



**Campus Plan**  
For Participation in



**Campus Plan Submitted by:**

## **SUNY Canton**

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## Properties for Designation as Tax-Free Zones

### College-Owned Building Space

#### **Wicks Hall – SUNY Canton**

**Building ID: SU-123-1-B-216-000-A**

#### **Map A**

Offices 019, 021, 023, 025, 025A  
34 Cornell Drive  
Canton, NY 13617

#### Description

Wicks Hall Office Space

A total of over 1365 square feet, currently separated into 3 large offices and 2 small offices. The spaces are divisible or may be combined. Carpeted. Fully equipped with all utilities and internet. Shared restroom facilities. Parking adjacent. Available Summer-Fall 2014.

Attached to this Application: Campus map with Wicks Hall identified; AutoCAD drawing of ground floor of Wicks Hall office spaces proposed as Tax-Free Zones under Start-Up NY.

#### Square Footage

3 Large Offices:  $14.42 \times 23.67 = 341.25 \text{ ft}^2$  each  
2 Small Offices:  $14.42 \times 11.84 = 170.66 \text{ ft}^2$  each  
Total square footage: =  $1365.07 \text{ ft}^2$

#### Types of Businesses for Wicks Hall

A broad range of businesses could locate in this space, including but not limited to:

- Small start-up firms
- Information technology firms
- Firms requiring limited office space

### College- and Foundation-Owned Undeveloped Land

**Parcel ID SU-123-1-L-R68.1-000-A**

**SUNY Canton-Owned Rte. 68 Tract – West of Campus Entrance**

#### **Map A**

#### Description

This tract of land is located on Hwy. 68 in the Town of Canton, and forms the southwestern boundary of SUNY Canton's campus. This land could be leased and improved by an approved business in the Start-Up NY Program. This location offers a thoroughfare location for offices or light industrial. Land is undeveloped, suitable for immediate building. The parcel is divisible.

Acreage

This land encompasses approximately 5.75 acres.

Types of Businesses

A broad range of businesses could locate in this space, including but not limited to:

- Start-up firms of small to medium size
- Information technology firms
- Firms requiring office and/or light industrial space

**Parcel ID: SU-123-1-L-R68.2-000-A**

**SUNY Canton-Owned Rt. 68 Tract – East of Campus Entrance**

**Map A**

Situated east of “Computer Guys” on Main Street/Rte. 68 in the Village of Canton, NY

Description

This tract of land is located on Main Street/Hwy. 68 and forms the southeastern boundary of SUNY Canton’s campus. This land could be leased and improved by an approved business in the Start-Up NY Program. This location offers a thoroughfare location for office space. Land is flat with few trees, suitable for immediate building. The parcel is divisible.

Acreage

This land encompasses approximately 2.15 acres.

Types of Businesses

A broad range of businesses could locate in this space, including but not limited to:

- Small start-up firms
- Information technology firms
- Firms requiring limited office space

**Parcel ID: SU-123-1-L-R68.3-000-A**

**SUNY Canton College Foundation-Owned Hwy. 68 Tract – West of Campus Entrance**

**Map B**

Description

This tract of land is located on Hwy. 68 in the Town of Canton, and is owned as “Hemlock Acres LLC” by the Canton College Foundation. This land could be leased and improved by an approved business in the Start-Up NY Program. This location offers a thoroughfare location for offices or light industrial. Land is undeveloped, suitable for immediate building. The parcel is divisible.

Acreage

This land encompasses approximately 23 acres.

Types of Businesses

A broad range of businesses could locate in this space, including but not limited to:

- Start-up firms
- Information technology firms
- Firms requiring office and/or light industrial space

**Parcel ID: SU-123-1-L-RD1-000-A**

**SUNY Canton College Foundation-Owned Riverside Drive Tract**

**Map C**

Description

This tract of land is located on Riverside Drive in the Village of Canton, and is owned as “Hemlock Acres LLC” by the Canton College Foundation. This land could be leased and improved by an approved business in the Start-Up NY Program. This location offers a central village location for offices.. Land is undeveloped, suitable for immediate building. The parcel is not divisible.

