees, etc.

   Funding:
   - Describes the relationship between the external interest and current sponsored activities that Prof NAME is engaged in.

2. Scope
   - The Conflict Management Plan (CMP) covers research conducted or supervised by Professor NAME and Professor NAME’s financial interests and commitments with ENTITY.
   - Notes if human participants are involved in Professor NAME’s research.
3. **Disclosure to students, collaborators and in publications/conferences:**

- Professor NAME will disclose his external financial interest in ENTITY to his students, fellows, trainees, and staff for whom he has direct supervisory responsibilities; to collaborators in the research related to ENTITY; to editors of journals when submitting publications that are related to ENTITY; and to organizers of conferences where he is presenting research results related to ENTITY. See Appendices for the disclosure statement(s) and attestation process.

4. **Conduct of research**

- Professor XXXXX, the Chair of Professor NAME’s Department at Cornell, will serve as the Conflict Manager for this Conflict Management Plan. Professor XXXXX does not have any interest in or relationship with ENTITY, does not have any direct interest in the research covered by this plan, and is not connected to Professor NAME or his lab members in any way that could influence or appear to influence the outcome of the research.

- The Conflict Manager (CM) has the following responsibilities:
  - The CM will review and sign-off that appropriate disclosures have been made to students, employees, and collaborators and to publishers and in conferences as required under the CMP, using the disclosures included as Appendices A.
  - The CM will submit a timely report of the semi-annual assessment, including a copy of the completed checklist (Appendix C), to the fCOI Committee* and serve as a liaison between the Committee and Professor NAME to implement any changes to the CMP if required.

* fCOI Contact: Amita Verma (av234@cornell.edu, 255-2214)

5. **Interaction with students and other personnel involved in Cornell research**

- Professor NAME will provide the Conflict Manager with an updated list of any students (graduate and undergraduate), staff, and postdoctoral associates that are working on the ENTITY related research in Professor NAME’s lab.
- All students, postdoctoral associates, fellows, trainees, and staff under Professor NAME’s supervision will be provided, no later than upon the execution of the CMP or within 7 days upon appointment and annually thereafter, the disclosure in Appendix A.
- Cornell staff or students, including postdoctoral associates, under the direct supervision of Professor NAME may not have a part-time or full-time position as an ENTITY employee or contractor.

  *(Note: This prohibition does not apply to students on academic leave or during summer break.)*

6. **Reporting**

- Professor NAME will comply with requests for information on his external interests related to his Cornell research from the Office of Research Integrity and Assurance (ORIA) and will work with ORIA and the CM to support compliance with regulatory requirements related to the management plan.
• In the event Professor NAME has independent written or oral communications regarding this management plan with any government agency, he will advise ORIA of the communication within 15 days.
  * ORIA Contact: Amita Verma (av234@cornell.edu, 255-2214)

7. Change in circumstances

Professor NAME will report any of the following to ORIA within 15 days of occurrence:

• significant changes to his financial relationships with or compensation from ENTITY;
• changes in his management, supervisory, or advisory responsibilities at ENTITY;
• any new compensation from ENTITY to Cornell students and staff who are under the direct academic or professional supervision of Professor NAME, or any other significant engagement between ENTITY and these individuals or members of their immediate families;
• involvement of human participants in his research;

or

• any new relationship between ENTITY and Professor NAME’s research collaborators at Cornell.
• any new relationships related to Cornell research, between any external entity and Professor NAME.

8. Purchases of products and services

   Procurement:

• Professor NAME may not use Cornell resources to purchase products or services for use by ENTITY.
• Professor NAME may not make any final decisions involving the purchase of products or services from ENTITY using funding under his control. Any purchases from ENTITY recommended by Professor NAME or his staff and students must be justified and approved in writing by the Conflict Manager. All purchases must be made in accordance with Cornell’s procurement policies and procedures.

