



STATE UNIVERSITY OF NEW YORK

OFFICE OF THE
PROVOST AND VICE
CHANCELLOR FOR
ACADEMIC AFFAIRS

System Administration
State University Plaza
Albany, NY 12246

518/443-5152
FAX: 518/443-5321

*Karen H
&
Jeanne G
2/1 and draft response if any.*

RECEIVED

JAN 20 1995

OFFICE OF THE
PROVOST

January 17, 1995

To: Campus Presidents and Chief Academic Officers

From: Joseph C. Burke *JCB*

Subject: Conflict of Interest Policy

The National Science Foundation (NSF) and the U.S. Public Health Service (PHS) have recently issued regulations requiring that institutions whose faculty apply for grants from these agencies have in place policies that meet the terms of the regulations. In addition, institutions must be able to certify that faculty grant applicants have disclosed information so that a determination about a conflict of interest can be made. While the NSF regulations are final, final PHS regulations have not yet been issued. The effective date of the NSF regulations is June 30, 1995. The PHS effective date will occur some months thereafter.

While SUNY personnel are subject to state law and regulation that cover many aspects of conflict of interest, the new federal mandates are somewhat more extensive. Therefore, it becomes necessary for SUNY to articulate a single policy that integrates both state and federal mandates.

A Task Group within the System Administration has prepared the attached draft policy and implementing guidelines. While the Task Group has tried to be as comprehensive as it could be, they were also guided by the concern that a final policy must be in place by June 30. Accordingly, changes from current policy and practice occur only as required by the new federal regulations. The SUNY I and SUNY II forms, as required by the State Ethics Commission, will continue to be used. Reporting requirements in these forms have not been changed, but the federal regulations require that they apply to all grant applicants, not only those above the current salary threshold.

Please initiate on your campus a review of the proposed policy and guidelines and forward any comments and suggested revisions to Dr. John W. Kalas, Associate Provost for Research and Economic Development in the System Administration. [Phone: (518) 443-5392; FAX: (518) 465-4992; E-Mail: kalasjw@SNYCENVA.BITNET]. Dr. Kalas will need your proposed revisions no later than Wednesday, March 1, 1995 in order that a draft incorporating your changes may be presented to the SUNY Board of Trustees.

Thanks for your help in addressing this important matter.

Attachments

Copy: Chancellor Bartlett
Dr. Chen
SUNY Trustees

Revisions of 1/18/95

DRAFT SUNY POLICY ON
CONFLICT OF INTEREST

I. INTRODUCTION

The mission of the State University of New York requires that all faculty and staff who serve it are committed to free and open enquiry and the unrestricted dissemination of knowledge. Open exchange of scholarly knowledge is integral to SUNY's goals of instruction, research and scholarship, and public service.

Moreover, as members of a public university, the faculty and staff of SUNY have a special responsibility to ensure integrity in all aspects of the performance of their assignments.

The University has an obligation to the State of New York and to society at large to share the benefits of research and scholarly knowledge with all, including those who may seek commercial benefit from that knowledge. As a matter of course, in order to conduct some of its research, SUNY relies in part upon external funding for financial support. Principal participants include the Federal and State governments, not-for-profit organizations, and the profit-making private sector. Potential conflicts of interest may arise in situations where faculty inventions, discoveries, or creations are the subject of commercial development; in these circumstances there is a delicate balance among the legitimate interests and obligations of faculty, the University, and the providers of funding.

This policy represents a compilation of existing University policy and pertinent State and Federal law and regulations which include:

Policies of the Board of Trustees, Article XI, Title H,4
New York State Public Officers Law, section 73-a
New York State Ethics Commission Advisory Opinion No. 90-15
U.S. 42 CFR Part 50, Subpart F
National Science Foundation, Grant Policy Manual (GPM),
Section 310

This policy is one of three documents pertaining to Conflict of Interest. The other two are: "General Procedures for Implementation of the SUNY Conflict of Interest Policy", and "Guide to Compliance with SUNY's Conflict of Interest Policy."

II. DEFINITION

-- A conflict of interest of concern to the University exists when there is a divergence between the private interests of a member of the University's faculty, staff, or student body and the discharging of that member's responsibilities and obligations to the University or its agents. Such divergence of interest can result in bias, or the appearance of bias, toward private interests in proposing, conducting or reporting research; in inappropriate use of University resources or assets; in inappropriate use of information; or in inappropriate business or financial decisions.