Acreage

This land encompasses approximately 0.18 acres.

Types of Businesses

A broad range of businesses could locate in this space, including but not limited to:

- Small start-up firms
- Information technology firms
- Firms requiring limited office space

## **Additional Sites for Potential Participation in the Start-Up NY Program**

SUNY Canton is partnering with the St. Lawrence County IDA and the OBPA to recruit businesses that may be eligible to partner with SUNY Canton under the Start-Up NY Program to fill available facilities owned by these agencies. If and when businesses are ready to partner with SUNY Canton, they will work directly with these agencies to lease these properties, and SUNY Canton will amend its Campus Plan to reflect these agreements, and the occupied square footage will be counted among the 200,000 square feet of off-campus space that SUNY Campuses upstate may designate as tax-free areas under the Start-Up NY program. These properties are detailed below.

### **Canton Industrial Building**

#### Address

120 Commerce Lane  
Canton, NY 13617

#### Description

The Canton Industrial Building, owned by the St. Lawrence County IDA, contains a 6,125 square foot space ready to finish to suit. The space can be divided, and includes a loading dock and door as well as a finished front entrance. It boasts ready access to the Ogdensburg Port and rail service, as well as road transport. The building, which was built in 2012, is also occupied by the IDA offices and a local brewery and tasting room. It is appropriate for light industrial, research and development, and/or office space.

### **Ogdensburg Bridge & Port Authority – Commerce Park**

#### Address

Building #1  
Ogdensburg, NY 13669

#### Description

Owned by the Ogdensburg Bridge and Port Authority, this facility has 30,000 square feet of space including 6,600 square feet of office space. It boasts ready access to the Ogdensburg Port and rail service, as well as road transport. The Commerce Park is located on the US-Canada border. Built in 1975 and expanded in 1979, this facility is divisible, and is appropriate for industrial, research and development, and/or office space.

### **Ogdensburg Bridge & Port Authority – Commerce Park**

#### Address

Building #6  
Ogdensburg, NY 13669

#### Description

Owned by the Ogdensburg Bridge and Port Authority, this 30,000 square foot building was built in 1990. It is equipped with a parking lot and all utilities, and is zoned industrial. It boasts ready access to the Ogdensburg Port and rail service, as well as road

transport. The Commerce Park is located on the US-Canada border. The facility could be divisible, and is appropriate for industrial, research and development, and/or office space.

**Ogdensburg Bridge and Port Authority – Commerce Park**

Address

Building 11  
Ogdensburg, NY 13669

Description

Owned by the Ogdensburg Bridge and Port Authority, this 40,000 square foot building was built in 1994 with an addition built in 2005. It is equipped with a parking lot and all utilities, and is zoned industrial. It boasts ready access to the Ogdensburg Port and rail service, as well as road transport. The facility could be divisible, and is appropriate for industrial, research and development, and/or office space.

**Massena Industrial Park**

Address

21 Trade Road  
Massena, NY 13662

Description

Located in the town of Massena, NY, on the U.S.-Canada border, this facility has 20,000 square feet of industrial space. The building, built in 1990, is in excellent condition and ready for immediate occupancy. It includes four dock-high doors and a drive-in door and is situated adjacent to a rail park. Owned by the St. Lawrence County IDA, this facility is suitable for industrial use.

## **Academic Linkages**

SUNY Canton provides an accessible, affordable, real-world education to students in engineering technologies, health, and public service. Offering 23 bachelor's degrees, 22 associate degrees, and 7 certificate programs, SUNY Canton seeks to prepare its students for successful careers in high-demand fields across the state and beyond.

