PHD CANCER BIOLOGY GRADUATE PROGRAM (CBGP)

Student and Faculty Handbook

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Introduction

The Louis V. Gerstner, Jr. Graduate School of Biomedical Sciences, Memorial Sloan Kettering Cancer Center (GSK) is the degree-granting arm of Memorial Sloan Kettering Cancer Center (MSK). Our website can be found here.

In addition to GSK, MSK is comprised of the Memorial Hospital for Cancer and Allied Diseases (MH), the clinical treatment arm of MSK that houses patient-oriented research, and the Sloan Kettering Institute for Cancer Research (SKI), which houses most of the laboratory research programs of MSK.

The mission of GSK is to advance the frontiers of knowledge by providing to gifted and creative students in an interactive, innovative, and collegial environment the education and training they need to make new discoveries in the biological sciences.

GSK strives to recruit a diverse student population and to support the development of scientists from underrepresented backgrounds in our community. Equity, diversity and inclusion, and the recruitment and support of underrepresented students, are a central focus of our mission to educate and train the next generation of leaders in the biomedical sciences.

The graduate school is housed in the Zuckerman Research Center (ZRC) located at 417 68th Street, Manhattan, on the Upper East Side in New York City. The administrative offices are located on the sixth floor, ZRC-669 adjacent to the GSK Student Center that includes a state-of-the-art classroom, study space for journal clubs, discussion groups, and student meetings.

The School

GSK was chartered by the New York State Board of Regents on September 10, 2004 to offer a curriculum in Cancer Biology leading to the Ph.D. degree. Absolute Charter was granted on March 18, 2008 and initial accreditation was granted in May 2008 and renewed in March 2015. In January 2023, GSK became accredited by the New England Commission of Higher Education and relinquished its accreditation with New York State. GSK has matriculated eighteen classes of graduate students since July 2006. GSK alumni now include over 110 graduates holding the Ph.D. degree. GSK grants only graduate degrees, there are no undergraduates enrolled. The Board of Trustees is chaired by Alan D. Schnitzer, JD, the President is Selwyn M. Vickers, MD, the Provost is Joan Massagué, Ph.D., the Dean is Michael H. Overholtzer, Ph.D., the Associate Dean is Thomas G. Magaldi, Ph.D. and the Assistant Dean is Julie Nadel, Ph.D.

A new Master of Science (M.S.) degree program in Clinical and Translational Cancer Research (CTCR) was approved by the New York State Education Department on March 19, 2019 for MSK appointed physicians. The handbook and information regarding this program are presented in a separate document.

There are currently 169 full-time faculty, all of whom hold either a Ph.D. or M.D. degree, or both. These faculty serve in the Cancer Biology PhD and/or CTCR M.S. programs.

The Cancer Biology Ph.D. Program

Our students are an integral part of our research effort and receive the most significant part
of their doctoral training in the student-mentor relationship leading to the Ph.D. dissertation. Prior to the full-time research focus of their training, students participate in a year-long course, special seminars, journal clubs, and an exploration of the faculty through up to three laboratory rotations and organized meetings during the first year.

All students enter the program without formal commitment to a particular laboratory. Students may change their initial areas of interests as they participate in the first-year curriculum and learn about new areas of research through meetings with the faculty, laboratory rotations, seminars, and journal clubs. During the first year, each student consults with the Deans and a First Year Mentor (FYM) who provide advice and guidance during the intense coursework, as well as assist with the selection of laboratory rotation mentors. Following the end of the spring semester in June, students are expected to formally choose a research mentor and begin full-time dissertation research in July of their second year. Students who decide to join one of their first two rotation laboratories may be exempted from the third rotation upon approval by the Dean.

All students must be enrolled full-time from matriculation to graduation. All students are required to develop a research project, under the supervision of one or more mentors who are members of the GSK faculty that will result in a dissertation that reports new findings and is presented, defended, and approved before the faculty. All students must successfully complete all other degree requirements that are part of the training program before the degree is awarded. The maximum time limit for the completion of all requirements for the Ph.D. degree is six years.

Cancer Biology, HEGIS code: 0499.00, has been approved by the New York State Education Department as the official program offered by GSK. This program has been registered and is listed on the Department’s Inventory of Registered Programs: Inventory of Registered Programs.