III. POLICY

Faculty and staff of the University are required to avoid conflicts of interest. In instances where apparent or actual conflicts exist, faculty and staff are expected to consult with appropriate University officers and abide by this University policy. It is the responsibility of campus officials charged with implementing this policy to identify apparent conflicts of interest and take appropriate steps to resolve conflicts.

- 1) SUNY faculty and staff are required to foster an atmosphere of academic freedom by promoting the open and timely exchange of scholarly knowledge independent of personal interests, and are also expected to inform students and colleagues about their outside interests that might influence the free exchange of scholarly information.
- 2) SUNY Faculty and Staff may not engage in other employment which interferes with the performance of their professional obligation (Article XI, Title H,4).
- 3) SUNY faculty and staff to the extent required by law or regulation shall disclose whether they and their spouses and dependent children have employment or financial interests (i.e., anything of monetary value including, but not limited to: salary or other payments for services such as consulting fees or honoraria; equity services such as stocks, stock options or other ownership interests; and intellectual property rights such as patents, copyrights and royalties from such rights); or hold significant offices, in external organizations that may affect, or appear to affect, the discharge of professional obligations to the University.
4. SUNY campuses shall ensure that all faculty and staff subject to pertinent laws and regulations comply with required reporting regulations. Campuses shall retain the reported information as required, identify actual or apparent conflicts of interest and resolve such conflicts.

5) Each campus President shall submit to the System Provost the name and title of the person designated as financial disclosure designee and shall further notify the Provost when a change in that assignment occurs. The Provost shall also be notified of any reports regarding Conflict of Interest that are forwarded to State or Federal compliance organizations.

Revisions of 1/18/95

GENERAL PROCEDURES FOR IMPLEMENTATION OF THE SUNY
CONFLICT OF INTEREST POLICY

The following procedures will be used to ensure compliance with the State University of New York policy on Conflict of Interest.

1. The SUNY I and SUNY II reporting forms will continue to be used. The SUNY II form has been changed to incorporate Federal reporting requirements.
2. Each campus must identify a campus financial disclosure designee officer who shall ensure that all reporting requirements are met, that records are maintained, that any sanctions imposed by the campus are recorded, and that appropriate persons at the University, State and Federal levels are notified of the disposition of alleged policy violations. The campus financial disclosure designee shall have on file a copy of all current rules and law governing conflict of interest on SUNY campuses.
3. All faculty whose salaries are above the threshold established by the State Ethics Commission (\$57,509 in 1994-1995) shall file a conflict of interest statement (SUNY I) with the campus financial disclosure designee on an annual schedule that permits the campus to meet the November 1 reporting deadline.
4. All faculty and staff who submit applications to the National Science Foundation or the U.S. Public Health Service for funds as principal investigators or co-principal investigators (or project directors or co-project directors) shall file a conflict of interest statement (SUNY II) at the time of application and update the statement as required by law or regulation. SUNY II records will be maintained by the campus financial disclosure designee or designee of that office. The office maintaining the records shall verify compliance to the campus sponsored research office at the time of application.
5. Each campus' Financial Disclosure Designee shall review financial disclosures, determine whether an actual or potential conflict of interest exists, and determine what conditions or restrictions, if any, should be imposed to resolve such conflict of interest. Campuses may continue the review processes currently in use so long as they conform to State and Federal Regulations. The Financial Disclosure Designee shall be responsible for recording the outcomes of reviews and reporting such outcomes to the appropriate campus officials who in turn shall report as necessary to State and Federal compliance organizations. The University System Provost shall also receive any notifications that are forwarded to State and Federal compliance organizations.

6. Where a conflict of interest as defined by SUNY Policy is discovered, the Financial Disclosure Designee must take steps to manage, reduce or eliminate such conflict of interest. These steps can include: 1) public disclosure of significant financial interests; 2) monitoring of research by independent reviewers; 3) disqualification from participation in the portion of the NSF or PHS funded research that would be affected by significant financial interests; 4) divestiture of significant financial interests; 5) severance of relationships that create actual or potential conflicts; 6) the reviewer may allow the research to go forward without imposing such conditions or restrictions if the reviewer determines that imposing conditions or restrictions would be either ineffective or inequitable, and that the potential negative impacts that may arise from a significant financial interests are outweighed by interests of scientific progress, technology transfer or the public health and welfare. Where any such conflict is found with respect to the investigator or the investigator's spouse (in contrast to those with respect to the investigator's dependent children), which would also violate the NYS Ethics in Government Act, any such corrective steps must ensure conformance with the Ethics in Government Act. In instances where disciplinary action is contemplated as a result of activities disclosed by the reporting requirements, such actions shall be consistent with the agreement collectively negotiated between the State of New York and United University Professions.