## Highlighted Academic Programs

SUNY Canton highlights the following academic programs that can benefit most directly from partnership with businesses through the Start-Up NY Program:

- Accounting (A.A.S.)
- Air Conditioning Maintenance and Repair (Cert.)
- Air Conditioning Technology (A.A.S.)
- Alternative and Renewable Energy Systems (B. Tech)
- Automotive Technology (A.A.S.)
- Business Administration (A.S., A.A.S.)
- Civil and Environmental Technology (B. Tech)
- Civil Engineering Technology (A.A.S.)
- Construction Technology: Management (A.A.S.)
- Criminal Investigation (B. Tech)
- Criminal Justice (A.A.S.)
- Electrical Construction and Maintenance (Cert.)
- Electrical Engineering Technology (A.A.S.)
- Electrical Technology (B. Tech)
- Engineering Science (A.S.)
- Finance (B.B.A.)
- General technology (A.A.S.)
- Graphic and Multimedia Design (B. Tech)
- Health Care Management (B. Tech)
- Heating and Plumbing Service (Cert.)
- Homeland Security (B. Tech)
- Information Technology (B. Tech)
- Management (B.B. A.)
- Nursing (A.A.S., B.S.)
- Powersports Performance and Repair (Cert.)
- Sports Management (B.B.A.)
- Veterinary Science Technology (A.A.S.)
- Veterinary Technology (B.S.)

## Targeted Industries

The industries SUNY Canton will target will align with one or more of the academic programs listed above. These industries include:

- Research and development/manufacture of alternative and renewable energy systems
- Research and development of construction management technologies
- Data storage and analytics

- Agricultural processing
- Software development
- Research and development/manufacture of safety systems for vehicles (recreational, automobiles)
- Research and development/manufacture of biomedical products
- Research and development/manufacture of law enforcement technologies
- Research and development/manufacture of sports safety/performance technologies
- General manufacturing

### **Selection of Partnering Businesses**

SUNY Canton is working in cooperation with the local municipalities, SUNY Canton Small Business Development Center (SBDC), the St. Lawrence County Industrial Development Agency (IDA), and the Ogdensburg Bridge and Port Authority (OBPA) to recruit and select partnering businesses for participation in Start-Up NY. The College is also receiving leads from ESD and other referrals, as well as direct inquiries. These businesses will be vetted in cooperation with appropriate agencies, SUNY Canton's Start-Up NY Advisory Committee, and the College President in consultation with appropriate campus, municipal and SUNY offices/individuals.

### *Campus Advisory Committee*

SUNY Canton has established a Campus Advisory Committee to receive and review Business Applications. The members of the Campus Advisory Committee have been chosen based on their wide-ranging expertise in their academic and/or professional fields, their capacity to represent various interests on campus, their ability to determine the strength of business plans, and the capacity to ensure the alignment of businesses to SUNY Canton's academic mission.

The Campus Advisory Committee consists of:

- President of the College
- Executive Director for University Relations/Start-Up NY Representative
- Dean of the Canino School of Engineering Technology
- Dean of the School of Business and Liberal Arts
- Dean of the School of Health, Science, and Criminal Justice
- Union Representative from United University Professionals
- Presiding Officer of the Faculty Assembly
- Director of Public Relations
- Director of Physical Plant
- Director of Facilities Planning
- President of Student Government Association (or designee)

### *Criteria*

- 1) Academic and Research Alignment
  - a. The business must provide some combination of the following to SUNY Canton to show its alignment with/support of the College's academic mission:

- i. Experiential learning opportunities – such as internships – for current students
  - ii. Research partnerships with faculty
  - iii. Full-time employment and/or fellowship opportunities for graduates of SUNY Canton
  - iv. Donation of equipment/facilities/amenities in relevant program areas to enhance hands-on learning environment
  - v. Access to equipment/tools/instrumentation to enhance faculty and student research in synergy with the business
  - vi. Funding for student scholarship(s) in relevant program areas
- b. The Campus Advisory Committee will take the following factors into account when determining whether and how to partner with applying businesses:
  - i. Effects on SUNY Canton community:
    - 1. What space will be used for the business?
    - 2. What costs, if any, will SUNY Canton incur as a result of the partnership?
    - 3. What financial/other benefits will SUNY Canton enjoy as a result of the partnership?
  - ii. Economic Benefits:
    - 1. How many net new jobs will be created?<sup>1</sup>
    - 2. Is the business viable in both the short-term and the long-term?
    - 3. Will the business attract private financial investment?
    - 4. Does the business plan to make capital investments (renovation, new construction)?
    - 5. Are the new jobs in critical areas of the regional economy?
    - 6. Will the College financially benefit from the terms of the lease/contract, and how?
  - iii. Community Benefits:
    - 1. Will the business recruit employees from the local workforce?
    - 2. Will the business rely on suppliers within the regional economy?
    - 3. Will the business support one or more municipal or community entities?

