

Ithaca and Reporting Campuses Non-Research COI/COC

April 2026

Overview



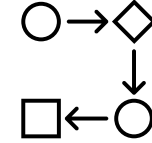
Annual Policy Attestation

- Distributed by HR to all paid employees
- Reinforces awareness of university policies on non-research COI/COC (4.14) and nepotism (6.14)
- Requires employees to attest that they have read, understand, and agree to comply with these policies
- Separate from disclosure process



Disclosure Process

- Under Policy 4.14, Unit Heads (e.g., Deans & VPs) are responsible for:
 - Communicating unit-specific disclosure procedures
 - Collecting disclosures
 - Managing conflicts within their units
- Disclosure procedures may vary by college or unit



Tools & Support

- HR developed an online disclosure form with an accompanying electronic workflow as a resource
- Form use is currently optional; intended to supplement – not replace – existing unit practices
- HR provides templated messaging for Unit Heads
- Central HR works with local HR to advance the review, routing, and resolution of disclosures

Online Disclosure Form

Disclosure Requirement (Policies 4.14 & 6.14)

- Employees must disclose actual or potential COI/COC or nepotism
- Online form use is optional; units may opt in or use another method

What the System Is (and Isn't)

- Salesforce + Workday integration
- Notification tool, not case management
- Will likely require offline review and communication within the unit

