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. 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 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

- Because of the conflicting interests presented by Professor NAME’s role as a Cornell employee, and his personal financial interest in ENTITY, Professor NAME may not serve as a sole PI for any ENTITY funded research performed in his Cornell lab.

- Professor SMITH, mutually selected by Professor NAME and the financial Conflict of Interest Committee (fCOIC), will serve as a Co-PI on the ENTITY funded research performed in Professor NAME’s Cornell lab. Professor SMITH does not have any direct or indirect interest in or relationship with ENTITY. See Appendix E for the working definitions of PI and Co-PI.

- Professor XXXXX, the Chair of Professor NAME’s Department at Cornell, will serve as the Conflict Manager (CM) 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 review and sign-off on 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 project or within 30 days of the execution of this management plan, to make sure that all members are made aware of and can review the management plan, and are aware of 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 his personal interests in ENTITY and the academic interests of Cornell students and postdoctoral associates under his 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:

- 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 disclosure in Appendix A.
- 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.
- 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 the ENTITY funded Cornell research project.
  (Note: This prohibition does not apply to students on academic leave or during summer break.)
- Cornell graduate students will only be engaged in this research project 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 management plan, the CM will meet with members of the Special Committee to review Professor NAME’s Conflict Management Plan. The CM will 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/he 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 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;
- 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, except in the case of purchases required to conduct the ENTITY-funded research at Cornell, the results of which are and will remain Cornell property.
- 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 CM. All purchases will 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 funded by 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.

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 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.

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 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.

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 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.

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 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.

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>Yes/No/NA</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> 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>Yes/No/NA</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
<tr>
<td><strong>2</strong> Have any new students, employees or collaborators hired into the project signed a disclosure notification?</td>
<td>Yes/No/NA</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
<tr>
<td><strong>3</strong> 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>Yes/No/NA</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
<tr>
<td><strong>4</strong> Are the budget expenditures submitted to sponsors accurate and reasonable?</td>
<td>Yes/No/NA</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
<tr>
<td><strong>5</strong> Have any concerns been raised by students, employees or collaborators related to the research conducted under the ENTITY funded project?</td>
<td>Yes/No/NA</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
<tr>
<td><strong>6</strong> If concerns have been raised, have you reported them to the fCOI Committee and overseen their resolutions?</td>
<td>Yes/No/NA</td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
</tr>
<tr>
<td><strong>7</strong> Is Professor SMITH performing the agreed upon functions of the Co-PI on the ENTITY funded project?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>Comments:</td>
<td></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.*
Definitions*

- **Principal Investigator (PI):** This title identifies the individual responsible for the conduct of the project. This responsibility includes the intellectual conduct of the project, fiscal accountability, administrative aspects, and the project's adherence to relevant policies and regulations. A project may have multiple individuals as PIs who share the authority and responsibility for leading and directing the project, intellectually and logistically. Each PI is responsible and accountable for the proper conduct of the project. The presence of more than one identified PI on a project diminishes neither the responsibility nor the accountability of any individual PI.

- **Co-Principal Investigator (Co-PI):** This designation refers to individuals who share the responsibility for the project with the Principal Investigator and therefore requires the same qualifications.

*Please refer to the Principal Investigator Eligibility policy available on [http://www.research.cornell.edu/VPR/Policies/PI-policy.html](http://www.research.cornell.edu/VPR/Policies/PI-policy.html)