FINANCIAL CONFLICT MANAGEMENT PLAN
Professor REPORTER FULL NAME

As required under Cornell Policy 1.7 on Financial Conflicts of Interest Related to Research, this conflict management plan (CMP) has been put in place to address the intersection of Professor REPORTER FULL NAME’s external financial interests with HIS/HER Cornell duties, as described below. This CMP defines requirements which ensure the integrity of Cornell research by eliminating any reasonable assumption that the research results are biased by financial self-interests, while also allowing for the pursuit of entrepreneurial interests, protecting the academic freedom and the academic best interests of students, protecting the interests of the institution and fulfilling regulatory and policy requirements. In case of non-compliance with the terms of this CMP, Cornell may be required to report such non-compliance to external agencies or sponsors funding related research, which may result in the loss of funding or require repayment of funds to the sponsor.

Description of the managed relationship:
Description of the relationship, funding, human participants, and the intersection of interests that require a CMP.

Conflict Manager:
Professor CONFLICT MANAGER FULL NAME agrees to serve as the Conflict Manager for this CMP, taking responsibility for the duties laid out in the attached “Guide for Conflict Managers of CMPs Implemented by the FCOI Committee1.”

Professor REPORTER FULL NAME’s Specific responsibilities:
Professor REPORTER FULL NAME agrees to:
1. Disclosure: Disclose HIS/HER financial interest in the entity2 within 15 days of the execution of this CMP, and annually thereafter, to students, fellows, postdoctoral associates, trainees and staff who are under HIS/HER supervision, or who are working on any of HIS/HER research projects; to collaborators in HIS/HER research that is related to the entity; to editors of journals when submitting publications; and to organizers of conferences where research results are presented that are related to the entity;
2. Paid Appointments: Ensure that Cornell students, fellows, postdoctoral associates, trainees, and staff working under HIS/HER direct supervision do not have a paid appointment with the entity3;
3. Visitors: Refrain from seeking or sponsoring the appointment of any employee of the entity as a visitor to the University4 without seeking prior approval from the cognizant Dean and the Senior Vice Provost for Research;
4. Purchases: Refrain from personally using Cornell resources to purchase products or services for use by the entity or permitting HIS/HER staff or students to make such purchases. If any purchases are to be made from the entity, written permission must be sought from the CM, who may approve or deny these purchases. All purchases must be made following Cornell Policy 3.25: Procurement of Goods and Services,
5. Intellectual Property: Following Cornell Policy 1.5 on Inventions and Related Property Rights, assign the rights to any inventions or related property rights that resulted from any activity conducted in the course of HIS/HER Cornell

---

1 Guide for Conflict Managers of CMPs Implemented by the FCOI Committee is provided in the appendices
2 Sample disclosure text is provided in the appendices
3 This prohibition does not apply to students during summer break, or students on academic leave
4 For more information, please consult your unit regarding policies and procedures for appointments of visiting scientists

Updated and approved by the FCOIC on March 7, 2018
appointment, or which utilized University resources, to the University or its designee. This includes, those provided through an externally funded grant, contract, or other type of award or gift to the University;

6. **Cornell Resources**: Not request or allow the use of Cornell facilities by the entity, including office materials or space, conference facilities, laboratory resources or equipment, or digital resources, unless such use is covered by an agreement executed by the Office of the Vice Provost for Research or another authorized representative of the University;

7. **Cornell Name**: Per Policy 4.10 on Use of Cornell’s Name, Logos, Trademark, and Insignias, use Cornell’s name only as a factual reference to identify HIM/HERSELF, and not in any manner which implies University endorsement;

8. **Conflict of Commitment**: Abide by HIS/HER college’s rules and expectations for commitment of time, per the expectations laid out in Cornell Policy 4.14 on Conflicts of Interest and Commitment and in the Faculty Handbook;

9. **Changes to Relationship**: Inform the Cornell COI office within 15 days, of any changes to HIS/HER relationship with the entity or the relationship of their research with the entity (for example, new funding, licensing agreement, involvement of human subjects in the research, etc.) and, if terms of the plan need to be changed to accommodate the changes, agree to abide by them;