The school can award two graduate degrees in Cancer Biology: Master of Science (M.S.), program code: 29204, and Doctor of Philosophy (Ph.D.), program code: 29205.
Admissions

Students who wish to pursue a Ph.D. in Cancer Biology at GSK and who have, or will have, completed a baccalaureate program at an accredited institution, should submit all components of an on-line application for consideration for admission to GSK by the deadline.

In most cases, successful applicants will have completed the following courses: general biology, general chemistry, general physics, organic chemistry (2 semesters), mathematics (through integral calculus), introductory biochemistry, and additional advanced science and math courses. Significant basic science research experience is essential. Letters from research mentors and written comments from the applicant about prior research are major components of the admissions file.

The deadline for receipt of completed applications is December 1, but early submission is highly recommended. As part of the application form, the applicant must include a personal statement, official transcripts from all institutions attended, and three letters of recommendation. Final transcripts may be requested upon completion of programs to which a student is currently enrolled. The submission of GRE (Graduate Record Examinations) scores (verbal, quantitative and analytical writing) is optional, and is not required to apply to the school. Applicants for whom English is not the first language must submit official scores of the TOEFL (Test of English as a Foreign Language). This requirement is automatically waived for applicants who earned their undergraduate or graduate degrees in either the United States or a United States Territory, and can be waived upon request if degrees were earned in a country where English is the official language or at an institution where the primary language of instruction is English.

Applicants who, on the basis of their submitted application materials, are being seriously considered for acceptance will be invited for interviews. The GSK Admissions Committee will consider all data on each applicant before making its decision.

Notice of Non-Discrimination

In accordance with institutional policy and in compliance with the requirements of the Civil Rights Act, the Education Amendments, the Rehabilitation Act, the Age Discrimination Act, and the Americans with Disabilities Act, Gerstner Sloan Kettering Graduate School of Biomedical Sciences (GSK) does not discriminate on the basis of age, gender identity, gender expression, race, color, creed, religion, national origin, disability, veteran status, marital status, sex, sexual orientation, citizenship status or any other status protected by law in the administration of its educational policies, admission policies, employment or any other GSK program or activity.

Any inquiries regarding the non-discrimination policies can be addressed to GSK’s Title IX Coordinators:
- Leslie Ballantyne, Esq., MSK HR Legal & Regulatory Affairs (tel: 646-227-2742; ballantl@mskcc.org)
- Lindsay Cornacchia, Esq., Associate Director of Compliance & Assistant General Counsel (Tel: (212) 639-2496; cornaccl@mskcc.org)

For further information on notice of non-discrimination, you can contact the appropriate federal office by visiting the website for the address and phone number of the office that serves your area, or call (800) 421-3481.
Transfer of Credit
Matriculated students can apply for transfer of credit. Supporting materials including complete syllabus, reading materials, and exams should be submitted to the registrar with a cover letter detailing the request. Such requests will be reviewed by the curriculum committee for content, topic coverage, and comparison to the Gerstner Sloan Kettering Graduate School curriculum.

GSK Transfer Policy
GSK does not accept transfer students. Any student who would like to enroll in GSK must first apply and be accepted into the program under the normal PhD recruitment and application cycle.
Financial Support

Stipend and Tuition
All matriculated students are offered a fellowship package consisting of a stipend, the full cost of tuition, and a comprehensive health insurance plan including medical, dental, and vision benefits. Insurance benefits also cover students’ spouses, domestic partners and dependents. Student progress is evaluated each semester and continuation of the fellowship is contingent upon satisfactory progress (see section on Satisfactory Progress) in the program. The school reserves the right to terminate the fellowship in the absence of satisfactory progress. The annual stipend rate for the 2023-24 academic year is $48,600. Federal and state taxes are not withheld from student stipends in accordance with relevant tax laws, but students are responsible for reporting and paying taxes on their stipends as these are taxable income. If a spouse, domestic partner, and/or dependent child is added to your insurance plan, the value of this additional coverage is also considered taxable as imputed income (see student tax regulations in Appendix 1).

Supplemental Stipend Support
Students are encouraged to apply for external fellowships. All students who are awarded external individual fellowships above the amount of $25,000 per year are provided with a supplement of $5,000 per year that is added to the standard annual stipend amount for the duration of the award. GSK or MSK fellowships awarded to students are not considered external fellowships.

