

## **Cary Institute of Ecosystem Studies** **Financial Conflict of Interest Disclosure Policy**

The Cary Institute's Financial Conflict of Interest Disclosure policy requires that all personnel (**investigators**<sup>1</sup>) involved in the design, conduct, or reporting of a research or educational project, contract, sub-contract, agreement or protocol must disclose any potential **Significant Financial Interests**<sup>2</sup> (SFIs) that reasonably appear to be related to their Cary Institute (and related entities) responsibilities. These responsibilities may include, but are not limited to, activities such as research, teaching, and institutional committee memberships. This policy requires not only disclosure of SFIs of the investigator, but also any SFI incurred by his/hers spouse, domestic partner, dependent children and/or Associate Corpus (any trust, organization or enterprise other than the Institute over which investigator, singly or collectively with members of their household and/or immediate family, exercise a controlling interest).

Any potential SFIs must be disclosed annually, prior the submission of any proposal and within 30 days of any change in or addition of a financial interest.

### **What should be reported?**

The following activities and/or holdings should be reported as they are typically major sources of Financial Conflicts of Interest (FCOI).

**Publicly Traded Companies:** Combined equity value (ownership of stock, options, etc.) and income exceeding \$5,000 (or the equivalent cash value) from any one entity when aggregated over the preceding 12 months for the investigator and family that appears to be related to your institutional responsibilities.

**Privately Held or Nonprofit Companies:** Ownership in any dollar amount or income exceeding \$5,000 over the preceding 12 months (or the equivalent cash value) from any one entity that when aggregated for the investigator and family appears to be related to your institutional responsibilities.

**Intellectual Property Rights** (e.g., patents, copyrights) from which you received any income over the preceding 12 months, and the intellectual property appears to be related to your institutional responsibilities.

**Sponsored Travel** paid for, or reimbursed directly to you, by an organization other than an accredited U.S. institution of higher education or by any governmental agency (federal, state, or local) when the sponsoring organization appears to be related to your institutional responsibilities.

**Paid Positions of Influence** in which you exercised an authoritative or direction-shaping role in any entity not affiliated with the Cary Institute, including non-profit organizations, and the interests of the entity appear to be related to your institutional responsibilities.

If an investigator reports an activity/holding, this does not mean that the reported activity/holding is an actionable FCOI. Cary's Compliance Officer (CO) will investigate the reported item and will determine whether the item meets the criteria for an actionable FCOI. If the CO deems that the activity/holding is a true FCOI, the investigator and the CO will discuss means to mitigate the FCOI to assure compliance with Cary and Federal regulations.

**Cary Institute of Ecosystem Studies**  
**Financial Conflict of Interest Disclosure Form**

Name:

Section A

In the 12 months preceding this disclosure, did you, your spouse, domestic partner, dependent children and/or Associate Corpus have Significant Financial Interests: (1) that would reasonably appear to affect activities funded (or proposed for funding) by the Cary Institute of Ecosystem Studies, the NSF, PHS or any other federal funding source; (2) in **Entities**<sup>3</sup> not controlled by the Cary Institute whose financial interests would reasonably appear to be affected by such activities?

**Select one:**    No        Yes (If "Yes", please fill out Section B)

Section B

- Please describe any SFI you, your spouse/domestic partner, or dependant family member has had in the last 12 months related to Publicly/Non-Publicly Traded Entities or any Intellectual Property, in which you, your spouse/domestic partner, or dependant family member has interest/income/holdings exceeding \$5000 (per holding/activity, not cumulative) and appear to be related to your institutional responsibilities.
  
- Please describe any Sponsored Travel paid for, or reimbursed directly to you, your spouse/domestic partner, or dependant family member, by any organization *other than* the Cary Institute, an accredited, U.S. institution of higher education or government agency (federal, state, or local) and the sponsoring organization appears to be related to your institutional responsibilities.
  
- Please describe the holding of any Paid Position of Influence in which you, your spouse/domestic partner, or dependant family member had any authoritative or direction-shaping role in any entity NOT affiliated with the Cary Institute (including non-profit organizations) and the interests of the entity appear to be related to your institutional responsibilities.

By signing this document you:

(1) Certify that you have read the Cary Institute of Ecosystem Studies Financial Conflict of Interest Disclosure Policy;

(2) Certify that the information contained in this form (including any attachments) is complete and accurate to the best of your knowledge; and

(3) Acknowledge your continuing obligation to complete and submit an updated Financial Conflict of Interest Disclosure Form when there is any new or anticipated significant change in your outside activities or related financial interests which meet the criteria described in the policy.

***Name:***

***Signature:***

***Date:***

## Definitions

<sup>1</sup>The term **investigator** signifies the principal investigator, co-principal investigator, and any other person at the Cary Institute of Ecosystem Studies who is responsible for the design, conduct or reporting of research or educational activities which are funded, or proposed for funding, by the Cary Institute, NSF, PHS or other federal, state, or local agencies.

<sup>2</sup>The term **significant financial interest** signifies anything of monetary value, including but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights).

### Significant financial interest does not include:

- a. Salary, royalties or other remuneration from the Cary Institute of Ecosystem Studies;
- b. Income from seminars, lectures or teaching engagements sponsored by public or non-profit entities;
- c. Income from service on advisory committees or review panels for public (federal, state, and local) or non-profit entities;
- d. Any equity interest that when aggregated for the investigator and the investigator's spouse, domestic partner, or dependent children meets both of the following tests:
  - i. Does not exceed \$5,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and represents more than a 5% ownership interest in any single entity; or
  - ii. Salary, royalties or other payments that when aggregated for the investigator and the investigator's spouse, dependent children or domestic partner over the next twelve months, are not reasonably expected to exceed \$5,000.
- e. Income from investment vehicles, such as mutual funds and retirement accounts, as long as the investigator does not directly control the investment decisions made in these vehicles.

<sup>3</sup>The term **entity** signifies any legal body created for profit or charitable purposes, e.g., Central Hudson, General Electric, Clearwater, or the Hudson River Foundation.