FINANCIAL DISCLOSURE FILING REQUIREMENT
FOR CERTAIN STATE UNIVERSITY OF NEW YORK FACULTY AND STAFF

RESPONSIBILITIES OF CAMPUS FACULTY FINANCIAL
DISCLOSURE DESIGNEES AND THE STATE ETHICS COMMISSION AND THE
NATIONAL SCIENCE FOUNDATION AND U.S. PUBLIC HEALTH SERVICE

II. ACADEMIC FINANCIAL DISCLOSURE FORMS -

A. Disclosure Statement for Certain Academic Employees
(SUNY-1 -- see Attachment A)

1. All SUNY faculty who meet the Ethics Commission's required filer criteria by September 1 must file a SUNY-1 form by **November 15** of each academic year. SUNY faculty who begin meeting the required filer criteria after September 1 must file a SUNY-1 within 30 days of meeting the criteria.
2. Forms are filed with the Campus Financial Disclosure Designee at filers' employing campus, rather than with the Ethics Commission.
3. The reporting period, or academic year, is defined as the most recent period from September 1 through August 31.
4. Required filer criteria includes all faculty who:
 - a. are employed by the University for the current academic year in which the filing is required;
 - b. hold certain academic titles (see Attachment B);
 - c. earn annual compensation at a rate equal to or in excess of salary grade 24 which is currently \$57,509 (SG24 is set forth in Civil Service Law S130(1)(a); and
 - d. are not designated policy-making by the University. (Policy-makers continue to file the statutorily required Annual Statement of Financial Disclosure -- "long form" -- with the Ethics Commission.)

5. Financial Disclosure Designee and the Ethics Commission coordinate identification and monitoring of required Academic Financial Disclosure Filers.
 - a. At the beginning of each academic year, the **Ethics Commission** provides each Designee a computerized tracking system report ("Report") of the campus faculty members believed to meet the required filer conditions listed above in Section II.A.4 for the Designee's review/ revisions.
 - b. Each **Financial Disclosure Designee** is responsible for updating the Report to reflect all current faculty members who meet the required filer criteria listed in Section II.A.4 for the current academic year.
 - c. Each **Financial Disclosure Designee** should review the Report and:
 - 1) Delete names of faculty members who ceased to meet the filing requirements as of commencement of the current academic year, and indicate on the Report one of the following reasons for deletion:
 - a) resigned from or otherwise left employ of the College or University prior to September 1 of the current academic year ("**LS,**" with date left service);
 - b) designated policy-making by the University (**filer type change to "PM"**);
 - c) earn annual compensation at a rate in excess of \$57,509 but who are anticipated to actually earn less than \$57,509 on an annual basis due to part-time employment status ("**PT**" -- **part-time**); or
 - d) transferred to administrative or non-academic position (**filer type change to "TO"**).
 - 2) Complete an Academic Employee Update Form for each faculty member to be added to the list of required filers who does not appear on the Report. (see Attachment C).

- 3) To advise the Commission of changes in title, home address or other information with respect to faculty members on the list of required filers which occurred during the academic year, complete an Academic Employee Update Form.
 - 4) Return revised Report and update forms to the Ethics Commission by **November 1**.
- b. Each **Financial Disclosure Designee** is responsible for identifying all faculty on the revised Report who fail to comply with the **November 15 filing deadline** and forwarding a list of those who fail to complete or file an incomplete SUNY-1 to the Ethics Commission by **November 30**, using the Faculty SUNY-1 Filing Certification form (**SUNY-3**). (see Attach-ment D.)
- c. **Ethics Commission** will notify failed filers in writing of their obligation to file, failure to file and penalties which may be assessed for continued non-compliance with the law. (refer to Section IV - Violations and Penalties).
- d. For personnel changes occurring throughout the academic year which affect the academic required filers list, including:
- 1) faculty members hired after September 1 who meet the required filer criteria listed in Section II.A.4 above, and
 - 2) current faculty members who cease to meet the required filer criteria:
 - a) The **Faculty Financial Disclosure Designee** completes an Academic Employee Update Form and forwards the Form to the Ethics Commission to update the database of required academic filers.
 - b) The **Ethics Commission** notifies in writing new academic employees meeting required filer criteria of their requirement to file, provides the academic financial disclosure forms, and instructs to file **SUNY-1** within 30 day of notification.

