



Do you need to report these outside activities in the Conflict of Interest form?

	Does your external activity fall into any of these categories?	Should you report?	Explanation
EMPLOYMENT AND APPOINTMENTS			
1	I was employed over the past year at another company/institution , but the previous employment has been terminated and now I am an employee of Cornell. Should I report my employment at the other entity?	No	Do not report your previous employment as an external financial interest because you are subject to Cornell policy only after your employment with Cornell begins.
2	I will be leaving Cornell in the coming year, to be employed at another company/institution . My Cornell employment will be terminated at that time. Should I report this upcoming employment?	No	The Cornell policy will not apply to you when you are no longer a Cornell employee.
3	I had a part time or temporary employment at another US non-profit institution of higher education (college or university), US federal, state or local government agency during the reporting period (for example--visiting appointment at another US university, advisor to the FDA, consultant for the NIH, advisor to the President, etc.). Do I need to report this employment?	Yes, but limited only to the <u>number of days</u> spent	How to report: DO state the number of days spent on this engagement in Question 2 of the screening questions. A US non-profit institution for higher education, US federal, state or local government agency is not considered an external entity. Therefore this engagement or employment will not be considered an external financial interest. Do not report details of this engagement anywhere else on your report. The time spent on this activity will be used by your College/Department to determine if there could be a Conflict of Commitment (COC), in accordance with the University Conflicts policy. Click here for more on COC.
4	I have a part-time appointment at Cornell and another appointment at an external entity. Should I report my other employment?	Yes	Please explain the relationship in your report, so that the fCol Committee can use it to determine if the external activity constitutes a significant financial interest.
5	I have a visiting appointment at Cornell but my primary employment is with a non-Cornell entity. Should I report my employment and income from my primary employer?	Yes	Even if your Cornell appointment is unpaid or if the compensation from Cornell is in kind, your employment with a non- Cornell entity must be reported.



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6	I have a teaching (or extension) appointment at Cornell and don't do any sponsored or any other kind of research. I have other teaching appointments and or other compensated external activities elsewhere. Do I need to report my non-Cornell teaching activities?	Yes	Your College/Unit may use it to determine the possibility of a Conflict of Commitment. Click here for more on COC.
7	I am or was on sabbatical leave for some or all of the reporting period. During this time, I had an appointment at another entity. This entity was not another US institution of higher learning or a US government agency. Should I report my income and external activities during my sabbatical leave?	Yes	During your sabbatical, your Cornell appointment was still active. Therefore any engagement with an outside entity during this time is reportable.
8	Appointments at foreign or international entities: I have taught courses, given seminars or have had other engagements at foreign universities, organizations of the United Nations, foreign government agencies or NGOs over the past year. I was compensated for these activities. Should I report these activities?	Yes	Income from non US entities --education, governmental, non-profits--is considered an external financial interest that needs to be reported.
EQUITY/OWNERSHIP INTEREST/SHARES			
9	I own a company and run some or part of the operations that does business that is not related to my Cornell work at all. Should I report this external activity?	Yes	This information may be used by your College/Unit to determine the possibility of a Conflict of Commitment.
10	I own stock in publicly traded companies and the value of some of those shares is more than \$5,000. Although the business of these companies maybe in the general area of my research, there is no other relationship (I don't consult for them or work with them or with a direct competitor). Do I need to report this stock?	No	If the companies' business interests are not related to your Cornell duties, this equity interest is not reportable.



