



Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

POLICY STATEMENT

All members of the Cornell University community are expected to conduct the affairs of the university in a manner consistent with their primary commitments to the university, and the performance of their professional responsibilities must be free from real or apparent bias motivated by self-interest. This policy, and the complementary University Policy 1.7, Financial Conflict of Interest Related to Research, sets forth the principles and procedures to identify, report, review, and manage real and apparent conflicts of commitment and conflicts of interest.

REASON FOR POLICY

The university recognizes that the quality of teaching, research, extension service, and the administration of university programs may be enhanced when members of the Cornell University community participate in extramural activities. This policy establishes the principles and procedures to assure that individuals' primary commitments to the university and the objective performance of their professional responsibilities are not adversely affected by external commitments and financial interests.

ENTITIES AFFECTED BY THIS POLICY

- All units of the university

WHO SHOULD READ THIS POLICY

- Trustees, faculty, and staff

WEB ADDRESS FOR THIS POLICY

- This policy: www.dfa.cornell.edu/treasurer/policyoffice/policies/volumes/governance/conflicts.cfm
- University Policy Office: www.policy.cornell.edu

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

CONTENTS

Policy Statement	1
Reason for Policy	1
Entities Affected by this Policy	1
Who Should Read this Policy	1
Web Address for this Policy	1
Contents	2
Related Resources	4
Contacts	5
Definitions	6
Responsibilities	8
Principles	9
Overview	9
Conflicts of Interest	9
Financial Conflicts of Interest Related to Research	10
Conflicts of Commitment	11
Community, Civic, and Governmental Activities	12
Procedures	13
Trustees, Overseers, Officers of the Corporation, and Other Senior Administrators	13
Deans, Directors, and Academic Unit Heads	14
Academic and Nonacademic Staff Members Involved in Research	14
All Other Academic Staff	15
All Other Nonacademic Staff	15
Managing Reporting-Line Conflicts (Including Avoiding Nepotism)	16
Appeals	17
Sanctions for Non-Compliance	17
Reporting Suspected Conflicts of Others	18
University Conflicts Committee (UCC)	18
Additional Procedures Specific To Weill Cornell Campus Units	19
Conflicts Management Office (CMO)	19
Conflicts Advisory Panel	19
Conflict Disclosure	20
Travel Disclosure	20
Sanctions and Disciplinary Actions	22
Right to Appeal	23
Industry Relationships	23
Frequently Asked Questions (FAQ) Regarding WCMC Conflicts Survey	30
Annual Disclosure Review Process	34
Appendix A: Examples and Commentary	35
Conflicts of Interest	35
Conflicts of Commitment	37
Appendix B: Community, Civic, and Governmental Activities	39

Cornell Policy Library
Volume: 4, Governance/Legal
Responsible Executive:
Provosts/University Counsel
Responsible Office:
Provosts/University Counsel
Originally Issued: May 31, 1986
Last Updated: June 16, 2016

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

CONTENTS, continued

Community, Civic, and Municipal Activities	_39
Appendix C: START-UP NY	40
Introduction	40
Section 220.20 Conflict of Interest Guidelines	_40
Index	42

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

RELATED RESOURCES

University Policies and Documents Applicable to All Units of the University

[University Policy 1.7 Financial Conflict of Interest Related to Research](#)

[University Policy 3.6, Financial Irregularities](#)

[University Policy 3.25, Procurement of Goods and Services](#)

[University Policy 4.6, Standards of Ethical Conduct](#)

[Cornell Conflict of Interest website, maintained by the Office of Research Integrity and Assurance](#)

[Guidelines for Addressing Potential Conflicts of Interest and Commitment in Faculty/Staff Involvement in Startup Companies](#)

University Policies and Documents Applicable to Only Ithaca Campus Units

[University Policy 3.11, Effort Planning and Confirmation](#)

[University Policy 6.9, Time Away From Work \(Excluding Academic and Bargaining Unit Staff\)](#)

[University Policy 6.11.3, Employee Discipline \(Excluding Academic and Bargaining Unit Staff\)](#)

[Bylaws of the Board of Trustees](#)

[Dismissal/Suspension Policy for Faculty Members](#)

[Human Resources Policy 6.11.4, Staff Complaint and Grievance Procedure](#)

[Human Resources Policy 6.13.1, Conflict of Commitment: Dual Appointment](#)

[The Faculty Handbook, Chapter 5: Academic Policies and Responsibilities, Conflicts of Interest and Conflicts of Commitment; Consulting](#)

University Policies and Documents Applicable to Only Weill Cornell Campus Units

[Weill Cornell Medical College Academic Handbook](#)

[Employee Complaint and Grievance Procedure, Weill Cornell Medical College](#)

[Weill Research Gateway Job Aid: Conflicts of Interest Reporting](#)

[Annual Conflicts Survey: Quick Reference Guide](#)

[New York Presbyterian Code of Conduct](#)

External Resources

[START-UP NY Regulations, Section 220.20 \(PDF\) \(see the Appendix C section of this document\)](#)

[NIH Financial Conflicts of Interest Regulations](#)

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

CONTACTS

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

Ithaca Campus Units

Subject	Contact	Telephone	E-mail/Web Address
Policy Clarification and Interpretation	Office of the Provost	(607) 255-2364	provost@cornell.edu www.cornell.edu/provost/
	University Counsel	(607) 255-5124	
Federal and State Laws and Regulations on Financial Conflicts of Interest	Office of Research Integrity and Assurance	(607) 255-6439	www.oria.cornell.edu
Reporting Suspected Conflicts of Others	Immediate supervisor	Unit-specific	
	University Audit Office	(607) 255-9300	
	Cornell Hotline	(866) 384-4277 (toll-free)	www.hotline.cornell.edu

Weill Cornell Campus Units

Subject	Contact	Telephone	E-mail/Web Address
Conflicts of Interest Policy and Conflicts Survey	Conflicts Management Office	(646) 962-8200	conflicts@med.cornell.edu

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

DEFINITIONS

These definitions apply to terms as they are used in this policy.

Academic Staff Member	Any instructional or research staff member listed in Article XVII, Section 1. of the Cornell University Bylaws (see Related Documents).
Apparent Conflict of Interest	A situation that arises when there is a reasonable concern, which an informed person is likely to have, that the opportunity for personal gain could compromise or influence the performance of an individual's professional responsibilities.
Associate	A person, trust, organization, or enterprise (of a business nature or otherwise) with respect to which the individual or any member of his or her family (1) is a director, officer, employee, member, partner, or trustee, or (2) has a significant financial interest or any other interest that enables him or her to exercise control or significantly influence policy.
Community and Civic Activities	Elected or appointed service on local government councils, boards, and commissions.
Conflict Management	Measures taken to address the risk of bias or the appearance of bias when members of the university community have real or apparent conflicts of interest.
Conflict of Commitment	A situation caused when an individual undertakes external commitments that may burden or interfere with his or her primary obligations and commitments to the university, even if the outside activity is valuable to the university or contributes to professional development and competence.
Conflict of Interest	A situation where an individual has the opportunity to influence the university's business, administrative, academic, or other decisions in ways that could lead to personal gain or advantage of any kind.
Consequential Personnel Decision	A decision involving hiring, compensation (including annual merit increases), duration of employment, work assignments, evaluations of performance, promotion, termination, or another similar issue.
Disclose/Disclosure	To provide relevant information about an individual's external commitments and financial interests to parties inside and outside the university to assure full awareness of potential conflicts and institutional efforts to address them. Compare with <i>Report</i> , below.
External Commitment	An obligation or activity (e.g., management, employment, advisory, or consulting role) that is not part of one's primary commitments or obligations to the university.
External Entity	An entity other than the university.
Family	An individual, and that individual's spouse, domestic partner, parent, sibling, child, or any other blood relative, if that other blood relative resides in the same household.
Nonacademic Staff Member	An employee not included in the definition of <i>Academic Staff Member</i> , above.
Officers of the Corporation	The president, provosts, chief financial officer, and university counsel and secretary of the corporation, as defined in Article VI of the university bylaws.
Other Senior Administrators	Vice provosts, vice presidents, chief investment officer, auditor, treasurer, and controller.
Report [Ithaca] / Conflicts Survey [WCMC]	To provide information to the university concerning one's external commitments and financial interests in accordance with this policy.
Significant Financial Interest	1. With regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

DEFINITIONS, continued

value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

2. With regard to any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when an individual or his or her family holds any equity interest (e.g., stock, stock option, or other ownership interest).
3. Related to intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

The term significant financial interest **does not include** the following types of financial interests:

- Salaries, royalties, or other remuneration paid by Cornell to an individual, including intellectual property rights assigned to the institution and agreements to share in royalties related to such rights.
- Income from investment vehicles, such as mutual funds and retirement accounts, as long as the individual does not directly control the investment decisions made in these vehicles.
- Income from seminars, lectures, or teaching engagements sponsored by, or income from service on advisory committees or review panels for a federal, state, or local government agency, a non-profit U.S. institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.
- Any paid for or reimbursed travel determined by the Cornell to not constitute a significant financial interest.