   Sub-awards:

• Prior to the issuance of any sub-award from Cornell to ENTITY for a project on which Professor NAME is named as a PI or key personnel, Professor NAME’s financial interest in ENTITY must be disclosed to the sponsor, along with suitable justification for the sub-award. The proposed sub-award must be approved in writing by the funding agency, either as part of the award, or in a separate document prior to execution of a sub-contract from Cornell to ENTITY. (Sample disclosure to sponsor included in Appendix D)
9. **Inventions**

Professor NAME agrees to provide to the Cornell Center for Technology Enterprise and Commercialization (CCTEC) a copy of every provisional or full patent application made by the Company listing him as an inventor or a co-inventor within thirty days of filing. The disclosure requirement shall apply to all patentable inventions including those that he has reason(s) to believe shall not be owned by the University. Professor NAME should include with the copy of the application a statement of the reasons why he believes the University shall not own the invention, if applicable, so that the University may determine the proper ownership according to University policies.

10. **Use of Cornell facilities**

Any use of Cornell facilities and services by Professor NAME or his students or staff for the benefit of ENTITY and any use of Cornell facilities and services by any ENTITY employee or affiliated individual will be covered by a written agreement between Cornell and ENTITY and approved in advance by the Senior Vice Provost for Research. This requirement includes any use of Professor NAME’s laboratory and equipment for the benefit of ENTITY.

- This requirement does not apply to the appropriate use of Cornell facilities and services for the purpose of carrying out the Cornell research related to Professor NAME’s interest in ENTITY.
- This requirement also does not apply to the use of those Cornell facilities and services that are openly available to outside commercial entities, provided that the fees for such use are paid directly by ENTITY or some other outside commercial entity.

11. **Use of Cornell’s name, logo and artwork**

According to Cornell University Policy 4.10, Use of Cornell’s Name, Logos, Trademarks, and Insignias, Page 8:

“Faculty and staff members may use Cornell’s name as a factual reference to identify themselves in a manner that does not imply university endorsement. For example, using “John Smith, Professor of Psychology, Cornell University” on a book jacket or journal article or on a business card. However, the use of Cornell letterhead, address, or other identification to suggest or imply university support for a personal viewpoint should be avoided.”

Professor NAME will advise ENTITY that the name of Cornell University or any variant will not be used in any advertising, publicity, securities offering, or other public statement by, on behalf of, or regarding ENTITY, including any website controlled by ENTITY or by any other company without express written approval of Cornell University. Requests concerning use of the Cornell University name and affiliation should comply with Cornell University Policy 4.10, Use of Cornell’s Name, Logos, Trademarks, and Insignias.
Agreement:

I understand and agree to the terms and conditions laid out in the Conflict Management Plan.

I understand that failure to adhere to the plan may require Cornell University to report such non-compliance to external agencies or sponsors funding my research, may result in the loss of external funding, may require repayment of funds to the external agency or sponsor, and may subject me to disciplinary action in accordance with Cornell Policy 1.7, Financial Conflict of Interest Related to Research and policies referenced therein.

I understand this plan is effective immediately on the date that I sign below and until such time as expressly revoked in writing by the fCOI Committee.

Researcher:

___________________________________  _____________
NAME        Date

Conflict Manager:

___________________________________  _____________
CM NAME       Date

fCOI Committee Chair:

___________________________________  _____________
Professor Bruce Ganem      Date
Appendix A:

Disclosure regarding external financial interest related to Cornell research to students

Dear

I have an equity interest in ENTITY FULL NAME (ENTITY). The outcomes of the research performed in my lab may be of interest to or may be beneficial to ENTITY.

In accordance with Cornell University policy, I have a Conflict Management Plan, which requires disclosure of the existence of my external interests to my students, fellows, trainees, employees under my supervision, collaborators in the research related to ENTITY, and publishers of my/our research that is related to my external financial interest in ENTITY. Professor XXXXX, who does not have any financial interest in, or relationship with ENTITY, has been appointed as the Conflict Manager, which means that s/he will work with me to assure that my relationship with ENTITY does not influence or appear to influence the integrity of our research; and that the interests and academic freedoms of my students, employees and collaborators are adequately safeguarded.

My relationship with ENTITY cannot inhibit your ability to receive, analyze or interpret data, or restrict publications or presentations resulting from our research, although publications may be delayed for the purpose of pre-publication review for a period consistent with Cornell policies.

