



The State University
of New York

Office of the
Chief Financial Officer

State University Plaza
Albany, New York 12246

www.suny.edu

January 12, 2016

President Gregory L. Eastwood
SUNY Upstate Medical University
750 East Adams Street
Syracuse, NY 13210

Re: START-UP NY

Dear President Eastwood:

Congratulations. Attached is the approved application for SUNY Upstate Medical University's Campus Plan for Designation of Tax-Free Area(s).

After completion of the required 30-day comment period, please submit evidence of stakeholder notification, along with your complete campus plan, to Empire State Development at designations@esd.ny.gov.

Best of luck to you and SUNY Upstate Medical University in launching the START-UP NY program.

Best Regards,

Eileen McLoughlin
Vice Chancellor for
Finance and Chief
Financial Officer

Attachment
Copy: SUNY START-UP NY Proposal Review Team

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To Search
To Serve

the Power of



The State University of New York

SUNY START-UP NY
Campus Plan for Designation of Tax-Free Area(s) Memorandum (CPM)

To: SUNY Chancellor

From: Gregory L. Eastwood

Re: SUNY Upstate Medical University Campus Plan for Designation of Tax-Free Area(s) ("Campus Plan")

Date: December 16, 2015

For campus Office of the President:

The arrangement documented in the attached Campus Plan is aligned to the academic mission of SUNY Upstate Medical University and in accordance with all SUNY policies, procedures, and guidelines.

[Handwritten signature of Gregory L. Eastwood]

Signature of campus President

G. EASTWOOD

Print Name

FOR SUNY SYSTEM ADMINISTRATION USE ONLY

For SUNY's START-UP NY Proposal Review Team Co-Chair: It is recommended by the SUNY START-UP NY Proposal Review Team that SUNY [approve/reject] the attached Campus Plan:

[Handwritten signature of Jeffrey A. Boyce]

Proposal Review Team Co-Chair

1-7-16
Date

Jeffrey A. Boyce

Print Name

For SUNY Office of the Chancellor:

The attached Campus Plan is hereby [approved/rejected] for campus submission to the NYS Commissioner of Economic Development.

[Handwritten signature of Eileen McLaughlin]

Signature of the Chancellor or designee

1/14/16
Date

Eileen McLaughlin

Print Name

January 7, 2016

Jeffrey A. Boyce, BA, MPA
Director of Research Supported Economic Development
The Research Foundation
State University of New York
35 State Street
Albany, NY 12207

Dear Mr. Boyce,

Attached please find a draft amended "Campus Plan for Designation of Tax Free Areas Memorandum" from Upstate Medical University.

The plan was amended as follows:

- Added Building 3 at Electronics Parkway
- Revised Sara Loguen Building 1st and 2nd floors area available
- Revised Community General Site Plan for land available
- Revised Institute for Human Performance Building to include area available on the 1st and 3rd floors
- Removed Harrison House Building

I appreciate your assistance in processing this amendment and please just contact me with any questions or concerns.

Sincerely,


Mary Grace Van Nortwick
Chief of Staff, College of Medicine
Upstate Medical University

cc: David Duggan

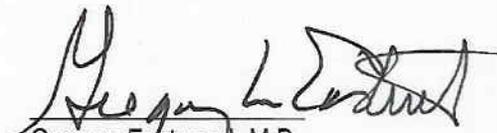


The State University
of New York

To: Mr. Howard Zemsky, NYS Commissioner of Economic Development
From: President Gregory Eastwood, M.D. of SUNY Upstate Medical University
Re: Upstate Medical University's Campus Plan for Designation of Tax-Free Area(s)
Date: December 16, 2015

I, President Eastwood of Upstate Medical University hereby certify the following:

- a.) we have provided a copy of the enclosed Campus Plan for Designation of Tax-Free NY Area, to the municipality or municipalities in which the proposed Tax-Free NY Area is located, local economic development entities, the applicable faculty senate, union representatives, and student government at least 30 days prior to submitting the plan to you and attached evidence of submission herewith; and
- b.) we comply with Public Officers Law Section 74; State University of New York's Policy on Conflict of Interest and; the START-UP NY Program Participation Policy; and have attached our campus conflict of interest policy CAMP_A-24; and
- c.) we comply with the Commissioner's rules and guidelines on anticompetitive behavior (NY EDL, art. 21, sect. 440); and
- d.) we are aware of the non-governmental use limitations associated with state issued tax exempt bonds and if our proposed Tax-Free NY Area was financed with tax exempt bonds, we will: 1.) make potential businesses aware of these limitations when marketing property; and 2.) take appropriate steps to ensure that non-governmental use of property funded with tax-exempt bonds will not jeopardize the tax exempt status of state issued bonds; and
- e.) we have not relocated or eliminated any academic programs, any administrative programs, offices, housing facilities, dining facilities, athletic facilities, parking, or any other facility, space or program that actively serves students, faculty or staff in order to create vacant land or space to be designated as a Tax-Free NY Area; and
- f.) the information contained in the enclosed application is accurate and complete.


Gregory Eastwood, M.D.

December 16, 2015

Attachments/Enclosures:

- 1-7.) Tax-Free Area Plan with Polygon shapefile of campus area (if available) and/or point data of vacant space (if available), OR outline and shaded delineation of proposed tax-free area on a campus aerial photo and/or campus map shaded to indicate land or building containing proposed tax-free space, and floor plans of building space with designated space clearly labeled and shaded.
- 8.) Excel spreadsheet of property to be designated
 - 9.) POL §74
- 10.) SUNY Conflict of Interest Policy
- 11.) Campus Conflict of Interest Policy CAMP_A-24
- 12.) (If applicable: Letter from bond counsel or other appropriate documentation)- to follow with final submission
- 13.) Evidence of submission of Tax-Free Area Plan to interested parties will be provided with the final plan
- 14.) Description of CNT Biotech Accelerator and Loguen's Crossing



START-UP NY CAMPUS PLAN FOR DESIGNATION OF TAX-FREE AREA(S)

Campus Name: SUNY Upstate Medical University
Campus Contact Name: MaryGrace VanNortwick
Campus Contact Title: Chief of Staff, College of Medicine
Campus Contact E-mail: vannortg@upstate.edu
Campus Contact Phone: 315-464-9720

THE TAX-FREE NY AREA PLAN SHALL BE DEVELOPED BY THE CAMPUS TEAM AND PROVIDE THE FOLLOWING REQUIRED INFORMATION:

1) Specification or identification of space or land proposed for designation as a Tax-Free NY Area identifying the following:

- i. Provide the name and address of the SUNY, CUNY or community college seeking approval as a Sponsor, the address of the space or land proposed for designation as a Tax-Free NY Area, and a written description of the physical characteristics of the area for designation.

Name: SUNY Upstate Medical University
Campus Address:
Address(es) of Proposed Tax-Free NY Area(s) : See Spreadsheet and maps
A. Description of Physical Characteristics of Proposed Tax-Free NY Area(s): The Upstate Plan designates land on our two campuses; - The main (downtown) campus, located within the City of Syracuse and the Town of Onondaga, respectively; both within the County of Onondaga, and separated by 3.1 miles. The first area is 13 acres of land Located 1/4 mile north of the downtown campus at 800-1000 East Water Street and 841 East Fayette Street, and is known as Loguen's Crossing. It is currently open land, part of which is owned by Upstate Medical University (and not on the tax roll) , and part of which is held by Upstate Property Development,

Inc, a 501(c)3 corporation whose sole member is Upstate Medical University (this remains on the tax roll). Loguen's Crossing is a reclaimed brownfield approximately 4 blocks from University Hospital and the Institute for Human Performance. Nine acres at Loguen's Crossing held by Upstate Property Development, Inc. is currently under a development arrangement in which Upstate is a partner with a private company. Loguen's Crossing has one current building on it, the Bioaccelerator, which was designed as a biotech incubator and is a collaborative project with SUNY ESF; there is substantial vacant space of 14,400sq.ft. in the building which is included in the plan.

- The other designated land surrounds the Community General Hospital and is owned by Upstate Medical University and located at 1400 Broad Road.

It is two acres of land associated with the Community General Campus. The area is open land and the location of an idle boiler house that is to be demolished.

-In addition to the 20,000 sq.ft. of available space on the second floor of IHP there is 1,801 sq.ft. of additional vacant building space in the Institute for Human Performance building located on the first and third floors and is primarily suited for office space.

-We also have 9,982 sq.ft of the Sarah Loguen Center located on the first and second floors that is unoccupied and in need of renovation.

Additionally we added 100,000 sq.ft. of vacant building space in the former "Laboratory" building or Building #3 of the once General Electric industrial complex, now known as "Electronics Business Park: The Park is located on Electronics Parkway in the Town of Salina, Onondaga County New York.

- ii. Complete the Excel spreadsheet template provided with this document, noting the instructions on page 2. Include the official SUNY Physical Space Inventory (PSI) building number and a clear description of the spaces in the building or floor (when the entire floor is under consideration), or floor/wing (with outer rooms defining the space specifically listed). Include only properties sought to be designated now and exclude potential sites that may be considered in the future (see 2a below). See Attached File.
- iii. Provide also a representation of each proposed site drawn in AutoCAD on a scaled campus map with boundaries drawn clearly. Two versions should be created; one including an imbedded layer from Google Earth or other aerial photograph of the property. The second version should exclude the photographic imagery. Each parcel under consideration must have a unique alpha numeric identifier, clearly labeled on each plan which ties to identifiers in the Excel spreadsheet. If digital files containing Polygon

shapefile that delineates area for designation are available, provide these as well. See attached file

- iv. Provide a campus map with each proposed building shaded. Label each building with the official building number as listed in the SUNY Physical Space Inventory (PSI) along with the building name. For each building shaded and labeled, include floor plans of all areas under consideration with the specific spaces clearly shaded and labeled with official PSI room numbers. If digital files containing Point shapefiles that provide locations of area for designation are available, provide these as well. See attached

- 2) The total square footage of the space and/or acreage of land proposed for designation as a Tax-Free NY Area is:

14.86 acres of land and 146,183 square feet of building space

- 2a) *If applicable:* You may include here a description of any potential space or acreage of land that you may seek to designate as a Tax-Free NY Area under the START-UP NY Program in the future. This may include campus property that may become vacant, or other properties in your community that are not currently part of your campus but may be desirable for a company partner and with which you may consider an affiliation if an appropriate partner is identified. Do not include these properties in the Excel spreadsheet.

- 2b) *If applicable:* The total square footage of the space or acreage of land that you may propose to designate as a Tax-Free Area as identified in 2a, if known.

- 3) Provide a description of the type of business or businesses that may locate in the area identified in #1.

The industries that Upstate plans to target through the Start-Up NY program are those related to health and the life sciences, although Upstate will be open to targeting any company that can benefit from the type of expertise, equipment or facilities of Upstate, including the Biotechnology Accelerator. In the health and life sciences industries space Upstate will be targeting any companies that are making or developing healthcare-related IT, medical devices, therapeutic compounds, diagnostics, biologics, research instruments, or any other type of biomedical innovation.

- 4) Provide a description of the campus academic mission, and explain how the businesses identified in #3 will align or further the academic mission of the university or college.

The mission of Upstate Medical University is "To improve the health of the communities we serve through education, biomedical research, and health care". We intend to locate businesses on our campus that relate to this mission. In considering which businesses will be appropriate for our campus, we will

evaluate:

- I. Opportunities for education of SUNY students from Upstate Medical University and area campuses (eg ESF, OCC, Oswego, Cortland)
- II. Opportunities for collaborative research and direct support for educational, basic or applied biomedical, or translational research
- III. Creation of new jobs
- IV. Regional economic development
- V. Expanding regional, national, and international research and scholarship opportunities

- 5) Provide a description of how participation by these types of businesses in the START-UP NY Program will generate positive community and economic benefits, including but not limited to:
- Increased employment opportunities;
 - Increased opportunities for internships, vocational training and experiential learning for undergraduate and graduate study;
 - Diversification of the local economy;
 - Environmental sustainability;
 - Increased entrepreneurship opportunities;
 - Positive, non-competitive and/or synergistic links to existing businesses;
 - Effect on the local economy; and
 - Opportunities as a magnet for economic and social growth.

Participation by businesses in the biomedical space in our campus tax-free zone will generate positive community economic benefits through increased employment opportunities, integrated opportunities for training for technicians, students, health professionals including nurses, physicians and other allied health professions, graduate students and graduate physicians, and be a boost to the local economy. By co-locating on our Loguen's Crossing site, a reclaimed brownfield, it will help to cement the relationship between Syracuse University, Upstate Medical University, and the surrounding Syracuse downtown to attract other businesses to the region. We expect that new employees will patronize the small businesses already in the area. We directly support new businesses and entrepreneurs through our Bioaccelerator building.

Some of the properties under consideration are still on the tax roll of the City of Syracuse. Should there be any interest in developing these sites under Start-Up NY there will first need to be an endorsement from the City of Syracuse and an agreed upon plan for appropriate tax considerations.

- 6) Provide a description of the process the Sponsor (campus) will follow to select participating businesses. The description should identify the membership of any group or committee that may make recommendations, the final decision-maker, and the criteria that will be used to make decisions. This group or committee must include representation from faculty governance. The criteria may include some or all of the following:

A. Academic and Research Alignment

1. Is the business in an industry aligned with current and/or developing University research, scholarly, and creative activity?
2. Does the business provide opportunities for creation of new job, such as full time employment through integrated opportunities for training for technicians, health professionals including nurses, physicians and other allied health professions, graduate students and graduate physicians?
3. Does the business provide experiential learning and workforce opportunities (e.g., internships, fellowships, full-time jobs) for students and graduates?
4. Does the business provide areas for partnership and advancement for faculty and students?
5. Will the business provide access to research instrumentation, tools, and/or equipment necessary to advance the academic and research mission?
6. Will the business fund scholarships, campus facilities or other academic services or amenities?
7. Will the business and/or its employees contribute to instruction or provide student mentoring?
8. Does the business offer the use of company resources, intellectual property or expertise to support the academic mission?

B. Economic Benefit

1. How many net new jobs will be created?
2. Is the business viable in both the short- and long-term?
3. Will the business attract private financial investment?
4. Does the business plan to make capital investments (e.g., renovation, new construction)?
5. Are the new jobs in critical areas of the economy?
6. How will the University financially benefit from the terms of the lease?

C. Community Benefits

1. Does the business have the support of one or more municipal or community entities?
2. Is the business recruiting employees from the local workforce?
3. Does the business invest in underserved, economically distressed regions?
4. Will the business rely on suppliers within the local and regional economy?

1. Upstate will use the following process to select businesses to participate in the Tax-Free NY program.

- I. A steering committee comprised of campus leaders will review all applications. Those deemed credible will then also have a review performed by the University Faculty Council, and be circulated for comment to leaders in the institution, including the Deans of the four Colleges, CEO of University Hospital, and the Executive Committee of UMAS, college campus practice plan. Comments from these groups will be forwarded to the President (Chief Administrative Officer) with a recommendation regarding approval from the steering committee for final decision. Steering Committee members will include:

- a. Vice President for Finance
- b. Vice President for Research
- c. Vice President for Academic Affairs
- d. Vice President for Development
- e. University Counsel
- f. Dean of the College of Medicine
- g. Chief Operating Officer of University Hospital
- h. Assistant Vice President for Facilities and Planning

II. The following criteria will be used when considering applicants for participation in the program

A. Academic and Research Alignment

1. Is the business in an industry aligned with current and/or developing University research, scholarly, and creative activity?
2. Does the business provide opportunities for creation of new job, such as full time employment through integrated opportunities for training for technicians, physicians in training, and graduate physicians?
3. Does the business provide areas for partnership and advancement for faculty and students?
4. Will the business provide access to research instrumentation, tools, and/or equipment necessary to advance the academic and research mission?
5. Does the business provide opportunities for education of SUNY students from Upstate Medical University and area campuses (eg ESF, OCC, Oswego, Cortland)
6. Will the business fund scholarships, campus facilities or other academic services or amenities?
7. Does the business offer the use of company resources, intellectual property or expertise to support the academic mission?

B. Economic Benefit

1. How many new jobs could be created for graduates of our SUNY Colleges of Health Professions, Nursing, Graduate Studies and Medicine.
2. Is the business viable in both the short- and long-term?
3. Will the business attract private financial investment?
4. Does the business plan to make capital investments (e.g., renovation, new construction)?
5. How will the University financially benefit from the terms of

the lease?

C. Community Benefits

1. Does the business have the support of one or more municipal or community entities?
2. Is the business recruiting employees from the local workforce?
3. Does the business invest in underserved, economically distressed regions?

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 to 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.

 Category:	Policy Title: Conflict of Interest Document Number: 6001
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Loguen's Crossing, site of new biotech accelerator

Loguen's Crossing is currently owned by Upstate Property Development (UPD), a 501 (c) 3 corporation. Six acres have been allocated to the Biotech Center and 8 acres remain with UPD. In order to partner with a for-profit business, Upstate Loguen's Crossing LLC was created as a for-profit subsidiary of UPD. Upstate Loguen's Crossing LLC is in a joint venture with the COR company known as the Upstate COR Development LLC. The JV agreement calls for six acres of UPD land to be transferred into the partnership, but when Start-Up NY became known it was agreed to delay the transfer of land.

The accelerator and its larger setting were awarded \$5.6 million as part of a New York's Regional Economic Development Council initiative. The award designates \$3.6 million to redevelop the 10-acre site hosting the accelerator into residential and commercial area. The location, previously known as Kennedy Square, has been renamed Loguen's Crossing.

The CNY Biotech Accelerator is a joint project between Upstate Medical University and SUNY-ESF. The 40,000-square-foot building will accommodate companies involved in the commercialization of biomedical technologies.

CNY-Biotech Accelerator: Five Great Reasons to Grow and Prosper

1

A new biotech facility in Central New York

The CNY Biotech Accelerator is being built to provide affordable space for companies — including office and wet laboratory space — that meets the latest and most up-to-date specifications for the biotech industry. Clients will have access to all the components necessary to help their companies prosper. Planners for the facility have solid experience in the incubator setting and bring cumulative expertise to the design and operation of this new facility.

2

Relevant support for emerging businesses and entrepreneurs

The CNY Biotech Accelerator provides new companies with a strong foundation of support — ranging from business planning via Syracuse University's Whitman School of Management, to monthly on-site seminars, to meetings with speakers in our entrepreneurship lecture series, to the development of an individually-paced commercialization plan for clients to launch them to future

success. Clients also will receive discounted rates on a range of services, including insurance, attorneys, relocation, and human resources.

3

The richness of a dedicated environment

Clients of the CNY Biotech Accelerator will find themselves in a setting adjacent to three of Central New York's leading universities, with direct support from two highly specialized institutions. Upstate Medical University, with basic science and clinical expertise in biomedical sciences, and the SUNY College of Environmental Science and Forestry, with a focus on biotechnology from the natural world, provide a unique platform for the accelerator and its program. The accelerator also has proximity to Upstate University Hospital with its specialized clinical and research settings and to area biotech industry partners.

4

Access to university resources

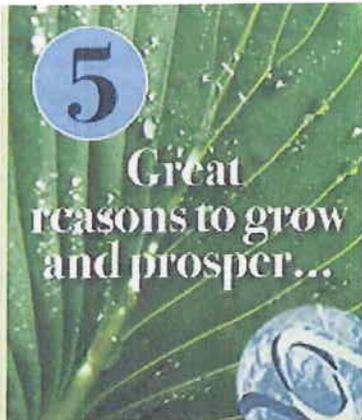
Clients of the CNY Biotech Accelerator will be able to access the talents of leading researchers, scientists, clinicians and experts in biomedical and biotechnology fields. Clients also will have use of core institutional resources at faculty-discount rates and free library services and journal access. The combined student body within walking distance of the accelerator totals nearly 25,000 — providing a talented and ready pool of potential interns and employees.