10. **Seek Prior Approval**: Inform the COI office and seek prior approval if any individual mentioned in bullet 1 of this section seeks paid engagement with the entity;

11. **Annual Checklist**: Complete a checklist annually to confirm compliance with the terms of the CMP over the prior 12 months

12. **Sub-awards**: In the case of any sub-award to the entity, provide any information requested by Cornell’s Office of Sponsored Programs for the purpose of disclosing the financial interest to the sponsor. Suitable justification for the sub-award will be required. The CM must approve increases in funding by $5,000 or more to the entity under any sub-award from Cornell to the entity that is funded by a US government agency.

13. **Involvement of Human Participants in Research**: Not involve human participants in research that is related to the entity. If such participation is expected, a revised Conflict Management Plan will be required. See guidance here for specific requirements: [Guidelines for Managing Conflict of Interest in SBIR-STTR Projects](https://www.oria.cornell.edu/COI/documents/Guidelines%20for%20Managing%20Conflict%20of%20Interest%20in%20SBIR-STTR%20Projects.pdf)

14. **Company funding for Cornell research**: Become aware of and comply with the special terms that must be in place before the entity can sponsor research at Cornell, whether directly, as an industry partner for a Cornell program, or as a sub-award for an SBIR/STTR project. Some conditions, such as review for appropriate use of Cornell resources and student involvement, apply before proposals can be submitted, and others, such as appointment of a Co-PI and independent budget review, may be required before an award can be accepted. We advise researchers to consult with the COI office prior to submitting a proposal for such funding. Guidance on this topic is also available here: [Guidelines for Managing Conflict of Interest in SBIR-STTR Projects](https://www.oria.cornell.edu/COI/documents/Guidelines%20for%20Managing%20Conflict%20of%20Interest%20in%20SBIR-STTR%20Projects.pdf)

By signing below, all parties agree that the terms of this conflict management plan are acceptable to effectively manage any real or apparent conflicts arising from the intersection of relationships described here, and that all individuals identified in this plan agree to fulfil their responsibilities as described. If the terms of this plan are not followed, this will constitute non-compliance.

---

5 Checklist is provided in the appendices

6 All proposed sub-awards must be approved in writing by the funding agency prior to the execution of a sub-contract from Cornell to the entity. Sample disclosure text is provided in the appendices
with Cornell policies. Cornell may be required to report such non-compliance to external agencies or sponsors funding related research, which may result in the loss of external funding or require repayment of funds to the sponsor.

___________________________________  _____________
Professor REPORTER FULL NAME                  Date

___________________________________  _____________
Professor CONFLICT MANAGER FULL NAME            Date

___________________________________  _____________
Professor Maurine E. Linder, FCOIC Chair         Date
Sample disclosures
To students, postdoctoral associates, fellows, and trainees engaged in research related to the interests of ENTITY NAME under Professor REPORTER NAME’s academic supervision

Dear

Per university policies pertaining to disclosures of potential Conflicts of Interest, I am writing to inform you that I have a financial interest in an external company.

RELATIONSHIP SUMMARY. Since the outcomes of my Cornell research may be of interest to or may be beneficial to this company, university policies require that we disclose these potential for conflicts and inform you of the principles that govern how these conflicts are managed.

In accordance with Cornell University policy, a Conflict Management Plan is in effect to ensure that my relationship with my company does not influence or appear to influence the integrity of our research.

My relationship with ENTITY NAME may not inhibit your ability to receive, analyze or interpret data, or restrict publications or presentations resulting from our research, nor alter or compromise the quality and scope of our Cornell research.

I invite you to discuss your concerns about this relationship with me. You are also welcome to discuss them with Professor CONFLICT MANAGER FULL NAME, who will meet with you on at least an annual basis, or with your Faculty Advisor or Committee Chair if you are a student. Your discussions will be kept confidential at all times.