Unit

A department, research center, institute, program, business service or financial transaction center, office, or other operating entity of the university.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

RESPONSIBILITIES

The major responsibilities each party has in connection with this policy are as follows:

Advisory Committee Appointed By the Provost	Consider appeals and recommend resolution to the provost.
Audit Committee of the Board of Trustees	Oversee the administration of the university's policies on conflicts of interest.
Committee on Conflicts of Interest of the Board of Trustees	Manage conflicts for trustees, officers of the corporation, and other senior administrators.
Conflicts Advisory Panel (CAP) [WCMC]	Advise the dean of Weill Cornell Medical College (WCM), regarding conflicts of interest and commitment (see Additional Procedures Specific to Weill Cornell Medical College Campus Units in this document).
Dean, Director, or Unit Head	Collect and retain reports of non-research-related external commitments and interests. Manage conflicts of individuals within the unit. Provide the University Conflicts Committee (UCC) with such summaries or reports of conflicts as it may require.
Individual	Discharge Cornell duties in a manner that is free from real or apparent bias motivated by self-interest. Report and manage conflict of interest and commitment in a manner consistent with this policy.
Office of Research Integrity and Assurance (ORIA) [Ithaca] Office of Research Integrity (ORI) [WCMC]	Collect and forward reports of potential conflicts of commitment to the appropriate college, division, or other administrative unit.
Provost and Provost for Medical Affairs	Manage conflicts of deans, directors, and unit heads. When appropriate, appoint an advisory committee for appeals. Make final and binding determinations under this policy regarding appeals.
University Conflicts Committee (UCC)	Maintain an ongoing awareness of college procedures, practices, and standards, with a view toward assuring consistency. Provide advice and recommendations to the provost on general matters related to conflict of interest and conflict of commitment. Report annually to the faculty and the president on matters within its jurisdiction.
University Counsel	Advise on matters involving external commitments and financial interests of trustees, officers of the corporation and other senior administrators. Where appropriate, consult with the Committee on Conflicts of Interest of the board of trustees.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PRINCIPLES

Overview

All members of the Cornell University community are expected to promote the best interests of the institution in the conduct of their Cornell responsibilities. Individuals who accept full-time appointments must maintain a primary commitment to the university, and must discharge their Cornell duties free from real or apparent bias motivated by self-interest. The university recognizes that the quality of teaching, research, extension, and clinical service, and administration of university programs is enhanced when individuals participate in extramural activities. This policy, and the complementary policy on Financial Conflict of Interest Related to Research, sets forth the general principles and procedures to identify, review, manage, and disclose real and apparent conflicts of commitment and conflicts of interest.

Individuals are expected to evaluate and arrange their external interests and commitments in order to avoid compromising their ability to carry out their primary obligations to the university. In the first instance, conflicts should be avoided or resolved through the exercise of individual judgment or discretion. Full disclosure of the circumstances surrounding a real or potential conflict should be made prior to making the commitment or initiating the activity that poses the possible conflict. Disclosure shall be sufficiently detailed to permit an accurate and objective evaluation.

Conflicts of Interest

An individual is considered to have a conflict of interest when he or she, a member of his or her family, or an associate (to his or her present knowledge) either (1) has an existing or potential significant financial interest or other material interest or relationship that impairs or might appear to impair the individual's independence and objectivity in the discharge of his or her responsibilities to the university; or (2) may receive a financial or other material benefit from information confidential to the university.

Typically, a conflict of interest may arise when an individual has the opportunity to influence the university's business, administrative, academic, or other decisions in ways that could lead to personal gain or advantage of any kind.

Upon full reporting, the university may approve a transaction or affiliation, provided that the conflict can be managed. In many cases, the conflict can be managed through disclosure. In some cases, the individual may be required to report on the conflict annually. The university will disapprove the transaction or affiliation if a conflict of interest is involved that cannot be managed.

Business Ventures

An individual involved in a business venture as owner, operator, or major investor must be alert to the possibility that a conflict may arise. If the entity does no business with the university, only the area of conflict of commitment is likely to be involved.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PRINCIPLES, continued

If the entity does business with the university, or might do business with the university, whether in a research or non-research context, the individual is expected to report that fact. Generally, there is the potential for a real or apparent conflict of interest where an opportunity exists for the individual's interest in the business to influence the university or the individual's professional decisions.

Contracting

An employee may not review, approve, or administratively control a contract when the contract is between the university and a company in which the employee has a significant financial interest, or when the contract is with a member of the employee's family, or when a member of the employee's family is an employee of the contractor and directly involved with activities included under the contract or has a significant financial interest in the contractor.

Gifts

No gifts or accommodations of any nature may be accepted by any individual when to do so could possibly place that individual in a prejudicial or embarrassing position, interfere in any way with the impartial discharge of duties to the university, or reflect adversely on that individual's integrity or that of the university. For more information, see University Policy 4.6, Standards of Ethical Conduct and University Policy 3.25, Procurement of Goods and Services.

Reporting-Line Conflicts (Including Nepotism)

The university requires that a person not supervise or be in the direct line of authority over a family member without the written approval of the responsible university official.

Such situations must be disclosed and managed (see "Managing Reporting-Line Conflicts (Including Avoiding Nepotism)").

Financial Conflicts of Interest Related to Research

The university addresses financial conflicts of interest arising from the design, conduct, reporting, or direct administration of research (research-related conflicts) separately from those that do not (non-research-related conflicts). Individuals involved in the design, conduct, reporting, or direct administration of research must also read carefully and comply with University Policy 1.7, Financial Conflict of Interest Related to Research (see the Related Resources section of this policy).

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PRINCIPLES, continued

Conflicts of Commitment

For All Members of the Cornell University Community

A conflict of commitment arises when an individual undertakes external commitments that may burden or interfere with primary obligations and commitments to Cornell. See appendix A for illustrative examples.

Trustees, Officers of the Corporation, and Other Senior Administrators

Trustees, officers of the corporation, and other senior administrators are fiduciaries, owe special duties of care and loyalty to the institution as a whole, and must keep the university's interests paramount to all others.

Academic Staff

An academic staff member who accepts a full-time appointment has a primary commitment that generally includes teaching classes, being available to students and colleagues outside the classroom, serving departmental, college, and university committees, providing clinical services (where applicable), conducting research, publishing scholarly works, and otherwise meeting the changing needs of the university. Those holding Cooperative Extension or clinical appointments have specified obligations of service to the public.

Such an appointment constitutes a full-time obligation to the university, and, with the exceptions explicitly permitted by university policies on consulting and other related professional activities (see the Related Resources section of this policy), full-time faculty members must not engage in other employment.

◆**Note:** Rules on consulting are addressed in the Faculty Handbook (see the Related Resources section of this policy).

Nonacademic Staff

In the case of staff members, commitments of time and the expectations attached to such positions are more explicitly defined, and therefore the likelihood of conflicting external activities is reduced. Nevertheless, the university expects that staff members also will recognize the possibility that their external activities and commitments may have adverse effects on the performance of their university obligations.

Part-Time Appointees

Faculty and staff members who hold part-time appointments commonly will have major obligations and commitments, not only to the university, but also to one or more outside entities. The potential for conflict may be significant. Accordingly, part-time employees are expected to exercise special care in reporting and fulfilling their multiple obligations.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PRINCIPLES, continued

Community, Civic, and Governmental Activities

The university encourages participation in community, civic, and governmental activities. As with other external engagements, employees who consider serving in elected or appointed positions on local government councils, boards, and commissions should report and discuss such part-time opportunities with their supervisors to ensure that there is no conflict with their primary commitment to the university. See appendix B for guidance on how to determine when recusal is required.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PROCEDURES

Trustees, Overseers, Officers of the Corporation, and Other Senior Administrators

Conflicts of Interest

- **Reporting**

Any member of the board of trustees, board of overseers, an officer of the corporation, or other senior administrator must report annually, in writing, any external interests, or those of a family member or associate, to the university counsel and secretary of the corporation, in such form as he or she directs. The university counsel and secretary of the corporation will advise the Audit Committee of the board of trustees regarding such matters as necessary.

- **Managing**

The university counsel and secretary of the corporation manages conflicts, consulting, where appropriate or necessary, with the Committee on Conflicts of Interest of the board of trustees, which consists of the chair of the board, the vice-chairs, if any, the chair of the Executive Committee, the chair of the Audit Committee, and the president of the university. Where appropriate or necessary, the university counsel and secretary of the corporation and the Committee on Conflicts may refer the matter to the board of trustees for management.

