Guide for Conflict Managers for CMPs
Implemented by the FCOI Committee

Applicable to the Ithaca Campus

Introduction

Under Cornell Policy 1.7, a Financial Conflict of Interest (FCOI) arises when an individual’s financial interest or other opportunity for personal financial gain, is likely to or may appear likely to compromise or influence the objective design, conduct, reporting, or direct administration of research. The faculty Financial Conflict of Interest Committee (FCOIC) is charged with ensuring that real or apparent FCOIs are identified, that appropriate measures are taken to address the risk or appearance of bias in research, and to assure that University policies and guidelines that govern any outside engagement of academic personnel are followed, while allowing personal financial and professional freedom of the individual whose conflicts are being managed. FCOIs are addressed by implementing a Conflict Management Plan (CMP). 1

A critical step in managing any FCOI is the appointment of a Conflict Manager (CM). It is the duty of the CM to oversee compliance with the CMP, serve as a resource for the individual whose conflict is under management, and act as a liaison to the Conflict of Interest office.

Who may serve as a Conflict Manager

The FCOIC implements a CMP and appoints a CM for each individual whose external interests may present a FCOI. Typically, the Chair of a Cornell department is asked to serve as the CM for any CMP involving individuals in his or her department. If, however, the Chair has a relationship with the entity described in the CMP (for example, a financial interest or an advisory role) or participates directly in the research covered by the CMP (for example, as a collaborator, advisor, or reviewer), then in consultation with the college leadership and the managed individual, the FCOIC may call upon another senior member of the faculty or staff, unaffiliated with the research or the external entity, to serve as the CM.

Role of the Conflict Manager

It is the role of the CM to oversee compliance with the CMP and serve as a resource for the individual whose conflicts are under management, as well as to staff and students affected by the research. This guidance outlines the specific responsibilities of a CM, however recognizing that it is not possible to cover every possible instance that may arise in the course of managing a conflict, CMs should consult with the Cornell COI office for guidance on specific matters.

Specific duties of the CM are as follows:

1 For a template Conflict Management Plan, please visit the COI page here: https://oria.cornell.edu/COI/mgmtplaninfo/
• ensure that appropriate disclosures have been made to students, employees, collaborators, publishers, and in conferences as required in the CMP;
• meet with the managed individual’s students annually to discuss any concerns related to the managed relationship;
• meet with the managed individual annually or as required by the FCOIC, to assess compliance with the terms of the CMP;
• submit an annual report of compliance with the terms of the CMP, including a copy of the completed checklist included in the CMP, to the FCOIC;
• serve as a liaison between the FCOIC and the managed individual to implement any changes to the CMP that are required due to changes in circumstances or relationship between the managed individual and the entity, or between their research and the entity;
• review and approve any proposed purchases of products or services by the managed individual or his or her staff or students, from the entity;
• report to the COI office any concerns raised by students, employees, or collaborators concerning the FCOI managed under the CMP or research that is related to the managed entity, and partner with the FCOIC as necessary to address and resolve those concerns.

If the entity seeks to sponsor Cornell research under the supervision of the managed individual, the CM may be required to provide additional oversight, such as:

• review and sign-off on budget expenditures and budget reports for Cornell research that is sponsored by the managed entity;
• if the managed individual acts as the Chair or member of the Special Committee of any graduate student who will be working on projects funded by the managed entity, meet with the Special Committee at the initiation of the project or within 30 days of the execution of the CMP to make sure that all members are made aware of and review the CMP, and are aware of their responsibility to take adequate measures to protect the student’s progress and ability to publish and meet degree requirements;
• if the FCOIC requires the appointment of a Co-PI for an entity-sponsored project, assist in identifying an appropriate person to serve as the Co-PI and ensure that the Co-PI is able to execute his/her responsibilities to the project as required by the sponsor and the FCOIC.

If the managed individual seeks to issue a sub-award to the entity with which s/he has the managed relationship, the CM will:

• Review and approve any increases over $5,000 in sub-award funding to the entity

Additional Information

For additional information about the role of the Conflict Manager, please contact the Director of the Office of Research Integrity and Assurance, Amita Verma (av234@cornell.edu, 255-2214) or the Assistant Director, Guilaine Senecal (gds64@cornell.edu, 255-8994).