### *Final Approval*

The Campus Advisory Committee will make a recommendation to the President for final approval of the business application. The recommendation will be in writing, and will include any pros, cons, and reservations the committee may have. The President provides the final approval.

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<sup>1</sup> SUNY Canton, situated in the North Country – a region that is both rural and economically depressed – expects that businesses creating fewer than 5 jobs will apply. In this region, even small numbers of net new jobs can make a large economic impact; therefore, such businesses will be considered.

### **Stakeholder Approval**

Upon approval from SUNY Research Foundation, SUNY Canton will present this plan to local stakeholders for comment for a 30-day period. Local stakeholders include:

- Chief executive officers of the municipality/ies in which the subject properties are located
- The St. Lawrence County Industrial Development Agency
- Faculty Assembly
- The Student Government Association
- The College Council
- Local union representatives (copies will also be mailed to unions representing state employees on campus)

# PUBLIC OFFICERS LAW

## § 74. Code of ethics.

**1. Definition.** As used in this section: The term "**state agency**" shall mean any state department, or division, board, commission, or bureau of any state department or any public benefit corporation or public authority at least one of whose members is appointed by the governor or corporations closely affiliated with specific state agencies as defined by paragraph (d) of subdivision five of section fifty-three-a of the finance law or their successors.

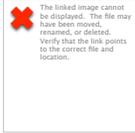
The term "**legislative employee**" shall mean any officer or employee of the legislature but it shall not include members of the legislature.

**2. Rule with respect to conflicts of interest.** No officer or employee of a state agency, member of the legislature or legislative employee should have any interest, financial or otherwise, direct or indirect, or engage in any business or transaction or professional activity or incur any obligation of any nature, which is in substantial conflict with the proper discharge of his duties in the public interest.

**3. Standards.**

- a. No officer or employee of a state agency, member of the legislature or legislative employee should accept other employment which will impair his independence of judgment in the exercise of his official duties.
- b. No officer or employee of a state agency, member of the legislature or legislative employee should accept employment or engage in any business or professional activity which will require him to disclose confidential information which he by reason of his official position or authority.
- c. No officer or employee of a state agency, member of the legislature or legislative employee should disclose confidential information acquired by him in the course of his official duties nor use such information to further his personal interests.
- d. No officer or employee of a state agency, member of the legislature or legislative employee should use or attempt to use his or her official position to secure unwarranted privileges or exemptions for himself or herself or others, including but not limited to, the misappropriation to himself, herself or to others of the property, services or other resources of the state for private business or other compensated non-governmental purposes.
- e. No officer or employee of a state agency, member of the legislature or legislative employee should engage in any transaction as representative or agent of the state with any business entity in which he has a direct or indirect financial interest that might reasonably tend to conflict with the proper discharge of his official duties.

- f. An officer or employee of a state agency, member of the legislature or legislative employee should not by his conduct give reasonable basis for the impression that any person can improperly influence him or unduly enjoy his favor in the performance of his official duties, or that he is affected by the kinship, rank, position or influence of any party or person.
  - g. An officer or employee of a state agency should abstain from making personal investments in enterprises which he has reason to believe may be directly involved in decisions to be made by him or which will otherwise create substantial conflict between his duty in the public interest and his private interest.
  - h. An officer or employee of a state agency, member of the legislature or legislative employee should endeavor to pursue a course of conduct which will not raise suspicion among the public that he is likely to be engaged in acts that are in violation of his trust.
  - i. No officer or employee of a state agency employed on a full-time basis nor any firm or association of which such an officer or employee is a member nor corporation a substantial portion of the stock of which is owned or controlled directly or indirectly by such officer or employee, should sell goods or services of any person, firm, corporation or association which is licensed or whose rates are fixed by the state agency in which such officer or employee serves or is employed.
- 4. Violations.** In addition to any penalty contained in any other provision of law any such officer, member or employee who shall knowingly and intentionally violate any of the provisions of this section may be fined, suspended or removed from office or employment in the manner provided by law. Any such individual who knowingly and intentionally violates the provisions of paragraph b, c, d or i of subdivision three of this section shall be subject to a civil penalty in an amount not to exceed ten thousand dollars and the value of any gift, compensation or benefit received as a result of such violation. Any such individual who knowingly and intentionally violates the provisions of paragraph a, e or g of subdivision three of this section shall be subject to a civil penalty in an amount not to exceed the value of any gift, compensation or benefit received as a result of such violation.