Conflicts of Commitment

- **Reporting**

Any member of the board of trustees, an officer of the corporation, or other senior administrator must report, in writing, any external commitments to the university counsel and secretary of the corporation, in such form as he or she directs. The university counsel and secretary of the corporation will advise the Audit Committee of the board of trustees regarding such matters as necessary.

- **Managing**

The university counsel and secretary of the corporation manages conflicts, consulting, where appropriate or necessary, with the Committee on Conflicts of Interest of the board of trustees, which consists of the chair of the board, the vice-chairs, if any, the chair of the Executive Committee, and the president of the university. Where appropriate or necessary, the university counsel and secretary of the corporation and the Committee on Conflicts may refer the matter to the board of trustees for management.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PROCEDURES, continued

Deans, Directors, and Academic Unit Heads

Conflicts of Interest

- **Reporting**

Deans and directors of the colleges, schools, and units defined at Article I, Section 7 of the university bylaws must file annual statements with the provost or provost for medical affairs, or designees, reporting any external interests, or those of a family member or associate, in such form as the provost or provost for medical affairs may direct.

- **Managing**

The provost or provost for medical affairs, or designees, will manage conflicts in such cases.

Conflicts of Commitment

- **Reporting**

Deans and directors of the colleges, schools, and units defined at Article I, Section 7 of the university bylaws must file annual statements with the provost or provost for medical affairs, or designees, reporting any external commitments in such form as the provost or provost for medical affairs may direct.

- **Managing**

The provost or provost for medical affairs, or designees, will manage conflicts in such cases.

Academic and Nonacademic Staff Members Involved in Research

Conflicts of Interest

- **Reporting**

Members of the faculty or staff who are involved in the design, conduct, reporting, or direct administration of research must report their potential conflicts of interest pursuant to University Policy 1.7, Financial Conflict of Interest Related to Research.

- **Managing**

Conflicts of interest related to members of the faculty or staff who are involved in the design, conduct, reporting, or direct administration of research are managed in accordance with University Policy 1.7, Financial Conflict of Interest Related to Research.

Conflicts of Commitment

- **Reporting**

Members of the faculty or staff who are involved in the design, conduct, reporting, or direct administration of research must report their potential conflicts of commitment through the process defined in University Policy 1.7,

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PROCEDURES, continued

Financial Conflict of Interest Related to Research. The Office of Research Integrity and Assurance (ORIA) will forward reports to the college, division, or other administrative unit in which the individual is employed.

- **Managing**

The appropriate vice president, vice provost, dean, or director, or his or her designee, will receive reports and manage potential conflicts of commitment.

All Other Academic Staff

Conflicts of Interest and Commitment

- **Reporting**

Members of the academic staff must report their external financial interests and commitments through the process defined by ORIA. ORIA will forward reports to the college, division, or other administrative unit in which the individual is employed.

- **Managing**

The appropriate vice president, provost, vice provost, dean, or director, or his or her designee, will receive reports and manage any non-research-related potential conflicts of interest and commitment.

All Other Nonacademic Staff

Conflicts of Interest

- **Reporting**

Any other member of the faculty and staff will report information concerning his or her external interests, or those of a family member or associate, to the college, division, or other administrative unit in which he or she is employed, in such form and manner as the vice president, vice provost, dean, or director (“unit head”), or his or her designee, may prescribe.

Individuals have an obligation to report in a manner that is sufficiently detailed to permit an accurate and objective evaluation and to cooperate fully in the review of the pertinent facts and circumstances. Staff members involved in the following duties must be particularly conscious of possible conflicts or the appearance of such conflicts: the procurement, exchange, or sale of goods, services, or other assets; the negotiation or formation of contracts or other commitments affecting the assets or interests of the university; and the handling of confidential information and the rendition of professional advice to the university.

- **Managing**

Conflicts of interest are reviewed at the college, department, or other unit level. In the event that reported information reveals a conflict or appearance of conflict, the unit head or designee will review the facts and manage the

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PROCEDURES, continued

conflict. Proper management may include disclosure to other members of the university community of an individual's role in an external entity.

Conflicts of Commitment

- **Reporting**

Any member of the faculty and staff will report all potential conflicts of commitment, including consulting agreements, to the college, division, or other administrative unit in which the individual is employed in such form and manner as the vice president, vice provost, dean, or director ("unit head") or designee may prescribe.

- **Managing**

Conflict of commitment disclosures are reviewed at the college, department, or other unit level. In the event that reported information reveals a conflict, the unit head or designee will review the facts and manage the conflict.

Managing Reporting-Line Conflicts (Including Avoiding Nepotism)

In situations where a staff or faculty member is in the direct line of authority over a family member, the university official to whom the more senior of the two reports will be the "responsible university official."

◆**Note:** For the purposes of this policy, a department chair reports to the Dean; deans and vice provosts report to the Provost; provosts and the executive vice president (EVP) report to the President; vice presidents report to the President, provost or EVP and the President reports to the Chair of the Board of Trustees. The University Counsel reports jointly to the President and board of trustees.

The "responsible university official" is required to ensure that consequential personnel decisions (see "Definitions") concerning the supervised family member are:

- made objectively,
- in the university's interests, and
- not influenced by personal or family interests of the family members.

Toward that end, the "responsible university official" must:

1. Fully consider potential or current employment (reporting-line) conflicts brought to his or her attention.
2. Discuss the conflict with the local HR representative and the more senior of the two reports.
3. Determine how the conflict and the consequential personnel decisions concerning the supervised family member will be managed, and document the agreed-upon plan ("conflicts management plan").

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PROCEDURES, continued

4. Share the conflicts management plan with both family members and all intermediate supervisors.
5. Retain the conflicts management plan in HR files.
6. Monitor consequential personnel decisions affecting the supervised family member.

Appeals

In the event that the faculty or staff member objects to the resolution recommended by the unit head or designee, he or she may ask for the matter to be referred to an advisory committee appointed by the provost or provost for medical affairs. The committee will consider the matter and recommend a resolution to the provost or provost for medical affairs. The provost or provost for medical affairs may accept, reject, or modify the committee's recommendation. If the member disagrees with the provost's determination, the individual may request a further consideration of the matter and, in that connection, may examine the recommendations of the advisory committee, including supporting evidence, and offer other relevant information or explanations. The university counsel shall serve as advisor to the provost. Following such reconsideration, the provost shall make a final and binding determination in writing.

If the determination requires the termination of a faculty member's appointment, the procedures described in the Dismissal/Suspension Policy for Faculty Members will apply.

A staff member may invoke the nonacademic Human Resources Policy 6.11.4, Staff Complaint and Grievance Procedure (at the Weill Cornell Medical College, Employee Complaint and Grievance Procedure) (see Related Resources). In the event that a staff member may be entitled to arbitration of the proposed resolution, the arbitrator may reject or modify the proposed remedy but shall have no authority to alter the determination of the university regarding the meaning, interpretation, or applicability of this policy. Members of collective bargaining units may invoke the applicable contract grievance procedure.

Sanctions for Non-Compliance

Any member of the academic staff who does not comply with reporting requirements will be subject to sanctions outlined in University Policy 1.7, Financial Conflicts of Interest Related to Research.

Any member of non-academic staff engaged in research who does not comply with reporting requirements will be subject to sanctions outlined in University Policy 1.7, Financial Conflicts of Interest Related to Research.

For all others, sanctions for non-compliance with reporting or conflict of interest management will be imposed by the respective unit head.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

PROCEDURES, continued

Reporting Suspected Conflicts of Others

Any member of the Cornell University community may report known or suspected conflicts of interest or commitment. Reporting must be handled in a confidential manner. If you suspect that someone else has a conflict, you may report this information to your supervisor, to the University Audit Office, or through the Cornell Hotline, at (866) 384-4277 (toll-free) or www.hotline.cornell.edu.

University Conflicts Committee (UCC)

Purpose

The University Committee on Conflicts (UCC) is established by the president to serve as a university resource with respect to matters involving the general subject of conflicts of interest and commitment and the oversight and implementation of this policy.

Composition

The UCC is co-chaired by the dean of the faculty and the senior vice provost for research and must include not fewer than five additional members appointed by the president, including faculty representation from the endowed and contract colleges in Ithaca. Members serve three-year staggered terms. The university counsel serves as a non-voting member. To the extent practicable, the UCC should include representatives from the physical, biological, and social sciences, the humanities, engineering, medicine, and veterinary medicine.

Duties

A. General Oversight

The UCC is responsible for general oversight over the identification and management of conflicts of commitment and of conflicts of interest that are not related to the design, conduct, reporting, or direct administration of research.

B. Advisory Role

The UCC maintains an ongoing awareness of college procedures, practices, and standards, with a view toward assuring consistency.

The UCC provides advice and recommendations to the provost on matters related to conflict of interest and commitment.

The UCC may recommend to the provost changes to this policy.