5

Terrific location

The CNY Biotech Accelerator is located in Syracuse, in the center of New York's fourth largest city, in the heart of New York State. Clients enjoy easy access to rail, air and bus transportation, and the facility is close to the intersection of the state's main interstate highways. The accelerator is blocks from both Downtown Syracuse and University Hill, with parking at the incubator site.

CNY Biotech Accelerator



Company Space

The main physical feature of the CNY Biotech Accelerator is modern lab space designed by the S/L/A/M Collaborative architectural firm.

Each Laboratory Module Includes:

- Benches and casework for the module
- Fume hood and biosafety cabinet
- Telephone jacks
- Data connections
- Manual keypad entrance lock with key override
- Fixed lighting
- Building heating, air conditioning and ventilation system
- 120-volt single phase electrical outlets
- House compressed air and vacuum
- Hot/cold potable water
- Sinks
- Purified water
- Natural gas for laboratory instruments

Common Space

A critical feature of incubation is the synergy that occurs among other growth-oriented companies. The CNY Biotech Accelerator provides several common areas for formal and informal gatherings. In addition, several accelerator-wide programs will be held in these areas and open to all clients.

Types of Businesses Supported

The Accelerator focuses on technologies related to the life sciences and the environment. Examples include:

Biomedical	Biotech
Pharmaceutical therapeutics	Renewable energy
Medical devices	Alternative fuel
Stem cell applications	Biomass and Renewable Products
Diagnostics	Bio and Chemical Sensor Development
Large and small molecule work	Cleantech
Medical processes	Bio Industrial

Access to University Resources

Upstate

Upstate Medical University is the only academic medical center in Central New York. It is the region's largest employer and is built around a rapidly expanding biomedical research enterprise, four colleges and its own teaching hospital.

As a research enterprise, Upstate's investigations are aimed specifically at improving human health. Its research growth is currently the second-fastest among the 64 campuses of the State University of New York.

As a clinical enterprise, Upstate's service area covers one-third of NY state and has a diverse patient population. Upstate has the region's only Level-1 trauma center and dedicated children's hospital, and has broken ground for a new cancer center.

It has 80 specialty clinics and is a NYS Designated Center for six services, and its Joslin Diabetes Center is a NYS Center of Excellence.

ESF

SUNY College of Environmental Science and Forestry (SUNY-ESF) is ranked by U.S. News and World Report among the Top 50 Public National Universities. Committed to developing technologies to create a sustainable future, ESF faculty use contemporary biotechnology to make research contributions in plant genomics, natural products chemistry, biosensors, environmental toxicology, bioprocess engineering, molecular biology, bioenergy and bioproducts such as biodegradable polymers.

A 17 acre main campus in Syracuse is complemented by more than 25,000 acres on regional campuses throughout New York State that provide unique environments for education and research. The main campus includes greenhouses, a bioprocessing pilot plant and state-of-the-art analytical equipment available to CNY BRC clients at reduced rates.

Through ESF Outreach an annual biotechnology symposium brings together biotechnology companies and academic partners to exchange information and form research collaborations. Ninety-four percent of ESF faculty are active in funded research (the highest percentage in SUNY) and it has the second-highest funding per faculty member.

Core Facilities and Other Resources

Accelerator clients will have access to core research facilities and consultation at discounted rates. In addition, there are faculty experts in specific areas of inquiry.

Upstate's Institutional and Departmental Core Research Facilities

- Center for Research and Evaluation
- Clinical Research Unit
- DNA Sequencing
- In Vivo Computed Tomography
- Laboratory Animal Resources
- Microarray
- Musculoskeletal
- Proteomics
- Confocal and Two-Photon Imaging
- Flow Cytometry
- Humanized SCID Mouse & Stem Cell Processing

Upstate University Hospital facilities include state-of-the art skills labs, including a new Surgical Research and Training Center, the Clinical Skills Center with simulated patients, and the Emergency Medicine Simulation and Training Center.

SUNY-ESF has more than two dozen institutes and research centers related to aquatic ecosystems, bioenergy, biotechnology, biodiversity, ecology, genetic engineering, nanotechnology, remote sensing, wildlife disease prevention, and more.

Upstate University Hospital

Upstate University Hospital is part of the only academic medical university in Central New York—a region stretching from Canada to Pennsylvania. The hospital and its clinics serves 1.8 million people, drawing most of its patients from an area covering one-third of the state.

The hospital has long held the distinction of caring for among the most seriously ill and injured in the state. It is a Level-I trauma center and offers the regions only children's hospital and has broken ground for a new cancer center, where it will consolidate its advanced care. University Hospital is also a NYS Designated Center for: Stroke, AIDS, Trauma, Burn, SAFE services, and Poison Control, and offers 80 unique specialty clinics.

University Hospital is the top tier of technologically advanced hospitals and its faculty physicians provide medical education and most of the continuing education in the region, including 20 grand rounds each month.

Space in the CNY Biotech Accelerator is competitive and is geared toward biotech clients in health care-related or life sciences fields.

The CNY Biotech Accelerator has comprehensive admission criteria. Prospective clients will need to provide:

- Business name, type of business and date registered.
- CEO biography.
- Resumes for officers and directors.
- Scientific advisory board members, if applicable.
- Professional references.
- A non-proprietary description of the proposed R&D program to be carried out at the CNY Biotech Accelerator, and resources required to fully develop the technology and/or service.
- Product brochures and literature, if available.
- Potential customers and market size.
- Competitors and competitive advantages.
- Current amount of financing raised and anticipated needs.
- A copy of your business plan.

Those clients hoping to become part of the Start-Up NY program will also be required to satisfy those program requirements.

Accelerator Location

841 East Fayette Street Syracuse, NY 13210 Ample on site parking is available.

The Syracuse Region is rich in entrepreneurial spirit, with \$5.4 billion in new investment and economic development projects underway.

The CNY Biotech Accelerator is on East Fayette Street in Syracuse, two blocks from Upstate Medical University's largest research facility and across the street from Syracuse University's

incubator. Upstate Medical University's own hospital, SUNY-ESF, University Hill, the Syracuse VA Medical Center, and downtown's Centerstate CEO Tech Garden Incubator site are also within walking distance.

The area is also rich in intellectual capital, with 35 colleges and universities in the city and surrounding counties, including 25,000 students enrolled at the institutions within five blocks of the CNY Biotech Accelerator. The CNY Biotech Accelerator is conveniently close to the campuses of its major partners and two minutes from downtown Syracuse.

Located in the center of New York State, at the intersection of the state's two main thruways, the CNY Biotech Accelerator is also within a 4-to-5-hour drive of New York City, Boston, Philadelphia or Toronto.

Syracuse has the conveniences of a big city and the comforts of a small town, offering an outstanding quality of life—all in a beautiful and affordable part of the state. In addition to "University Hill", which provides a college town atmosphere—and Division I basketball, football and lacrosse—Syracuse offers a rich cultural life including a variety of outdoor festivals, a symphony, opera company, professional theater, several museums, and the historic Armory Square district with many fine restaurants and unique shops.

With four distinct seasons, affordable housing, and easy commutes, Syracuse consistently ranks high on national quality-of-life and cost-of-living polls. Popular outdoor activities include hiking, cycling, golfing, swimming, boating and fishing. Winter sports enthusiasts enjoy skating, snowmobiling and downhill and cross country skiing. Many lakes, parks, and golf courses are within a few minutes drive of the CNY Biotech Accelerator. Within an hour's drive are Lake Ontario, the Finger Lakes region (producing world famous wines), the Thousand Islands, and Adirondack Mountain vacation areas.

 <p>Category: Academic Affairs Community Colleges Legal and Compliance Research</p> <p>Responsible Office: Academic Affairs</p>	<p>Policy Title: START-UP NY Program Participation Policy</p> <p>Document Number: 6800</p> <p>Effective Date: February 10, 2014</p> <p>This policy item applies to: Community Colleges State-Operated Campuses</p>
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Summary

START-UP NY is a state economic development program that positions SUNY campuses as magnets for entrepreneurs and businesses from around the globe. START-UP NY aligns with SUNY's mission of teaching, research and public service; enabling engagement with industry, knowledge acceleration, translation of research into practical applications, and delivering the 21st century workforce businesses need to grow and thrive. START-UP NY will transform university communities to deliver unprecedented economic benefits to New York. To participate in the program, all campuses must comply with this policy and any applicable rules and regulations issued by the NYS Commissioner of Economic Development.

This policy governs the review process that all participating campuses must follow to secure SUNY's approval of the plans, applications, and other documents required by the NYS Commissioner of Economic Development to participate in the START-UP NY program. It also prescribes special requirements for the disclosure and management of actual or potential conflicts of interest in matters pertaining to the campus' START-UP NY program. Any conflict between this policy and any other applicable Conflict of Interest policy shall be resolved in favor of disclosure of any potential, actual, or perceived conflict of interest relating to the campus' START-UP NY program to the President or Chief Executive Officer of the sponsoring campus.

Policy

- A. Campus Plans for Designation of Tax-Free Area(s):** Any campus intending to submit a Campus Plan for Designation of Tax-Free Area(s) ("Campus Plan") to the NYS Commissioner of Economic Development must first have it reviewed and approved by the Chancellor or designee. The Chancellor or designee shall approve or reject all Campus Plans within fifteen (15) business days of receipt. Any rejected Campus Plan shall be accompanied by an explanation of the basis for rejection. Once approved by the Chancellor or designee a campus may submit its Campus Plan to the NYS Commissioner of Economic Development in accordance with the Commissioner's rules and regulations. Any Campus Plan that is rejected can be resubmitted for Chancellor

or designee approval and will be reviewed in accordance with this policy and related procedures. Any amendments to approved Campus Plans must be submitted for Chancellor or designee approval and will be reviewed in accordance with this policy and related procedures.

- B. Sponsoring University or College Applications for Business Participation:** Any campus intending to submit a Sponsoring University or College Application for Business Participation ("Sponsor Application") to the NYS Commissioner of Economic Development must first have it reviewed and approved by the Chancellor or designee. The Chancellor or designee shall approve or reject all Sponsor Applications within thirty (30) business days of receipt. Any rejected Sponsor Application shall be accompanied by an explanation of the basis for rejection. Once approved the campus may submit the Sponsor Application to the NYS Commissioner of Economic Development in accordance with the Commissioner's rules and regulations. Any Sponsor Application that is rejected can be resubmitted for Chancellor or designee approval and will be reviewed in accordance with this policy and related procedures. Any amendments to approved Sponsor Applications must be submitted for Chancellor or designee approval and will be reviewed in accordance with this policy and related procedures.
- C. Delegations:** The Chancellor or designee may charge a group of individuals, collectively called the SUNY START-UP NY Proposal Review Team, to evaluate all submitted Campus Plans and Sponsor Applications prior to accepting or rejecting them.
- D. Conflicts of Interest:** Service as an Official shall not be used as a means for private benefit or inurement for any Official, a Relative thereof, or any entity in which the Official or Relative thereof has a Business Interest. A conflict of interest exists whenever an Official has a Business Interest or other interest or activity outside of the university that has the possibility, whether potential, actual, or perceived, of (a) compromising the Official's judgment, (b) influencing the Official's decision or behavior with respect to the START-UP NY Program, or (c) resulting in personal or a Relative's gain or advancement. Any Official who is an owner or employee of an entity that is the subject of any matter pertaining to the university's START-UP NY Program, or who has a Business Interest in any entity that is the subject of any matter pertaining to the university's START-UP NY Program, or whose Relative has such a Business Interest, shall not vote on or otherwise participate in the administration by the university of any START-UP NY matter involving such entity. Any Official or other campus representative who becomes aware of a potential, actual or apparent conflict of interest, either their own or that of another Official, related to a sponsoring university or college's START-UP NY program must disclose that interest to the President or Chief Executive Officer of the sponsoring college or university. Each such President or Chief Executive Officer shall maintain a written record of all disclosures of actual or potential conflicts of interest made pursuant to this policy, and shall report such disclosures on a calendar year basis, by January 31st of each year, to the University Auditor or to the Chancellor's designee, in which case the University Auditor shall be copied on the correspondence to such designee. SUNY shall then forward such reports to the Commissioner of Economic Development for the State of New York, who shall make public such reports.
- E. Exceptions:** There are no exceptions to this policy.

Definitions

Business Interest means that an individual (1) owns or controls 10% or more of the stock of an entity (or 1% in the case of an entity the stock of which is regularly traded on an established securities exchange); or (2) serves as an officer, director or partner of an entity.

Official means an employee at the level of dean and above as well as any other person with decision-making authority over a campus' START-UP NY Program, including any member of any panel or committee that recommends businesses for acceptance into the START-UP NY program.

Relative means any person living in the same household as another individual and any person who is a direct descendant of that individual's grandparents or the spouse of such descendant.

Sponsoring College or University means any entity defined or described in NYS Education Law Sec. 352 and Article 126.

START-UP NY Program means the SUNY Tax-free Areas to Revitalize and Transform Upstate New York Program established by Article 21 of the Economic Development Law.

Tax-Free NY Area means vacant land or space designated by the Commissioner of Economic Development Article

21 of the Economic Development Law that is eligible to receive benefits under the START-UP NY program.

Other Related Information

[Start-Up NY Regulations](#); available at the [Start-Up NY Website](#).

At least thirty days before submitting the Campus Plan to the Commissioner of Economic Development the campus must provide a copy of the Plan to the chief executive officer of the municipality or municipalities in which the proposed Tax-free NY Area is located, local economic development entities, the applicable university or college faculty senate, union representatives and the campus student government. The campus shall include in their submission to the Commissioner of Economic Development certification of such notification, as well as a copy of any written response from chief executive officer of the municipality or municipalities in which the proposed Tax-free NY Area is located, local economic development entities, the applicable campus or college faculty senate, union representatives and the campus student government.

[StartUp-NY.gov](#) website and program information.

Procedures

[START-UP NY Program Participation. Procedures for](#)

Forms

[SUNY START-UP NY Campus Plan for Designation of Tax-Free Area\(s\) Memorandum](#)

[SUNY START-UP NY Campus Plan for Designation of Tax-Free Area\(s\) Template](#)

[START-UP NY Sponsoring University or College Application for Business Participation Memorandum](#)

[ESD START-UP NY Sponsoring University or College Application for Business Participation](#)

[ESD START-UP NY Business Application Instructions](#)

[ESD START-UP Business Application](#)

Authority

[State University of New York Board of Trustees Resolution 14-\(\) . START-UP New York Program Administration, adopted January 14, 2014](#)

[Law, New York Economic Development Law Article 21 \(Start-Up NY Program\)](#)

[Start-Up NY Regulations](#)

History

Enacted into law in June 2013, START-UP NY is a groundbreaking new initiative from Governor Andrew M. Cuomo that provides major incentives for businesses to relocate, start up or significantly expand in New York State through affiliations with public and private universities, colleges and community colleges. Businesses will have the opportunity to operate state and local tax-free on or near academic campuses, and their employees will pay no state or local personal income taxes.

Appendices

There are no appendices relevant to this policy.

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.

Appendices

There are no appendices relevant to this policy.

ITEMS TO INSERT:

**1.) DEPARTMENT OF ECONOMIC DEVELOPMENT
EXCEL SPREADSHEET TEMPLATE LISTING ALL
DESIGNATED PROPERTIES**

**2.) COPY OF ANY OTHER APPLICABLE CONFLICT OF
INTEREST POLICIES OR GUIDELINES**

**3.) EVIDENCE OF SUBMISSION OF TAX-FREE AREA
PLAN TO INTERESTED PARTIES, I.E., COPIES OF
CORRESPONDENCE SENT AND RECEIVED**

Note that program regulations require 30-day notice to potential stakeholders, including the chief executive officers of the municipality or municipalities in which the subject properties are located, a local economic development entity, faculty senate, campus student government, and union representatives, and require "evidence" of the campus' communications to these local stakeholders. Please note that you **MUST** include copies of all correspondence in your formal submissions to SUNY and ESDC. It is important that the plan be mailed **via first class mail** to each of the unions representing state employees, including the local (or statewide if no local exists) leadership for UUP, CSEA, PEF, PBA, GSEU and NYSCOPBA. Community colleges must also notify the unions representing their employees. If you are unsure whom to contact, please let us know and we can assist you in making this notification.

HR / Labor Relations Legal and Compliance Responsible Office: University Counsel	Effective Date: October 01, 1995 This policy item applies to: State-Operated Campuses
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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.

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.

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](#)

Procedures

There are no procedures relevant to this policy.

Forms

There are no forms relevant to this policy.

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

History

Issue Date: 02/01/2010

Last Revision Date: 10/01/2012

Last Review Date: 10/01/2012

Policy Number: **CAMP_A-24**

Approved by: David R. Smith, MD, President

Page(s): 1 of 69

**Policy on the Identification and Management
of Conflicts of Interest and Commitment**

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Introduction

Purpose of Policy

The mission of SUNY Upstate Medical University is to improve the health of the communities we serve through education, biomedical research, and health care. Clinicians have a primary responsibility to work for patients' welfare. Researchers are dedicated to furthering scientific biomedical understanding in ways that can be translated into products and techniques that benefit society. To achieve these ends, SUNY Upstate's faculty, staff, and students interact and, at times, partner with the pharmaceutical, medical device and other companies and organizations, such as federal, state and local governments, foundations and individuals.

As part of SUNY Upstate Medical University's research missions, Upstate faculty, staff, and students are encouraged to engage in appropriate outside relationships with private industry and other organizations and individuals who sponsor research. Without these relationships our academic research could not be translated into products that benefit society. A principled partnership between the academic community and these research sponsors is essential if we are to realize the promise of biomedical research. Such collaborations must be free of conflicts of interest to assure that research is objectively designed, conducted, and reported.

This policy establishes expectations for behavior in relations with the pharmaceutical, medical device, biotechnology, and other companies (hereafter referred to as Industry), and other organizations in accordance with the expressed values of SUNY Upstate Medical University. It is intended to guide interactions with Industry and other organizations so that institutional and professional integrity is maintained while we care for patients, teach clinicians, scientists, and students, and carry out biomedical research.

In addition, this policy promotes objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct and reporting of sponsored research will be free from bias resulting from investigator conflicts of interest, including financial conflicts of interest.

Covered Individuals

This policy applies throughout SUNY Upstate to all employees (including faculty, staff, residents, fellows, others in training), students, employees of the Research Foundation of the State University of New York, employees of MedBest, and members of the SUNY Upstate Council, who shall be known as covered individuals, unless otherwise noted. With regard to research, this policy applies to project directors/principal investigators and all other persons, regardless of title or position, who are responsible for the design, conduct or reporting of sponsored research, including their consultants and contractors, and related parties, defined as their immediate family members, including spouses, domestic partners, and dependent children.

This policy incorporates and, at times augments existing laws, including the New York State Public Officers Law; state, SUNY, and campus policies; PHS Financial Conflict of Interest regulations (42 CFR Part 50 Subpart F and 45 CFR Part 94); and negotiated agreements. Nothing in this policy shall take precedence over existing laws, policies, and negotiated agreements with any union of employees. Individual departments and units shall review their policies and revise them if necessary to ensure that they are consistent with this policy.

Oversight and Implementation

The President of SUNY Upstate Medical University is responsible for overseeing the implementation of this policy. The President has delegated implementation of this policy to the Conflict of Interest and Commitment Officer and Research Conflict of Interest Committee.

An Upstate Conflict of Interest and Commitment (COIC) Officer will be appointed by the President and will report to the Associate Senior Vice President of Operations or other designee of the President.

The COIC Officer will (1) oversee the implementation, evaluation, and revision of this policy; (2) respond to questions about this policy and provide authoritative guidance as to how the policy applies to particular situations; (3) receive and evaluate declarations of conflicts of interest and make recommendations regarding them to covered individuals and, where appropriate, to the President and senior leadership; (4) monitor compliance with this policy; (5) serve ex officio, with vote, on the Research Conflict of Interest Committee; (see Section 3C. The Research Conflict of Interest (COI) Committee); and (6) ensure that this policy is accessible to all Upstate personnel and the public through the Upstate Medical University website.

