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 her 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 her 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. This information is collected from the individual disclosure report, licensing reports from CCTEC and sponsored activity from OSP.

**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 her external financial interest in ENTITY to her students, fellows, trainees, and staff for whom she 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 she 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 her 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 review and sign-off on any budget expenditures and budget reports related to the ENTITY funded research;
  - If Professor NAME is the Chair or member of the Special Committee of any graduate student that will be working on ENTITY funded projects, the CM will meet with the Special Committee at the initiation of the projects or within 30 days of the execution of this CMP, to make sure that all members are made aware of and can review the management plan, and their responsibility to take adequate measures to protect the student’s progress, ability to publish and meet degree requirements;
  - The CM will meet with Professor NAME on a periodic basis, not less than semi-annually, to review the progress of the students and to assess compliance with the terms of the management plan. This assessment will include the items in the checklist provided as Appendix C;
  - The CM will submit a timely report of the semi-annual assessment, including a copy of the completed checklist 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 should make every effort to avoid situations in which there may be a real or apparent conflict between her personal interests in ENTITY and the academic interests of Cornell students and postdoctoral associates under her direct supervision. If, after consultation with and approval by the CM, the involvement of such individuals in the research funded by ENTITY is deemed essential, the following scenarios will govern such involvement:
• Professor NAME will provide the CM with an updated list of any students (graduate and undergraduate), staff and postdoctoral associates that are working on the ENTITY funded research project.

• All students, postdoctoral associates, fellows, trainees and staff under Professor NAME’s supervision will be provided, no later than upon the execution of this CMP or within 7 days upon appointment and annually thereafter, the disclosures in Appendix A.

• The following individuals may not have a part-time or full-time position as a ENTITY employee or contractor:
  - Cornell staff or students, including postdoctoral associates, under the direct supervision of Professor NAME, and
  - Cornell students working on ENTITY funded Cornell research projects.

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

• Cornell graduate students will only be engaged in ENTITY funded research projects under a Cornell appointment as either a graduate research assistant (GRA) or as a part-time student.

• For any Cornell enrolled graduate student working on research on the ENTITY funded project, Professor NAME may serve as the Chair of a graduate student’s Special Committee under the following conditions:
  - Professor NAME will establish a research plan with milestones for each such student, agreed to by the student and the Committee;
  - At the initiation of the project or within 30 days of the execution of this CMP, the CM will meet with members of the Special Committee to review Professor NAME’s Conflict Management Plan, and on at least a semi-annual basis, hold independent meetings with the student(s) to discuss the activities in the lab and assess the effectiveness of the management plan in ensuring students’ progress against the research milestones agreed upon and towards Cornell University degree requirements. If at any time during the course of the research, the CM becomes aware of situations or concerns that may require some remedial action, s/she will inform the fCOIC Chair within 3 business days and in consultation with the fCOIC Chair, take appropriate remedial action;
  - Within 15 days of first becoming aware of the concern, the CM will provide a complete written report to the fCOI Committee Chair and any other University authorities per University policy of any such concerns and the remedial action taken.

If further conflicts arise that prevent, or appear to the CM or to the fCOIC to prevent Professor NAME from being able to serve appropriately as the Chair or member of the student’s Special Committee, the fCOIC will review this Conflict Management Plan and make appropriate modifications.

Where appropriate and as applicable, the considerations above shall be made for any student or post doctoral associate or fellow participating in the research, for whom Professor NAME may have supervisory or oversight responsibilities.
6. Reporting

- Professor NAME will comply with requests for information on her external interests related to her 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, she 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 her financial relationships with or compensation from ENTITY;
- changes in her 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 her 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/subawards

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 her control. Any purchases from ENTITY recommended by Professor NAME or her 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 she 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 she 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 her 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, LLC, (ENTITY) the sponsor of research project XYZ. ENTITY has been granted a Phase I STTR grant from the National Institutes of Health (NIH) and has flowed a portion of the NIH funding to Cornell to support research project XYZ.