C. Reporting

The UCC reports biennially to the faculty and to the president on matters within its jurisdiction.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS

Conflicts Management Office (CMO)

The provost for medical affairs of Weill Cornell Medical College (WCMC) or his/her designee shall establish a conflicts management office, which shall be responsible for the overall management of issues related to conflicts of interest and commitment. The office shall be responsible for the following:

- Implementing the WCMC conflicts policy
- Serving as a resource to the faculty and staff regarding questions relevant to issues of conflict of interest or commitment and regulations related to conflicts of interest
- Collecting an annual disclosure of conflict related information from the faculty and staff
- Evaluating information submitted in the annual disclosure as well as other individual disclosures
- Developing and implementing conflicts management plans
- Providing staff support for the Conflicts Advisory Panel (see below) and for any conflicts oversight committees
- Developing educational programs for faculty and staff regarding conflicts related issues

The Conflicts Management Office (CMO) shall establish procedures to fulfill these responsibilities consistent with this policy.

The CMO shall be under the direction of the dean or his/her designee.

Conflicts Advisory Panel

The provost for medical affairs shall appoint a Conflicts Advisory Panel (CAP) consisting of the chairman of the General Faculty Council and between four and ten members of the faculty of the medical college (at least two of whom shall hold the rank of professor).

The CAP shall, upon request, (1) provide advice to the dean or his/her designee, the associate dean and the CMO, in consultation with other staff members to the panel such as the associate university counsels, with regard to conflicts of interest and commitment-related matters; (2) advise and make recommendations to the dean on the acceptability of conflicts management plans submitted to the panel by the CMO on behalf of members of Cornell regarding potential conflicts of interest or commitment. In addition to reviewing conflicts management plans submitted by the CMO, the CAP will also review possible conflicts of interest or commitment issues as referred to it by the Office of Sponsored Research Administration (OSRA), Joint Clinical Trials Office (JCTO), Office of BioPharma Alliances and

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, continued

Research Collaborations, Office of the University Counsel, the Center for Technology Licensing (CTL), the Institutional Review Board (IRB), and the Institutional Animal Care and Use Committee (IACUC).

Conflict Disclosure

WCMC employees are required to report conflicts annually via the Conflicts Survey and to update their Conflicts Survey any time they develop a financial relationship related to their institutional/WCMC responsibilities that may present, or appear to present, a conflict of interest. Any new relationships must be reported through the Conflicts Survey within 30 days of acquiring them. Additional regulations apply for investigators applying for or using PHS funding. See policy 7.171.7 for conflicts reporting policies related to research.

Annual Conflicts Survey Submission Requirements:

New Appointments: Upon the appointment of a new faculty member, academic/non-academic staff member, (or other employee), the new appointee must complete Conflicts Survey within forty-five (45) days of his or her WCMC start date. See policy 1.7 for requirements for medical students and trainees involved in research.

The unit making the appointment is responsible for ensuring that these WCMC representatives are identified and complete their conflicts survey within the required timeframe.

Travel Disclosure

Introduction

Various regulatory and oversight groups require institutions to monitor external funding of travel for their employees involved in research and clinical care. These include rules for disclosing Sponsored Travel for individuals applying for or funded by Public Health Services (PHS), which includes the National Institutes of Health (NIH) and other non-profit agencies that chose to invoke PHS COI policy. In addition, travel undertaken by WCMC employees but paid for by industry are now being reported by industry to the Medicare Open Payments Database (Sunshine Act). Such information is also relevant to the WCMC conflicts of interest management disclosure process.

All employees who travel in conjunction with their institutional and professional responsibilities should familiarize themselves with this travel disclosure policy, and if required, report externally-funded travel reimbursements accordingly via the Weill Research Gateway (WRG)

Policy

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, *continued*

All Sponsored Travel provided by "for-profit" entities must be disclosed within 30 days of completing travel.

Sponsored Travel and other compensation greater than \$5,000 per year in aggregate from a single non-profit entity need to be reported. This means that you only have to report Sponsored Travel by a single non-profit entity if :

The trip was more than \$5,000,

Multiple trips for that entity in aggregate exceed \$5,000,

You receive more than \$5,000 for services from that entity, or

A combination of trips and services in aggregate from a single entity exceeds \$5,000.

You do not have to report Sponsored Travel for WCMC or Cornell University, nor Sponsored Travel paid by:

a federal, state, or local government agency,

a U.S. non-profit institution of higher education as defined at 20 U.S.C. 1001(a),

a U.S. academic teaching hospital, U.S. medical center, or

a research institute that is affiliated with an institution of higher education

There are additional regulations for individuals applying for or funded by Public Health Services (PHS), which includes the National Institutes of Health (NIH) and other non-profit agencies that choose to invoke PHS COI policy. Investigators and others involved in research sponsored by these entities must disclose their reimbursed or sponsored travel related to their institutional responsibilities over the previous twelve-month period no later than at the time of application for PHS-funded research and after that, within 30 days of completing reimbursed travel. This includes reimbursed or sponsored travel received by the Investigator's spouse and dependent children that is also related to the individual's institutional responsibilities.

Investigators applying for or funded by PHS sponsors should familiarize themselves with these regulations, which can be found at <http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=45:1.0.1.1.51>. Answers to frequently asked questions about these regulations can be found at http://grants.nih.gov/grants/policy/coi/coi_faqs.htm#3451.

Travel reimbursements should be reported via the Weill Research Gateway (WRG) either by filing a separate travel disclosure and/or checking the travel reimbursement box when disclosing a financial interest for a given entity in your Conflicts Survey. (See WRG for instructions on how to complete a travel disclosure)

To the extent possible, listing all potential travel prospectively on your travel disclosure will reduce or eliminate the need to file updates throughout the year.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, *continued*

If in doubt, please disclose the travel and the Conflicts Management Office staff will determine what needs to be reported. If you need further explanation or have questions about a travel disclosure or entity, please contact the Conflicts Management Office at (646) 962-8200 or conflicts@med.cornell.edu.

Definitions

Sponsored travel means (a) travel expenses paid to a WCMC employee or travel paid on a WCMC employee's behalf, by a single entity in any twelve-month period and/or (b) travel reimbursed to or paid on behalf of a WCMC employee's spouse and dependent children by a single entity in any 12-month period.

For-Profit Entities generally refers to pharmaceutical and device manufacturers, technology and imaging companies and other entities whether publicly or privately held, including start-ups or other entities in which WCMC employees may have interest.

Not-for Profit Entities, for the purposes of travel reporting, fall into one of two categories:

Travel expenses not required to be reported -

a federal, state, or local government agency,

a U.S. non-profit institution of higher education as defined at 20 U.S.C. 1001(a),

a U.S. academic teaching hospital, U.S. medical center, or

a research institute that is affiliated with an institution of higher education

Travel Expenses subject to reporting based on amount >\$5,000 when combined with other compensation -

Non-Profit Health Foundations (e.g., American Heart Association, Koman Foundation, North American Menopause Society)

Non-Profit Professional Organizations (e.g., American College of Radiology, American Society of Clinical Oncology, College of Internal Medicine)

Non-Profit Research Organizations NOT affiliated with an institution of higher education (e.g., Gordon Conferences)

Sanctions and Disciplinary Actions

In the event that the faculty, staff member, or student does not comply with the disclosure of financial interests or outside commitments, sanctions and disciplinary actions may include, but are not limited to, the following:

7. The inclusion in the faculty or staff member's file of a letter from the provost for medical affairs indicating that the individual's good

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, continued

standing as a member of the faculty or staff has been called into question, i.e., censure

8. Ineligibility of the faculty or staff member to submit sponsored project applications, enter into technology transfer agreements, to teach or organize Continuing Medical Education programs, to obtain Institutional Review Board (IRB) or Institutional Animal Care and Use Committee (IACUC) approval, or to supervise graduate students
9. Withdrawal of the individual's annual salary increment
10. Non-renewal of appointment or termination of employment
11. Dismissal from the university

Department Chairs/Unit Heads and the Department Administrators (DA's) will be notified if faculty and non-faculty within their respective department/unit does not comply with the completion and/or submission of the conflicts survey within forty-five (45) days of hire OR when annual re-certification of the conflicts survey are not completed by the reporting deadline. The CAP will monitor instances of non-compliance and may recommend to the Department Chair/Unit Head the enforcement of appropriate Sanctions and Disciplinary Actions.

Right to Appeal

Faculty and staff members have the right to appeal all sanctions proposed by the provost for medical affairs.

If the member disagrees with the provost's determination, the member may request further consideration of the matter and may then examine the recommendations of the CAP, including supporting evidence, and offer other relevant information or explanations.

The university counsel shall serve as advisor to the provost for medical affairs. Following such consideration, the provost shall make a final and binding determination in writing.