An Upstate Research Conflict of Interest (COI) Officer will be appointed by the VP for Research.

The RCOI Officer will (1) oversee the implementation, evaluation, and revision of this policy as it relates to sponsored research; (2) receive, review and evaluate disclosures by investigators regarding relations with industry and other conflict of interest as described in Section 2, including financial conflict of interest in sponsored research; (3) report all disclosures in need of management to the Research Conflict of Interest Committee and oversee development of plans to manage and/or eliminate conflicts; (4) monitor compliance with this policy as it relates to sponsored research; (5) chair the Research Conflict of Interest Committee; (see below, D. 3. b. The Research Conflict of Interest (COI) Committee and its process); and (6) ensure that this policy is accessible to all Upstate personnel and the public through the Upstate Medical University website and is fully compliant with all research sponsor requirements.

The Vice President for Research will establish a Research Conflict of Interest Committee (RCOI).

This committee will include representation from the IRB; the Counsel's office; the Sponsored Programs Office; the clinical and basic science faculty; Upstate administration representing faculty development, research integrity, technology transfer, and relations with industry; and non-Upstate individuals. Committee members are appointed for two year terms and may be reappointed. The COI Officer will serve ex officio, with vote, on the Research Conflict of Interest Committee. Because the major sources of conflict of interest are related to industry sponsorship of clinical research, the Chair of the RCOI Committee, the RCOI Officer, will be a faculty person with personal experience in conducting Industry sponsored research. The RCOI Committee will establish standing monthly meetings to review and manage identified conflicts of interest, but will only meet when it has business to conduct.

RCOI Committee members and all meeting guests will sign Confidentiality Agreements assuring that no information regarding investigator disclosed financial interests, deliberations regarding these conflicts used to develop management plans, or other confidential information is discussed or disclosed outside of RCOI Committee meetings.

Section 1. Relations with Industry¹ in Patient Care and Education

A. Introduction and Purpose

Academic health centers and their clinicians have fundamental responsibilities to save lives, ameliorate disease, and relieve suffering. The pharmaceutical, medical device, and biotechnology industries have developed and brought to market drugs, devices, and other products that help achieve these ends. Clinicians have the ethical duty to recommend and prescribe specific drugs and devices based on the patient's best interests, and not out of personal gain. The following guidelines are intended to:

1. help ensure that clinicians select products based primarily on the patient's welfare, and
2. minimize the influence of Industry on clinical decision-making through gifts, personal or institutional financial interests in Industry, or uncritiqued marketing presentations or materials.

B. Scope of Policy

This section focuses on the clinical realm and education of health care professionals and applies to all covered individuals, as defined in the Preamble, at all times, both on and off-duty, and to all interactions at SUNY Upstate, including its hospital, clinics, MSG practices, and any other locations that may be added to Upstate's space inventory. An exemption for part-time, paid faculty may be granted by the department chair with the concurrence of the dean, provided that the part-time faculty's clinical, teaching, and research commitments and obligations to Upstate are not compromised and remain fulfilled. A department chair may choose to extend this policy to the department's voluntary faculty and must inform the voluntary faculty in writing if he or she does so.

In addition to complying with this policy, covered individuals must comply, where applicable, with the legal requirements as expressed in the New York Public Officers Law, other relevant State and Federal laws and regulations, and the Research Foundation of the State University of New York policies and procedures.

C. Specific Topics Requiring Scrutiny

1. Detailing by Industry representatives²

- a. Access to premises of Upstate by Industry representatives may occur only by appointment or invitation of the physician. Pharmaceutical representatives are allowed only in non-patient care areas and nonpublic areas, except when it is necessary for them to traverse a public area (e.g., lobby or hallway) to reach an approved destination. Device manufacturer representatives are permitted in patient care areas only when they are appropriately credentialed by the relevant Upstate department. They may be present during patient care only to provide in-service training or assistance on devices and equipment, and then only with prior disclosure to and consent by the patient. Departments that allow the presence of medical device representatives must develop written guidelines for clarifying the credentialing of such representatives.
- b. Contact with residents, fellows, students, and others in training by Industry representatives should occur only for educational purposes under the supervision of a faculty member, with faculty-supervised critical analysis of the information provided. The department or unit of the primary person who invited the representative must have written methods and resources that are used for critical analysis.

¹ Unless otherwise noted in this report, "Industry" is meant to refer collectively to the pharmaceutical, medical device and equipment, and biotechnology industries.

² Adapted from the AAMC's report, *Industry Funding of Medical Education* (2008).

2. Institutional decisions regarding purchasing and the role of covered individuals with financial interests

- a. Individuals with any financial interest in Industry, excluding mutual funds and similar investments, or whose immediate family member (spouse, domestic partner, child) has such an interest, must disclose such interest to their supervisor, if applicable, and to the COI Officer of Upstate (see Section 5. B. Conflict of Interest Officer) and withdraw from involvement in purchasing decisions relevant to the conflicting interests.
- b. If an individual's expertise is necessary in evaluating a product, and that person also has financial ties to any manufacturer of that or any related product, the ties must be disclosed in writing to those charged with the responsibility for making the decision, and only written testimony will be accepted for consideration in deciding whether to adopt the drug, device, or product. (See Section 2. C. 6. for discussion of sponsored research agreements with Industry, including clinical trials).
- c. Those who request that a drug, device, or product be adopted by the institution must disclose any financial interests they have in the product to those making the purchasing decision at the time of the request.

3. Gifts and meals from Industry³

- a. All individuals are prohibited from accepting gifts of any kind from representatives of Industry.⁴ Gifts are defined as anything of monetary value, regardless of amount, and include, but are not limited to pens, pads, stethoscopes, textbooks, money, services, favors, discounts, food, conference fees, lodging, travel to conferences, entertainment, or other hospitality provided at any time or location (including individual or group meals and meals at local restaurants sponsored by Industry).
- b. Educational materials for patients, students, and others that are developed by Industry may be accepted if they are the best source of such materials available and are for the purpose of education. They may not be accepted if it is evident that they are primarily for the purpose of selling a product. Also, written materials are permitted for products for which manufacturers' information and instructions are required.
- c. Travel funded by Industry to be trained on equipment already purchased by or approved for use at Upstate, is not considered a gift and is permitted. Provision for such travel should be included in the contract or memorialized in some other manner. Travel funded by Industry to evaluate equipment not yet purchased by Upstate is allowed if the equipment to be purchased is included in the open bid process. For sole-source vendors, the purchasing entity (e.g., University Hospital, medical service group) should pay for the travel.

³ Adapted from University of Massachusetts policy

⁴ State employees also are bound by the New York Public Officer's Law. Please refer to that law for restrictions regarding receipt of gifts from sources other than the pharmaceutical and medical device industries.

4. Free drug samples⁵

- a. Drug samples may be dispensed only to patients being cared for at the practice site. They may not be used by employees, students, volunteers, family members, or anyone else who is not a patient at the practice site.

Samples may be dispensed only to patients meeting one of the following conditions:

- medically indigent
- no prescription coverage and extraordinarily expensive agents are required
- access to pharmacy services is temporarily unavailable (e.g., the pharmacy is closed)
- a short trial (1 week or less) of the medication is necessary to determine whether it has the desired effect or the medication needs to be changed before taking the prescription to the pharmacy, thus avoiding unnecessary costs.

- b. Drug samples must be managed centrally within the practice site. Samples must be dispensed consistent with standards of pharmaceutical practice, which include, but are not limited to, correct labeling (including patient name, date, medication name and dosage, instructions for use, prescribing clinician), a log tracking the medication and documenting that the patient has received appropriate medical counseling, and secure storage. The Pharmacy Department will conduct routine on-site inspections and annual review of written procedures.

5. Industry-sponsored speakers' bureaus⁶

- a. Industry-sponsored speakers' bureaus are defined as follows. Industry hires faculty speakers to deliver promotional talks, using Industry-prepared and approved presentations. These talks are confined to FDA-approved product safety and efficacy discussions and approved disease-state education. By the nature of their content and origin of their authorship, such talks do not qualify for CME certification.
- b. Participation in Industry-sponsored speakers' bureaus by covered individuals is prohibited. (Covered individuals may provide certified CME talks.) Covered individuals or Upstate departments may not sponsor or promote Industry-sponsored speakers' bureau talks, and Industry-sponsored speakers' bureau talks are prohibited on University premises.

6. Continuing education⁷

- a. The following applies to all continuing education (CE), whether it is continuing medical education (CME) or CE in other disciplines. SUNY Upstate units (e.g., departments, colleges, University Hospital) may accept funds from Industry for CE, but Industry may not specify the content or the speakers. Industry may request the overall topic, such as a condition or disease state (e.g., epilepsy, hypertension, lung cancer). All agreements for Industry support must be negotiated through and executed by the Office of CME (CME Office).

⁵ Adapted from the Associated Medical Schools of New York State's *Common Policy for Interacting with Pharmaceutical Company Representatives* (2008) [hereafter referred to as "AMSNY Common Policy"], AAMC's *Industry Funding of Medical Education*, and University Hospital policy CM D-06 and University Hospital policy M-12.

⁶ Adapted from AMSNY Common Policy

⁷ Adapted from *Accreditation Council for Continuing Medical Education Standards for Commercial Support of Educational Programs* (2007) and University of Pittsburgh policy

- b. In order to ensure that potential for bias is minimized and that CE programs are not a guise for marketing, all CE events hosted or sponsored by SUNY Upstate must comply with Accreditation Council for Continuing Medical Education standards (or other similarly rigorous, applicable standards required by other health professions), whether or not CE credit is awarded for the event. CE programs must be open on equal terms to all interested practitioners and may not be limited to attendees selected by Industry.
- c. Industry funding for such programming should be used to improve the quality of the education, not to support meals or social activities. Industry funding may be used to support the costs of internal department meetings, if the subject and content of these meetings is determined solely by the department, in consultation with the CME Office. The CME Office will audit CE programs to ensure that departments comply with these policies.
- d. Training programs designed solely for sales or marketing, presented by personnel supported by Industry, are prohibited.
- e. Upstate facilities may not be rented by or used for Industry-funded or directed programs, unless there is a CE agreement for Industry support that complies with these policies.
- f. Industry support for CE in the form of donated funds shall be recognized in a manner that does not promote a particular product.

D. Implementation

1. Responsibility for Implementation

The operational responsibility for the implementation of this policy is delegated to the Conflict of Interest (COI) Officer.

2. Declaration, Disclosure, and Referral

a. Disclosure of financial interests in Industry

All covered individuals must disclose to the COI Officer any financial arrangements with Industry that exceed \$1,000 from any single company annually.

b. Disclosure of relationships with Industry to students

Covered individuals in a teaching capacity should inform their students and other learners of their relationships with Industry. This may be done at the beginning of a course or session or other appropriate time. In situations that are transient or inconvenient (e.g., patient rounds), the teacher should use his/her discretion in informing students, being guided by the relevance of the relationship with Industry to the situation at hand.

Section 2. Conflict of Interest in Sponsored Research

A. Introduction and Purpose

As part of SUNY Upstate Medical University's research missions, Upstate faculty, staff, and students engage in relationships with state and federal government, private industry and other organizations and individuals who sponsor research. These partnerships enable academic research to be translated into products that benefit society. A principled partnership between the academic community and these research sponsors, essential if we are to realize the promise of biomedical research, must be free of conflicts of interest to assure that research is objectively designed, conducted, and reported.

This section describes Upstate's policy to identify, review, manage, or eliminate potential conflicts of interest, including financial conflict of interest, and is fully compliant with 42 CFR Part 50 Subpart F and 45 CFR Part 94, Promoting Objectivity in Research, as adopted by the Public Health Services on August 24, 2011 and The Research Foundation of SUNY Conflict of Interest Policy, adopted 8/17/12. By Upstate research and educational employees being aware of and following this policy, we can protect the institution and its employees and students involved in research from real or perceived challenges to the integrity of our missions. We also avoid jeopardizing public trust in support of these missions. Finally, we protect human subjects who participate in research projects, and the public, by diminishing bias in the experimental design, conduct of the research, or interpretation of data.

This policy establishes standards that provide a reasonable expectation that the design, conduct and reporting of sponsored research will be free from bias resulting from investigator financial conflicts of interest. Standards are established to identify financial interests held by investigators and related parties; determine if those financial interests could result in financial conflicts of interest that could bias the design, conduct or reporting of the research; and manage or eliminate the conflicts.

B. Scope of Policy

This section applies to all covered individuals, as defined in the Introduction, as well as voluntary faculty, contractors and consultants who are involved in the design, conduct, or reporting of research and their related parties: spouses, domestic partners, and dependent children.

All covered individuals must disclose all significant financial interest related to their institutional responsibilities held by them or their related parties (spouse, domestic partner, or dependent children), which will be reviewed by the Research COI Officer to determine if these significant financial interests could bias their involvement in a specific research project and, if so, to develop plans to eliminate or manage these conflicts, in consultation with the RCOI Committee.

C. Definitions

The following definitions apply to Section 2 of this policy:

1. *Disclosure of significant interests* means an investigator's disclosure of significant financial interests to an institution.
2. *Financial conflict of interest (FCOI)* means a significant financial interest that could directly and significantly affect the design, conduct or reporting of sponsored research.
3. *FCOI Policy* means Section 2 of the Upstate Policy on the Identification and Management of Conflicts of Interest and Commitment.
4. *FCOI report* means an institution's report of a financial conflict of interest to a sponsored research entity.
5. *Financial interest* means anything of monetary value, whether or not the value is readily ascertainable.
6. *Institution* means any organization that applies for or receives sponsored research funding, such as Upstate Medical University.
7. *Institutional responsibilities* means an investigator's professional responsibilities on behalf of the Institution, and as defined by the Institution, which may include research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as IRBs and Data and Safety Monitoring Boards.
8. *Investigator* means the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of sponsored research, or proposed for such funding, which may include, as an example, collaborators or consultants.
9. *Manage* means taking action to address a financial conflict of interest, which can include reducing or eliminating the financial conflict of interest, to ensure, to the extent possible, that the design, conduct, and reporting of research will be free from bias.
10. *PD/PI* means a project director or principal investigator of a sponsored research project; the PD/PI is included in the definitions of senior/key personnel and investigator in this policy.
11. *Related parties* means an investigator's spouse, domestic partner, and dependent children.
12. *Research* means a systematic investigation, study, or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social sciences research. This term encompasses basic and applied research and product development, and includes any such activity for which research funding is available through a grant, cooperative agreement or contract.
13. *Research Conflict of Interest Committee* means the committee appointed by the Upstate Vice President for Research to review decisions by the Research Conflict of Interest Officer that significant financial interest of an investigator may constitute financial conflict of interest and to develop plans for managing or eliminating the financial conflicts of interest at Upstate.
14. *Research Conflict of Interest Officer* means that individual appointed by the Upstate Vice President for Research who has the authority to review significant financial interests disclosed by investigators to determine if a financial conflict of interest may be present.
15. *Senior/key personnel* means the PD/PI and any other persons identified as senior/key personnel by the institution in the grant application, progress report, or any other report submitted to the research sponsor.
16. *Significant financial interest (SFI)* means
 - a. a financial interest consisting of one or more of the following interests of the investigator and related parties that reasonably appears to be related to the investigator's institutional responsibilities and includes:

- 1) with regard to any publicly traded entity, the value of remuneration received from that entity during the 12 months preceding and the value of any equity interest as of the date of disclosure that when aggregated exceeds \$5,000 (including salary and any payment for services not otherwise identified as salary, such as consulting fees, honoraria, paid authorship);
 - 2) with regard to any non-publicly traded entity, the value of remuneration received from that entity during the 12 months preceding the date of disclosure that when aggregated exceeds \$5,000 or when the investigator or related parties hold any equity interest; or
 - 3) intellectual property rights and interests (e.g. patents, copyrights) upon receipt of income related to such rights and interests.
- b. the occurrence of any reimbursed or sponsored travel related to institutional responsibilities paid by an entity, including a nonprofit, but excluding travel sponsored by a government agency, institution of higher education, an academic teaching hospital or medical center, or a research institute affiliated with an institution of higher education. Travel disclosures must include the purpose of the trip, name of sponsor/organizer, destination, and duration.
 - c. significant financial interest does not include salary, royalties or other remuneration paid by the institution where the investigator is currently employed or appointed, including intellectual property rights assigned to the institution and agreements to share in royalties related to such rights; any ownership interest in the institution if it is a commercial or for-profit organization; income from investment vehicles, such as mutual funds and retirement accounts, provided the investigator does not directly control investment decisions; income from seminars, lectures, or teaching engagements sponsored by government agencies, institutions of higher education, academic teaching hospitals, medical centers, or research institutes affiliated with institutions of higher education; or income from service on advisory committees or review panels for a government agency, institution of higher education, academic teaching hospital, medical center, or research institute affiliated with an institution of higher education.
17. Small Business Innovation Research (SBIR) Program means the extramural research program for small businesses that was established by awarding entities of the federal government in 1982 under Pub L. 97-219 and also includes the Small Business Technology Transfer Program, established in 1992 by Pub.L. 102-564 and reauthorized under Pub L. 112-81 as the SBIR/STTR Reauthorization Act of 2011 under the National Defense Reauthorization Act.
 18. Sponsored Programs Office Director means that individual at Upstate who is responsible for the submission of sponsored research applications and acceptance sponsored research funds on behalf of the Research Foundation of SUNY, and who is responsible for obtaining significant financial interest disclosures from all investigators prior to submission of sponsored research applications.
 19. Vice President for Research means that individual at Upstate who appoints the Research Conflict of Interest Officer and members of the Research Conflict of Interest Committee, approves management plans when it has been determined that significant financial interests constitute financial conflicts of interest, imposes administrative sanctions when there is noncompliance with this policy or with an approved management plan, and assures compliance with 42 CFR Parts 50 Subpart F and 94 of the PHS Conflict of Interest regulations in terms of reporting and public disclosure.

D. Policy

Upstate Medical University shall take the following steps to identify and manage financial conflict of interests to assure that research conducted at Upstate by faculty and subrecipients is, to the extent possible, free from bias that could result from such financial conflicts of interest:

1. Upstate establishes and maintains this up-to-date, written, enforced policy, including Section 2 related to financial conflicts of interest that complies with the PHS Financial Conflict of Interest regulations of 42 CFR Part 50 Subpart F and 45 CFR Part 94. This policy is posted on the Upstate Medical University publically accessible section of Upstate's web site at <http://www.upstate.edu/researchadmin/policies.php> and will also be made available to any requestor within five business days of a request.
2. Upstate informs all of its investigators of this policy, including this financial conflict of interest section of the policy and of investigators' responsibilities regarding disclosure of significant financial interests under this policy, and requires each investigator to complete FCOI training prior to engaging in sponsored research and at least every four years thereafter, and immediately when this Upstate policy is revised or procedures changed in any manner that affects the requirements of investigators, when an investigator is new to Upstate, or Upstate finds that an investigator is not in compliance with this policy or management plan.
3. Upstate ensures that subrecipient investigators comply with this policy by incorporating language into subrecipient written agreements that state whether the Upstate Policy on the Identification and Management of Conflicts of Interest and Commitment or the policy of the subrecipient institution will apply to subrecipient investigators and, if complying with subrecipients' policies, require the subrecipient to certify that their policy is in compliance with 42 CFR Part 50 Subpart F and 45 CFR Part 94. If the subrecipient institution cannot provide such certification, Upstate will require that subrecipient investigators comply with the Upstate policy. In its subrecipient agreements, Upstate will require subrecipients to report FCOI to Upstate within 45 days and report subrecipient financial conflicts of interest to PHS prior to expenditure of funds or within 60 days of identification of subrecipient FCOI, or according to the timeframes required by other research sponsors.
4. Upstate designates the Sponsored Programs Office Director as the individual responsible for receipt of investigator disclosures of SFI and the Research Conflict of Interest Officer as the Upstate official responsible for review of such disclosures of SFI.
5. Upstate requires that each investigator planning to participate in the design, conduct or reporting of sponsored research must disclose SFI at the time of application for funds for that project, disclose updated SFI annually during the funded period, and submit an updated disclosure of SFI within 30 days of discovering or acquiring new SFI.
6. Upstate has established the following guidelines to be used by the RCOI Officer to determine if the SFI is likely to be an FCOI:
 - a. that the SFI is related to the sponsored research and could be affected by the sponsored research or is in an entity whose financial interest could be affected by the research or
 - b. that the SFI could directly and significantly affect the design, conduct or reporting of the sponsored research.