N.B. There is only one stipend bonus per year for external fellowship(s).

Applying for External Fellowships
Students who intend to apply for fellowships should:
1) Contact MSK’s Grants and Contracts team at fdt@mskcc.org. This team can help identify appropriate fellowship opportunities, ensure that you are eligible for fellowships you have identified on your own, provide proposal tips and strategies, and offer proposal review services.
2) Once students have identified a fellowship that they intend to target, contact Alana Zbaren, GSK’s Grants Management Specialist, at zbarena@mskcc.org. The Grants Management Specialist can review budgets and obtain institutional approval. In some cases, the GMS must submit the application on your behalf.
3) Contact GSK Associate Dean who can help with any necessary letters of support from the Graduate School.
4) Students who receive a grant or award should notify the Graduate School and the Grants Management Specialist immediately.

Useful Resources at MSK
For tips on developing fellowship proposals as well as successful examples, please visit the Grants and Contracts Proposal Development Page.

The Office of Scientific Training and Education also provides additional tips on searching for fellowships. https://education.mskcc.org/OSET/Home/Fellowship
Common External Fellowships

US Citizens and Permanent Residents Only

NIH (NRSA) for Individual Pre-Doctoral and MD/PhD Fellowships (F30 and F31)
https://www.cancer.gov/grants-training/training/funding/f31
https://www.cancer.gov/grants-training/training/funding/f30

NSF Graduate Research Fellowship
www.nsfgrfp.org

Department of Defense (DoD) National Defense Science and Engineering Graduate Fellowship
ndsegfellowships.org

Department of Energy (DoE) Computational Science Graduate Fellowship
krellinst.org/csgr

The PhRMA Foundation Predoctoral Fellowship in Pharmacology/Toxicology and Informatics
pharmafoundation.org/awards

The Hertz Foundation Graduate Fellowship
hertzfoundation.org

For All Students

The NCI Predoctoral to Postdoctoral Fellow Transition Award (F99/K00) (Must be nominated by GSK)
cancer.gov/grants-training/training/funding/f99

Thermo Fisher Scientific Antibody Scholarship Program
goo.gl/9N2Wf7

For Underrepresented Minority Students

NRSA (F31) to Promote Diversity in Health-Related Research
researchtraining.nih.gov/programs/fellowships/F31

Ford Foundation Pre-Doctoral Fellowship
nationalacademies.org/ford

For International Students

Boehringer Ingelheim Fonds PhD Fellowship (European Citizens)
bifonds.de
American Association of University Women (AAUW) International Pre-Doctoral Fellowship
aauw.org/

Travel Allowance to Attend Scientific Conferences

Each GSK student is eligible for one award per academic year (July 1 to June 30) of up to $1,000 to cover fees and travel to attend a scientific conference at which the student is either giving a talk or presenting a poster. The award is only applicable for travel that occurs while the student is matriculated and in good academic standing in the GSK. In advance of travel, students must complete the Travel Award Application located on the SIS student portal under Forms and have it signed by their Thesis Mentor and upload their abstract in SIS. Copies of the signed form and abstract must be submitted to the GSK office for approval by the Associate Dean prior to the meeting. Students must subsequently submit proof of the poster/talk presentation at the time that reimbursement is requested. Travel funds will not be given in advance of the meeting. Students are required to access Egencia to book, air/rail, travel, hotel and ground transportation. Students must register to use Egencia. Questions regarding travel can be addressed to GSK’s Registrar.

Travel Checklist:

1. Complete the Graduate Student Travel Award Application in SIS before your trip. (MSK requires 1 month for domestic travel and 2 months minimum for international travel).

2. Should you expect total expenses to be over $1,000, you must provide your mentor’s Cost Center/Fund number that will cover the additional expense charges.

3. Submit original proof of purchase for all items (registration and/or fees, an abstract or picture of the poster; flight, hotel, etc.). Remember to book travel and hotel using Egencia as per MSK policy. NOTE: MSK will not reimburse for AIRBNB reservations.

4. Submit receipts for reimbursement within two weeks of return. All receipts must be original and itemized for food. MSK will not reimburse for any alcoholic beverages purchased.