Industry Relationships

Equity and Stock Holdings in External Entities based on Faculty Technologies

Equity and stock holdings are defined as monetary investments, held by a WCMC representative or his/her family tied to the financial standing of an external entity. This policy refers specifically to entities that have licensed technology developed at WCMC through agreement with the Cornell Technology Licensing (CTL). Refer to the 'Equity and Stock Holdings in External Entities Not Based on Faculty Technologies' for specific information regarding these types of relationships. WCMC representatives holding equity/stock with an entity that also supports his/her

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, continued

research are strongly encouraged to speak with the Conflicts Advisory Panel (CAP) prior to entering into any research agreements with such an entity.

Agreements made between the WCMC representative conducting clinical research and the entity related to his/her research, specifically those in which the WCMC representative or his/her family is expected to receive \$5,000 (or the active de minimis threshold required for disclosure by the National Institutes of Health included in 42 CFR Part 50 Subpart F) or more annually, may be subject to increased scrutiny from the Office of Research Integrity and/or Conflicts Advisory Panel. In such cases, additional and/or supplemental information may be required by the Conflicts Advisory Panel in order to determine the appropriateness of such relationships and whether or not the arrangement should be allowed, monitored or modified. Final determination on the permissiveness of consulting arrangements in these circumstances will be made at the discretion of the Conflicts Advisory Panel in consultation with the appropriate WCMC representative(s). While the holding of equity/stock options by WCMC representatives in such cases may be permissible, these types of relationships may be subject to increased scrutiny by the CAP and will require the implementation of a comprehensive conflicts management plan.

Research involving human participants is critical in developing knowledge and discoveries that will benefit society. Protecting the rights and welfare of human research participants is of the utmost importance and a requirement of all research personnel and the university. Of particular concern, therefore, are external commitments and financial interests that compromise or appear to compromise the rights and well-being of human research participants. The university scrutinizes the roles in such research of research personnel who have external commitments and financial interests with a sponsor or with an external entity that is related to, or can be affected by, the research. The university has instituted a rebuttable presumption that research personnel who are involved in the design, participant selection, informed consent process, or the clinical management of a trial cannot have a financial interest in an entity whose interest could be affected by the research. In other words, the default position is that participation in human participant research by conflicted research personnel is not allowed. However, there may be compelling circumstances in which conflicted research personnel would be permitted to participate in the research. In these cases, the management strategies for the involvement of conflicted researchers must be carefully adjusted to the level of anticipated risk. All financial interests and external relationships related to human-participant research that are not eliminated must be disclosed to all participants in the related research. The management plan must be implemented before research personnel can participate in the design or conduct of the research, enrollment of participants, or analysis of the results.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, *continued*

Equity and Stock Holdings in External Entities Not Based on Faculty Technology

Equity and stock holdings are defined as monetary investments, held by a WCMC representative or his/her family tied to the financial standing of an external entity. This policy refers specifically to entities that have not licensed technology developed at WCMC through agreement with the Cornell Technology Licensing (CTL). Please refer to the 'Equity and Stock Holdings in External Entities Based on Faculty Technologies' for specific information regarding these types of relationships. This policy does not refer to diversified mutual funds not under the control of the WCMC representative. WCMC representatives holding equity/stock with an entity that also supports his/her research are strongly encouraged to speak with the Conflicts Advisory Panel (CAP) prior to entering into any research agreements with such an entity.

Agreements made between the WCMC representative conducting research and the entity related to his/her research, specifically those in which the WCMC representative or his/her family is expected to receive \$5,000 (or the active de minimis threshold required for disclosure by the National Institutes of Health included in 42 CFR Part 50 Subpart F) or more annually, may be subject to increased scrutiny from the Office of Research Integrity and/or Conflicts Advisory Panel. In such cases, additional and/or supplemental information may be required by the Conflicts Advisory Panel in order to determine the appropriateness of such relationships and whether or not the arrangement should be allowed, monitored or modified. Final determination on the permissiveness of consulting arrangements in these circumstances will be made at the discretion of the Conflicts Advisory Panel in consultation with the appropriate WCMC representative(s).

Research involving human participants is critical in developing knowledge and discoveries that will benefit society. Protecting the rights and welfare of human research participants is of the utmost importance and a requirement of all research personnel and the university. Of particular concern, therefore, are external commitments and financial interests that compromise or appear to compromise the rights and well-being of human research participants. The university scrutinizes the roles in such research of research personnel who have external commitments and financial interests with a sponsor or with an external entity that is related to, or can be affected by, the research. The university has instituted a rebuttable presumption that research personnel who are involved in the design, participant selection, informed consent process, or the clinical management of a trial cannot have a financial interest in an entity whose interest could be affected by the research. In other words, the default position is that participation in human participant research by conflicted research personnel is not allowed. However, there may be compelling circumstances in which conflicted research personnel would be permitted to participate in the research. In these cases, the management strategies for the involvement of conflicted

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, *continued*

researchers must be carefully adjusted to the level of anticipated risk. All financial interests and external relationships related to human-participant research that are not eliminated must be disclosed to all participants in the related research. The management plan must be implemented before research personnel can participate in the design or conduct of the research, enrollment of participants, or analysis of the results.

Executive Positions

For purposes of this policy, executive positions (EPs) are defined as those that imply managerial or supervisory roles within an external entity (commercial or non-profit) including external entities based on faculty technologies. These titles may include, but are not limited to; President, Vice-President, Chief Executive Officer, Chief Technical Officer, Chief Operations Officer, Scientific Director and Medical Director. This policy does not refer to members of Scientific Advisory Boards. While executive positions in external entities may be permissible, these types of relationships may be subject to increased scrutiny by the Conflicts Advisory Panel for potential conflicts of interest and conflicts of commitment and will require the implementation of a Comprehensive Conflicts Management Plan (cCMP).

Ghostwriting

WCMC representatives are prohibited from engaging in the practice commonly referred to as ghostwriting, or honorary authorship. This refers to the practice in which a manuscript is developed principally by a for-profit business directly or through a third party vendor such as a medical education company and then attributed to an academic researcher who did not contribute meaningfully. This policy does not refer to attribution determination. Further, this policy does not prohibit instances in which an author's own work is shared with an outside entity for purely editorial assistance. WCMC representatives are expected to follow the rules of authorship as defined by the International Committee of Medical Journal Editors.

Gifts

WCMC representatives are prohibited from accepting gifts, of any variety or value, from external entities whose interests may represent an actual or perceived conflict of interest to the individual and/or institution. Gifts are defined as any remuneration not made in exchange for services rendered. WCMC representatives are, however, permitted to accept educational materials if the material does not include the logo or brand of the external entity. Educational material, including academic journals, intended to promote the product(s) of the external entity are not permitted.

Industry or Vendor Representatives in WCMC Controlled Spaces

Industry or vendor representation refers to the physical presence of individuals or groups, representing for-profit, non-WCMC entities, including but not limited to,

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, *continued*

employees, Officers and consultants of pharmaceutical manufacturers, in any WCMC-controlled space for the purpose of product marketing and/or promotion. This policy does not refer to industry or vendor representatives on campus for previously scheduled and faculty-approved educational purposes including, but not limited to, product and/or device demonstrations.

Industry or vendor representatives visiting the WCMC campus must have a scheduled appointment with a WCMC representative. Any literature provided by the industry or vendor representative, particularly those including a company or logo or brand and intended to market a particular drug or company, must be given directly to a WCMC representative and not left by the industry or vendor representative in patient areas. Materials provided by the industry or vendor representative must be reviewed by senior practice leadership before being left in patient areas. Facilities are expected to develop and enact procedures that minimize patient exposure to industry or vendor representatives. Industry or vendor representatives are prohibited from entering any patient care areas or at meetings and/or functions in which patient-specific information is discussed.

Industry-sponsored Meals in non-WCMC Controlled Space

WCMC representatives are prohibited from accepting meals from external entities whose interests may represent an actual or perceived conflict of interest to the individual and/or institution. This does not include off-campus continuing medical education (CME) events in which it would not be reasonable to attribute individual consumption, e.g. large conferences featuring buffet-style meals. Please refer to the 'Industry-sponsored Meals at WCMC-Controlled Space' section for additional regulations regarding industry interactions.

Industry-sponsored Meals in WCMC-Controlled Space

Meals or drinks directly funded by industry are not permitted at non-CME events in WCMC-controlled space. Please refer to the 'Industry Sponsored Meals in non-WCMC Controlled Space' and 'Vendor Representation at WCMC-Controlled Space' policies for additional regulations regarding industry interactions.

Private Consulting Agreements

For purposes of this policy, a consulting agreement is defined as a financial relationship between a WCMC representative and an external entity in which the faculty member is compensated for providing his/her expert advice and/or opinion for the benefit of that entity.