7. Upstate requires that FCOI must be managed or eliminated, including conflicts of a subrecipient investigators, before the expenditure of sponsored research funds and delegates development of management plans to the Research Conflict of Interest Committee and approval by the VP for Research, as well as the conduct of retrospective reviews and mitigation reports, as might be necessary per 42 CFR 50.605(a) of the PHS regulations.
8. Upstate will provide FCOI reports to the Research Foundation of SUNY and all research sponsors, according to their reporting requirements.
9. Upstate will maintain records related to all investigator disclosures of SFI, review of and response to such disclosures, and all actions under this policy or retrospective reviews, for three years from the date the final expenditures report is submitted to the research sponsor, or where applicable, other dates as specified in 45 CFR 74.53(b) and 92.42(b) for different situations.
10. Upstate delegates enforcement mechanisms that provide for employee sanctions or other administrative actions to assure investigator compliance to the Offices of VP for Research and President, respectively.
11. In each sponsor application, Upstate, through the Sponsored Programs Office, will certify that it has an up-to-date, written policy and enforced administrative procedures to identify and manage FCOI with respect to all sponsored research projects, promotes and enforces investigator compliance with the policy and procedures, manages FCOI, and fulfills all sponsor reporting requirements.
12. Upstate's policy complies with all provisions of 42 CFR Parts 50 Subpart F and 94 and applies these provisions to all sponsored research
13. Upstate has established procedures to publicly post this policy and all disclosed significant financial interest that meets the following three criteria on the public portion of its website to assure that the public has access to this information:
 - a. the SFI was disclosed and is still held by the senior/key personnel,
 - b. it has been determined by Upstate that the SFI is related to the sponsored research, and
 - c. the SFI is an FCOI
14. Upstate will post the following information on the public portion of its website, to be updated annually or within 60 days of receipt and/or identification of previously undisclosed SFI or upon the disclosure of SFI of senior/key personnel new to the research project, for all SFI that meets the above three criteria:
 - a. Investigator name
 - b. Investigator title and role with respect to the research project
 - c. The research sponsor and title of the research project
 - d. Name of the entity in which the SFI is held
 - e. Nature of the SFI
 - f. Approximate dollar value of the SFI in ranges or a statement that the SFI is one whose value cannot be readily determined
15. Upstate will retain this publicly disclosed information on its public website for three years from the date that the information was most recently updated.

E. Implementation

Implementation of the FCOI portion of this policy at Upstate Medical University will commence on or before August 24, 2012 and continue until amended. Implementation will include the following components: Education and Training, Disclosure of SFI, Review of SFI Disclosure and Determination if SFI May Be FCOI, Development and Oversight of Management Plans, Actions to Address Noncompliance with this Policy or Management Plans, Reporting to Research Sponsors, and Public Access to Upstate FCOI Policy and Identified FCOI.

1. Education and Training

- a. All Upstate faculty, staff, students and fellows who engage in the design, conduct or reporting of sponsored research will be provided with a copy of the Upstate Policy on the Identification and Management of Conflicts of Interest and Commitment on/before 8/24/12 (or upon hire after that date) and be familiar with the policy as it applies to their patient care, research, and educational responsibilities at Upstate.
- b. All Upstate faculty, staff, students and fellows who engage in the design, conduct or reporting of sponsored research must successfully complete training. At the time of the incorporation of the PHS regulations into this policy, this training will consist of successful completion (score of 80 or higher) the CITI Conflict of Interest Modules, "Financial Conflicts of Interest: Overview, Investigator Responsibilities, and COI Rules" and "Institutional Responsibilities as They Affect Investigators" by 9/15/12 or prior to submission of a sponsored research application or acceptance of sponsored research funds between 8/24/12 and 9/14/12 and repeat this training every four years thereafter. Successful completion of this CITI training will be required in order to participate in a sponsored research project application as an investigator in the design, conduct, or reporting of the research, and additional CITI modules or training activities may be required at a later date.
- c. Subrecipients investigators must document that they have completed CITI or an equivalent FCOI training program according to the timeframes in E.a.ii. above.

2. Disclosure of Significant Financial Interests (SFI) by Investigators

- a. All investigators who participate in the design, conduct, or reporting of a research project will be required to submit an Upstate Medical University Disclosure Form (attached) prior to the submission of an application for sponsored research support, within 30 days of discovering or acquiring new SFI, and annually during the period of the sponsored research to the Upstate Sponsored Programs Office. PIs on sponsored research applications will be expected to identify everyone on the research team who is responsible for the design, conduct or reporting of research and, therefore, must submit a Disclosure Form to the Sponsored Programs Office
- b. Disclosure Forms must be submitted to the Sponsored Programs Office prior to the submission of a sponsored research application in a manner determined by that office.
- c. Investigators must disclose all SFI, including related parties' SFI, on the disclosure form.
- d. The Sponsored Programs Office will transmit completed disclosure forms to the Research Conflict of Interest (RCOI) Officer for review.
- e. The Sponsored Programs Office will determine if subrecipients on Upstate applications for sponsored research will follow the Upstate policy or the policy of their institution.
 - 1) If subrecipients follow the Upstate policy, all subrecipient investigators must submit an Upstate Disclosure Form to the Upstate Sponsored Programs Office prior to the submission of the sponsored research application.

- 2) If subrecipients follow their institution's policy, they must provide a copy of that policy or a certification that their institution's policy is compliant with 42 CFR Parts 50 Subpart F and 94 prior to submission of the sponsored research application.
3. Review of SFI Disclosure and Determination if SFI May Be FCOI
 - a. All disclosure forms transmitted from the Sponsored Programs Office to the RCOI Officer will be reviewed by the RCOI Officer to determine if disclosed SFI could be FCOI using the following guidelines:
 - 1) that the SFI is related to the sponsored research and could be affected by the sponsored research or is in an entity whose financial interest could be affected by the research, or
 - 2) that the SFI could directly and significantly affect the design, conduct or reporting of the sponsored research.
 - b. When the RCOI Officer determines that SFI could be FCOI, the RCOI Officer will notify the investigator and the RCOI Committee.
 4. Development and Oversight of Management Plans
 - a. When it has been determined by the RCOI Officer that SFI may be FCOI, the RCOI Committee will meet with the investigator (including a subrecipient investigator if the Upstate FCOI policy applies to the subrecipient) to review the RCOI's findings to confirm that there is a financial conflict and to create a plan to manage or eliminate the financial conflict. Key elements of the management plan include:
 - 1) the role and principal duties of the conflicted investigator in the research project
 - 2) conditions of the management plan
 - 3) how the management plan is designed to safeguard objectivity in the research project
 - 4) confirmation of the investigator's agreement to the management plan
 - 5) other information as needed to determine the FCOI is being managed or eliminated
 - b. This management plan may include one or more of the following:
 - 1) public disclosure of FCOI
 - 2) for human subjects research projects, disclosure of FCOI directly to participants
 - 3) appointment of an independent monitor to take measures to protect the design, conduct or reporting of research
 - 4) modification of the research plan
 - 5) change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research
 - 6) reduction or elimination of the financial interest
 - 7) severance of relationships that create financial conflicts
 - c. The RCOI Committee will meet monthly and its schedule will be posted on the Research Administration website along with the names of the RCOI members and the RCOI Officer.
 - d. Once the investigator and RCOI Committee have agreed to a plan to manage/eliminate FCOI, the plan will be submitted to the VP for Research for final approval.
 - e. The investigator will be required to comply with the terms of the Management Plan during the funded period of the sponsored research.
 - f. The RCOI Committee will determine if oversight of the Management Plan is required, and if so, include the names and duties of the oversight committee in the plan.
 - g. All Management Plans must be developed and approved prior to the acceptance of funds from a research sponsor by the Sponsored Programs Office on behalf of the Research Foundation of SUNY.

5. Actions to Address Noncompliance with the Disclosure Requirements
 - a. When Upstate identifies SFI that was not disclosed in a timely manner by an investigator or not previously reviewed by Upstate during a sponsored research funded period, within 60 days of the discovery, the RCOI Officer shall request and review the SFI and determine if the SFI is related to the sponsored research and whether an FCOI is likely to exist.
 - b. The RCOI Officer will notify the investigator of the results of this review and the actions to be taken to manage the FCOI going forward, including the development and approval of a management plan.
 - c. Within 120 days of the discovery of the failure to disclose or review a disclosure, Upstate shall complete a retrospective review of the investigator's activities and the sponsored research project to determine whether any sponsored research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of such research.
 - d. The following will at a minimum be documented in a retrospective review: project number, project title, PL/PD contact, name of investigator with FCOI, name of entity with which the investigator has an FCOI, reason(s) for the retrospective review, detailed methodology used for the retrospective review, findings of the review, and conclusions of the review.
 - e. If the results of the review warrant, Upstate will update a previously submitted FCOI report specifying the actions to be taken to manage the FCOI.
 - f. If bias is found, Upstate will notify the research sponsor and submit a mitigation report that includes the key elements documented in the retrospective review and a description of the impact of the bias on the research project, and Upstate's plans to eliminate or mitigate the effect of the bias and any additional measures that are determined to be necessary with regard to the investigator's participation in the sponsored research project.
6. Actions to Address Noncompliance with an Approved Management Plan
 - a. Whenever it is determined that an investigator is noncompliant with an approved Management Plan, the VP for Research will be notified of the noncompliance. The VP for Research may impose administrative actions or sanctions or take other action.
 - b. In addition, within 120 days of the identification of noncompliance, Upstate shall complete a retrospective review of the investigator's activities and the sponsored research project to determine whether any sponsored research, or portion thereof, conducted during the time period of the noncompliance, was biased in the design, conduct, or reporting of such research.
 - c. The description of the retrospective review and actions taken to update previously submitted FCOI reports and mitigate any bias that is found are described above in E.e.iv-vi.
7. Reporting to Research Sponsors and the Research Foundation of SUNY
 - a. Upstate will comply with all research sponsor reporting requirements regarding disclosure of SFI, determination that SFI is FCOI, development and implementation of management plans, retrospective reviews and results, and public disclosure of FCOI.
 - b. With regard to PHS-sponsored research, Upstate will submit the following to the PHS awarding component (CDC, NIH, HRSA, SAMSHA):
 - 1) an FCOI report regarding any SFI determined to be FCOI and an assurance that a management plan to mitigate/eliminate the FCOI has been implemented prior to the expenditure of any PHS funds and annually during the funded period specifying any changes to the management plan and if the FCOI is still being managed or why the FCOI no longer exists.

- 2) for any SFI that has been identified as FCOI subsequent to the submission of the initial FCOI report, including the FCOI of an investigator new to the research project, an FCOI report and assurance of implementation of a Management Plan will be submitted within 60 days.
 - 3) When it is determined that SFI was not disclosed by an investigator or not previously reviewed or managed by Upstate, Upstate will complete and submit a retrospective review within 120 days.
 - 4) If bias is found, Upstate will immediately submit a mitigation report.
 - 5) All FCOI reports will include the following at a minimum: project number, PI/PD, name of investigator with FCOI, name of entity with which the investigator has FCOI, nature of the FCOI, value of financial interest specifically or in dollar ranges, a description of how the financial interest related to the PHS-funded research and the basis for the determination that SFI is FCOI, and a description of key elements of the management plan. Key elements may include role and principal duties of the conflicted investigator in the research project, conditions of the management plan, how the management plan is designed to safeguard objectivity in the research project, confirmation of the investigator's agreement to the management plan, how the management plan will be monitored to ensure investigator compliance, and other information as needed and appropriate.
- c. Upstate will comply with all Research Foundation of SUNY reporting requirements.

8. Public Disclosure of Upstate's FCOI Policy and Identified FCOI

- a. Upstate's FCOI policy, incorporated into the Policy on the Identification and Management of Conflicts of Interest and Commitment, is located on Upstate's publicly accessible website at <http://www.upstate.edu/researchadmin/policies.php>. Updated/modified versions of this policy will be posted within 30 days of update at this URL.
- b. The following information will be publicly disclosed and updated annually or within 60 days of receipt and/or identification of previously undisclosed SFI or upon the disclosure of SFI of senior/key personnel new to the research project, for all SFI that meets these three criteria: the SFI was disclosed and is still held by the senior/key personnel, it has been determined by Upstate that the SFI is related to the sponsored research, and the SFI is an FCOI
 - 1) Investigator name
 - 2) Investigator title and role with respect to the research project
 - 3) Title of research project and the research sponsor
 - 4) Name of the entity in which the SFI is held
 - 5) Nature of the SFI
 - 6) Approximate Dollar value of the SFI in ranges or a statement that the SFI is one whose value cannot be readily determined
- c. the above publicly disclosed information will remain on the publicly accessible section of the Upstate website for three years from the date that the information is most recently updated.

F. Other Specific Topics Requiring Scrutiny

1. Relations with Industry and Other Organizations in Sponsored Research

SUNY Upstate Medical University is committed to promoting objectivity in research and complying with all applicable federal and state regulations regarding conflict of interest. A conflict of interest has the potential to compromise or bias the professional judgment or objectivity of the holder of the interest or has the appearance of having the potential to compromise or bias the holder of the interest.

Any personal monies that covered individuals receive from pharmaceutical and/or medical device companies must be reported to their supervisor and the Research COI Committee, regardless of the amount or type of compensation.

Recruitment incentives are offered by some study sponsors to investigators or other persons on the research team for enrolling or accelerating the enrollment of subjects. These referral fees are paid to doctors or other practitioners for referring their patients to another investigator's study. The practice of accepting or offering financial incentives (bonuses) for subject enrollment and referrals, sometimes referred to as "finder's fees," may compromise the integrity of the study and may generate an unethical conflict of interest. Therefore, Upstate does not allow covered individuals to accept or to offer recruitment incentives, including finder's fees.

Also, any payments to the University or other professional or research accounts received from such companies that are not directly related to the conduct of a sponsored project and any consultancy or board membership for an external agency involved in the research or sponsored project in any way must be reported by the covered individual to the Research COI Committee.

The report should include the sponsor's name, any subcontractor or sub-recipient, or owner or licensee of any product, process, or technology studied in the project.

University investigators must disclose in any publication or presentation of their research the existence and nature of all possibly related personal financial interests and related external executive positions.

2. Gifts from research sponsors

- a. Gifts to members of the research team from research sponsors are prohibited because such gifts are intended or may appear to influence the individual in the performance of his or her research activities. Even gifts of nominal value, such as logo pens, pads, mugs, and other items, should be declined. Gifts offered to study subjects may be allowed, if approved in advance by the Institutional Review Board (IRB).
- b. Reimbursement for travel and associated expenses, such as lodging and meals, related to an investigator's institutional responsibilities is appropriate but must be disclosed by that investigator (for example, travel to an investigator's meeting, when the investigator is conducting the clinical trial at Upstate).

3. Use of University resources including privileged information

- a. Covered individuals must not use confidential or privileged information acquired by the University for personal gain. As an example, covered individuals should avoid consulting arrangements with Industry through which they may risk sharing confidential proprietary information acquired through sponsored University projects.
- b. University resources, including but not limited to laboratory facilities, work products, results, or information developed with University funding or other Upstate support should not be used for personal gain. This includes using the SUNY Upstate Medical University name in a manner that implies that the University is associated with, sponsors, or endorses this external activity. It is appropriate to use the University name on abstracts for meetings or publications where no monetary personal gain is involved. One can utilize the University name on a research or teaching textbook or chapter, where personal gain is involved, as long as it is clear that Upstate is not sponsoring or endorsing the contents of the textbook or book chapter.

4. Purchasing, contracting, and other business transactions on behalf of the University

Upstate employees must not make personal investments in organizations that they have reason to believe may be directly involved in or related to decisions made by the employee on behalf of Upstate or will otherwise create substantial conflict between duties on behalf of Upstate and private interests.

Upstate employees may not represent Upstate in any transactions with a business entity or organization if they or their family have a financial or other interest in that entity.

Procurement of goods or services on behalf of Upstate must be consistent with Upstate, SUNY, and Research Foundation procurement policies.

Upstate employees may not accept employment or engage in any business or professional activities that will impair the independence of their judgment in the exercise of duties for Upstate.

Upstate employees may use confidential information gained in the course of their duties only in furtherance of their official Upstate duties and may not use Upstate, Research Foundation or SUNY confidential information to further their personal interests or that of family members. Upstate employees cannot accept employment or engage in any outside business or professional activity that will require them to disclose Upstate, SUNY or Research Foundation confidential information.

Upstate employees cannot misappropriate the property, services or other resources of Upstate, SUNY, the RF or others – whether for themselves or for someone else.

Upstate employees may not, by their conduct, give reasonable basis for the impression that any person can improperly influence them or unduly enjoy their favor in the performance of their Upstate duties, or that they are affected by the kinship, rank, position, or influence of any party or person.

Upstate employees may not use, or attempt to use, their positions to secure unwarranted privileges or exemptions for themselves or others. Bribery, extortion, and other attempts to exert undue influence are strictly prohibited.

A covered individual may not participate in awarding, negotiating, reviewing, or approving a financial transaction (including but not limited to purchases, contracts, and subcontracts) involving the university and an entity in which the individual has a personal financial interest without prior review and approval as described below. Where an individual is involved in the design, conduct, or reporting of University research related to that individual's personal financial interest, that potential conflict of interest is governed by the sections below titled "Intellectual Property" and "Financial Conflict of Interest in Sponsored Research."

A covered individual may assist in the negotiation of license agreements for University intellectual property. However, only an individual duly authorized by the Research Foundation of SUNY may execute a license agreement.

Covered individuals routinely involved in the negotiation, approval or administration of University contracts with external entities must file a Conflicts of Interest *Declaration Form* annually with the Research Conflict of Interest Committee.

If an individual has not filed a Conflict of Interest *Declaration Form* and is prospectively involved in awarding, negotiating, reviewing, or approving a financial transaction involving the University and a private interest of that individual, the conflict of interest must be reported to the individual's supervisor to the Research Conflict of Interest Committee and the supervisor shall reassign that transaction to another employee under such supervision management as is deemed appropriate by the Research Conflict of Interest Committee.

Covered individuals must involve the appropriate institutional contract professionals in finalizing all contracts. For instance, for clinical trials, the Sponsored Programs Office and the Research Foundation of SUNY will finalize and execute all contracts, respectively.

5. Intellectual property

The SUNY Upstate Medical University "Strategic Plan for Strengthening Research (2008)" calls for Upstate fostering the invention and development of new patentable technologies by entrepreneurial faculty, staff, and students. The SUNY Research Foundation (RF), through the Upstate Office of Technology Transfer, attempts to license those inventions, approved by the Upstate Institutional Patent Committee and Vice President for Research, to appropriate Industry partners. In this way, new technologies created by Upstate faculty, staff, and students may reach the market for the public good. Licensing of these patentable technologies is for the benefit of Upstate and its employees, including the inventors, SUNY RF, and the public. Any time an Upstate inventor or a member of their immediate family (including a spouse, domestic partner, or dependent child), has the potential for financial benefit from an invention or patent owned by or licensed to a pharmaceutical or device company except for patent income paid directly from Upstate under the Patent Policy, the Upstate inventor must report this potential financial interest to the Research COI Committee using the UME Financial Disclosure Form. In addition, any external consulting relationship between the Upstate inventor and the Industry holder of the license must be requested and approved, in advance, by the Research COI Committee. Prior approval by the Research COI Committee is required before any Upstate inventor can undertake a founding role in any company. Any covered individual inventor (or an immediate family member) who holds equity in, is an officer or director of, or provides consultative services without prior Research COI Committee approval to an entity that has licensed or acquired rights to a SUNY Upstate Medical University invention will be deemed to have a conflict of interest under this policy. Financial disclosure is required upon receipt of income related to intellectual property rights and interests (e.g., patents, copyrights), other than income received under the Patent Policy.