Should you have any concerns regarding the conduct of the research, the reporting or publication of research results, or your academic progress, I invite you to discuss them with me. You are also welcome to discuss these concerns with the Conflict Manager, Professor XXXXX who will meet with you on a semi-annual basis, or the Chair of your Special Committee. Your discussions will be kept confidential at all times, and there will be no retaliation or adverse impact on your research or progress towards your degree for raising any questions related to my relationship with ENTITY.

Please sign and date the disclosure form below, return the original to me and keep a copy for your own files.

Sincerely,

NAME

Acknowledged and understood:

_________________________________  _____________________  ___________
Student Signature  Student name    Date
Appendix A-1:

Disclosure regarding external financial interest related to Cornell research to postdoctoral associates

Dear

I have an equity interest in ENTITY Inc. (ENTITY). The outcomes of the research performed in my lab may be of interest to or may be beneficial to ENTITY.

In accordance with Cornell University policy, I have a Conflict Management Plan, which requires disclosure of the existence of my external interests to my students, fellows, trainees, employees under my supervision, collaborators in the research related to ENTITY, and publishers of my/our research that is related to my external financial interest with ENTITY. Professor XXXXX, who does not have any financial interest in, or relationship with ENTITY, has been appointed as the Conflict Manager, which means that s/he will work with me to assure that my relationship with ENTITY does not influence or appear to influence the integrity of our research; and that the interests and academic freedoms of my students, employees and collaborators are adequately safeguarded.

My relationship with ENTITY cannot inhibit your ability to receive, analyze or interpret data, or restrict publications or presentations resulting from our research, although publications may be delayed for the purpose of pre-publication review for a period consistent with Cornell policies.

Should you have any concerns regarding the conduct of the research, the reporting or publication of research results, or your academic progress, I invite you to discuss them with me. You are also welcome to discuss these concerns with the Conflict Manager, Professor XXXXX who will meet with you on a semi-annual basis. Your discussions will be kept confidential at all times, and there will be no retaliation or adverse impact on your postdoctoral research or career development for raising any questions related to my relationship with ENTITY.

Please sign and date the disclosure form below, return the original to me and keep a copy for your own files.

Sincerely,

NAME

Acknowledged and understood:

___________________   _____________________  ___________
Postdoctoral Associate Signature   Postdoctoral Associate Name   Date
Appendix A-2:

Disclosure regarding external financial interest related to Cornell research to staff

Dear

I have an equity interest in ENTITY Inc. (ENTITY). The outcomes of the research performed in my lab may be of interest to or may be beneficial to ENTITY.

In accordance with Cornell University policy, I have a Conflict Management Plan, which requires disclosure of the existence of my external interests to my students, fellows, trainees, employees under my supervision, collaborators in the research related to ENTITY, and publishers of my/our research that is related to my external financial interest. Professor XXXXX, who does not have any financial interest in, or relationship with ENTITY, has been appointed as the Conflict Manager, which means that s/he will work with me to assure that my relationship with ENTITY does not influence or appear to influence the integrity of our research; and that the interests and academic freedoms of my students, employees and collaborators are adequately safeguarded.

My relationship with ENTITY cannot inhibit any collaborator’s or student’s ability to receive, analyze or interpret data or restrict publications or presentations resulting from our research, although publications may be delayed for the purpose of pre-publication review for a period consistent with Cornell policies.

Should you have any concerns regarding the conduct of the research, the reporting or publication of research results, or your academic progress, I invite you to discuss them with me. You are also welcome to discuss these concerns with the Conflict Manager, Professor XXXXX. Your discussions will be kept confidential at all times, and there will be no retaliation or adverse impact on your Cornell position for raising any questions related to my relationship with ENTITY.

Please sign and date the disclosure form below, return the original to me and keep a copy for your own files.

Sincerely,

NAME

Acknowledged and understood:

___________________  _____________________  ___________
Staff Member Signature  Staff Member Name   Date
Appendix A-3:

Disclosure regarding external financial interest related to Cornell collaborators

Dear

I have an equity interest in ENTITY, Inc. (ENTITY). The outcomes of the research performed in my lab may be of interest to or may be beneficial to ENTITY.