- Private consulting may be undertaken if it enhances the value of the individual to the University and does not interfere with University duties.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, *continued*

- Private consulting duties of WCMC representatives cannot include services that are otherwise provided by WCMC or the WCMC representative in the course of his/her usual duties.
- WCMC representatives are required to notify their Department Chairperson of private consulting agreements and permission will be given at the discretion of the Department Chairperson, or his/her designee.
- WCMC representatives are expected to include the 'Addendum to Consulting Agreement' document, available through the institution website, as part of all private consulting agreements.
- The private consulting agreement policy does not apply to arrangements commonly referred to as speakers' bureaus. Please refer to the section on 'speakers' bureaus' for specific information on these types of relationships.
- Agreements covered by this policy include, but are not limited to, participation on Advisory Boards, Scientific Advisory Boards and Data Safety Monitoring Boards. Please refer to the WCMC policy regarding agreements that involve 'Executive Leadership' positions for specific information and guidelines on leadership positions including, but not limited to, President, Vice-President, Chief Executive Officer, Chief Technical Officer, Chief Operations Officer, Scientific Director and Medical Director.
- Because consulting arrangements represent agreements entered into between a WCMC representative, individually, and an external entity, this policy does not refer to Sponsored Research Agreements (SRAs) made between the external entity and WCMC.
- WCMC representatives seeking to engage in a consulting agreement with an entity that also supports his/her research are strongly encouraged to speak with the Office of Research Integrity prior to entering into any arrangement. Consulting agreements made between the representative conducting research and the entity related to his/her research, specifically those in which the WCMC representative is expected to receive \$5,000 (or the active de minimis threshold required for disclosure by the National Institutes of Health included in 42 CFR Part 50 Subpart F) or more annually, may be subject to increased scrutiny from the Conflicts Advisory Panel. In such cases, additional and/or supplemental information may be required by the Conflicts Advisory Panel in order to determine the appropriateness of such relationships and whether or not the arrangement should be allowed, monitored or modified. Final determination on the permissiveness of consulting arrangements in these circumstances will be made at the discretion of the Conflicts Advisory Panel in consultation with the appropriate WCMC representative(s).

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, *continued*

- WCMC representatives must refer to Policy 4.10, 'Use of Cornell's Name, Logos, Trademarks and Insignias' for specific guidelines on allowable use and required disclaimers related to their appointment with WCMC.
- The reasonable use of WCMC resources as part of consulting agreements may be permitted only after the approval of the Department Chairperson or his/her designee. Use of WCMC space, equipment or other resources will be subject to service charges.
- WCMC faculty members are not permitted to use WCMC employees or students to promote, advance, assist or participate in private consulting.

Purchasing Authority of Conflicted WCMC Representatives

WCMC representatives must disclose relevant relationships and refrain from participating in procurement decisions in which he/she has a conflict of interest with the potential entity, or a competing entity. The disclosure of potential COIs in purchasing are required as part of annual survey of external relationships and as part of conflicts management plans.

Speaker's Bureau

WCMC representatives are prohibited from participating in external relationships commonly referred to as 'speakers' bureaus.' This includes any arrangement in which the outside entity has the contractual right to dictate or control the content of a presentation or talk, and/or the company creates the slides or presentation material and has final approval of the content and edits, and/or the WCMC representative is expected to act as a company's agent or spokesperson for the purpose of disseminating company or product information. WCMC representatives have the right to appeal to the Conflicts Advisory Panel (CAP) if he/she feels that their relationship does not meet this definition.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, continued

Frequently Asked Questions (FAQ) Regarding WCMC Conflicts Survey

For All Disclosures

Q1: Do I have to fill out the Conflicts survey? I am certain I have no conflicts.

A1: Yes. Cornell University Policy requires that all employees, including faculty, complete a Conflicts Survey annually.

Q2: Do I have to indicate that I receive a salary/stipend from WCMC?

A2: No. Financial arrangements outside of WCMC are what you must disclose.

Q3: If my position at WCMC does not involve any research activity, must I still complete the Conflicts Survey?

A3: Yes. The disclosure requirement applies to all persons who hold appointments at WCMC or are employees of WCMC. There are types of conflicts that do not involve research. Here are some examples:

- A WCMC employee is involved in purchasing and/or procurement decisions made on behalf of WCMC but has a financial interest in a company doing business with WCMC.
- A WCMC employee holds an executive position in an entity and therefore has a fiduciary duty to that entity.

Q4: I have no change in my external activities since I reported last year. Must I still complete the Conflicts Survey?

A4: The WCMC policy requires recertifying external activities annually. When you initially engage the conflicts management system, you will create your initial Conflicts Survey. In subsequent years, your Conflicts Survey may be updated and recertified electronically.

Q5: Will I receive a response from the Conflicts Management Office (CMO) regarding my disclosure?

A5: If you have disclosed a possible conflict of interest or commitment and a determination is made that further information is required or that there are special procedures you must follow in view of the possible conflict, you will receive an email from the Conflicts Management Office. If you fully complete the disclosure survey and indicate no conflicts, you will receive an email stating that your submission was received and that no further action will be required.

Q6: What should I do if I am unsure about how to answer a question on the Survey?

A6: If in doubt, please disclose and the Conflicts Management Office staff will determine if you have a conflict. Please use the comments sections where you can provide clear and accurate description of your relationship with a disclosed entity.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, continued

The comments sections do not have word count limitations. If you have any questions, you may always call the Conflicts Management Office at (646) 962-8200 or email at conflicts@med.cornell.edu.

Q7: What happens if I disclose a potential conflict of interest or commitment?

A7: The Conflicts Management Office may contact you with a determination of your disclosed relationship(s) or request for additional information.

Q8: When the Conflicts Survey asks about the financial interests of my family, what is meant?

A8: The term “family” is meant to include spouses (or domestic partners), siblings, parents, children, and any other blood relatives, (if that other blood relative resides in the same household). In some circumstances, you may feel that it is appropriate for you to include other persons as “family.” Within the Conflicts Survey, there will be comment boxes available to provide more detailed information. When disclosures are reviewed by the Conflicts Management Office, the term “family” will be used in the review determination as prescribed by the specific federal regulation(s) to which a research is required to adhere.

Q9: Is it necessary for me to disclose all of my external financial activities, even those unrelated to my work for the WCMC?

A9: The policy requires disclosure of all activities/relationships that could be or give the appearance of a conflict of interest or commitment to your Cornell responsibilities. If a problem should arise in the future, you having reported the activity/relationship offers some protection to you and to the institution in terms of how people may interpret the problem. A failure to report an activity/relationship may be interpreted as a desire to hide the activity because you feel there is something undesirable about it. No one is criticized for “over-reporting.”

Q10: Am I required to disclose interests in mutual funds or retirement accounts?

A10: You do not need to disclose interests held in mutual funds, pensions, institutional investments, or other investment vehicles where you have no ability to control what shares you buy and sell. But if you are in doubt about whether a particular fund meets this description, disclose. (See Q6, above)

Q11: What if my financial interests changed since I last disclosed my interests? When do I report these new interests?

Q11: You should disclose new entities as follows –

- If the interest is not related to a research protocol or grant proposal, then you can disclose it at your next required Conflicts Survey update.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, *continued*

- For guidance on the disclosure of financial interests related to research or grant funding, refer to policy 1.7 *Financial Conflict of Interest Related to Research*

Q12: Must I disclose income I received from an outside non-profit organization?

A12: Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education, do not need to be disclosed. Income from any other non-profit should be disclosed (this includes activities sponsored by foreign institutes of higher education or foreign governmental agencies). When in doubt, disclose. (See Q6 above)

Q13. What if my financial interests changed since I last disclosed my interests? When do I report these new interests?

Q13: You should disclose new entities as follows –

- If the interest is significant, or involves intellectual property or licensing, contact the Conflicts Management Office directly before engaging the interest. In addition, please note that university policy requires that any compensated consulting must be reported to, and approved by, your department chairperson prior to being undertaken.
- FOR RESEARCHERS ONLY: If you are an investigator on a grant that [follows the Public Health Service Financial Conflict Of Interest regulation](#), you must disclose new significant financial interests by the time an application is submitted to the agency for funding, within thirty (30) days of discovering or acquiring a new significant financial interest and on an annual basis.
- FOR RESEARCHERS ONLY: If the entity is for profit and related to your ongoing research or research grant(s), you must disclose within 30 days of acquiring the conflict. Do this by updating your Conflicts Survey in the Weill Research Gateway. You should then submit an updated Study Specific Report.
- FOR RESEARCHERS ONLY: Whenever you complete a Study Specific Report. Before completing the Study Specific Report, you should update your Conflicts survey in the Weill Research Gateway with the new entity. Since the Study Specific Report process requires certification of your entire Conflicts Survey, this will reset your annual disclosure date to 12 months hence.