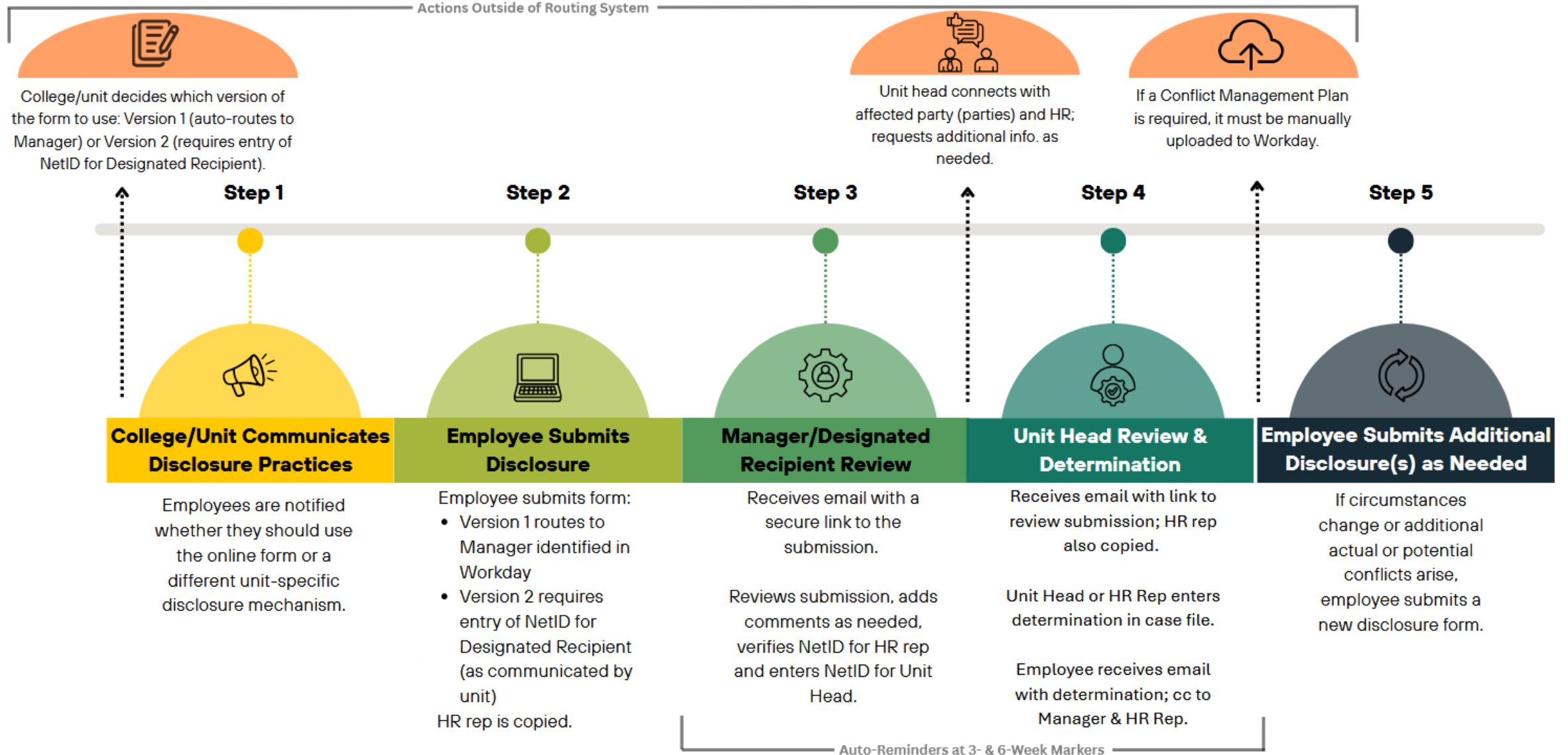
Form Options

- Units choose between two form versions available:
 - Version 1: auto-routes to Manager (no NetID entry)
 - Version 2: Employee enters NetID of individual delegated to receive submissions (“Designated Recipient”)

Access, Roles & HR Support

- Access to disclosures limited to named recipients; links cannot be forwarded
- System (Salesforce) access limited to Workforce Policy & Compliance team members
- Questions or role changes: email hrpolicy@cornell.edu

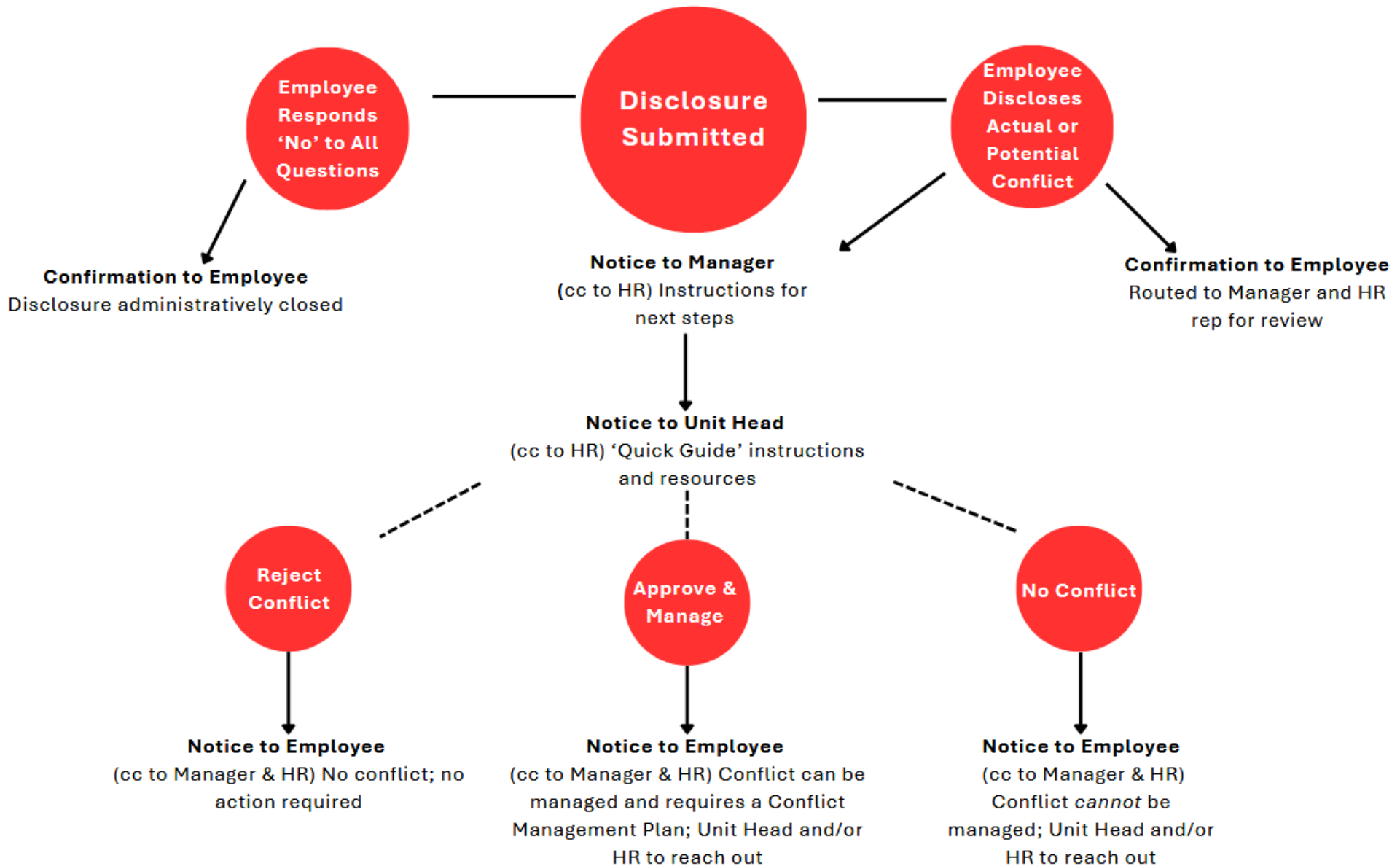
Online Disclosure Form: Process & Routing Map