 <p>Category: HR / Labor Relations Legal and Compliance</p> <p>Responsible Office: <a href="#">University Council</a></p>	<p>Policy Title: Conflict of Interest Document Number: 6001</p> <p>Effective Date: October 01, 1995</p> <p>This policy item applies to: State-Operated Campuses</p>
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**Summary**

Faculty and staff of the State University of New York (University) are encouraged to foster an atmosphere of academic freedom by promoting the open and timely exchange of scholarly knowledge independent of personal interests and are required to avoid conflicts of interest. Where potential or actual conflicts exist, faculty and staff are expected to consult with appropriate University officers and abide by University policy. This policy represents a restatement of existing University policy and pertinent state and federal law and regulations.

**Policy**

Faculty and staff of the State University of New York (University) are encouraged to foster an atmosphere of academic freedom by promoting the open and timely exchange of scholarly knowledge independent of personal interests. In keeping with this obligation, they are also required to avoid conflicts of interest.

In instances where potential 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 potential or actual conflicts of interest and take appropriate steps to manage, reduce, or eliminate them.

This policy represents a restatement of existing University policy and pertinent state and federal law and regulations.

1. University faculty and staff may not engage in other employment which interferes with the performance of their professional obligation.

2. University faculty and staff are expected to comply with the New York State Public Officers Law provisions on conflict of interest and ethical conduct.
3. University faculty and staff, to the extent required by law or regulation, shall disclose at minimum whether they (and their spouses and dependent children) have employment or financial interests or hold significant offices, in external organizations that may affect, or appear to affect, the discharge of professional obligations to the University.
4. University campuses shall ensure that all faculty and staff subject to pertinent laws and regulations disclose financial interests in accordance with procedures to be established by the Chancellor or designee. Campuses shall retain the reported information as required, identify actual or apparent conflicts of interest and seek resolution of such conflicts.
5. Each campus president shall submit to the chancellor's designee the name and title of the person or persons designated as financial disclosure designee(s) and shall further notify the chancellor's designee when a change in that assignment occurs. The chancellor's designee shall also be notified of any reports regarding conflict of interest that are forwarded to state or federal agencies.

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### **Definitions**

**Conflict of interest** — any interest, financial or otherwise, direct or indirect; participation in any business, transaction or professional activity; or incurring of any obligation of any nature, which is or appears to be in substantial conflict with the proper discharge of an employee's duties in the 'public interest. A conflict of interest is also any financial interest that will, or may be reasonably expected to, bias the design, conduct or reporting of sponsored research.

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### **Other Related Information**

[Outside Activities of University Policy Makers](#)

[Ethics in State Government - A Guide for New York State Employees](#)

[National Science Foundation, Grant Policy Manual](#)

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### **Procedures**

There are no procedures relevant to this policy.

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### **Forms**

There are no forms relevant to this policy.

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### **Authority**

[42 CFR 50, Subpart F](#)

The following link to FindLaw's [New York State Laws](#) is provided for users' convenience; it is not the official site for the State of New York laws.

[NYS Public Officers Law, Section 73-a, and 73 and 74](#)

In case of questions, readers are advised to refer to the New York State Legislature site for the menu of [New York State Consolidated](#).