If the interest is not related to your research or grants, and you have not disclosed it in the process of submitting a Study Specific Report, then you can disclose it at your next required Conflicts Survey update.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL CAMPUS UNITS, continued

Q14. Who should use the Travel Disclosure form? What does the Conflicts Management Office (CMO) do with this information?

QA14: The form should be used by WCMC employees to disclose sponsored travel that is not reimbursed or paid by Cornell University. You also do not have to report self-funded travel. Please note there are different reporting requirements for travel that is sponsored by “for-profit” and “non-profit” entities. Details can be found under the “Policy” section of the Travel Form.

Sponsored travel may be considered a Significant Financial Interest. It will be reviewed in the context of one’s Conflicts Survey and will be managed based on value.

Q15: What if I cannot utilize the electronic conflict management system located within the Weill Research Gateway?

A15: Please contact the ITS Service desk at (212) 746-4878 or send an email to support@med.cornell.edu for assistance. Office hours for ITS can be found here: <http://weill.cornell.edu/its/about/>.

Q16: Do I have to sign the Conflicts Survey?

A16: Yes, your electronic signature will indicate that you have personally provided the information and that the information provided is accurate to the best of your knowledge.

Q17: After I complete it, what do I do with the Conflicts Survey?

A17: The electronic Conflict Management System (CMS) will enable you to download a copy of the completed disclosure for your records, which can be printed or saved.

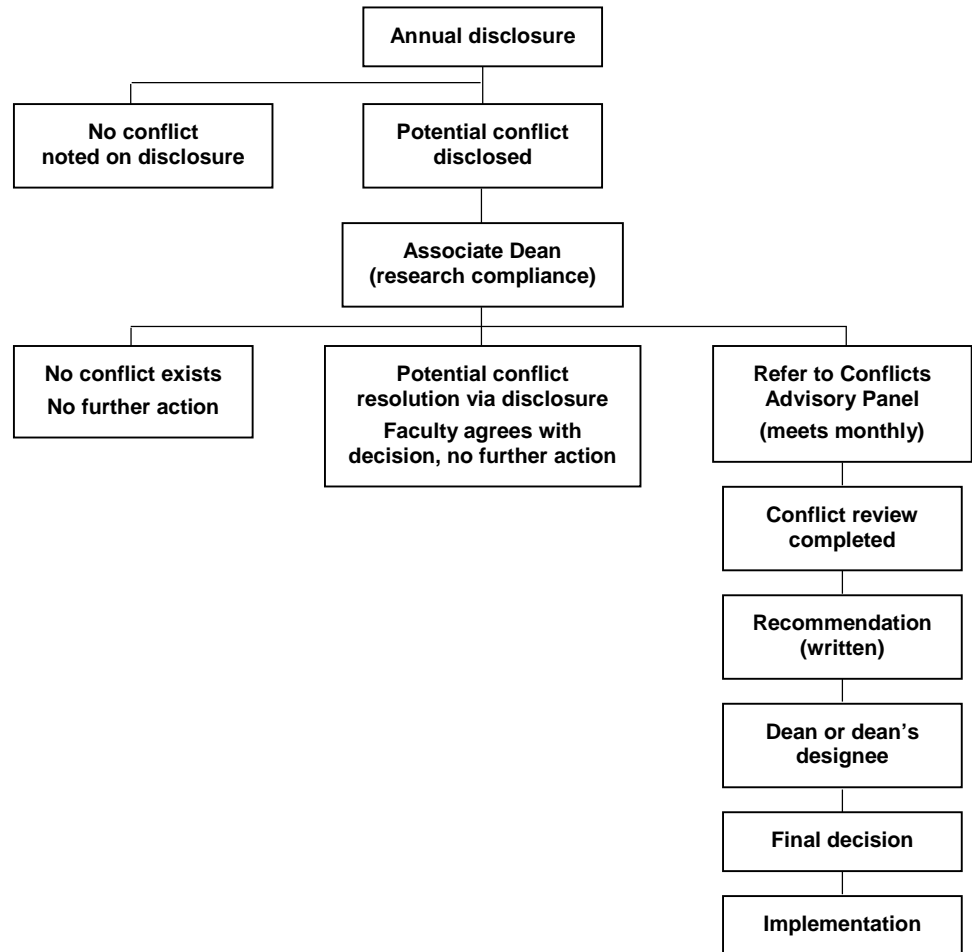
POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

**ADDITIONAL PROCEDURES SPECIFIC TO WEILL CORNELL
CAMPUS UNITS, continued**

**Annual Disclosure
Review Process**



POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

APPENDIX A: EXAMPLES AND COMMENTARY

The following commentary and examples are intended to provide guidance in the identification of conflicts of interest or commitment. The list does not cover all possible situations that might involve a real or apparent conflict of interest. It is intended to be illustrative only. For more information, see University Policy 1.7, Financial Conflict of Interest Related to Research, and University Policy 3.25, Procurement of Goods and Services.

Conflicts of Interest

The following activities have the potential to create conflicts of interest or commitment and should be reported and reviewed prior to being undertaken.

Example 1

Situations where an individual directly or indirectly leases, rents, trades, or sells real or personal property to the university.

Example 2

Situations where an individual possesses a significant financial interest in or participates in the profits of any organization that deals or seeks to deal with the university. Participation through stockholdings, mutual funds, and similar vehicles is not a conflict unless the stocks of the organization held by the individual constitute a substantial holding.

Example 3

Situations where an individual accepts appointment as an officer or director or serves in any management capacity in an external commercial, industrial, business or financial organization, or profit-making enterprise that deals or seeks to deal with the university.

Example 4

Situations where an individual, while serving in a position at Cornell, is concurrently engaged to teach a course or otherwise make a substantial contribution to the instruction or educational services offered by another entity. Instructional activities performed in the course of a dean-approved faculty sabbatical plan are not meant to be covered by this example, nor are instructional activities conducted for a subsidiary of the university. These activities are routinely subject to reporting and approval processes.

Example 5

Situations where an individual makes substantial use of university resources (e.g., studios, computer technology, research, technical, or support staff) in developing and/or teaching a course to be offered by another entity.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

APPENDIX A: EXAMPLES AND COMMENTARY, continued

Example 6

Situations where an individual, without permission, utilizes the name of the university or one of its colleges or programs in connection with the promotion, marketing, or sale of a product or service in such a way as to imply university sponsorship, e.g., "The Cornell Book of _____."

Example 7

Situations where an individual, as part of an arrangement with an entity unaffiliated with Cornell, agrees to any limitations on his or her performance of university duties (e.g., through agreements containing exclusive provider, non-competition, or right of first refusal clauses).

Example 8

Relationships that might enable individuals to influence Cornell's interactions with outside organizations in ways that may lead to personal gain, to the taking of improper advantage by anyone, or the improper diversion of university assets from the primary missions of the university, including the time and talents of its faculty and staff members.

Example 9

Situations where an individual, while serving as a consultant to an external organization has access to unpublished, privileged information from a colleague that has potential commercial value and wishes to provide that information to the external organization.

Example 10

Situations where an individual directs a student into a research area or other activity, under circumstances where that individual has the potential to realize personal gain as a result of the student's participation in that area or activity.

Example 11

Situations where the individual is asked to assume executive or managerial positions with outside organizations that might seriously divert the individual's attention from university duties, or create other conflicts of loyalty.

Example 12

Disclosure or use for personal profit or gain of unpublished information coming from university research or other confidential university sources, or assisting outside organizations by giving them access to such information except as may be authorized by university policies.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

APPENDIX A: EXAMPLES AND COMMENTARY, continued

Example 13

Consultation that imposes obligations that conflict with University Policy 1.5, Inventions and Related Property Rights, or with Cornell's obligations to sponsors.

Example 14

Situations where a substantial body of research that could and ordinarily would be conducted by the investigator within the university is directed elsewhere.

Example 15

Situations where the individual is invited to advise or serve an organization doing business in the general area of the individual's university responsibility or that is related to that field.

Example 16

Situations where an individual is offered a position on a scientific or administrative board of an organization that has research contracts with the individual's unit.

Example 17

Situations where an individual is offered support from an organization in which the individual serves as a director, a member of an advisory board, or as a consultant, or in which the individual holds a significant equity position.

Example 18

Situations where the individual occupies a position in an enterprise doing business in the area of the individual's university responsibility that is related to that field.

Example 19

Situations where the individual is involved in independent business ventures as owner, operator, or major investor, particularly if the corporation is doing business with the university.

Example 20

Situations where an individual can require others to purchase a product in which the individual has a proprietary interest and from which the individual will receive income.