B. GRANT APPLICATION FINANCIAL DISCLOSURE FORM (SUNY-2 -- see Attachment E).

1. All SUNY employees who meet the following criteria and apply for federal funding are required to file:
 - a. are employed by the University for the current academic year;
 - b. hold certain academic titles (see Attachment B);
 - c. earn annual compensation at a rate equal to or in excess of \$57,509 and apply to agencies other than NSF or PHS; and
 - d. are not designated policy-making by the University.
2. SUNY-2 required filers include all employees who apply for federal funds from NSF or PHS (regardless of income level).
3. Each **Financial Disclosure Designee** is responsible for identifying and monitoring continually throughout the academic year all faculty required to file SUNY-1 who apply for federal funding, and requiring them to file SUNY-2.
 - a. Initial filing of SUNY-2 is due with a filer's first grant application of the academic year.
 - b. Addenda to initial filing or a new SUNY-2 are to be filed with subsequent grant applications made within an academic year as reportable information changes.
 - c. Grant applications will not be accepted by any campus research office responsible for processing grant applications without a completed SUNY-2.

SUNY-1 FORMS AND SUNY-2 FORMS ARE MAINTAINED AT FILERS' EMPLOYING CAMPUS IN A SECURE ENVIRONMENT ACCESSIBLE BY AUTHORIZED PERSONNEL ONLY. For those employees applying for NSF or PHS funds, unresolved conflicts of interest must be reported to the sponsor.

DISCLOSURE STATEMENT FOR CERTAIN ACADEMIC EMPLOYEES STATE UNIVERSITY OF NEW YORK

REPORTING YEAR: September 1, 1993 - August 31, 1994

Pursuant to State Ethics Commission Advisory Opinion No. 93-6, this form satisfies the filing requirements of Public Officers Law §73-a. Information on this form is available for public inspection pursuant to the rules of the State Ethics Commission. The Statements are not available for photocopying; handwritten notes may be taken.

| | |
|-------------------|------------|
| Name | |
| Title of Position | |
| Campus | Department |

List below the source and description of any outside employment and sources of honoraria, consultant or lecture fees, whether public or private, for the academic year September 1, 1993 - August 31, 1994. **DO NOT LIST THE AMOUNTS.**

| Source | Description |
|--------|-------------|
| | |
| | |
| | |
| | |
| | |
| | |
| | |

USE ADDITIONAL SHEETS IF NECESSARY

I declare that the above information is true and correct.

_____ Signature

_____ Date

INFORMATION AND INSTRUCTIONS

The Ethics in Government Act of 1987, as amended, imposes a financial disclosure filing requirement on State employees who earn in excess of the job rate of Civil Service SG-24 (currently \$57,509) and who have not been exempted. The State Ethics Commission established in its Advisory Opinion No. 90-15 a financial disclosure filing process to govern individuals serving in academic titles at the State University of New York. By its Advisory Opinion No. 93-6, the Commission adopted as final a two-step filing system for certain academic employees. Individuals serving in academic titles are not exempt from filing, but must submit this short-form financial disclosure in place of the statutorily prescribed Statement. Individuals serving in the following titles need not file:

| | |
|------------------------------|---------------------------------|
| Assistant Librarian 08 | Librarian |
| Assistant Librarian 08 (AY) | Librarian (AY) |
| Assistant Librarian 08 (CY) | Librarian (CY) |
| Associate Librarian | Senior Assistant Librarian |
| Associate Librarian (AY) | Senior Assistant Librarian (AY) |
| Associate Librarian (CY) | Senior Assistant Librarian (CY) |
| Associate Director Libraries | Graduate Assistant |
| | Teaching Assistant |

You do **NOT** have to report your position in an organization if the sole purpose of the organization is religious, social (e.g., boy or girl scouts, athletic groups, alumni or other school associations), political, civic, school associations or self-help (e.g., Alcoholic Anonymous, Neighborhood Watchdog) unless the organization, during the reporting year, received or applied for funds from the State of New York, and you held such an office during the reporting year. You do **NOT** have to report your position in a union or employee organization which represents employees in your State agency. Do **NOT** list uncompensated honorary positions.