In accordance with Cornell University policy, I have a Conflict Management Plan, which requires disclosure of the existence of my external interests to my students, fellows, trainees, employees under my supervision, collaborators in the research related to ENTITY, and publishers of my/our research that is related to my external financial interest. Professor XXXXX, who does not have any financial interest in, or relationship with ENTITY, has been appointed as the Conflict Manager, which means that s/he will work with me to assure that my relationship with ENTITY does not influence or appear to influence the integrity of our research; and that the interests and academic freedoms of my students, employees and collaborators are adequately safeguarded.

My relationship with ENTITY cannot inhibit any collaborator’s or student’s ability to receive, analyze or interpret data or restrict publications or presentations resulting from our research, although publications may be delayed for the purpose of pre-publication review for a period consistent with Cornell policies.

Should you have any concerns regarding the conduct of the research, the reporting or publication of research results, or your academic progress, I invite you to discuss them with me. You are also welcome to discuss these concerns with the Conflict Manager, Professor XXXXX. Your discussions will be kept confidential at all times, and there will be no retaliation or adverse impact for raising any questions related to my relationship with ENTITY.

Please sign and date the disclosure form below, return the original to me and keep a copy for your own files.

Sincerely,

NAME

Acknowledged and understood:

___________________  _____________________  ___________
Collaborator Signature  Collaborator Name    Date
Appendix B:

Sample Disclosure to editors of publications, to conference organizers or at conference presentations

I have an equity interest in ENTITY Inc. (ENTITY) which holds the exclusive license to Cornell technology that was developed in my lab. The outcomes of the research performed in my lab may be of interest to or may be beneficial to ENTITY.

Required elements of disclosure:

Relationship with entity: including equity interest, licensing arrangement, consulting, management role, or any other relationship.

Funding: whether or not the entity with which the researcher has a financial interest funds the research, directly or indirectly.

Where applicable: that the relationship has been disclosed to Cornell University and is being managed in accordance with the CU policy 1.7 on financial conflicts of interest related to research.
# Appendix C: Checklist for Semi Annual CMP review

Attendees (must include at a minimum Professor NAME and Conflict Manager Professor XXXXX).

Please use the checklist to review and report the progress of the project and the compliance with the CMP over the time period (specify dates)

<table>
<thead>
<tr>
<th>Review item</th>
<th></th>
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<tbody>
<tr>
<td>1</td>
<td>Have all students, employees, and collaborators engaged in the research related to ENTITY received and signed a disclosure notification? <em>(Ensure signed disclosures match with the list of students, staff, and others provided by Professor NAME)</em>&lt;br&gt;Comments:</td>
</tr>
<tr>
<td>2</td>
<td>Have any new students, employees, or collaborators hired into the project/s signed a disclosure notification?&lt;br&gt;Comments:</td>
</tr>
<tr>
<td>3</td>
<td>Have proper disclosures been made to the editor of the publication(s) and to conference organizers?&lt;br&gt;(Review submitted manuscripts for disclosure language)&lt;br&gt;Comments:</td>
</tr>
<tr>
<td>4</td>
<td>Have any concerns been raised by students, employees, or collaborators on research that is related to ENTITY?&lt;br&gt;Comments:</td>
</tr>
<tr>
<td>5</td>
<td>If concerns have been raised, have you reported them to the fCOI Committee and overseen their resolutions?&lt;br&gt;Comments:</td>
</tr>
</tbody>
</table>

Signed: _____________________________ Professor XXXXX, Conflict Manager  Date:__________<br>_____________________________ Professor NAME  Date:__________

Please sign and send a copy of the document to ORIA at Amita Verma (av234@cornell.edu) within 5 days of the meeting. Retain original for your records.
Appendix D:

Sample Disclosure to Sponsors prior to the issuance of a Sub-Award to ENTITY

I am writing to inform you that I have DEFINE INTEREST (such as equity, management role, consulting, licensing activity, etc.) in ENTITY, which is listed as a sub-awardee of funds under the proposal (title and Number) currently under review by Sponsor name. The outcomes of the research performed in my lab may be of interest to or may be beneficial to ENTITY. I have disclosed this external relationship to Cornell University and it is being managed in accordance with University policy of financial Conflicts of Interest related to research.

Provide a justification for the selection of ENTITY as the sub-awardee and any other information you deem important to convey to the sponsor that the selection of ENTITY is not biased by your financial interests.