6. **Individuals on University review panels**

Important conflict of interest responsibilities also exist for individuals participating on panels providing scientific and/or administrative review and evaluation on behalf of the University – such as the Institutional Review Board (IRB) for the Protection of Human Subjects, the Institutional Animal Care and Use Committee (IACUC), the Research Conflict of Interest Committee, purchase evaluation committees, etc.

All panel members will submit a *COI Declaration Form* and a *COI Disclosure Form* (if necessary) at the time of their initial appointment with updating annually and more often when circumstances change. If any member of a University review panel has a financial interest, or has a member of the immediate family (including a spouse, domestic partner, or dependent child) with a financial interest, in a matter subject to the panel's review, that individual must report the conflict of interest to the panel's chair. If the panel chair deems the conflict to be material to the matter under review, the panel member shall recuse him/herself from the deliberations and voting on the matter. The recusal shall be documented in the panels' minutes.

7. **Ghostwriting**

Articles written by Industry-paid writers who are not credited as an author ("ghostwriters") hide conflicts of interest in that the real writers' ties to Industry go unreported. Typically, such ghost authors are professional medical writers who are employees or consultants for a pharmaceutical or medical device company. The practice raises further concerns when physicians sign their names to articles containing data which the physicians have not carefully reviewed and may not have access to the original data. The International Committee of Medical Journal Editors (ICMJE) has adopted a set of authorship principles that are considered to be the "gold standard." The University will ensure that employees and students are aware of these principles, and that they understand that they are responsible for upholding these standards.

Therefore, all covered individuals involved in the reporting of -sponsored research should follow the guidelines of the ICMJE, which state that authorship means "substantive intellectual contributions," including conception or analysis of the subject and drafting or critical revision of the document. It is dishonest to claim authorship on a paper to which one has not substantially contributed.

Similarly, every person who has made actual contributions to an article that satisfies the qualifications for authorship outlined by the ICMJE needs to be included in the list of authors, with a full disclosure of their conflicts of interest.

A covered individual should not be listed as co-author of any manuscript that has been drafted by one or more "ghost authors." In addition, covered individuals should always be responsible for the content of any papers or talks that they give, including the content of platform and poster presentations.

G. **Implementation**

The operational responsibility for the implementation of this policy is delegated to the Research of Interest (COI) Officer, described above.

Section 3. Personal Financial Interests of University Leadership in Industry

A. Introduction and Purpose

University officials with leadership or supervisory positions have unique authority over the allocation of University resources, procurement, or adoption of specific technologies or materials, and the shaping of how the institution carries out its educational, research, and clinical missions. For this reason, financial interests of leadership pose not only potential individual conflicts of interests, but concerns of institutional conflicts of interest. As is often the case with alleged conflicts of interest, a co-existing financial interest does not inevitably affect decision-making. However, the very appearance of a potential conflict for a leader, between doing what is in the institution's best interest and what is in one's own personal financial interest, can undermine trust and the ethical climate within an institution.

B. Scope of Policy

This policy applies to:

1. President, SUNY Upstate
2. Vice Presidents of the University
3. Chief Executive Officer, University Hospital
4. Deans of the Colleges of Graduate Studies, Health Professions, Medicine, and Nursing
5. Chair of the Pharmacy and Therapeutics Committee, University Hospital
6. Chair of the Institutional Review Board, the IRB Administrator, and Chief Compliance Officer for Research
7. Chair, Values Analysis Committee, University Hospital and the Values Analysis Coordinator

C. Policy

Those individuals indicated above under "Scope of Policy" are required to divest themselves of all personal investments and other financial relationships with Industry. These include:

1. Equity interests in Industry, but does not include mutual funds or similar investment vehicles over which the owner does not have direct control of purchasing or selling;
2. Acceptance of consulting fees, advisory board fees, honoraria, "in kind" compensation, gifts, or other remunerations from an Industry source;
3. Service as an officer, director, or board member of an Industry entity;
4. Service on the scientific advisory board of a commercial sponsor of research conducted at Upstate.⁸

D. Implementation

1. Scope

This section will address implementation of the policy regarding Personal Financial Interests of University Leadership in Industry.

2. Responsibility for Implementation

The operational responsibility for the implementation of this policy is delegated to the Conflict of Interest (COI) Officer.

⁸ This list is adapted from the AAMC report, *Protecting Patients, Preserving Integrity, Advancing Health* (2008)

Section 4. Conflict of Commitment⁹

A. Introduction and Purpose

It is in the interest of Upstate Medical University and its faculty and staff to encourage and embrace collaboration and interaction with external partners in the development of ideas, research, policy, or the application of university work to real world concerns. At the same time, fulfilling their responsibilities to Upstate requires the primary and full commitment of faculty and staff. A conflict of commitment may arise when a covered individual's efforts on outside activities interfere, or may appear to interfere, with the amount or quality of their efforts fulfilling primary obligations to Upstate in the areas of education, research, patient care, service, and/or administration. This policy provides a definition and context for conflict of commitment and provides guidelines for managing external efforts when conflicts arise.

Conflicts of commitment arise when either the amount of time an individual spends on external efforts interferes with his or her ability to meet responsibilities to Upstate or the external efforts adversely affect the quality of their efforts in fulfilling obligations to Upstate. Conflicts of commitment also may arise in use of the Upstate name/brand or use of Upstate facilities or resources in the support of external activities.

The Conflict of Interest policy of the State University of New York¹⁰ states that "University faculty and staff may not engage in other employment which interferes with the performance of their professional obligation" and "In instances where potential or actual conflicts exist, faculty and staff are expected to consult with appropriate university officers.... It is the responsibility of campus officials...to identify potential or actual conflicts...and take appropriate steps to manage, reduce, or eliminate them." Nothing in this policy shall take precedence over existing laws, policies, and negotiated agreements with any union of employees.

B. Scope of Policy

This section applies to all SUNY Upstate employees (including faculty, staff, residents, fellows, others in training), and employees of the Research Foundation, the Medical Service Groups (MSGs), and MedBest.

Examples of potential conflicts of commitment include, but are not limited to:

- External consulting, employment, or contract work, including contracts for clinical service or teaching in other institutions, whether in person or online
- Research proposals submitted under the name of another organization, when Upstate could also have sponsored such research
- Membership on boards or directorships
- Significant involvement with professional organizations
- Serving as expert witness in legal cases

⁹ This sections is informed by the AAMC report, *Protecting Patients, Preserving Integrity, Advancing Health*, SUNY Conflict of Interest Policy, SUNY Faculty Disclosure Policy, and institutional policies from Cornell University, Indiana University, Purdue University, Johns Hopkins University, Stanford University, the University of North Carolina at Chapel Hill, University of Oregon, and Vanderbilt University.

¹⁰ SUNY Policy 6001

- Development of spin-off or start-up businesses, especially when the individual has management or administrative responsibilities (n.b., using the Upstate brand or logo in association with a business is prohibited without University approval.)
- Spending time on external efforts on behalf of another Upstate employee (e.g., preparing briefs, preparing presentations, managing billing for services)

C. Policy

1. Guidelines regarding conflict of commitment. These guidelines address the identification of potential conflict of commitment, provide limits on time spent on external efforts, and outline the process for disclosing, reviewing, and resolving conflicts of commitment. The guidelines apply to any potential conflict of commitment related to the definition or examples above.
2. Identification of potential conflict of commitment. Ideally, conflicts of commitment will be prevented by discussion prior to making external commitments, but conflicts may also be identified after they have occurred.
 - a. Role of the statement of professional expectations (or the performance program).
A clear statement of professional expectations or obligations is essential in the assessment of whether or not a faculty or staff member is meeting 100% of their commitments to Upstate. This statement is the responsibility of the department chair or supervisor and should be updated annually.
 - b. Clarifying potential conflict before external commitments are made. Each faculty or staff member is responsible for obtaining approval from his or her department chair or supervisor for any external efforts prior to committing to that effort.
 - c. Identifying potential conflict of commitment after commitments are made.
 - 1) Incidental awareness. Covered individuals who identify any concerns about potential conflict of commitment for themselves or for others should bring this to the attention of the department chair or supervisor.
 - 2) Periodic surveillance. Department chairs and supervisors are responsible for obtaining and reviewing annual disclosure information from covered individuals regarding their external efforts (see below for annual disclosure).
3. Limits on type of external activities allowed. Only activities that demonstrably enhance the covered individual's professional career and fulfill or enhance, in some way, the University's mission are permissible.
4. Limits on time spent on external activities. This guideline refers to total external effort.
 - a. For full-time faculty and Management Confidential employees, a limit of 3 work days per month or 36 work days per year on external commitments is acceptable, *provided they continue to fulfill 100% of their commitments and professional obligations to the University* as determined by their department chair or supervisor. These 36 days exclude vacation time, sick leave, pass days, and holidays. Nothing in this policy shall take precedence over existing negotiated agreements with any union of employees. Covered individuals may engage in other employment or other activities when they are not "on duty" at Upstate, provided relevant conflicts are declared.
 - b. For part-time covered individuals, a proportionate limit of time on external efforts should be determined. In some circumstances, especially for part-time work less than 0.5 effort, it may be appropriate to limit further or exclude allowable external effort, based on the responsibilities outlined in their statement of expectations.

- c. Instances of exceeding the time limit guidelines should be exceptional and may be granted only if approved by the department chair in consultation with the dean of the relevant college or the unit head in University Hospital in consultation with the CEO of University Hospital. Deans, vice presidents, and the CEO of University Hospital should seek approval for exceptions from the person to whom they report. The president should seek approval from the chair of the Upstate Medical University Council.
5. Disclosure, review and resolution
- a. **Annual disclosure.** All covered individuals are required to disclose potential conflicts of commitment on an annual basis to their department chairs or supervisors.
 - b. **Review and resolution of conflicts.** Department chairs and supervisors will review annual disclosure statements and meet with covered individuals when potential conflicts are identified. Initial meetings will be informal at which time the department chair or supervisor and faculty or staff will try to identify a resolution. Concerns that cannot be addressed in this manner will be referred to the appropriate dean or administrator for resolution. If the conflicts remain unresolved, they will require institutional review.
 - 1) Institutional review. Unresolved conflicts will be brought to the institutional Conflict of Interest Officer. The COI officer, with input from the Research COI Committee if appropriate, will make recommendations to the Associate Senior Vice President for Operations or the Vice President for Research, as appropriate, who will determine a resolution within 30 calendar days of receipt. Extensions may be granted for extenuating circumstances.
 - 2) Appeal. If the covered individual does not agree with the resolution recommended above, he/she may submit a written appeal to the President within ten working days from receipt of the recommended resolution. The President will review the case, seeking advice of appropriate experts, and notify the covered individual of his/her decision and reasons for it within 30 calendar days of receipt. Extensions may be granted for extenuating circumstances.

Determining the appropriate balance between fulfilling obligations to the University and external obligations is challenging and requires reflection, communication, and judgment informed by thoughtful and collaborative members of the Upstate community. Department chairs and heads of units within University Hospital may wish to develop more circumscribed guidelines for external activity within their own departments or units, with the approval of their dean or supervisor.

Section 5. Review and Evaluation of the Policy on the Identification and Management of Conflicts of Interest and Commitment

This policy shall be reviewed and evaluated periodically by the University to determine if it is working as intended and whether any modifications are needed. This review and evaluation as well as any changes in the Policy will be made available to the University community.

This policy incorporates all requirements of the August 24, 2012 PHS Financial Conflict of Interest regulations (42 CFR Parts 50 Subpart F and 94) and apply to all sponsored research applications submitted by Upstate or conducted at Upstate on/after 8/24/12.

Appendices:

1. PHS Policy on Financial Conflict of Interest 42 CFR Parts 50 Subpart F and 94
2. Upstate Medical University Disclosure Form



**Upstate Medical University
Financial Disclosure Form**

Name:	
Title of Position:	
Department:	Phone/Email:
Proposal Title:	
Sponsor Name:	
Application Due Date:	Disclosure Submission Date:

WHO MUST DISCLOSE

Investigator: the project director or principal investigator or any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of sponsored research

Investigator's Related Parties: spouse, domestic partner, and dependent children

WHAT MUST BE DISCLOSED

Significant Financial Interest: consists of one or more of the following

- With regard to a publicly traded entity, the value of remuneration received from that entity during the prior 12 months, including salary and any payment for services, such as consulting fees, honoraria, paid authorship; and equity interest, including stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.
- With regard to a non-publicly-traded entity, the value of remuneration received from the entity in the prior twelve months.
- With regard to any non-publicly traded entity, any equity interest held, such as stock, stock option, or other ownership interest
- Intellectual property rights and interests (patents, copyrights) upon receipt of income related to such rights and interests.
- Reimbursed or sponsored travel that is paid on behalf of the investigator/related parties not reimbursed, related to institutional responsibilities but excluding sponsored travel by a federal, state or local government; an institution of higher education; an academic teaching hospital; a medical center; or a research institute affiliated with an institution of higher education.

WHAT NEED NOT BE DISCLOSED

- income from the investigator's employer, including salary, royalties, or other remuneration paid by the Investigator's employer; intellectual property rights assigned to the institution and agreements to share in royalties related to such rights; or equity interest in that employer institution.
- income from investment vehicles that the investigator does not directly control, such as mutual funds and retirement accounts.
- income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government; an institution of higher education; 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, an institution of higher education; an academic teaching hospital; a medical center; or a research institute affiliated with an institution of higher education.

WHEN MUST SIGNIFICANT FINANCIAL INTEREST BE DISCLOSED BY INVESTIGATORS

- prior to submitting an application for sponsored research
 - annually during the sponsored research funding period
 - if any significant financial interest not previously disclosed is discovered or acquired
 - when an investigator is new to a research project following application and/or an award
1. List the names of all publicly traded entities from which you or a Related Party receive remuneration or in which you or a Related Party hold an equity interest. Report only those entities that reasonably appear to be related to your institutional responsibilities and from which the aggregate of (i) remunerations received in the preceeding 12 months, and (ii) the current value of equity interests exceeds \$5,000.

Name	Relationship	Entity	Nature

2. List the names of all non-publicly traded entities other than the Research Foundation or the State of New York from which you or a Related Party receive a remuneration. **Report only those entities that reasonably appear to be related to your institutional responsibilities and from which remunerations received over the preceding 12 months exceed \$5,000.**

Name	Relationship	Entity	Nature

3. List the names of all non-publicly traded companies in which you or a Related Party hold an equity interest. **Report only those entities that reasonably appear to be related to your institutional responsibilities.**

Name	Relationship	Entity	Nature

4. List and describe intellectual property rights or interests (e.g., patents, copyrights) held by you or a Related Party, royalties from such rights, and/or agreements to share in royalties related to such rights that reasonably appear to be related to your institutional responsibilities. Do not include intellectual property rights assigned to SUNY or the Research Foundation, or agreements to share in royalties related to such rights.

Name	Relationship	Nature	Income Received (Y/N)

5. List and describe any reimbursed or sponsored travel related to your institutional responsibilities. You do not need to disclose travel that was reimbursed or sponsored by a federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

Purpose of Trip	Sponsor/Organizer	Destination	Duration

© I have read and understand the Upstate Medical University Policy on the Identification and Management of Conflicts of Interest and Commitment.

<http://www.upstate.edu/researchadmin/policies.php>

Declaration:

I declare that the above information is true and correct.

Signature

Date

START-UP NY AFFILIATION AGREEMENT

THIS AGREEMENT (this "AGREEMENT") dated as of November 30, 2015, by and between The State University of New York ("SUNY"), an education corporation an educational institution organized and existing under the laws of the State of New York, with its principal office located at State University Plaza, Albany, New York 12246, acting on behalf SUNY at Upstate Medical University, 750 East Adams Street Syracuse New York, 13210 and New York State Urban Development Corporation, d/b/a/ Empire State Development Corporation ("ESDC"), a not-for-profit public benefit corporation ("The AFFILIATE") governed by the New York State Urban Development Corporation Act as amended (the "UDC Act") and the New York State Public Authorities Law as amended, having its principal place of business located at 633 Third Avenue, New York, NY 10017. Terms herein may be used before being defined.

W I T N E S S E T H

WHEREAS, the New York State Legislature has determined that to revitalize the economy of the State of New York (the "State"), it is necessary and appropriate to promote entrepreneurship and job creation by transforming public higher education institutions through the establishment of tax free areas, to attract high tech businesses, startups companies, venture capital, new business and investments from across the world; and

WHEREAS, in furtherance of this objective the State Legislature created the "START-UP NY program" under Chapter 68 of the Laws of 2013 (as amended from time to time, the "Act"), which authorizes the creation of tax-free areas ("Tax-Free NY Areas") on eligible university campuses in New York State, including SUNY campuses, for new and expanding businesses to both foster job creation and enhance the academic mission of the participating universities; and

WHEREAS, SUNY is sponsoring Tax-Free NY Areas to foster job creation to enhance the academic mission of its participating campuses as set forth in the Act and to make available vacant land and space in such Tax-Free NY Areas for use by eligible business under the Act; and

WHEREAS, pursuant to the Act, the Board of Trustees of SUNY has designated Upstate Medical University as one of its participating campus in the START-UP NY program and has submitted to the Commissioner a "Campus Plan for Designation of Tax-Free NY Area(s)" (as it may be amended from time to time, the "College Plan") for the designation of certain eligible property associated with the College; and

WHEREAS, the regulations associated with the Act (5 NYCRR § 220) (the "Regulations") define "campus" to include any real property in New York State owned or leased by an affiliated not-for-profit entity on behalf of a university or college or for the benefit of a university or college, and any such additional real property acquired, established, operated or contracted to be operated for or on behalf of the university or

college; in addition the Regulations require that real property owned or leased by a not-for-profit entity on behalf of a university or college or for the benefit of a university or college must be utilized by the university or college in furtherance of any stated academic mission of that university or college.

WHEREAS, AFFILIATE is an instrumentality of the State of New York, constituting a political subdivision and public benefit corporation, created under the laws of New York for the public purposes set forth in the New York State Urban Development Corporation Act as amended (the "Act").

WHEREAS, AFFILIATE owns the Real Property which is envisaged to be part of the College Campus for START-UP NY purposes; and

WHEREAS, SUNY and AFFILIATE are affiliated within the meaning of the Regulations as they are connected, related, or associated by virtue of their status as public entities within New York State and their shared goals and responsibilities under this AGREEMENT, as are set forth in greater detail below;

WHEREAS, the AFFILIATE mission, purposes and objectives are aligned with the academic mission of the College as are set forth in greater detail in the Amended College Plan to be approved by the Commissioner.

WHEREAS, as public entities formed under New York State Law, SUNY and AFFILIATE desire to work together to further the public purposes of job creation and public higher education in New York State through collaboration on the START-UP NY program, and desire to enter into this AGREEMENT to document their affiliation to do so; and

WHEREAS, the parties intend as a result of their affiliation that the Premises, as described in Schedule 1, shall be eligible as Tax-Free NY Areas.