FILING ASSISTANCE: If you have any questions concerning the completion of this form, you may write to the State Ethics Commission, 39 Columbia Street, 4th Floor, Albany, New York 12207, or call 1-800-87-ETHICS (1-800-873-8442).

WHEN TO FILE: November 15, 1994, or within 30 days of hire or transfer into an academic position meeting the required filer criteria

RETURN TO: Your Campus ~~Faculty~~ Financial Disclosure Designee

VIOLATIONS: If you knowingly and wilfully fail to file this form, or give information which you know to be false on the statement, you shall be subject to a civil penalty in an amount not to exceed \$10,000. The State University of New York may impose disciplinary action for failure to file or false filing and may refer individual cases of failure to file or false filing, or conflicts of interest presented by the information supplied, to the State Ethics Commission for investigation and disposition.

**SUNY ACADEMIC TITLES
REQUIRED TO FILE SUNY-1 AND SUNY-2
FINANCIAL DISCLOSURE STATEMENTS**

| | |
|---------|----------------------------|
| 3723000 | Adjunct Assnt Prof |
| 3723001 | Adjunct Assoc Prof |
| 3724200 | Adjunct Instructor |
| 3723005 | Adjunct Lecturer |
| 3723002 | Adjunct Professor |
| 3722150 | Assnt Clin Prof |
| 3710199 | Assnt Instructor (HS) |
| 3710197 | Assnt Instructor (SFT) |
| 3710198 | Assnt Instructor (12M) |
| 3720415 | Assnt Professor (Law) |
| 3720410 | Assnt Professor (10M) |
| 3720412 | Assnt Professor (12M) |
| 3720401 | Assnt Professor (GFT) |
| 3720413 | Assnt Professor (HS) |
| 3720402 | Assnt Professor (SFT) |
| 3720414 | Assnt Professor (TCL) |
| 3722250 | Assoc Clin Prof |
| 3730120 | Assoc Dir Libraries |
| 3723210 | Assoc Professor (10M) |
| 3723212 | Assoc Professor (12M) |
| 3723201 | Assoc Professor (GFT) |
| 3723214 | Assoc Professor (HS) |
| 3723213 | Assoc Professor (SFT) |
| 3720610 | Assoc Professor (TCL) |
| 3723215 | Assoc Professor (Law) |
| 3710597 | Clinical Assnt Instr |
| 3710599 | Clinical Assnt Instr (HS) |
| 3710525 | Clinical Assnt Instr (SFT) |
| 3722112 | Clinical Assnt Pr (12M) |
| 3722110 | Clinical Assnt Pr (10M) |
| 3709300 | Clinical Assnt Pr (GFT) |
| 3709301 | Clinical Assnt Pr. (HS) |
| 3722191 | Clinical Assnt Pr (SFT) |
| 3709302 | Clinical Assnt Pr (TCL) |
| 3709401 | Clinical Assoc Pr (HS) |
| 3709410 | Clinical Assoc Pr (10M) |
| 3722212 | Clinical Assoc Pr (12M) |
| 3709400 | Clinical Assoc Pr (GFT) |
| 3722298 | Clinical Assoc Pr (SFT) |
| 3709402 | Clinical Assoc Pr (TCL) |
| 3709210 | Clinical Instructor (10M) |