Reimbursement for Special Courses

Academic courses: The Graduate School will cover the cost of tuition for one special course per student offered outside of GSK that the mentor approves in advance. A letter should be submitted to the Associate Dean from the student’s mentor stating why the course is required to provide foundation knowledge for the student’s dissertation project. A detailed invoice and receipt of payment showing the cost of tuition, as well as proof of course completion (in the form of a certificate) are required for reimbursement. GSK will only pay for the cost of tuition and it will be the responsibility of the student to ensure any additional fees or payments to the institution are made. Students may request advance payment for course tuition to be paid directly to the institution where the course is offered. Proof of course completion is required. Additional courses can be taken outside of GSK upon special request and approval by the Dean. Note that tuition costs covered by GSK for outside courses are considered taxable income for GSK students. Please see Appendix 1 for a summary of relevant tax regulations.
Professional and career development courses: Students in years four and above are eligible to request reimbursement of up to $750 per year for registration fees or tuition to attend professional/career development course(s) approved in advance. Students must submit a full course description in advance of taking the course for approval to the Associate Dean. If the course is approved, students must submit a detailed invoice and receipt of payment along with proof of course completion (in the form of either a certificate or signed letter from the instructor) for reimbursement. Reimbursement requests must be made in writing no later than thirty days after completion of the course. Reimbursement is limited to a one-time award of $750 and can only be made for the cost of tuition or registration fees. Travel and other associated expenses to attend the course will not be reimbursed. Reimbursed registration fees or tuition for professional and career development courses are also considered taxable income for GSK students (see Appendix 1).
The Academic Program

General Program Requirements
All students must register for both fall and spring terms each year and are expected to fulfill the following requirements for the Ph.D. degree:

- **GSK Core Course**
  All students complete this year-long course during the first year of study. The core course consists of four sections: Experimental Biology, Mechanistic Biology I and II, and Cancer Biology.

- **Laboratory Rotation**
  Students enroll in three laboratory rotations in the first year prior to selecting their thesis laboratory. Students may join their thesis laboratory after the second rotation and be exempted from the third rotation upon approval by the Dean.

- **Logic and Critical Analysis**
  All students complete this five-week course at the beginning of the first year.

- **Responsible Conduct of Research (RCR)**
  All students complete this course in the first and fifth years.

- **President's Research Seminar Series Journal Club**
  All students complete two semesters of this course during the first year.

- **Graduate Student Seminar**
  All students in years three and four complete this course by presenting research seminars, and all students from years one through four are required to attend.

- **Chalk Talks**
  All students in year two complete this course by presenting research chalk talks.

- **Current Topics Journal Club**
  All students complete this course each semester beginning in their second year and continuing through their fifth year of study.

- **Thesis Proposal**
  Students are expected to present and defend their thesis proposal by April 15 of their second year in the Program.

- **Dissertation Defense**
  Students are expected to defend their dissertation by the end of the sixth year in the Program.

N.B. - Late registration or failure to register may result in suspension of stipend.

Laboratory Rotation
Laboratory rotations are an important part of the first-year curriculum of the graduate program at GSK. The rotations provide students with the opportunity to experience different research projects, as well as different laboratory and mentoring styles. In addition, the rotations provide the faculty with the opportunity to assess the interests and aptitude of the students. There are three, five-week laboratory rotations that are typically scheduled during the months of August, January, and June. Students choose their rotations by directly contacting faculty of interest and may consult with the Dean and the First Year Mentors. Once a rotation is agreed upon by a student and faculty member, students must register for the rotation in SIS. After each rotation, students prepare and submit a two-page written summary, and student performance in the rotation is assessed by written evaluation by the rotation mentor. Rotation mentors must also sign the cover page that is attached to the
student summary. Following each rotation, all first-year students also present a short (10 minute) power point-based presentation based on their rotation project in a seminar for all GSK students and their rotation mentors. Students and rotation mentors should also meet separately to discuss the rotation experience.

Students are required to complete at least the first two rotations before they can declare a research mentor. Students wishing to join their thesis laboratory after the second rotation can do so upon approval by the Dean and be exempted from the third rotation.