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

Sincerely,

REPORTER FULL NAME

Acknowledged and understood:

________________________________________  _____________________  ___________
Student Signature  Student name    Date
Sample Disclosures

To staff and collaborators engaged in research related to the interests of ENTITY NAME under Professor REPORTER NAME’s academic supervision

Dear

Per university policies pertaining to disclosures of potential Conflicts of Interest, I am writing to inform you that I have a financial interest in an external company.

RELATIONSHIP SUMMARY. Since the outcomes of my Cornell research may be of interest to or may be beneficial to this company, university policies require that we disclose these potential for conflicts and inform you of the principles that govern how these conflicts are managed.

In accordance with Cornell University policy, a Conflict Management Plan is in effect to ensure that my relationship with my company does not influence or appear to influence the integrity of our research.

My relationship with ENTITY NAME may not inhibit your ability to receive, analyze or interpret data, or restrict publications or presentations resulting from our research, nor alter or compromise the quality and scope of our Cornell research.

I invite you to discuss your concerns about this relationship with me. You are also welcome to discuss them with Professor CONFLICT MANAGER FULL NAME. Your discussions will be kept confidential at all times.

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

Sincerely,

REPORTER FULL NAME

Acknowledged and understood:

_________________________________________  ___________________________________________  ___________________________
Signature   Name                             Date
Sample Disclosures

To editors of publications, to conference organizers or at conference presentations

I am writing to inform you that RELATIONSHIP AND FUNDING SUMMARY. Since the outcomes of my Cornell research may be of interest to or may be beneficial to this company, university policies require that we disclose these potential for conflicts. I have disclosed this relationship to Cornell University and it is being managed in accordance with the CU policy 1.7 on financial conflicts of interest related to research.

To Sponsors prior to the issuance of a Sub-Award to ENTITY NAME

I am writing to inform you that RELATIONSHIP SUMMARY.

ENTITY NAME 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 NAME. 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 NAME as the sub-awardee and any other information you deem important to convey to the sponsor that the selection of ENTITY NAME is not biased by your financial interests.
A CMP was implemented to manage any real or apparent conflicts of interest presented by the intersection of Professor REPORTER FULL NAME’s relationship with ENTITY NAME and HIS/HER Cornell duties. The terms of the plan require an annual review and certification of compliance with the CMP. Please use this checklist to certify compliance over the time period of COMPLIANCE PERIOD.

Regarding the relationship with ENTITY NAME, Professor REPORTER FULL NAME certifies the following:

<table>
<thead>
<tr>
<th>Option</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disclosure</td>
<td>Disclosures have been made regarding the relationship with the company to all to students, fellows, postdoctoral associates, trainees and staff who are under his supervision, or who are working on any of their research projects; to collaborators in his research that is related to the company; to editors of journals when submitting publications; and to organizers of conferences where research results are presented that are related to the company.</td>
<td></td>
</tr>
<tr>
<td>Comments:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Involvement of Cornell Staff or Students | Cornell students, fellows, postdoctoral associates, trainees, and staff working under his direct supervision do not have a paid appointment with the company. | |
| Comments: | |

| Concerns Addressed | Have any concerns been raised by students, employees, or collaborators concerning the potential COI managed under the CMP, or regarding research that is related to the company? If so, please describe the nature of the concern(s), and how they have been resolved. | |
| Comments: | |

| Compliance with Cornell Policies | • Cornell resources have not been used by the company, including office materials or space, conference facilities, and lab resources or equipment, unless such use is covered by an agreement executed by the Office of Sponsored Programs or another authorized representative of the University; • Visiting appointments have not been sought or sponsored for company representatives except under the conditions outlined in the CMP; • Cornell’s name has not been used by Professor REPORTER FULL NAME to imply university endorsement of the company; Professor REPORTER FULL NAME and his students and staff have not used Cornell resources to purchase products or services for use by the company. If purchases were made from the company, written permission was first granted by the CM. | |
| Comments: | |
Regarding the relationship with ENTITY NAME, Professor REPORTER FULL NAME & Professor CM LAST NAME certify that the information above is complete and accurate.

**Signed:**

______________________________  Professor CM NAME, Conflict Manager  
Date: __________

______________________________  Professor REPORTER FULL NAME  
Date: __________
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). 

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/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:

---

2 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/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).