3709212 Clinical Instructor (12M)
3709200 Clinical Instructor (GFT)
3710527 Clinical Instructor (HS)
3710526 Clinical Instructor (SFT)
3710528 Clinical Instructor (TCL)
3709100 Clinical Lecturer
3709110 Clinical Lecturer (HS)
3709105 Clinical Lecturer (GFT)
3722310 Clinical Prof (10M)
3722412 Clinical Prof (12M)
3709500 Clinical Prof (GFT)
3709501 Clinical Prof (HS)
3722400 Clinical Prof (SFT)
3709502 Clinical Prof (TCL)
3721600 Disting Chair in Geriatrics
3721001 Disting Prof (LDG) (10M)
3721003 Disting Prof (LDG) (12M)
3721320 Disting Prof (10M)
3721325 Disting Prof (12M)
3721335 Disting Prof (GFT)
3721330 Disting Serving Prof
3721310 Disting Tch Prof (10M)
3721312 Disting Tch Prof (12M)
3740212 Div Chairman
3720293 Einstein Professor
3710210 Instructor (10M)
3710212 Instructor (12m)
3710201 Instructor (GFT)
3710204 Instructor (SFT)
3710213 Instructor (TCL)
3710299 Instructor (HS)
3720513 Lecturer (HS)
3720514 Lecturer (TCL)
3720516 Lecturer (GFT)
3720510 Lecturer (10M)
3720512 Lecturer (12M)
3720403 Professor Ldng-12M
3720399 Professor Ldng-10M
3720301 Prof & Chrnm (Health Sciences)
3720313 Prof & Chrnm (Medicine)
3720316 Prof & Chrnm (Medicine) (GFT)
3720312 Prof & Chrnm (Medicine) (SFT)
3720302 Prof & Chrnm (MTCL)

| | |
|---------|---------------------------|
| 3719010 | Professor (10M) |
| 3719012 | Professor (12M) |
| 3719001 | Professor (GFT) |
| 3720318 | Professor (HS) |
| 3720350 | Professor (LAW) |
| 3720400 | Professor (SFT) |
| 3720404 | Professor (TCL) |
| 3720207 | Research Assnt Prof |
| 3720238 | Research Assnt Prof (10M) |
| 3720239 | Research Assnt Prof (12M) |
| 3720217 | Research Assnt Prof (GFT) |
| 3720227 | Research Assnt Prof (HS) |
| 3720237 | Research Assnt prof (SFT) |
| 3720289 | Research Assoc Prof |
| 3720294 | Research Assoc Prof (10M) |
| 3720295 | Research Assoc Prof (12M) |
| 3720290 | Research Assoc Prof (GFT) |
| 3720291 | Research Assoc Prof (HS) |
| 3720292 | Research Assoc Prof (SFT) |
| 3720297 | Research Assoc Prof (TCL) |
| 3710200 | Research Instructor |
| 3710206 | Research Instructor (HS) |
| 3710208 | Research Instructor (10M) |
| 3710209 | Research Instructor (12M) |
| 3710205 | Research Instructor (GFT) |
| 3710207 | Research Instructor (SFT) |
| 3720288 | Research Prof |
| 3720283 | Research Prof (10M) |
| 3720284 | Research Prof (12M) |
| 3720280 | Research Prof (GFT) |
| 3720282 | Research Prof (SFT) |
| 3720281 | Research Prof (HS) |
| 3721342 | University Professor |
| 3720120 | Visiting Assnt Prof |
| 3720205 | Visiting Assoc Prof |
| 3710529 | Visiting Instructor |
| 3720206 | Visiting Professor |

NEW YORK STATE ETHICS COMMISSION
39 COLUMBIA STREET, 4TH FLOOR
ALBANY, NEW YORK 12207

ACADEMIC EMPLOYEE UPDATE FORM

Effective Date of Transaction: _____

| | |
|--|---|
| | New Academic Employee (or New to Academic Financial Disclosure Program/Requirements) |
| | Employee Leaving State or Agency Service Date off Payroll: _____ Transfer to: _____ |
| | Change in Employee Status/Information (including internal transfers) -- indicate type of change here -- provide specific information below |
| | title address salary filer type other _____ |

| | | | |
|--------------------------------|------|-------|----------|
| Employee Name | | | |
| Home Address (Street & Number) | City | State | Zip Code |

FILER TYPE

| | |
|--|--|
| | AF - Academic Filer – non-policymaker in academic title earning annual compensation at a rate equal to or in excess of \$57,509 (job rate of Civil Service SG-24) (FILES ACADEMIC DISCLOSURE FORMS) |
| | PM - Policy Maker – engaged in policymaking duties as determined by the appointing authority (FILES "LONG" FINANCIAL DISCLOSURE FORM) |
| | TO - Threshold & Over – non-academic, non-policymaker earning annual compensation at a rate equal to or in excess of \$57,509 (FILES "LONG" FINANCIAL DISCLOSURE FORM) |
| | PT - Part-time – non-policymaker working less than full-time earning salary less than \$57,509 (NOT REQUIRED TO FILE EITHER ACADEMIC OR "LONG" FINANCIAL DISCLOSURE FORM) |
| | Other - |

Title Code: _____

Title Narrative: _____

Annual Base Salary: \$ _____

Agency Information:

Appointing Authority: _____
(if different than agency)

Code: _____

Name: _____

Address: _____

City: _____ Zip Code: _____

The State University of New York
SUNY-1 Filing Certification

Academic Year: _____

College: _____

Check one:

_____ All covered faculty have complied with the November 15 deadline for completing and filing the Financial Disclosure Statement for Certain Academic Employees (SUNY-1).