Choice of Thesis Mentor
The choice of a thesis mentor is a major decision for each student at the end of the first year of the program. Students are urged to take full advantage of their rotation experiences and the guidance of the Deans and First Year Mentors. First year students also have the opportunity to meet the faculty in special sessions held throughout the fall. Rotation mentors are urged to present a realistic state of funding for their laboratory, the nature of the ongoing projects, how work is assigned or monitored, laboratory policies (such as publication/authorship, laboratory journal clubs and attendance at conferences), and the extent of direct contact to be expected with the mentor.

Each student should complete a Thesis Mentor Declaration Form (found in Student Information System) at the end of the first year in the program after they have been approved for promotion to the second year by the Curriculum Committee. In addition, each student, in consultation with their thesis mentor, selects a two- or three-member Advisory Committee from the GSK faculty who will be most helpful with their dissertation project. **Students are expected to declare their mentor at the end of the first year in the program, and their Advisory Committee by October 31 of their second year.**

Change of Thesis Mentor
In some instances, a student may contemplate a change in mentor. Students who are thinking about such a change must contact the Deans to discuss the issue and get approval to proceed. The student must also discuss this issue fully with the current mentor before approaching other faculty members. Students are urged to discuss such a change with the members of their Advisory Committee as well to seek their advice for a new thesis mentor. Upon approval by the Dean, students may have the opportunity to rotate in a new lab, for up to five weeks, before formally declaring a new mentor. It is the student's responsibility to explicitly discuss this change of advisor with the new thesis mentor.

Seminars and Journal Clubs
Seminars and journal clubs are central components of the educational mission of the program. It is important that students take advantage of the many opportunities to regularly meet scientists and build critical and presentation skills. All students are expected to participate in seminar and journal club activities each semester that they are matriculated in the program. (See [General Program Requirements](#) for more information.)

Special Courses
GSK will cover the cost of tuition for a special course that the mentor certifies, in a letter to the graduate school, is required to provide foundation knowledge for a student's dissertation project. (See [Reimbursement for Special Courses](#) for more information.)
Observing in the Clinic
An important aspect of integrating basic and clinical sciences is to develop an appreciation for the human side of disease (cancer in this case), to observe medical challenges faced by clinical practitioners, and to understand the gap between a good idea and its execution. During the first year in the program, under the supervision of a clinician, students visit various MSK clinics as observers. These visits, coordinated by the GSK Registrar, are held in December and May of the first year in the Program. An orientation to the clinics is held prior to the start of the clinic visits.

Clinical Apprenticeship
Students are encouraged to develop a clinical perspective as to how bench work can be applied in the clinic. At the end of the second year in the program and in consultation with the Thesis Committee and physician-scientist members of the GSK faculty, students can select a clinical mentor after consulting with the GSK clinical faculty representing the curriculum committee. The individual choice is guided by the student’s thesis project. Clinical Apprenticeships typically span two years of a student’s study at GSK. The clinical mentor will guide the student in hospital-based academic activities such as Grand Rounds, Pathology Conference and Disease Management Team (DMT) Conferences.

Upon being advanced to candidacy, students are encouraged to meet individually with a designated member of the GSK faculty to discuss their research interests and the decision of whether to commit to a Clinical Apprenticeship. Although students are encouraged to pursue this apprenticeship, it is an optional part of the program. Students who choose a clinical mentor will input the name into SIS and arrange to meet with the Associate Dean to review the guidelines.

Advancement to Candidacy
Students will be advanced to candidacy after successful completion of the thesis proposal examination. Students must successfully complete both the written and oral parts before they are advanced to candidacy.

Course Descriptions

- GSK Core Course
- Logic and Critical Analysis
- Responsible Conduct of Research (RCR)
- President’s Research Seminar Series Journal Club
- Chalk Talks
- Graduate Student Seminar
- Current Topics Journal Club

GSK Core Course

GSK students take one “core” course all together in the first year. Through this course they learn how to read, understand, and discuss science. The course has four sections: Experimental Biology, Mechanistic Biology I and II, and Cancer Biology.

Experimental Biology teaches conceptual and practical aspects of five different research disciplines: imaging, genetics, biochemistry, genomics, and quantitative biology. Each topic is considered for one week through a combination of workshops, research paper
discussions, and lectures. Questions that are considered include:

- How is imaging performed at different length scales, and what can be learned through different techniques?
- How have imaging technologies pushed the boundaries of knowledge?
- How are genetic principles and applied technologies used to make new discoveries?
- What techniques allow for the experimental manipulation of DNA, RNA, and protein, and how do they work?
- How do the “kits” on my research bench actually work?
- How can I think quantitatively about different approaches and data sets?