Conflicts of Commitment

These conflicts will be apparent in the failure of individuals to discharge fully the role and duties expected of them. These include the following:

Example 1

External commitments, whether compensated or in a volunteer capacity, that involve frequent or prolonged absence from the university on non-university business.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

APPENDIX A: EXAMPLES AND COMMENTARY, continued

Example 2

External commitments (e.g., running for public office), that engage a substantial portion of the time an individual is expected to spend in university-related activities and which thereby dilutes the amount or quality of participation in the instructional, scholarly, or administrative work of the university.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

APPENDIX B: COMMUNITY, CIVIC, AND GOVERNMENTAL ACTIVITIES

Community, Civic, and Municipal Activities

University employees elected or appointed to part-time public positions are generally free to consider and vote on any matter involving the university, unless the individual falls into one of the following three categories:

Trustees, Officers of the Corporation, and Other Senior Administrators

Trustees, officers of the corporation, and other senior administrators, including vice presidents and vice provosts, should refrain from discussions and voting on any matter involving Cornell's interests.

Deans and Directors

Other employees with managerial responsibilities, including full-time faculty, academic department heads, and administrative directors, should similarly recuse themselves from participating in the governmental decisional process regarding specific matters that directly involve their particular Cornell unit (administrative division, school, or college) or area of responsibility.

Academic and Nonacademic Staff

Academic and nonacademic staff members should similarly recuse themselves from participating in the governmental decisional process regarding issues over which they have specific authority.

Other Extramural Activities

This three-tiered analysis to determine when recusal is required should similarly be used to identify those circumstances in which the possible adverse effects of other extramural activities upon the university should be considered in evaluating the potential for conflict of interest. Thus, when pursuing extramural activities not specifically covered in the conflicts policy or limited by the three-tiered analysis, employees are not required by Cornell to take the interests of the university into account.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

APPENDIX C: START-UP NY

Introduction

The language below sets forth conflict of interest guidelines for those universities and colleges participating in the START-UP NY program, administered through the State of New York Department of Economic Development. Cornell University is a participant in the START-UP NY program and adopts the following conflicts guidelines for the duration of its participation in START-UP NY.

Section 220.20 Conflict of Interest Guidelines

- a. Each university or college participating in the START-UP NY Program shall adopt a conflict of interest policy. Such conflict of interest policy shall provide, as it relates to the Program:
 - 1) as a general principle, that service as an official of the university or college shall not be used as a means for private benefit or inurement for the official, a relative thereof, or any entity in which the official, or relative thereof, has a business interest;
 - 2) no official who is a vendor or employee of a vendor of goods or services to the university or college, or who has a business interest in such vendor, or whose relative has a business interest in such vendor, shall vote on, or participate in the administration by the university or college, as the case may be, of any transaction with such vendor; and
 - 3) upon becoming aware of an actual or potential conflict of interest, an official shall advise the president or chief executive officer of the university or college, as the case may be, of his or her or a relative's business interest in any such existing or proposed vendor with the university or college.
- b. Each university or college shall maintain a written record of all disclosures of actual or potential conflicts of interest made pursuant to this section, and shall report such disclosures, on a calendar year basis, by January 31st of each year, to the auditor for such university or college. The auditor shall forward such reports to the Commissioner, who shall make public such reports.
- c. For purposes of such conflict of interest policies:
 - 1) an official of a university or college has a "business interest" in an entity if the individual:
 - i. owns or controls 10% or more of the stock of the entity (or 1% in the case of an entity the stock of which is regularly traded on an established securities exchange); or
 - ii. serves as an officer, director or partner of the entity;
 - iii. a "relative" of an official of a university or college shall mean any person living in the same household as the individual and any person who is a

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

APPENDIX C: START-UP NY, continued

direct descendant of that individual's grandparents or the spouse of such descendant; and

- iv. an "official" of a university or college shall mean an employee at the level of dean and above as well as any other employee with decision-making authority over the START-UP NY Program.

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

INDEX

Absence	37	Disclosure Survey (WCMC).....	5, 30, 34
Academic staff.....	6, 11, 15, 17, 20	Dismissal/Suspension Policy for Faculty Members	
Advisory committee	7, 8, 17	4, 17
Annual Disclosure Survey (WCMC).....	5, 30, 34	Elected position	12, 39
Apparent conflict of interest.....	6, 10, 35	Employee complaint and grievance procedure,	
Appeal	23	WCMC	4, 17
Asset	15, 36	Executive Committee	13
Audit Committee	8, 13	Extension service	1
Board of trustees	4, 8, 13	External commitment.....	1, 6, 8, 11, 13, 14
Business venture	9, 37	External entity.....	6, 16
Bylaws of the Board of Trustees	4, 6, 14	Extramural activities	1, 9, 39
Chief Executive Officer	26, 28	Faculty....	1, 8, 11, 14, 15, 16, 17, 18, 19, 20, 22, 23, 26,
Chief Operations Officer.....	26, 28	27, 28, 29, 30, 35, 36, 39	
Chief Technical Officer.....	26, 28	Faculty handbook.....	4, 11
Civic activity.....	6, 12, 39	Family member	6, 7, 9, 10, 13, 14, 15, 31
Collective bargaining unit	17	Financial interest.....	1, 6, 7, 8, 10, 22, 31
Committee on Conflicts of Interest.....	8, 13, 18	General Faculty Council (WCMC).....	19
Confidential	9, 15, 18, 36	Ghostwriting	26
Conflict disclosure	2, 20	Gift.....	10
Conflict management	6	Gifts	26, 27
Conflict of commitment	4, 6, 8, 9, 11	Governmental activity	12
Conflicts Advisory Panel	2, 24, 25, 26, 29	Grants and Contracts Division (WCMC)	20
Conflicts Advisory Panel (WCMC).....	8, 19, 23	Human research.....	24, 25
Conflicts Management Office.....	2, 22, 30, 31, 32, 33	Human resources policies	
Conflicts Management Office (WCMC).....	5, 19, 30	6.11.4, Staff Complaint and Grievance Procedure	
Conflicts management system	30	4, 17
Consulting	4, 16, 28	6.13.1, Conflict of Commitment.....	4
Contract.....	10, 15, 17, 18, 37	Income.....	7, 32, 37
Cooperative Extension	11	Institutional Review Board (IRB)	20, 23
Cornell Hotline.....	5, 18	Interest	7, 8, 9, 11, 13, 14, 15, 39
Dean.....	8, 15, 16, 18, 19, 35	Investor	9, 37
Dean of the Faculty	18	Material interest.....	9
Director	8	Nepotism	2, 10, 16
Disciplinary action.....	22	NIH.....	4
Disclosure	6, 7, 9, 16, 19, 22, 30, 31, 36, 40	Nonacademic staff member	6, 11, 14, 15, 17, 39

POLICY 4.14

Conflicts of Interest and Commitment (Excluding Financial Conflict of Interest Related to Research)

Draft Date: June 16, 2016

INDEX, continued

Office of Technology Development (WCMC)	20	Speaker's Bureau	29
Officers of the corporation.....	6, 8, 11, 13, 39	Startup companies, potential conflicts.....	4
Part-time.....	11, 12, 39	START-UP NY	4, 40, 41
Personal gain	6, 9, 36	Stock Holdings.....	24, 25
Personal property	35	Teaching.....	1, 7, 9, 11, 35
PHS	20, 21	Travel	2, 7, 20, 21, 22, 33
President	16, 26, 28	Trustee	1, 11, 13, 39
Procurement	15, 29, 30	Unit head	8, 14, 15, 16, 17
Provost	5, 8, 14, 15, 16, 17, 18, 19, 22, 23	University Audit.....	5, 18
Provost for Medical Affairs (WCMC) ...	8, 14, 17, 22, 23	University Conflicts Committee (UCC).....	8, 18
Public Health Services (PHS)	20, 21	University Counsel.....	1, 5, 6, 8, 13, 17, 18, 19, 23
Public office	38	University policies	
Public position.....	39	1.7, Financial Conflict of Interest Related to	
Purchasing authority.....	29	Research.....	1, 4, 9, 10, 14, 35
Record retention.....	23	3.11 Effort Planning and Confirmation	4
Relative.....	6, 31, 40	3.25, Procurement of Goods and Services	4, 10, 35
Report, Reporting	1, 5, 6, 8, 9, 10-16, 18, 35	3.6, Financial Irregularities.....	4
Reporting-line conflicts.....	2, 10, 16	4.6, Standards of Ethical Conduct	4, 10
Research	1, 7, 8, 9, 10, 11, 14, 18, 30, 35, 36, 37	6.11.3, Employee Discipline	4
Research Integrity and Assurance (ORIA), Office of		6.9, Time Away From Work.....	4
.....	4, 5, 8, 15	University resources	35
Sanction.....	22	Vendor	26, 27, 40
Secretary of the Corporation	6, 13	Vice president	6, 15, 16, 39
Self-interest	1, 8, 9	Vice provost	15, 16, 18, 39
Senior administrator.....	6, 8, 11, 13, 39	Volunteer	37
Significant financial interest.....	6, 7, 9, 10, 35	Weill Cornell Medical College (WCMC) ..	4, 5, 8, 17, 19, 30, 31