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, to collaborators in the research funded by 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 this 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 this disclosure form below, return the original to me and keep a copy for your own files.

Sincerely,

NAME

Acknowledged and understood:

_______________________________________  ___________
Student Name and Signature     Date
Appendix A-1:

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

Dear

I have an equity interest in ENTITY, LLC, (ENTITY) the sponsor of research project XYZ. ENTITY has been granted a Phase I STTR grant from the National Institutes of Health (NIH) and has flowed a portion of the NIH funding to Cornell to support research project XYZ.

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, to collaborators in the research funded by 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 this 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 this disclosure form below, return the original to me and keep a copy for your own files.

Sincerely,

NAME

Acknowledged and understood:

______________________________________________________________________________

Postdoctoral Associate Name and Signature                      Date
Appendix A-2:

Disclosure regarding external financial interest related to Cornell research to staff

Dear

I have an equity interest in ENTITY, LLC, (ENTITY) the sponsor of research project XYZ. ENTITY has been granted a Phase I STTR grant from the National Institutes of Health (NIH) and has flowed a portion of the NIH funding to Cornell to support research project XYZ.

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, to collaborators in the research funded by 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 this 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 this disclosure form below, return the original to me and keep a copy for your own files.

Sincerely,

NAME

Acknowledged and understood:

_______________________________________   ___________
Staff Member Name and Signature     Date
Appendix A-3:

Disclosure regarding external financial interest related to Cornell collaborators

Dear

I have an equity interest in ENTITY, LLC, (ENTITY) the sponsor of research project XYZ. ENTITY has been granted a Phase I STTR grant from the National Institutes of Health (NIH) and has flowed a portion of the NIH funding to Cornell to support research project XYZ.

In accordance with Cornell University policy, I have a Conflict Management, which requires disclosure of the existence of my external interests to my students, fellows, trainees, employees under my supervision, to collaborators in the research funded by 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 this 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 this disclosure form below, return the original to me and keep a copy for your own files.

Sincerely,

NAME

Acknowledged and understood:

_________________________   ___________
Collaborator Name and Signature     Date
Appendix B:

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

This research project was funded by ENTITY, in which I have an equity interest and which holds the exclusive license to the technology that I invented and is patented by Cornell. ENTITY was awarded a Phase I STTR grant from the National Institutes of Health (NIH) and subcontracted a portion of the research to Cornell.

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

Please use this checklist to review and report the progress of the project and the compliance with the CMP over the time period ________________

<table>
<thead>
<tr>
<th>Review item</th>
<th>Details</th>
<th>Yes/No/NA</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Have all students, employees and collaborators engaged in the research received and signed a disclosure notification? <em>(Ensure signed disclosures match with the list of students, staff, and others provided by Professor NAME)</em></td>
<td>Comments:</td>
</tr>
<tr>
<td>2</td>
<td>Have any new students, employees or collaborators hired into the project signed a disclosure notification?</td>
<td>Comments:</td>
</tr>
<tr>
<td>3</td>
<td>Have proper disclosures been made to the editor of the publication(s) and to conference organizers? <em>(Review submitted manuscripts for disclosure language)</em></td>
<td>Comments:</td>
</tr>
<tr>
<td>4</td>
<td>Are the budget expenditures submitted to sponsors accurate and reasonable?</td>
<td>Comments:</td>
</tr>
<tr>
<td>5</td>
<td>Have any concerns been raised by students, employees or collaborators related to the research conducted under the ENTITY funded project?</td>
<td>Comments:</td>
</tr>
<tr>
<td>6</td>
<td>If concerns have been raised, have you reported them to the fCOI Committee and overseen their resolutions?</td>
<td>Comments:</td>
</tr>
</tbody>
</table>

Signed: _____________________________ Professor XXXXX, Conflict Manager     Date:__________

_____________________________ Professor NAME    Date:__________

Please sign and send a copy of this document to 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.