_____ The following covered faculty have failed to comply with the November 15, deadline for completing and filing the Financial Disclosure Statement for Certain Academic Employees (SUNY-1).

Faculty who failed to file SUNY-1:

Faculty who filed incomplete SUNY-1:

Campus Academic Financial Disclosure Designee

Date

**DISCLOSURE STATEMENT FOR CERTAIN UNIVERSITY EMPLOYEES*
UPON APPLICATION FOR A
SPONSORED PROGRAM GRANT OR CONTRACT
STATE UNIVERSITY OF NEW YORK**

REPORTING YEAR: September 1, 1993-August 31, 1994, unless otherwise specified in the question.

* Academic employees who earn annual compensation at the rate of \$57,509 at anytime during Academic Year September 1, 1994 - August 31, 1995; individuals serving in the librarian series titles do not file. Academic and professional staff including librarians, regardless of income level, who apply for grant support through the National Science Foundation (NSF) or the U.S. Public Health Service (PHS).

Pursuant to State Ethics Commissions Advisory Opinion No. 92-15, this form satisfies the filing requirements of Public Office Law S73-a for academic employees who apply for sponsored program grants and contracts. Information on this form is available for public inspection pursuant to the rules of the State Ethics Commission. The Statements are not available for photocopying; handwritten notes may be taken.

This form satisfies filing requirements of the New York State Public Officers Law S73-a pursuant to State Ethics Commission Advisory Opinion No. 92-15; and U.S. Government rules 42 CFR Part 50 and NSF Grant Policy Manual (GPM) Section 310 for academic employees . . .

| | |
|-------------------|------------|
| Name | |
| Title of Position | |
| Campus | Department |

USE ADDITIONAL SHEETS IF NECESSARY

1. List any office, trusteeship, directorship, partnership, or position of any type, whether or not compensated, held by you or your spouse since September 1, 1993, with any firm, corporation, association, partnership or other organization other than the State University or State of New York. DO NOT LIST THE AMOUNT.

For those employees whose obligation to file is based on their application for or continuation of NSF or PHS funding, only those affiliations should be reported that would reasonably appear to affect or be affected by the research or educational activities funded or proposed for funding by the NSF or PHS. NSF and PHS also requires disclosure of those affiliations of dependent children of the employee.

| <u>Self/ Spouse</u> | <u>Name of Organization and address</u> | <u>Position</u> | <u>Description</u> |
|-------------------------|---|-----------------|--------------------|
|-------------------------|---|-----------------|--------------------|

2. List name and describe the nature and source of any current employment or occupation of spouse and dependent children.

For those employees whose obligation to file is based on their application for or continuation of NSF or PHS funding, only that employment should be reported that would reasonably appear to be affected by the research or educational activities funded or proposed for funding by the NSF or PHS.

| <u>Source</u> | <u>Nature</u> |
|---------------|---------------|
|---------------|---------------|

3. List the name of warrants or stocks, and other investment interests including any interests in limited or general partnerships owned by you or your spouse or both at time of filing for research grant. DO NOT LIST AMOUNTS.

For those employees whose obligation to file is based on their application for or continuation of NSF or PHS funding, only those interests should be reported that would reasonably appear to be affected by the research or educational activities funded or proposed for funding by the NSF or PHS.

Self/
Spouse

Issuing Entity

4. If you are presently working with externally-funded program grant or contract funding or are applying for such funding, list the source, amount and a description of the nature of the sponsored work.

For those employees whose obligation to file is based on their application for or continuation of NSF or PHS funding, only that funding should be reported that would reasonably appear to be affected by the research or educational activities funded or proposed for funding by the NSF or PHS.

I declare that the above information is true and correct.

Signature

Date