Online Disclosure Process: Roles & Responsibilities

Manager or Designated Recipient	Unit Head or Designee	HR Representative
Internal to Routing System		
<ul style="list-style-type: none"> ✓ Reviews disclosure ✓ Adds comments as appropriate ✓ Verifies NetID for HR rep ✓ Enters NetID for Unit Head 	<ul style="list-style-type: none"> ✓ Reviews disclosure ✓ Records determination (as appropriate or directed by the Unit Head) 	<ul style="list-style-type: none"> ✓ Reviews disclosure ✓ Adds comments as appropriate ✓ Records determination (as appropriate or directed by the Unit Head)
External to Routing System		
<ul style="list-style-type: none"> ✓ Has conversations with affected party (parties), HR, and/or Unit Head as necessary ✓ If a Conflict Management Plan (CMP) is required, signs CMP 	<ul style="list-style-type: none"> ✓ Provides guidance to unit employees, including who to enter for: <ul style="list-style-type: none"> • Designated recipient (applicable to version 2 of the form only) • Unit Head or designee ✓ Has conversations with affected party (parties), Manager, and HR as necessary ✓ If a Conflict Management Plan (CMP) is required, prepares and signs CMP 	<ul style="list-style-type: none"> ✓ Supports employees in understanding what may potentially represent a conflict ✓ Has conversations with affected party (parties), Manager, and/or Unit Head as necessary ✓ If a Conflict Management Plan (CMP) is required, collects and uploads CMP to electronic employee file in Workday

Auto-Generated System Email Notifications



Compliance Program & Additional Resources

Managing Non-Research COI/COC & Potential for Nepotism:

The program, procedures and guidelines can be found on the **Working at Cornell** website ([Non-Research Conflicts of Interest & Commitment and Avoiding Nepotism](#)). The program materials outline unit heads' responsibilities, including guidelines on how to manage COC/COI issues and develop conflict management plans.

Additional Resources – Forms & Guides:

- ✓ Online **Disclosure Form** (paperless, electronic routing system) and PDF fillable version
- ✓ Conflict Management Plan **Template**
- ✓ Conflict Management Plan Methods **Checklist**
- ✓ **Examples** of Non-Research COI/COC & Nepotism
- ✓ **Quick Guide** for Unit Heads: Processing & Managing Non-Research and Nepotism Disclosures

Questions?