NOW THEREFORE, in consideration of the mutual covenants and conditions herein set forth, the parties agree as follows:

1. AFFILIATE Affirmations.

AFFILIATE hereby affirms the following:

(a) The New York State Urban Development Corporation Act, being Subchapter I of Chapter 24 of Title 16 of the Unconsolidated Laws of New York (the "State") as amended (the "Enabling Act"), created ESDC for the benefit of the municipalities of the State and empowered ESDC to encourage maximum participation of the private sector of the economy by the sale or lease of ESDC's interest in projects, by participation in programs undertaken by the State, its agencies and subdivisions, and by municipalities and the federal government, by providing or obtaining the capital resources necessary to acquire, construct, reconstruct, rehabilitate, or improve industrial, manufacturing, commercial, educational, recreational and cultural facilities, and housing

accommodations for persons of low income, and facilities incidental or appurtenant thereto, and by carrying out the clearance, replanning, reconstruction and rehabilitation of such areas, and by taking actions to retain existing industries and attract new industries in order to promote the health, safety, morals and welfare of the people of the State by prevention of economic stagnation and the encouragement of the creation of new job opportunities so as to protect against the hazards of unemployment, to reduce the level of public assistance, to increase the revenues to the State and to its municipalities and to achieve stable and diversified economies;

- (b) the premises is owned by AFFILIATE;
- (c) AFFILIATE is interested in the START-UP NY program and is committed to its goals of transforming higher education to create tax-free communities across the State to attract high-tech and other start-ups, venture capital, new business and investments from across the world;
- (d) AFFILIATE is interested in helping SUNY assist companies, especially high tech companies and start-up businesses, to start, grow and stay in the State;
- (e) AFFILIATE acknowledges SUNY's interest in and intent to participate in START-UP NY by becoming a Sponsor, as defined in the Regulations; and
- (f) AFFILIATE acknowledges the College's academic mission as described in the College Plan (the "Academic Mission"), and that START-UP NY will align with the Academic Mission through, among other things, linkages between the College and participating businesses to provide internships and work experience to College students.

2. Term.

This AGREEMENT shall commence as of December 20, 2015 and shall expire on December 20, 2065, provided, however that the term of the AGREEMENT shall be automatically extended to run for the duration of any sublease, permit, license, or the like of any Participating Business locating within all or a portion of the Premises as part of the Start-Up New York program (the "Term"). Notwithstanding the foregoing, SUNY may, on written notice to AFFILIATE, terminate this AGREEMENT in whole or in part with respect to any portion of the Premises that is leased or otherwise occupied by a Participating Business that has been removed from the START-UP NY program by the Commissioner pursuant to the Regulations (a "Terminated Business"). In addition, SUNY may terminate this AGREEMENT on thirty days' notice to AFFILIATE, if such termination does not terminate the benefits received by any Participating Business in the START-UP NY program.

3. Premises.

The Premises that is the subject of this AGREEMENT shall be the land or space in the General Electric industrial complex, now known as "Electronics Business Park",

located on Electronics Parkway in the Town of Salina, Onondaga County New York, described from time to time in Schedule 1 (the "Premises"). The parties may revise Schedule 1 from time to time by written agreement.

4. Use of Premises; Affiliation.

(a) During the Term AFFILIATE shall, consistent with the Campus Plan, lease and manage the Premises on behalf of and for benefit of SUNY and the College for use in the START-UP NY program as a Tax-Free NY Area sponsored by SUNY for the College. The parties agree that the Premises shall be utilized in furtherance of the College's Academic Mission and in accordance with the Act and the Regulations, including, without limitation, for occupancy by businesses that are a "high tech business" or a "business in the formative stage," as defined by the Regulations. The Parties further agree that, notwithstanding the forgoing, the Premises may be used for such other purposes as are consistent with AFFILIATE's mission pursuant to the Urban Development Corporation Act.

(b) The parties hereby agree that AFFILIATE is "affiliated" with the College consistent with Section 220.2(b) of the Regulations and that the Premises is part of the College's campus for purposes of Section 220.2(f) of the Regulations.

5. Responsibilities relating to Tenants and the Management of the Premises.

(a) AFFILIATE and SUNY shall cooperate to identify businesses that are eligible for the START-UP NY program for use and occupancy of the Premises. SUNY shall have the final discretion whether to accept an application from a business to locate in the Premises. AFFILIATE shall collaborate with SUNY to market the Premises to businesses consistent with SUNY's Plan for the purpose of securing approval by SUNY and the Commissioner for participation by such businesses in the START-UP NY program under the Plan (a "Participating Business"). Such collaboration shall not prevent AFFILIATE from marketing the Premises or entering into agreements for the occupation of the Premises by businesses, other than those seeking to participate in the START-UP NY program, consistent with AFFILIATE's mission pursuant to the Urban Development Corporation Act.

(b) Notwithstanding any other terms of this AGREEMENT, AFFILIATE shall be solely responsible in all respects for the management, maintenance and operation of the Premises, including, without limitation: negotiating and entering into Leases with Participating Businesses ("Program Leases"); collection of rent and other amounts, preparation of vacant space and land for rental; providing services and utilities; oversight and management of construction projects and tenant build-out; enforcing Lease provisions; marketing; and payment of all costs of associated with the foregoing. AFFILIATE shall publicly advertise and market the Premises. SUNY shall have no obligation to perform or bear the cost of any of the foregoing.

(c) AFFILIATE shall have no authority to execute any instruments, agreements, or other documents on behalf of SUNY, or otherwise bind SUNY, except with SUNY's prior written consent.

(d) Rent and other amounts collected by or on behalf of AFFILIATE under any Program Lease (collectively, "Program Rent"), shall be retained by AFFILIATE except that the AFFILIATE and College may decide to enter into revenue sharing arrangements. AFFILIATE shall receive no compensation from SUNY under this AGREEMENT or otherwise in relation to the START-UP NY program.

(e) For the avoidance of doubt, AFFILIATE may, in its discretion, continue to lease the Premises to a Terminated Business following its removal from the START-UP NY program by the Commissioner. In the event a Participating Business has been removed from the START-UP NY program by the Commissioner pursuant to the Regulations, AFFILIATE shall, following SUNY's request, cooperate with SUNY to identify replacement space in the Premises for the START-UP NY program.

(f) SUNY shall have no liability to AFFILIATE or to any Participating Business arising out of or related to any Program Lease. To the extent permitted by law, AFFILIATE shall indemnify, defend, and hold SUNY and its officials, trustees and employees harmless against any claims, liabilities, settlements, damages, costs and expenses of whatever kind or nature (including, without limitation, attorneys' fees and disbursement) arising out of or related to any Program Lease.

6. The AFFILIATE agrees to provide SUNY with a Comprehensive General Liability Insurance in the amount of \$2,000,000.00 per occurrence and \$2,000,000.00 in the aggregate, naming the State University of New York, as an additional insured. The AFFILIATE further agrees to send the College Campus designee cited in paragraph 8 of this AGREEMENT, a copy of any notice of cancellation of such policy, renewal certificate of insurance or new certificate of insurance naming such SUNY, as an additional insured, within five (5) business days.

7. Plan Amendments; Further Assurances; Conflicts of Interest

(a) The parties agree that the Campus Plan to be approved is incorporated by reference as Exhibit B to this Agreement.

(b) AFFILIATE shall reasonably assist SUNY with amending any Campus Plans to include any property, including without limitation, providing such documents, diagrams, maps, floor plans, attestations and certifications as may be required by SUNY as necessary or useful to amend the Plan.

(c) The parties agree to execute any additional documentation as are reasonably necessary to carry out the intention of this AGREEMENT.

(d) AFFILIATE shall comply with SUNY's conflict of interest policy relating to the START-UP NY program, as such policy is in effect from time to time. The applicable

College Conflict of Interest policy or guidelines is incorporated by reference as Exhibit C to this AGREEMENT.

8. Notices

Each written notice, demand, approval or request by SUNY or AFFILIATE in connection with this AGREEMENT, unless expressly otherwise provided, shall be in writing, and shall be deemed given if either delivered in person, with delivery acknowledged in writing by the party receiving the same, or mailed in the United States mails by certified mail, return receipt requested, postpaid, and addressed:

(a) to SUNY at the following address:

The State University of New York
State University Plaza
Albany, New York 12246
Attention: Vice Chancellor, Office of Capital Facilities

with a copy to:

The Research Foundation for
the State University of New York
START-UP NY Liaison Office
35 State Street
Albany, NY 12207
Attention: Jeffrey Boyce, Director of Economic Development

(b) to AFFILIATE at the following address:

To ESDC:
New York State Urban Development Corporation
d/b/a Empire State Development Corporation
633 Third Avenue
New York, New York 10017

With a copy to:
Empire State Development
Central New York Regional Office
620 Erie Boulevard
Syracuse, New York 13204

or to such other address as may be specified by written notice sent in accordance herewith. Every notice, demand or request shall be deemed to have been given at the time of delivery if given in person, or three days after mailing.

9. Miscellaneous.

(a) This AGREEMENT shall be binding upon and inure to the benefit of SUNY and AFFILIATE and their respective successors and assigns.

(b) This AGREEMENT shall be governed and construed in accordance with the laws of New York, excluding New York State's choice-of-law principles, and all claims relating to or arising out of this contract, or the breach thereof, whether sounding in contract, tort or otherwise, shall likewise be governed by the laws of New York State, excluding New York State's choice-of-law principles.

(c) Except as otherwise provided in this AGREEMENT, any dispute arising under this AGREEMENT shall be amicably resolved by the parties. If the parties are unable amicably to resolve the dispute within thirty (30) days, then either party may seek legal or equitable redress.

(d) In carrying out this AGREEMENT, AFFILIATE shall comply with all applicable laws, including, without limitation, the Act and the Regulations.

(e) This AGREEMENT may be executed in any number of counterparts, each of which when so executed and delivered shall be deemed original, but all such counterparts together shall constitute but one and the same instrument.

(f) Subject to section 138 of the New York State Finance Law, neither party may assign, convey or transfer this AGREEMENT or any of their rights hereunder. Any such assignment, conveyance or transfer shall be deemed null and void.

(g) This AGREEMENT including Exhibit A, Standard Clauses for State University of New York contains the entire understanding of the parties with respect to the matters contained herein. In the event of any conflict between the terms and conditions set forth in this AGREEMENT and Exhibit A, Exhibit A shall control.

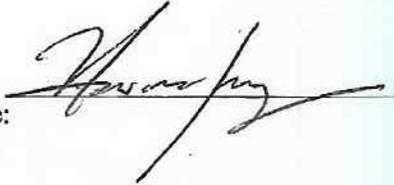
(h) Any provision of this AGREEMENT may be waived by mutual written consent of the parties hereto, provided, however, that no such waiver of any of the provisions hereof shall be binding unless in writing and signed by the party against whom the same is sought to be enforced.

(i) If any provision of this AGREEMENT is held to be illegal or invalid for any reason, such illegality or invalidity shall not affect the remaining portions of the AGREEMENT, unless it prevents accomplishment of the objectives and purposes of the AGREEMENT, which determination shall be submitted as a dispute under paragraph 9(c) herein.

IN WITNESS WHEREOF, the parties hereto have duly executed this AGREEMENT as of the day and year first above written.

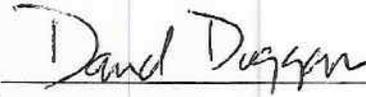
New York State Urban
Development Corporation, d/b/a/
Empire State Development

By:
Name:
Title:

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The State University
of New York
on behalf of SUNY at Upstate Medical
University Syracuse, NY

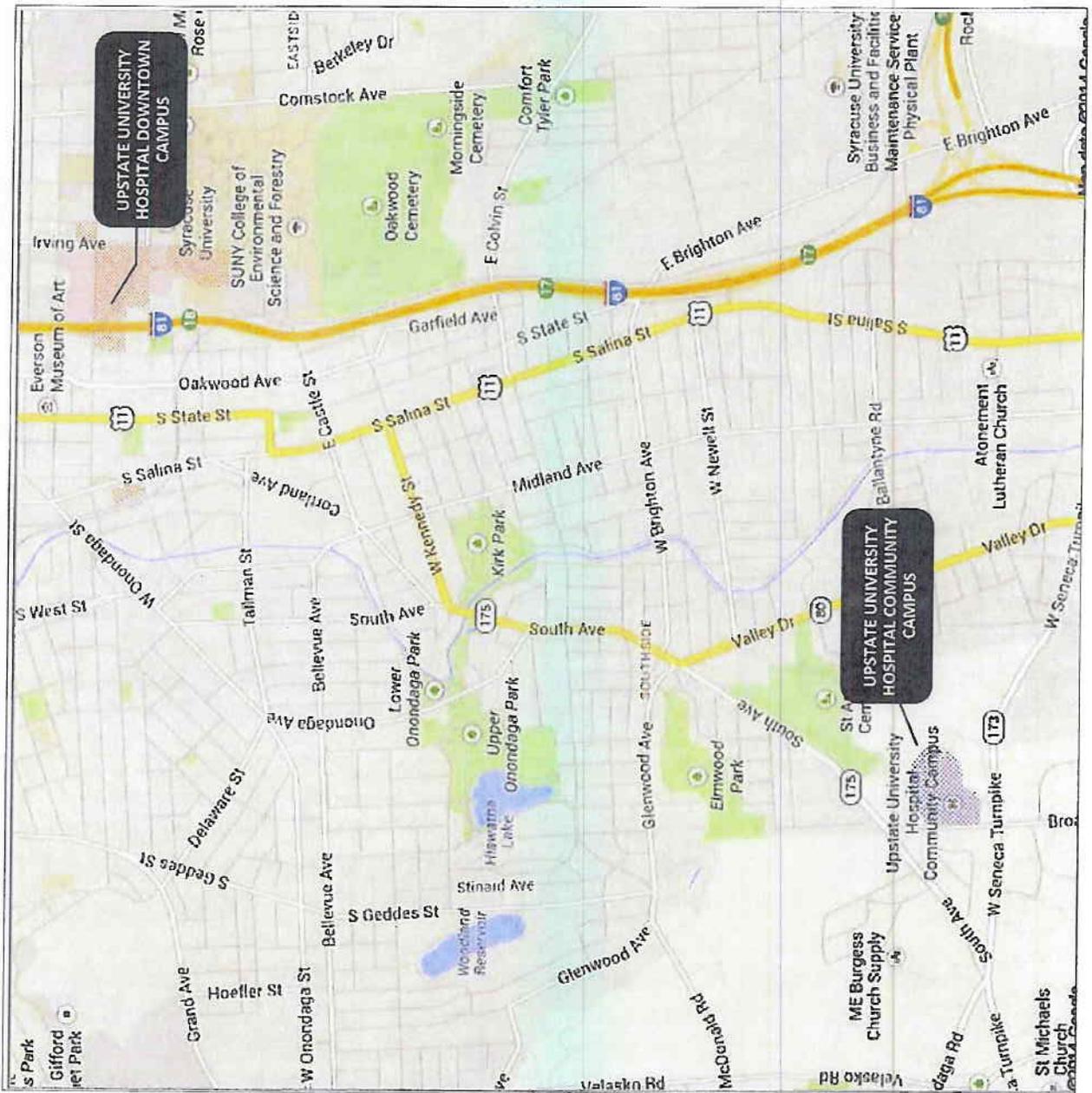
By:
Name:
Title:

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Location	UniqueID	Owner	PropertyType	Building Name	StreetAddress	City	ZipCode	ParcelID	Building Code	SpaceType	Description	Acres	Sq. Ft.	Latitude	Longitude
Syracuse	UMU-L-000099-000	SUNY Upstate Medical University	1	Upstate Medical Hospital@ Community General	1400 Broad Road	SYR	13215	#17	NA	D	Two acres of land associated with the Community General Campus. The area is open land and the location of an idle boiler house that is to be demolished.	2		76DEG10'00.34"W	43DEG00'29.91"N
Syracuse	UMU-L-000015-000	Upstate Properties Development, Inc.	1		800-1000 East Water street	SYR	13212		NA	D	Nine acres of land located 1/4 mile north of the downtown campus. It is currently open land.	9		76DEG08'07.09"W	43DEG02'59.26"N
Syracuse	UMU-L-000089-000	SUNY Upstate Medical University	1		800-1000 East Water street	SYR	13210	#7	89	D	3.86 acres of land surrounding the Bio-Technology Research Center	3.86		76DEG08'21.84"W	43DEG02'55.90"N
Syracuse	UMU-B-000089-002	SUNY Upstate Medical University	1	Bio-Tech Research Center	841 E. Fayette Street	SYR	13210	#7	89	B	Half floor of the second floor of the CNY Biotechnology Accelerator Center. Area is roughed in but not finished		4,400	43.048734	76.138333
Syracuse	UMU-B-000089-003	SUNY Upstate Medical University	1	Bio-Tech Research Center	841 E. Fayette Street	SYR	13210	#7	89	B	Third floor of the CNY Biotechnology Accelerator Center. Area is roughed in but not finished		10,000	43.048734	76.138333
Syracuse	UMU-B-000088-001	SUNY Upstate Medical University	1	Sarah Loguen Center	650 South Salina Street	SYR	13202	#2 & #3	88	C	First floor southern section of the Dr. Sarah Loguen Center. Currently unrenovated space		4,991	43.041544	76.151744
Syracuse	UMU-B-000088-002	SUNY Upstate Medical University	1	Sarah Loguen Center	650 South Salina Street	SYR	13202	#2 & #3	88	C	Second floor of the southern section of the Dr. Sarah Loguen Center. Currently unrenovated space		4,991	43.041544	76.151744
Syracuse	UMU-B-000074-001	SUNY Upstate Medical University	1	Institute for Human Performance	505 Irving Avenue	SYR	13210		74	C	First floor space within the University's Institute for Human Performance. Ready to occupy less tenant improvements		580	43.044787	76.137198
Syracuse	UMU-B-000074-002	SUNY Upstate Medical University	1	Institute for Human Performance	505 Irving Avenue	SYR	13210		74	C	Second floor space within the University's Institute for Human Performance. Ready to occupy less tenant improvements		20,000	43.044787	76.137198
Syracuse	UMU-B-000074-003	SUNY Upstate Medical University	1	Institute for Human Performance	505 Irving Avenue	SYR	13210		74	C	Space within the University's Institute for Human Performance. Ready to occupy less tenant improvements		1,221	43.044787	76.137198
Salina	UMU-B-000101-000	SUNY Upstate Medical University	1	Building 3	Electronics Parkway	SYR	13088		NA	B	Basement of two story building (33,000 sq.ft.)		33,000	43.0634N	76.1105W
Salina	UMU-B-000101-001	SUNY Upstate Medical University	1	Building 3	Electronics Parkway	SYR	13088		NA	B	First Floor of two story building with basement (35,333sq.ft.)		35,000	43.0634N	76.1105W
Salina	UMU-B-000101-002	SUNY Upstate Medical University	1	Building 3	Electronics Parkway	SYR	13088		NA	B	5.9 Acre parcel. Two story building with basement (32,000 sq.ft.)		32,000	43.0634N	76.1105W