**Mechanistic Biology I and II** teach what is understood about how cells are constructed and maintained, how groups of cells collaborate to achieve normal development, and how the immune system works. In this class a research paper is dissected every day with one of our GSK faculty members who is at the cutting edge of their research field. Over 15 weeks the class will consider:

- Genome biology, gene expression, and proteins
- Cellular architecture: from the cytoskeleton to organelles
- Cell cycle control, cell division, and cell death
- Cell signaling
- Stem cells and pluripotency
- Tissue and organismal development
- Innate and adaptive immunity

**Cancer Biology** teaches how to think about cancer as a disease and also as a biological problem. This course leverages the world-class research and clinical expertise at Memorial Sloan Kettering. The course lasts for ten weeks and considers both the biology of cancer and also clinical approaches to combatting this disease. Ten different, week-long topics are considered, including:

- Cancer as a disease
- Genetic and epigenetic mechanisms
- Computational biology and oncology
- Cancer signaling
- Cancer metabolism
- Metastasis
- Tumor modeling and heterogeneity
- Cancer types and microenvironments
- Therapeutic strategies
- Immunotherapeutic approaches

All students are expected to attend the GSK Core Class regularly. A student must notify the Registrar prior to class if they are going to be absent. This notice should be sent by email to gskregistrar@sloankettering.edu. A student is allowed a total of 3 absences from the Core Class over the course of the semester. Any absences in excess of 3 will result in 2 percentage points being subtracted from a student’s participation grade PER ABSENCE.

Additionally, students are expected to be ON TIME for class - being late to class can be considered an absence at the discretion of the teaching fellow and could affect your participation and final grade.
Logic and Critical Analysis

All first year students complete this course during the first rotation period. Papers from the scientific literature are used to help set the foundation for students to develop their ability to think along a logical path, to critically analyze information and data, and to present scientific results to a group. Students are encouraged to develop an approach to understanding the scientific literature that includes asking the following questions about each experiment considered: What is the question that the authors asked? How was the experiment performed? What techniques were used and why? What is the nature of the data produced? What represents a significant result? What were the conclusions made by the authors? Does the author’s data justify the conclusions made? And, what conclusions would the student make? This course is organized by the Dean and GSK faculty members.

Responsible Conduct of Research (RCR)

First and fifth year GSK students are required to take the formal RCR course that is managed by Memorial Sloan Kettering Cancer Center. This course is closely aligned with and meets the requirements of the National Institutes of Health and National Science Foundation guidelines for education and training in this area.

The goals of this course are to heighten awareness of ethical considerations that are important to the conduct of research, to inform of federal, state and institutional policies and procedures, and to provide critical analysis and problem-solving skills for ethical decision making.

The course will be offered in its entirety twice a year — in the fall from September to December and in the spring from January to April. Participants may register for one or the other, but it must be completed within a single semester. Those who start and don’t finish successfully will be required to repeat the course in its entirety the following semester.

Participants are required to complete the online modules and participate in a series of in-person and virtual workshop and discussion sessions.

Topics Include:

- Research Integrity and Research Misconduct (including whistleblowing and dispute resolution)
- Data Acquisition, Management, Sharing and Ownership
- Rigor and Reproducibility
- Safe Laboratory Practices
- Animal Welfare
- Protection of Human Subjects
- Conflicts of Interest and Commitment
- Disclosure and Reporting Requirements associated with Export Control and Research Security matters
- Authorship and Responsible Publication Practices
- Peer Review
- Collaboration and Mentoring
- The Scientist and Social Responsibility
- Safe Research Environments (e.g., those that promote inclusion and are free of sexual, racial, ethnic, disability and other forms of discriminatory harassment)
Visit the RCR course website for more information:  https://www.mskcc.org/rcr

President’s Research Seminar Series Journal Club

The President’s Research Seminar Series brings the leading and most distinguished scientists in the world to MSK. The topics represented are wide-ranging and cover some of the most exciting fields in modern biology, thus regular attendance by the students will encourage them to broaden their viewpoint. Students participate in a journal club the day before the President’s Research Seminar Series to review some of the published works of the speaker. The class is conducted by the faculty member that is hosting the speaker. Some students meet with the speaker on the day of the seminar. Students may nominate and host one President’s Research Seminar Series speaker each year.

