

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. This CMP will be in effect for as long as these financial interests continue, unless expressly revoked by the Cornell Financial Conflict of Interest Committee (FCOIC).

Description of the managed relationship:

REPORTER FULL NAME is XXXXXXXX at Cornell, in the Department of XXXXXXXXXX. Describe relationship with ENTITY NAME (hereafter referred to as the "entity"). Because of XXXXXXXXXXXX, the intersection of these relationships presents a conflict of interest that must be managed.

Conflict Manager:

Professor CONFLICT MANAGER FULL NAME agrees to serve as the Conflict Manager (CM) 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:

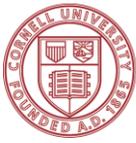
1. **Disclosure:** Disclose HIS/HER financial interest in the entity² within 15 days of the execution of this CMP, and annually thereafter, to ALL students, fellows, postdoctoral associates, trainees and staff who are under HIS/HER supervision, or who are working on any of HIS/HER research projects; 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 also 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 Vice Provost for Research;
4. **Purchases:** Refrain from 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

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*

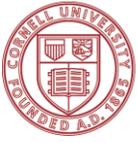


sought from the CM, who may approve or deny these purchases. If the purchase is to be made on sponsored funds, the sponsor may need to be informed. All purchases must be made following [Cornell Policy 3.25: Procurement of Goods and Services](#).

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 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 ([Policy on Use of University Facilities](#));
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 HIS/HER research with the entity (e.g., new funding, licensing agreement, involvement of human subjects in the research, etc.), and agree to abide by any amendments that may need to be made to the terms of this plan to accommodate the changes in relationship;
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 checklist⁵ annually to confirm compliance with the terms of the CMP over the prior 12 months, and address any concerns or questions promptly and appropriately;
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 required⁶. 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 our [guidance document](#) for specific requirements;
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. See our [guidance document](#) on this topic;

⁵ Checklist is provided in the appendices

⁶ All proposed sub-awards must be approved 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



15. **Address concerns:** if any individual or organization raises a COI concern about the design, conduct or reporting of research subject to this plan, provide the necessary information to, and fully cooperate with, the Conflict Manager and the FCOI Committee to report and resolve those concerns in a timely manner and implement corrective actions when necessary.

Agreement:

By signing below, all parties agree that the terms of this Conflict Management Plan are acceptable to manage effectively 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 any concerns raised are not resolved in a reasonable manner, or if the terms of this plan are not followed, the Cornell FCOI Committee may withdraw approval of this plan indicating that Professor REPORTER NAME may no longer engage in a financial activity with the entities while also pursuing related research, or impose additional conditions to allow continuation of that relationship. Cornell may also need to report such concerns or non-compliance to external agencies or sponsors funding related research, which may result in additional reporting, oversight or in extreme cases, the loss of external funding or repayment of funds to the sponsor.

Professor REPORTER FULL NAME

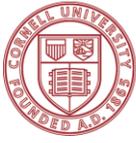
Date

Professor CONFLICT MANAGER FULL NAME

Date

Professor Maurine E. Linder, FCOIC Chair

Date



Sample disclosures

To all students, postdoctoral associates, fellows, trainees, and staff engaged in research 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, and that, in accordance with University policy, Cornell has implemented a plan to manage any real or apparent conflicts of interest resulting from that relationship.

RELATIONSHIP SUMMARY. This intersection of relationships presents a conflict of interest that must be managed. University policies require that we disclose these potential for conflicts and inform you of the principles that govern how these conflicts are managed.

A Conflict Management Plan is in effect to ensure that my relationship with ENTITY NAME does not influence or appear to adversely influence the integrity of our research, affect your ability to make academic progress or to conduct your Cornell responsibilities. This plan also guards against any undue influence on your ability to objectively design, conduct or analyze and report data and research, or publish or present results from our research.

If you have any concerns about this relationship, I invite you to discuss them 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 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, and that, in accordance with University policy, Cornell has implemented a plan to manage any real or apparent conflicts of interest resulting from that relationship.

RELATIONSHIP SUMMARY. This intersection of relationships presents a conflict of interest that must be managed. University policies require that we disclose these potential for conflicts and inform you of the principles that govern how these conflicts are managed.

A Conflict Management Plan is in effect to ensure that my relationship with ENTITY NAME does not influence or appear to adversely influence the integrity of our research. This plan also guards against any undue influence on your ability to objectively design, conduct or analyze and report data and research, or publish or present results from our research.

If you have any concerns about this relationship, I invite you to discuss them 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,

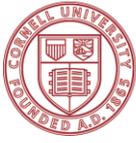
REPORTER FULL NAME

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 OSP 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.