[Board of Trustees Policies - Appointment of Employees \(8 NYCRR Part 335\)](#)

State University of New York Board of Trustees Resolution adopted June 27, 1995

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**History**

Memorandum to presidents from the office of the University provost, dated June 30, 1995 regarding revision to University conflict of interest policy to bring it in conformity with federal guidelines issued by the National Science Foundation and the Public Health Service.

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**Appendices**

There are no appendices relevant to this policy.



## **Conflict of Interest Policy**

<b>Effective Date:</b>	March 15, 2013
<b>Supersedes:</b>	Conflicts of Interest Policy pursuant to 95-5 Resolution and the Process Investigating Conflict of Interest Policy
<b>Policy Review Date:</b>	February 2016
<b>Issuing Authority:</b>	Research Foundation President
<b>Responsible Party:</b>	Chief Compliance Officer
<b>Contact Information:</b>	(518) 434-7145 <a href="mailto:rfcompliance@rfsuny.org">rfcompliance@rfsuny.org</a>

### **Reason for Policy**

As Research Foundation Board Members, Officers, and Employees, we hold positions of trust and must act in the best interests of the Research Foundation. We must avoid any activity that impairs or would reasonably appear to impair the ability to perform our duties with independence and objectivity. A conflict of interest arises if our personal relationships, activities, or finances interfere, or appear to interfere, with our ability to act in the best interests of the Research Foundation.

Research Foundation Board Members, Officers, and Employees must incorporate, where necessary and possible, the following rules into their services on behalf of the Research Foundation. Research Foundation Officers and Employees must adhere to the standards outlined in the New York State Public Officers Law Section [74](#). This policy incorporates the key standards outlined in Section [74](#).

### **Statement of Policy**

Research Foundation Board Members, Officers, and Employees may not have any interest or engage in any outside activity which results in an unmanaged conflict of interest. To this end, Board Members, Officers, and Employees must disclose their interests and outside activities, and those of a Related Party, which may affect their ability to perform their duties with independence and objectivity. A conflict of interest must be managed so the conflict is reduced or eliminated, and compliance with conflict of interest management plans should be monitored where necessary.

### **Prohibited Conflicts of Interest**

A conflict of interest exists if you or a Related Party has a Financial or Other Interest that will or may reasonably be expected to:

- substantially conflict with the proper discharge of your duties in the Research

Foundation's best interests;

- result in the disclosure of the Research Foundation's information that you have gained by reason of your position or authority; or
- impair your ability to exercise independent judgment in the performance of your duties and responsibilities.

### **Conflicts of Interest Posed By Outside Employment, Investments, or Other Business Activities**

As a Research Foundation Board Member, Officer or Employee, you must not make personal investments in enterprises that you have reason to believe may be directly involved in decisions to be made by you or will otherwise create substantial conflict between your duty on behalf of the Research Foundation and your private interest.

If you or a Related Party has a Financial or Other Interest in any business entity, you may not represent the Research Foundation in any transaction with that entity and must disclose the interest in accordance with this policy and the Procedure for Managing Conflicts of Interest.

Procurement of goods or services by the Research Foundation shall be conducted consistent with the Foundation's established procurement policy.

You may not accept employment or engage in any business or professional activity that will impair the independence of your judgment in the exercise of your duties for the Research Foundation or require you to disclose confidential information that you gained by reason of your affiliation with the Research Foundation.

### **Prohibition Against Disclosure or Use of Confidential Material for Personal Gain**

The Research Foundation prohibits disclosure of information that is confidential to the Research Foundation, acquired by any Board Member, Officer, or Employee in the course of his/her duties, except as required by law or as expressly authorized in writing by an Officer or other designated representative of the Research Foundation.

Board Members, Officers, and Employees may only use such confidential information in furtherance of their duties as a representative of the Research Foundation and shall not use such confidential information to further their personal interests or that of a Related Party.

You must not accept employment or engage in any business or professional activity that will require you to disclose confidential information that you gained by reason of your official position or affiliation with the Research Foundation.

### **Use of Research Foundation or State Resources**

You may not misappropriate the property, services or other resources of the Research Foundation, SUNY, or others, whether for yourself or someone else.