Chalk Talks

Chalk talks are presented by second year students on Thursday afternoons during the fall term. These provide second year students an opportunity to discuss the specific aims of their thesis projects, and first year students a chance to discuss research from one of their first two rotations. All first and second year students are required to present chalk talks and attend these sessions. Students must attend 75 percent of the sessions in a given semester to pass.

Graduate Student Seminar

One important feature of becoming a successful scientist is being able to present the results of your research in a coherent and logical form. Graduate Student Seminars (GSS) provide the opportunity for graduate students to develop their presentation skills in a formal seminar environment. Each student from the third and fourth year classes presents a 30 minute seminar in this course, and all students from the first through the fourth years are required to attend. The seminars are held on Thursday afternoons during fall and spring terms. GSS does not meet during the summer. A student must attend 75 percent of the sessions in a given semester to pass.

Current Topics Journal Club

Students participate in this student-run course beginning in the second year and continuing throughout their fifth year in the graduate program. A journal club of this type is important in that it helps prevent the tunnel vision that can sometimes develop as students focus on their thesis research. There are eight sections of roughly five participants each. Each section has a leader chosen by the Dean who chooses a topic that will serve as a guideline for the papers to be discussed. Topics are reviewed by the Dean before being published to the student cohort. Students must sign up for one section per semester. Each student in a section is expected to lead the discussion of one paper. The participants of each section, as organized by the Section Leader, are responsible for deciding how and when to conduct “in class” discussion sessions. Section leaders are responsible for the logistics of the meeting including informing members of the group of the assigned papers.

Students are required to sign in for each paper that is discussed. Signatures will be collected by the Section Leader and forwarded to the GSK Registrar.

In order to receive a passing grade, students must attend and participate in at least four of
the five discussions. Any student who does not meet this requirement will receive a grade of F for the course that semester. In order to be approved by the Graduate School to proceed to thesis defense, students must have satisfactorily completed all corresponding sections of Journal Club in the semesters preceding the one in which they register for their defense up to a total of eight sections. This requirement will be pro-rated for students currently in the program as of September 1, 2016.

Opportunity to Apply for a Teaching Fellowship

GSK offers a teaching opportunity for graduate students and postdoctoral researchers in the GSK Core Course that runs from September through May each year. The role of a GSK Teaching Fellow is to attend the classes, read the papers and facilitate discussion, lead one Special Topics class, lead one to two review sessions, and provide feedback to the students and Section Leaders about the students’ participation and presentations. GSK Teaching Fellows will be expected to commit to blocks of the course; each block is approximately two weeks. Application for fall is announced in the summer and the early winter for the spring course. A letter of support from the mentor is required as part of the application. Teaching Fellows attend an orientation and receive an honorarium for their participation.
Progress Points

*General Program Requirements*

The maximum time for completion of all requirements for the Ph.D. degree is six years. Students must defend and deposit their dissertation by June 30 of the sixth year in the Program. Students who do not deposit by April 15 will participate in the graduation ceremony of the following year. All students must be enrolled full time. All students are required to develop a research project, under the supervision of their mentor, which results in a dissertation that reports new findings, and is presented and defended before the faculty. All students must successfully complete 68 degree credits (which are fulfilled with a combination of coursework and research credits) and meet all other degree requirements that are part of the program to receive the Ph.D. degree.

*Typical Program*

**FALL SEMESTER**

<table>
<thead>
<tr>
<th>Rotation 1</th>
<th>Experimental Biology</th>
<th>Mechanistic Biology I</th>
<th>Winter Break</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lab</td>
<td>5 weeks</td>
<td>10 weeks</td>
<td></td>
</tr>
</tbody>
</table>

| July | August | September | October | November | December |

**SPRING SEMESTER**

<table>
<thead>
<tr>
<th>Rotation 2</th>
<th>Mechanistic Biology II</th>
<th>Cancer Biology</th>
<th>Rotation 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lab</td>
<td>5 weeks</td>
<td>10 weeks</td>
<td>Lab</td>
</tr>
</tbody>
</table>

| January | February | March | April | May | June |

**Year 1**

- RCR
- Student Seminars & Chalk Talks
- PRSS Journal Club
- Thesis Research
- Clinical Observation
- Student Journal Club