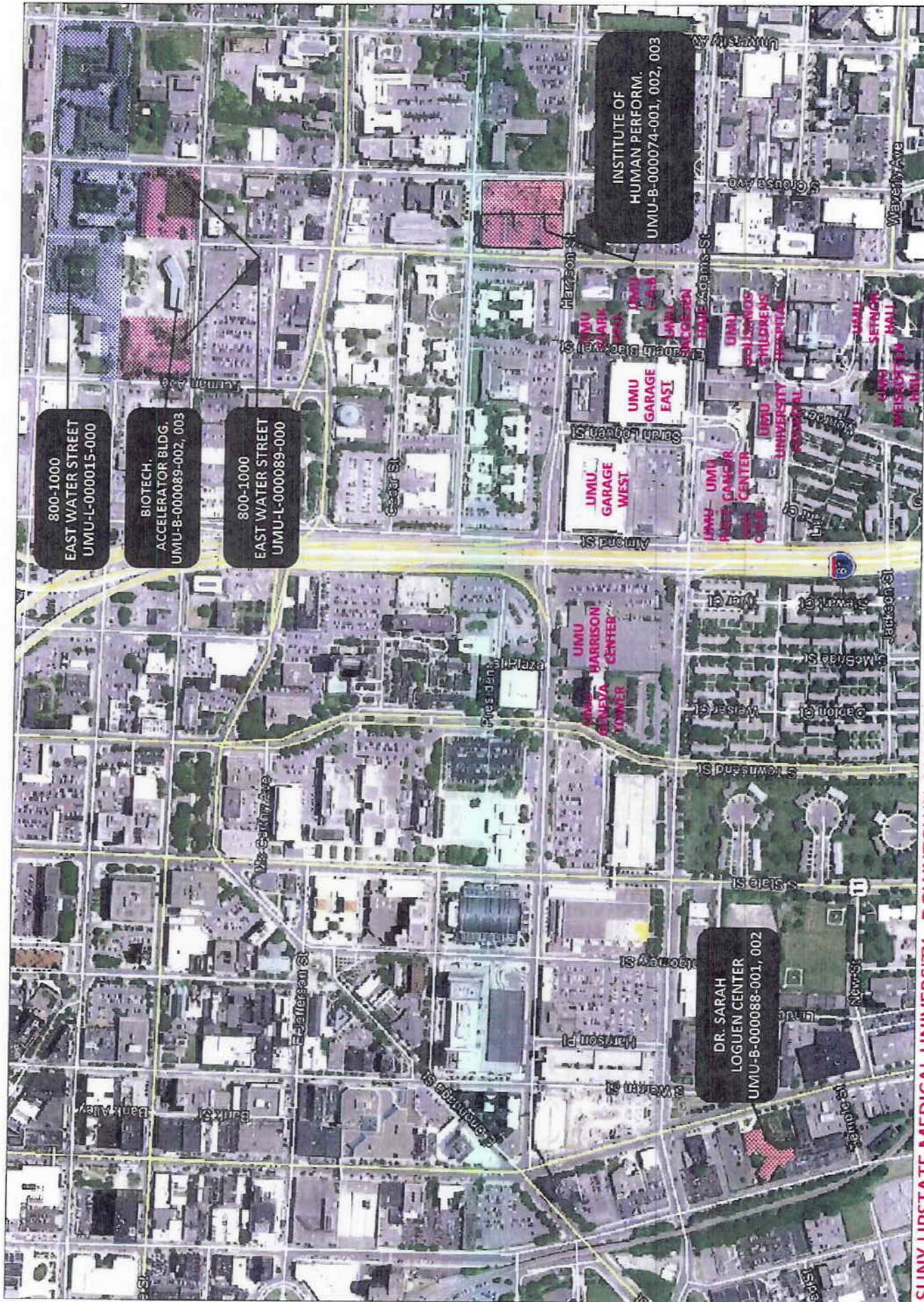
14.86 146,183

* 1= on campus
 2= 1 mile off campus
 3= State Asset
 ** A=entire building
 B=floor within building
 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



KEY	
	REPRESENTS DOWNTOWN CAMPUS
	REPRESENTS COMMUNITY CAMPUS

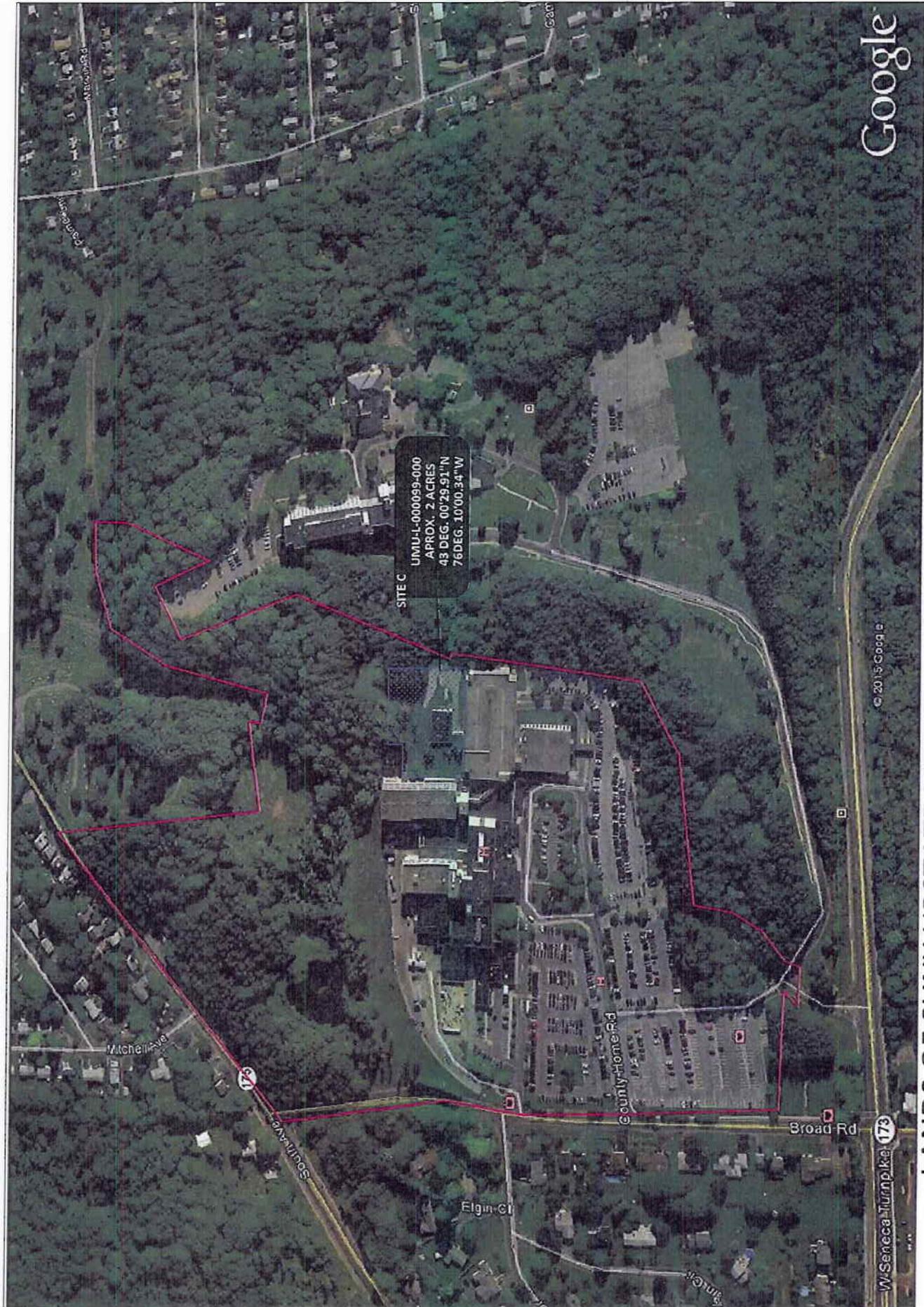
SUNY UPSTATE MEDICAL UNIVERSITY REGIONAL MAP DOWNTOWN AND COMMUNITY GENERAL CAMPUSES



SUNY UPSTATE MEDICAL UNIVERSITY - DOWNTOWN CAMPUS

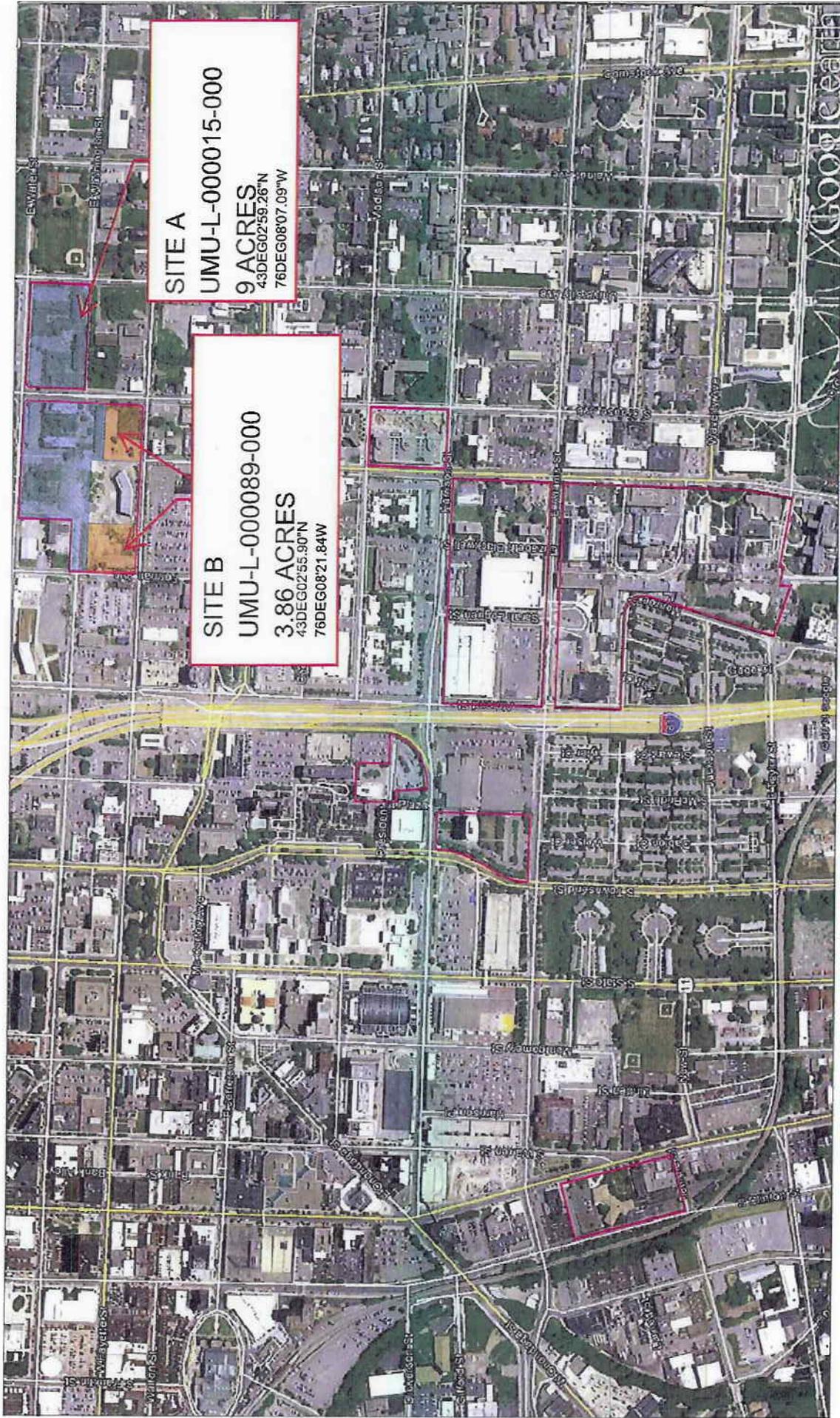
- KEY**
- REPRESENTS UPSTATE BUILDING
 - REPRESENTS PARCEL - PROPERTY OF UPSTATE MEDICAL UNIVERSITY
 - REPRESENTS PARCEL - PROPERTY OF UPSTATE PROPERTIES DEVELOPMENT INC.

- Notes:**
- 800-1000 Water Street Goggle map shows buildings which have since been razed.
 - IHP building includes recently completed addition on former parking lot located to its west.



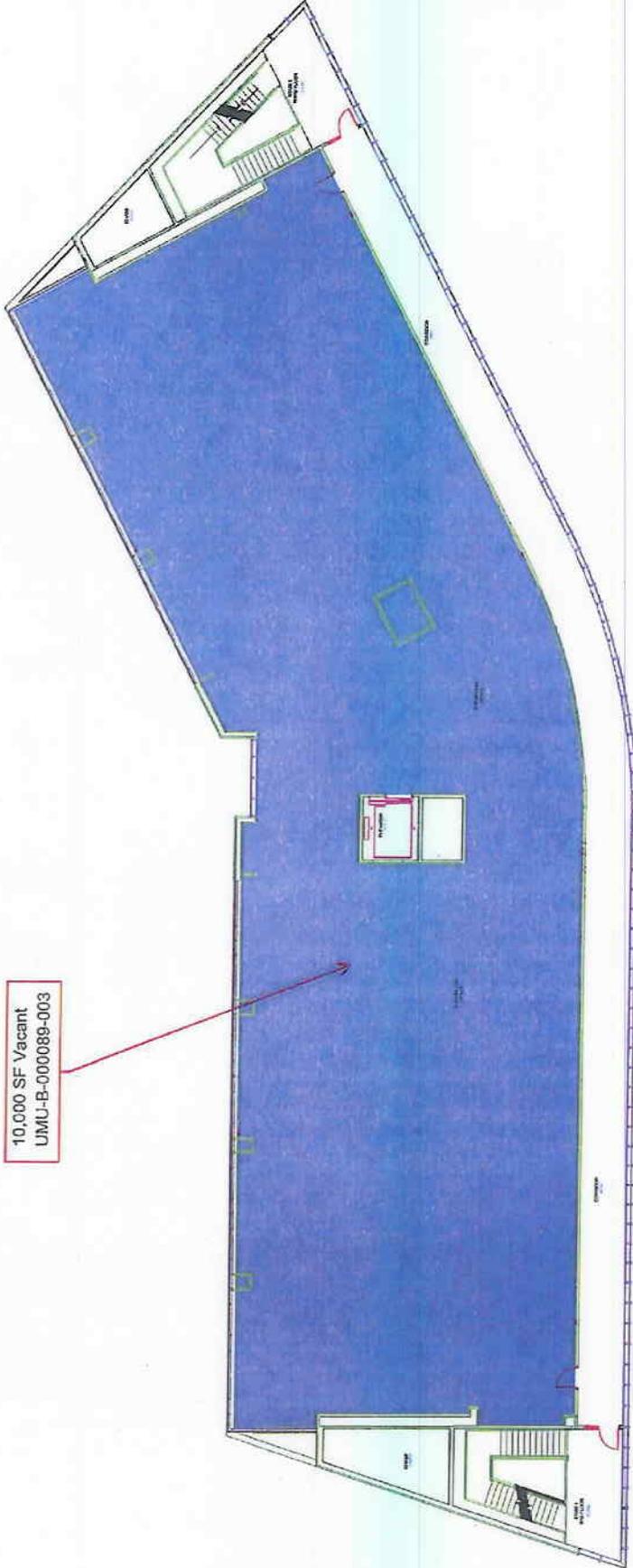
Google

LANDS OF SUNY UPSTATE MEDICAL UNIVERSITY - COMMUNITY CAMPUS



LANDS OF SUNY UPSTATE MEDICAL UNIVERSITY (DOWNTOWN CAMPUS)
INCLUDED IN TAX FREE ZONE

FIGURE 7

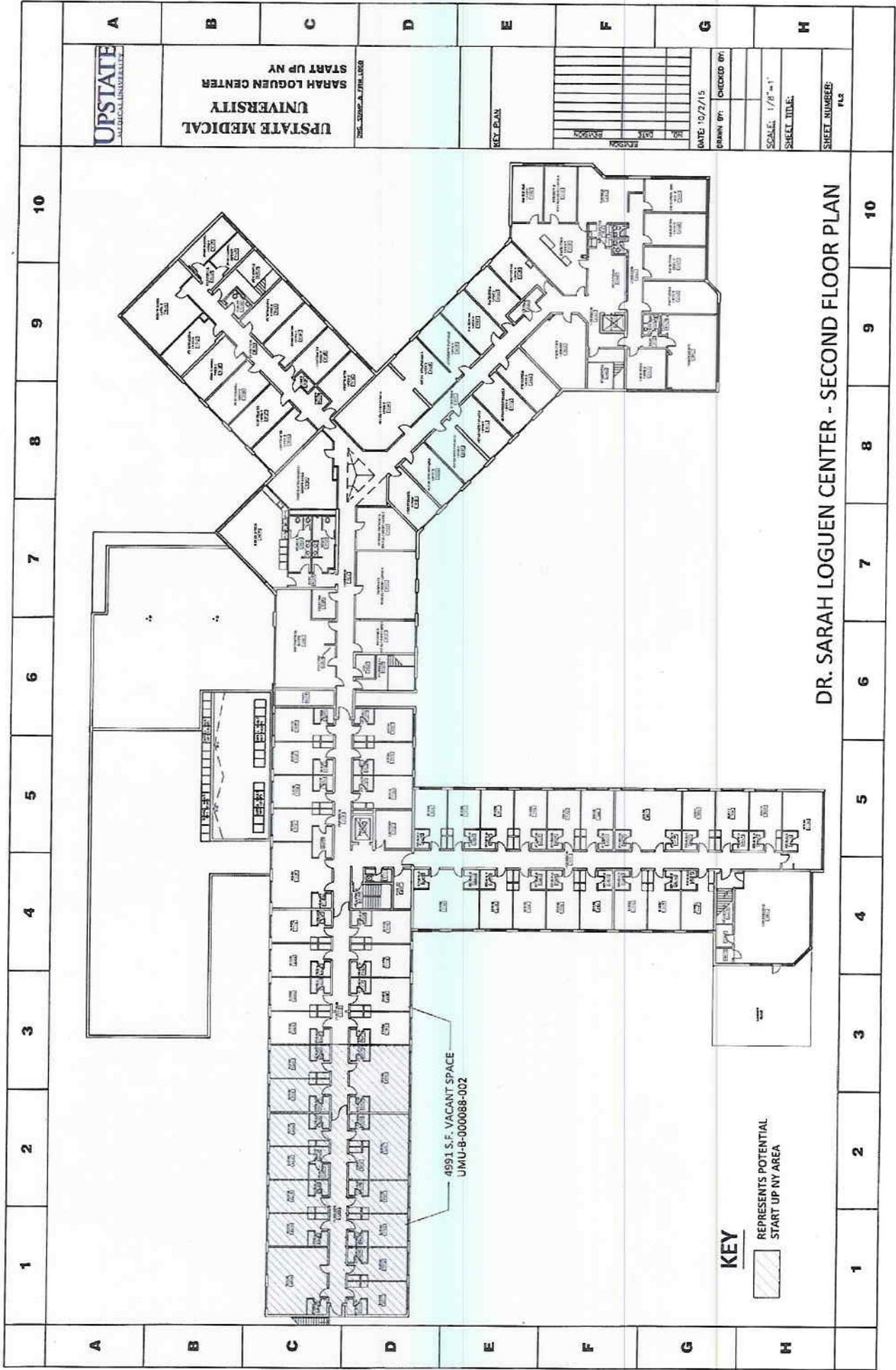


KEY


 REPRESENTS POTENTIAL
 START UP NY AREA

FIGURE 6

BIOTECHNOLOGY ACCELERATOR CENTER - THIRD FLOOR



UPSTATE
MEDICAL UNIVERSITY

UPSTATE MEDICAL
SARAH LOGUEN CENTER
START UP NY

DATE: 10/2/15

KEY PLAN

DATE: 10/2/15

NO.	DESCRIPTION	DATE	BY	CHECKED BY:

SCALE: 1/8"=1'