## **Avoiding the Appearance of Impropriety**

Board Members, Officers, and Employees shall not, by their conduct, give reasonable basis for the impression that any person can improperly influence them or unduly enjoy their favor in performance of their duties, or that they are affected by the kinship, rank, position, or influence of any party or person.

You may not use, or attempt to use, your position to secure unwarranted privileges or exemptions for yourself or others.

Similarly, bribery, extortion, and other attempts to exert undue influence are strictly prohibited. The Research Foundation expects Research Foundation Board Members, Officers, and Employees to avoid any conduct that may give the appearance of engaging in acts that are in violation of their trust.

## **Disclosing a Real, Apparent, or Potential Conflict of Interest**

Board Members, Officers, and Employees must disclose all real, apparent, or potential conflicts of interest for review as described below. At an Operating Location, those disclosures should be made to the operations manager or his/her designee in accordance with this policy and the Procedure for Managing Conflicts of Interest. Disclosures are required in three instances:

- 1. Annual Disclosures By Research Foundation Board Members, Officers, and Key Employees.** Board Members, Officers, and Key Employees must report Direct or Indirect Financial or other Interests that pose or may pose a real, apparent, or potential conflict of interest on an annual basis. These disclosures must be updated both annually and as new reportable interests are obtained or as new reportable activities occur.
- 2. Grant-Related Disclosures.** Principal investigators must follow the policy at their respective campus locations.
- 3. Situational Disclosures.** Board Members, Officers, and Employees must report any Direct or Indirect Financial Interest or other activity that may pose a conflict of interest under this policy. Such situational disclosures must be made as soon as practicable after the individual learns of the potential conflict.

When a disclosure is made under this policy, the actual, apparent, or potential conflict of interest will be reviewed pursuant to Procedure for Managing Conflicts of Interest. If a conflict of interest is found to exist, the Research Foundation must take steps to manage, reduce, or eliminate the conflict of interest. Individuals may appeal determinations with which they disagree. Please consult the Procedure for Managing Conflicts of Interest for more information.

## **Violation**

In addition to any penalty contained in any provision of law or federal or state policy, individuals who knowingly and intentionally violate any of these provisions may be subject to action by the Research Foundation. For employees, this may include action under the Research Foundation's progressive discipline policy,

including suspension or termination from employment.

### **Recordkeeping**

The operating location operations manager must designate an appropriate office of record and must ensure that records related to the disclosure, review, and management of a potential, apparent, or actual conflict of interest are retained and documented. In addition to any recordkeeping process established by the operations manager, all final determinations or management plans must be included in the personnel file of the individual with potential, apparent, or actual conflict of interest.

At the central office, the chief compliance officer must ensure that records related to the disclosure, review, and management of a potential, apparent, or actual conflict of interest for all disclosures, at the central office or otherwise brought to the attention of the chief compliance officer, are retained and documented. In addition to any recordkeeping process established by the chief compliance officer, all final determinations or management plans must be included in the personnel file of the individual with potential, apparent, or actual conflict of interest.

### **Campus Policy**

An Operating Location may adopt a policy no less restrictive than this Policy. If a local policy is adopted, then a copy of that policy must be filed with the RF's chief compliance officer.

### **Staffing Services**

Employees employed by the RF under an agreement or contract, other than the 1977 Agreement between the RF and SUNY must adhere to the conflicts of interest policy in place by the entity the employees are employed to support. In the absence of a policy, the conflicts of interest policy effective at the associated operating location must govern.

### **Responsibilities**

The following table outlines the responsibilities for compliance with this policy:

<b>Responsible Party</b>	<b>Responsibility</b>
Board Members, Officers, and Key Employees	Annual Disclosures
Principal Investigators	Grant-Related Disclosures
Employees	Situational Disclosures as needed

### **Definitions**

*Board Member:* A member of the Research Foundation's board of directors.

*Direct or Indirect Financial or Other Interests:* Financial or Other Interests held by

the Research Foundation Employee or by their spouse, domestic partner, significant other, family member, dependent, member of household, or business partner.

*Employee:* Officers, Key Employees, and any individual compensated employee of the Research Foundation.

