

## What to Disclose

You must disclose information about any outside entities with which you or an immediate family member (defined as an individual's spouse or domestic partner or person in a civil union or similar relationship, dependent children, or any other family members residing in the same household) have relationships outside of this institution. Outside entities include companies, service providers, non-governmental organizations (NGOs), foundations, competitors, non-competitors, and any other for-profit or not-for-profit entities (hereinafter called "companies") with which you or an immediate family member had a relationship in the previous 12 months, or with which you or an immediate family member anticipate a relationship with in this calendar year.

**Payments or Remuneration** - The following is a non-exclusive list of payments that you must disclose if the value is \$5,000 or more:

- Payments from all non-institutional sources, whether or not you received an IRS Form 1099, W-2, or K-1, except as noted in the Exclusions below
- Any payment or promise of payment of any kind to you or an immediate family member, either in currency or in-kind, for any purpose, whether or not you believe the purpose or the payment is related to your employment at this institution, except as noted in Exclusions below
- Payments or promises of payment from a company that has licensed or has options to license any intellectual property (patents, inventions, copyrights, trademarks) either directly or through any other entity (including the State University of New York and the Research Foundation for SUNY), where such intellectual property was developed by you or an immediate family member
- Any payments made to a company on your behalf; for example, if you are part of an organized consulting group that receives payment for your work, that consulting group and the companies that paid you through the consulting group are to be disclosed
- Payments from any corporate sponsor that pass through an intermediary should be attributed to the corporate sponsor; for example, a pharmaceutical company hires a public relations firm to arrange seminars in support of the pharmaceutical company's product. You or an immediate family member speak at a seminar and receive compensation. The payments should be attributed to the pharmaceutical company regardless of which company's name appears on the check you receive or anticipate receiving.

**Equity holdings or ownership** - You are required to disclose any shares of stock you or an immediate family member own, including options, warrants, or promises of such, etc., whether the company is privately or publicly held. The following is a non-exclusive list of ownership or equity holdings that you must disclose:

- Pharmaceutical, biotechnology, medical device, or other companies related to research conducted on the campus
- Start-up companies
- Companies that provide any tangible items to this institution, including equipment, office, medical or computer supplies, furniture, etc., regardless of cost
- Companies that provide services or other intangibles to this institution, including but not limited to medical services, housekeeping, laundry, landscaping, information technology, consulting, accounting, etc., regardless of cost

**Significant Obligations** – You are required to disclose any unpaid positions, such as officer, trustee, director, consultant, advisor, adjunct professor that you or an immediate family member hold.

**Exclusions** - The following exclusions apply to payments or ownership to you or an immediate family member. These excluded items need not be disclosed:

- 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
- Income from seminars, lectures or teaching engagements sponsored by a federal, state or local government agency, a (United States) 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
- Income from service on advisory committees or review panels for a federal, state or local government agency, a (United States) 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