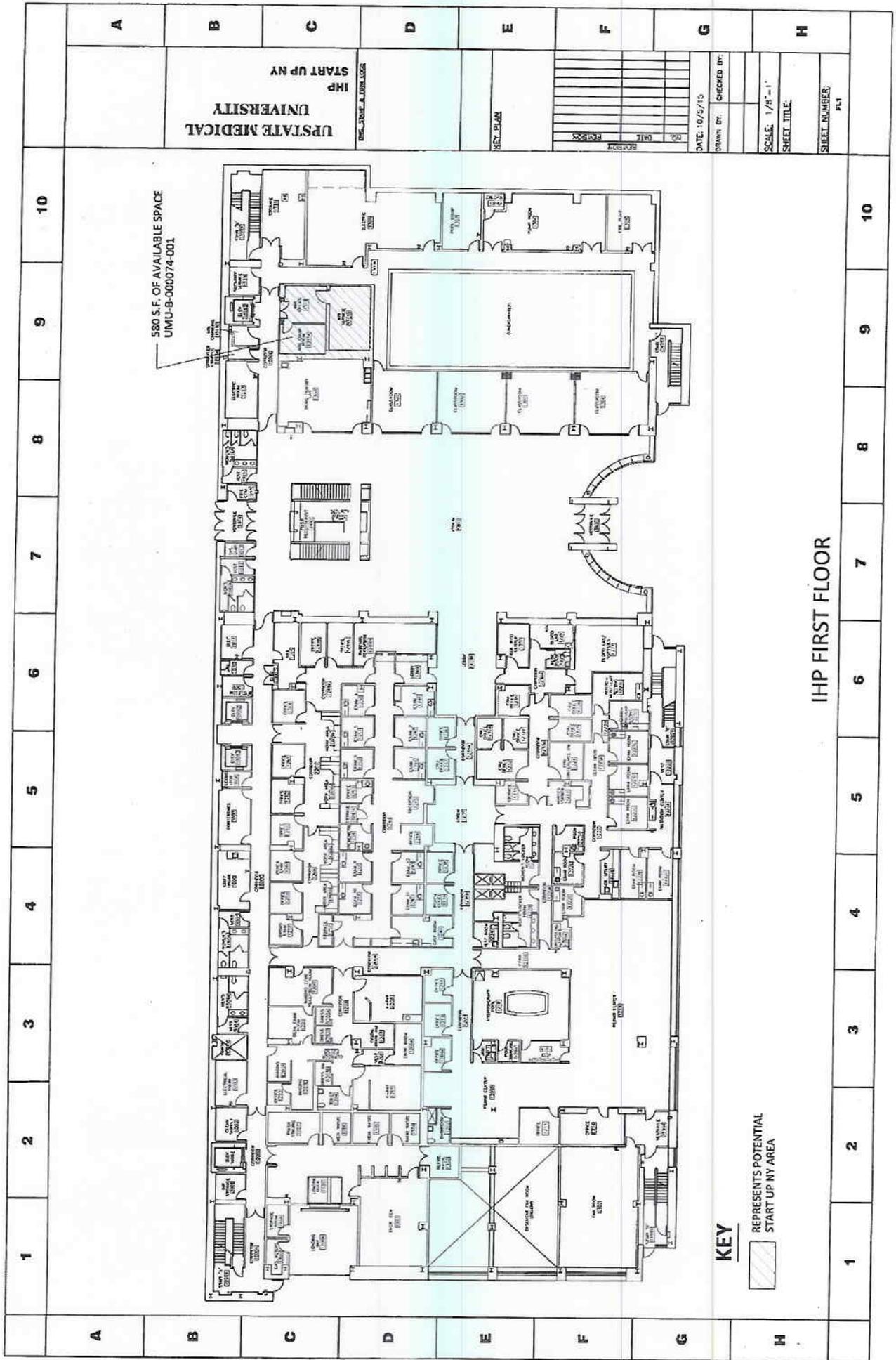
SHEET TITLE:

SHEET NUMBER: PL2

DR. SARAH LOGUEN CENTER - SECOND FLOOR PLAN

KEY

REPRESENTS POTENTIAL
START UP NY AREA



580 S.F. OF AVAILABLE SPACE
UIMU-B-000074-001

IHP FIRST FLOOR

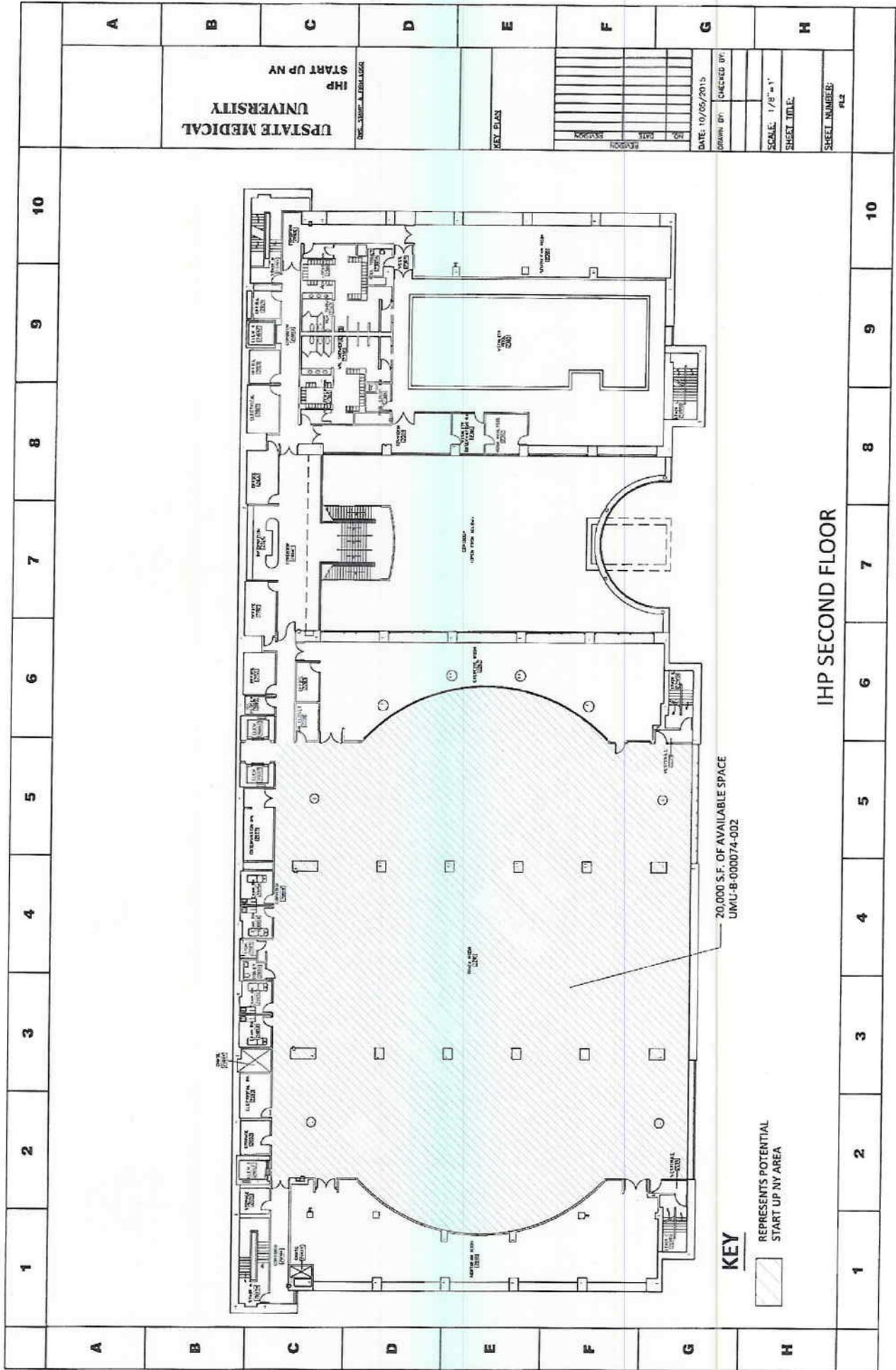
KEY
 [Shaded Box] REPRESENTS POTENTIAL
 START UP NY AREA

UPSTATE MEDICAL
 UNIVERSITY
 IHP
 START UP NY

DATE: 10/29/15
 DRAWN BY: []
 CHECKED BY: []
 SCALE: 1/8"=1'
 SHEET TITLE:
 SHEET NUMBER:
 PLOT

SET PLAIN

REVISION
 NO. DATE BY



UPSTATE MEDICAL
UNIVERSITY
IHP
START UP NY
DRG. 33000 - A. F. POLUSKA

KEY PLAN

PERSON
NO.
DATE
REVISION

DATE: 10/05/2015
DRAWN BY: A. F. POLUSKA
CHECKED BY:

SCALE: 1/8"=1'
SHEET TITLE:

SHEET NUMBER:
PLZ

20,000 S.F. OF AVAILABLE SPACE
UMC-B-000074-002

KEY

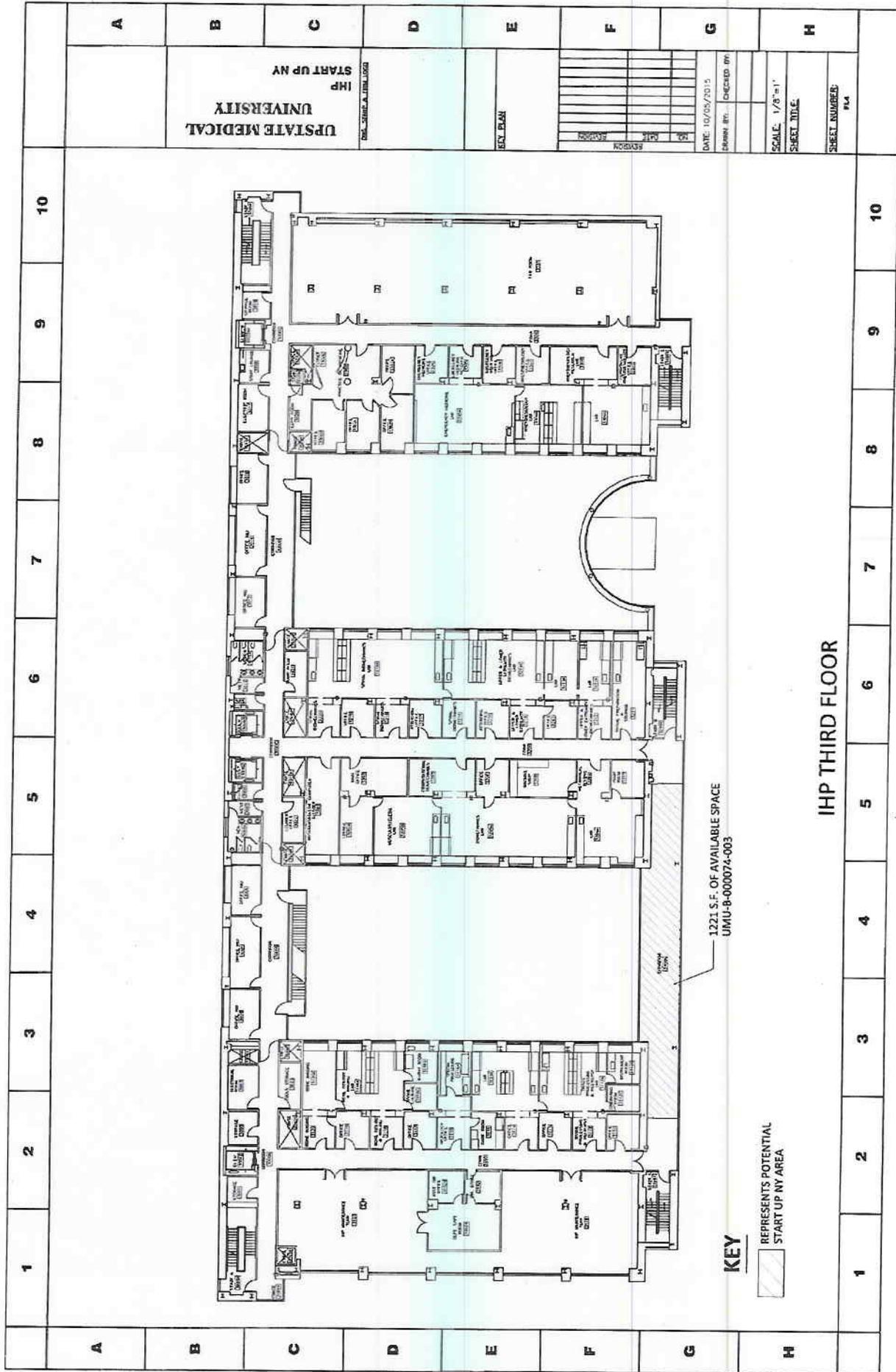
REPRESENTS POTENTIAL
START UP NY AREA

IHP SECOND FLOOR

1 2 3 4 5 6 7 8 9 10

A B C D E F G H

1 2 3 4 5 6 7 8 9 10



UPSTATE MEDICAL
UNIVERSITY
IHP
START UP NY

KEY PLAN

DATE: 10/05/2015
DRAWN BY: CHECKED BY:

SCALE: 1/8"=1'
SHEET TITLE:

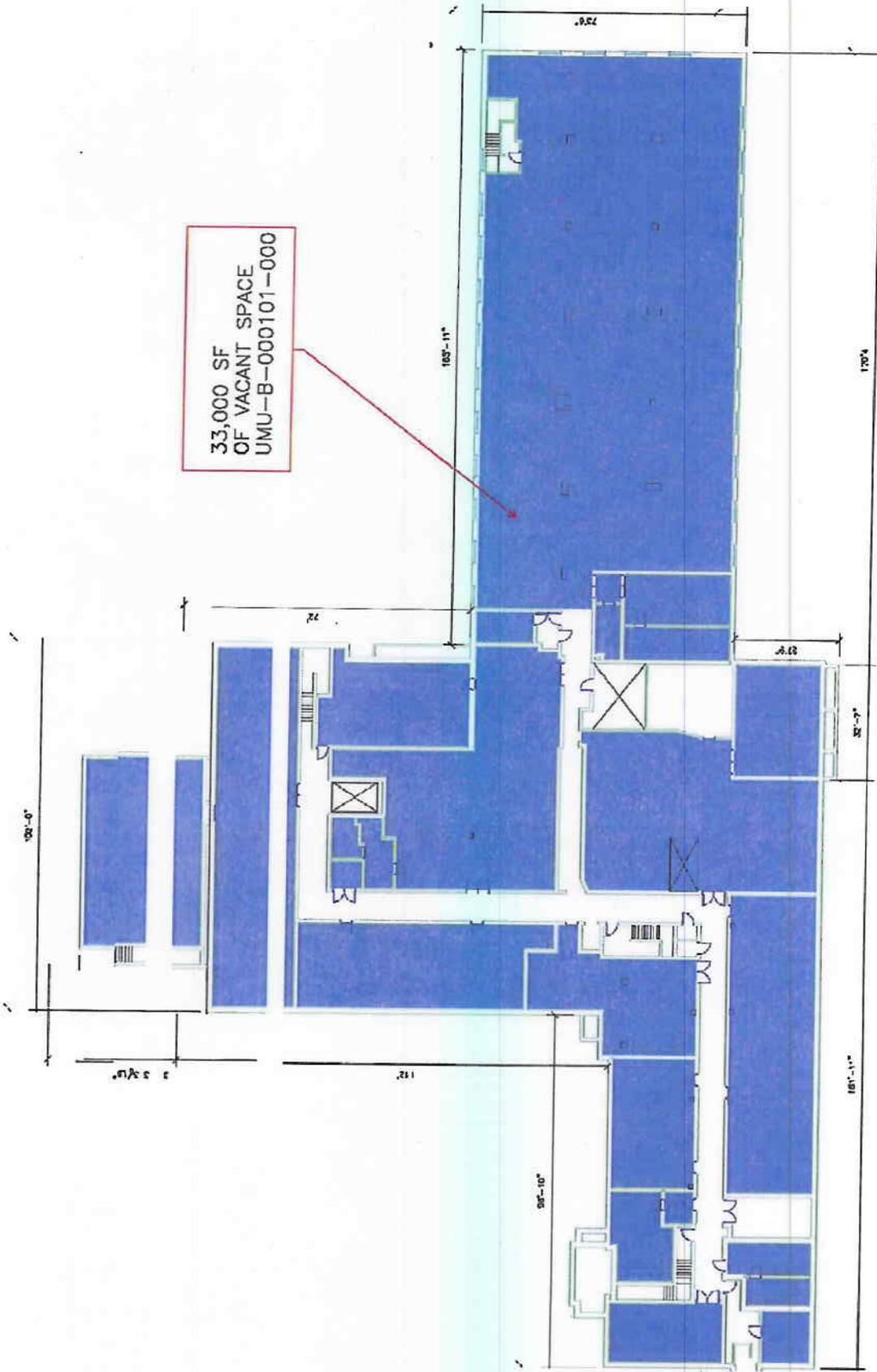
SHEET NUMBER:
104

1221 S.F. OF AVAILABLE SPACE
UMU-B-000074-003

KEY

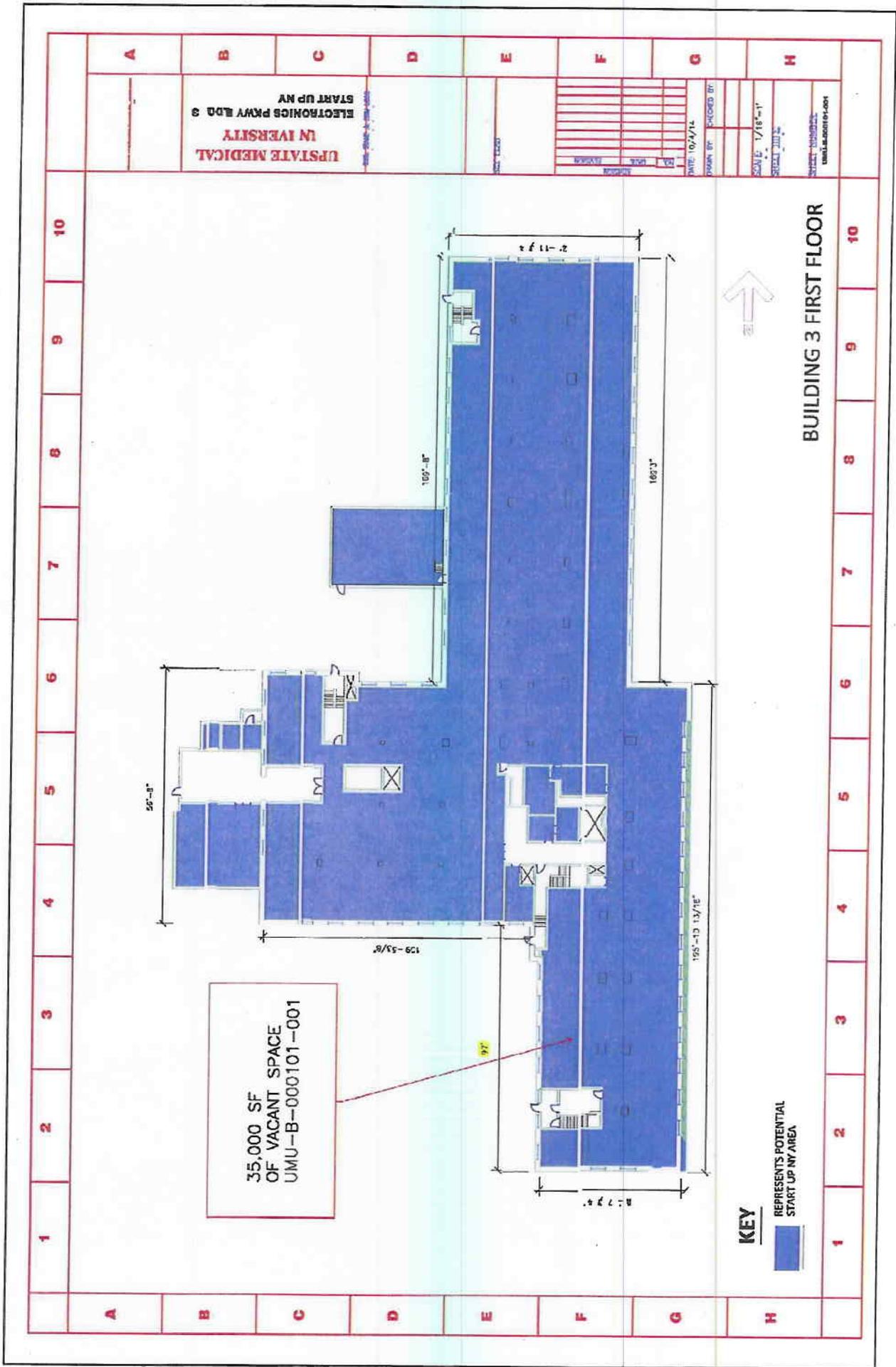
REPRESENTS POTENTIAL
START UP NY AREA

IHP THIRD FLOOR



RESENTS POTENTIAL
RT UP NY AREA

BUILDING 3 BASEMENT



UPSTATE MEDICAL
UNIVERSITY
ELECTRONICS PMW Bldg 3
START UP NY

DATE: 10/24/14
DRAWN BY: [unclear]
CHECKED BY: [unclear]
SCALE: 1/16"=1'
SHEET NO.: [unclear]
PROJECT NO.: UMU-B-000101-001

35,000 SF
OF VACANT SPACE
UMU-B-000101-001



KEY
REPRESENTS POTENTIAL
START UP NY AREA

BUILDING 3 FIRST FLOOR