*Financial or Other Interests:* Shall include, but are not limited to, the following:

- ownership or investment in any outside enterprise;
- serving as a director, officer, partner, consultant, broker, agent, or representatives of any outside enterprise;
- outside professional activity; or
- outside employment.

*Key Employee:* A “Key Employee” for purposes of this Policy includes:

1. Vice presidents;
2. Operations managers;
3. Deputy operations managers;
4. Chief research officers;
5. Technology transfer directors;
6. Sponsored program office directors or equivalent;
7. Other appointed officers
8. At the central office:
  - a. Vice presidents
  - b. Senior directors;
  - c. Assistant Vice-Presidents; and
  - d. Directors;
  - e. Other appointed officers; and
- 9.9. Any other persons who have procurement authority equal to or exceeding \$100,000 per transaction. *Officer:* An officer elected under the Research Foundation’s bylaws, including the Research Foundation’s president, general counsel, secretary, and chief financial officer and those appointed pursuant to Article IV Section 13 of the RF’s bylaws as appointed officers. *Operating Location:* Research Foundation office located at a SUNY campus location or other SUNY location supporting the Research Foundation mission and SUNY operations overseen by an operations manager. *Operations Manager:* An individual appointed to the position of operations manager by the Research Foundation. *Principal Investigator:* Primary individual(s) in charge of a research grant or other project administered by the Research Foundation. The term “Principal Investigator” includes those individuals serving as co-principal investigators. *Related Party:* A Research Foundation Employee’s spouse, domestic partner, significant other, family member, dependent, member of household, or business partner. *Research Foundation (or Foundation or RF):* The Research Foundation for The State University of New York.

## **Related Information**

[Management of Conflicts of Interest Procedure](#)

[Managing Conflicts of Interest Guidelines](#)

NYS Public Officer's Law Sections [73](#) & [74](#)

[Conflicts of Interest in Public Health Service Sponsored Programs](#)

[Nepotism Policy](#)

[Gifts to Employees from Non-RF Sources Policy](#)

**Forms**

[Conflict of Interest Annual Disclosure Statement](#)

[Conflict of Interest Situational Disclosure Statement](#)

Location	UniqueID	Owner	PropertyType	StreetAddress	City	ZipCode	ParcelID	Building	SpaceType	SqFt	Acres	Description	onCampus	Within1mileOfCampus	Latitude	Longitude	Note
Canton, NY	SU-123-1-B-216-000-A	State of NY/SUNY Canton	1	34 Cornell Dr.	Canton	13617		216	C	1365		Office suite, 5 offices, customizable	x		44° 36' 18.774"	-75° 11' 6.2334"	
Canton, NY	SU-123-1-L-R68.1-000-A	State of NY/SUNY Canton	1	34 Cornell Dr.	Canton	13617	R68.1		D		5.75	Undeveloped land, on Route 68/Main Street	x		44° 35' 52.1514"	-75° 11' 21.84"	
Canton, NY	SU-123-1-L-R68.2-000-A	State of NY/SUNY Canton	1	34 Cornell Dr.	Canton	13617	R68.2		D		2.15	Undeveloped land, on Route 68/Main Street	x		44° 35' 42.3054"	-75° 11' 8.088"	
Canton, NY	SU-123-1-L-R68.3-000-A	Canton College Foundation	1	34 Cornell Dr.	Canton	13617	R68.3		D		23	Undeveloped land, on Route 68/Main Street	x		44° 36' 17.2332"	-75° 12' 11.739"	
Canton, NY	SU-123-1-L-RD1-000-A	Canton College Foundation	1	53 Riverside Dr.	Canton	13617	RD1		F		.18	Undeveloped land, on Riverside Dr.		X	44° 35' 56.0538"	-75° 10' 29.8704"	

* 1= on campus	** A=entire building
2= 1 mile off campus	B=floor within building
3= State Asset	C=Room within building
	D=land on campus
	E= land off campus
	F=entire building off campus
	G=partial building off campus
	H=state asset

**Designated Land or Buildings Unique ID Standard**

See Sheet 2: SUNY Unique ID Codes