ROYALTIES/INTELLECTUAL PROPERTY/INCOME FROM ONLINE COURSES			
	Does your external activity fall into any of these categories?	Should you report?	Explanation
11	I receive royalty income from a technology I developed as part of my previous employment at another entity . Should I report this income? What if the income is less than \$5,000?	Yes	Please disclose the existence of this licensing activity and the income. The amount does not matter in this case.
12	I get royalties from the sale of a textbook I wrote related to my area of expertise. Should I report this activity and income?	No	Royalties from publications of scholarly materials are not considered significant financial interests under current regulations. The amount of compensation is not relevant.
13	I receive royalty income from an invention that is licensed by Cornell to an outside entity . I have no involvement in that relationship. Should I report this licensing relationship? Should I report the royalty income that I receive from Cornell?	Yes	Please report the licensing relationship. You do not have to report the royalty income that you receive from Cornell.
14	I get income from e-Cornell for some courses that I have developed. Should I report this income? What if the income was for another online course that I developed for someone else?	No	e-Cornell and other Cornell enterprise units (Cornell Bookstore, SRI, etc.) are not considered an entity outside of Cornell. Income from online and other courses developed for outside entities is reportable.
ACTIVITIES OF SPOUSE/ PARTNER, DEPENDENT CHILDREN			
15	My spouse/ partner is not a Cornell employee. She owns a business that is not related to my Cornell activities. Should I report this activity in my report?	No	If your spouse’s business has no relationship with your Cornell duties, you do not need to report it.
16	My spouse/ partner , who is a Cornell employee, does paid consulting activities related to her Cornell research. She and I own an LLC that we have set up to manage her consulting activities and I share the management responsibilities for this company. Her consulting is NOT related to my Cornell work. Should I report this LLC and my role in its management?	Yes	However, since the entity is not related to your Cornell duties, you can answer “No” to “equity” because equity interests are only considered relevant if they are related to your Cornell duties. Your partner should respond with a “Yes” to the question on “Equity/Ownership” in her report. Since you are engaged in management responsibilities for this entity, it is an external commitment that should be reported for conflict of commitment determination.



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17	My spouse/ partner is a Cornell employee and does paid consulting activities related to his Cornell research. The consulting is NOT related to my Cornell work. Should I report his activities in my report?	No	Inasmuch as you are not participating in the consulting activity, and because your spouse/ partner’s consulting is not related to your Cornell duties, this is not considered an external interest for you. Your spouse/ partner should report the consulting in his disclosure.
EXTERNAL FUNDING FOR RESEARCH			
18	I receive sponsored funding from outside entities for my Cornell research. This funding is executed by the Office of Sponsored programs at Cornell (OSP). Should I report this award and the salary that I derive from it as compensation?	No	Sponsored programs funded by external entities and executed by Cornell’s OSP are not considered external financial interests.
19	I have received monetary or in kind gifts from outside entities for my Cornell research. These gifts were executed by the Gifts/Endowments/Foundations office at Cornell or at the College. The money went to the Department or College and was used to fund some or part of my research activities. Should I report the gift amount?	Yes	Gifts from external entities in support of your Cornell duties are considered external financial interests and need to be reported.
20	I gave a general unrestricted gift to my department, which was then used to fund some or part of my research, to support some of my students or to buy some equipment. Should I report this gift?	Yes	Gifts in support of your Cornell research are reportable. Even if the decision to use the gift to support your research was made by the department, and not you.
INCOME and CONSULTING			
21	I have set up an LLC to manage my consulting activities. Should I report it as “Consulting” or “Equity/ownership” or both?	Yes	Please report it as Consulting. You can also report it in Equity, and indicate your ownership percentage.
22	I engaged in an external activity for which my income over the past 12 months and expected income over the next 12 months is less than \$5,000. I do not have any ownership interest in the company that gave me this compensation. Should I report this even though the income is less than \$5,000?	Yes	This outside activity is reportable for determination of Conflict of Commitment by the College/Unit.



23	I received income from an inheritance or a personal monetary gift last year. This income is not related to my Cornell duties.	No	Family inheritance and personal gifts are not a reportable financial interest, unless they are related to your Cornell duties.
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Please contact us at coi@cornell.edu if this does not answer your question or if you have further questions.

For **general guidance** on when a reported external interest could be considered a conflict of interest related to research, refer to the Decision matrix on the COI website http://www.oria.cornell.edu/COI/documents_k/Guidance%20Matrix.pdf.

An external entity is related to your Cornell duties if:

- Entity provides gifts, grants, awards, or other funding to the University for support of your Cornell activities
- Entity is a sponsor, subcontractor, sub-awardee, or supplier or lessor of goods, materials, proprietary information, services, or facilities for your Cornell duties
- Entity makes use of your Cornell research or scholarly work either directly or indirectly
- Entity is a member of an industry, trade, or advocacy group that directly funds your research or funds a sponsor of your Cornell research
- Entity manufactures, commercializes, or is developing a product that is being used, evaluated, or further developed by your Cornell duties
- Entity will receive materials, data, or other information from your Cornell research and/or other Cornell duties
- Entity is a competitor of a sponsor of your Cornell research
- Entity refers human participants for your Cornell research