**Year 2**

- Declare Thesis Lab

**Year 3**

- Thesis Proposal Exam

**Year 4**

- Defend Thesis and Graduate

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GSK Student & Faculty Handbook
v. 12/2023
**Thesis Proposal Examination**

The Thesis Proposal Examination (TPE) is required to be completed by April 15 of the second year. It consists of three parts: (1) a committee meeting that is held in January of the second year, (2) a written proposal, and (3) an oral examination.

The Examination Committee for the TPE consists of the two members of the Advisory Committee that are chosen by the student, and two additional members that are appointed by the Dean. One of these additional members serves as the Examination Committee chair.

**Registering for the TPE and key deadlines:**

- **By December 15** of the second year, students must pre-register for the TPE by submitting a Specific Aims page to the graduate school via upload to the student portal, and the Dean will then appoint the additional two members of the Examination Committee. Formatting guidelines for the Specific Aims page are included below under “Guidelines for preparing the TPE Specific Aims page”.
- **By the end of January**, the committee meeting must be held with the student's Advisory Committee and mentor.
- **Four weeks prior to the oral examination**, the oral exam must be scheduled with all members of the Examination Committee, and registered with the GSK office and Dean.
- **Three weeks prior to the oral examination**, the written proposal must be uploaded to the student portal; it will then be submitted to all members of the Examination Committee by the Registrar.
- **One week prior to the oral examination**, the members of the Examination Committee must vote to approve the written proposal and submit the Evaluation of Written Proposal Form. Approval of the written proposal advances the student to the oral examination.
- **By April 15**, the TPE must be completed, unless revisions or a retake of the oral exam are required.

1. **The Committee Meeting** is held with the student's Advisory Committee, which includes the major sponsor and two members who are recruited by the student. This meeting is held in January of the second year. It provides an opportunity for students to organize their ideas for the thesis proposal and to receive feedback from their committee members about their Specific Aims, preliminary data, and the approaches that will be used. This meeting is not a pre-test of the TPE and is meant to help the student identify and address deficiencies in their Specific Aims prior to writing the full TPE proposal.

2. **The Written Proposal** is prepared after the committee meeting and must be submitted to GSK for distribution to the Examination Committee at least three weeks prior to the scheduled oral examination date. Examination Committee members may reschedule the oral examination if not given the appropriate amount of time to read and evaluate the proposal. The written document is prepared with the same format as an NIH F31 student fellowship application. Detailed guidelines for the formatting of this document are included in the “Guidelines for preparing the written proposal” section below.
The written proposal should be:

- based on the student’s ideas and not exclusively the mentor’s, although the ideas should be informed by discussions with the mentor as part of the normal advising process.

- written by the student and not the mentor, although mentors are encouraged to read the proposal and to provide guidance throughout the TPE process.

**Evaluation of the Written Proposal:**

After submission of the written proposal, the Examination Committee will read and evaluate the document, and each member must submit the *Evaluation of Written Proposal Form* within two weeks to the committee chair. On this form each member of the Examination Committee will indicate whether they find the written proposal to be “Satisfactory” or “Unsatisfactory”. Three out of the four members of the Examination Committee (or four out of five, if applicable) must find the written proposal to be “Satisfactory” prior to the student proceeding to the oral examination.

A satisfactory written proposal will be considered “passed” and will not be subject to re-writing or further editing after the oral examination, unless revisions of the written document are considered to be helpful for students needing to retake the oral exam, as decided by the Examination Committee chair.

If two or more of the four members of the Examination Committee find the written document to be “Unsatisfactory”, the oral examination will be postponed, and a revised version of the written proposal must be prepared. The committee members will include specific critiques on the Evaluation of Written Proposal Form to allow the student to respond with a revised proposal. The extent of revisions that will be required will be communicated to the student and to GSK by the Examination Committee chair, and an appropriate timeline for preparing the revised written document will be established, in consultation with the Dean. The student is allowed only one cycle of revision for the written proposal. Upon approval of the revised written proposal by at least three of the four members of the Examination Committee, the student may proceed to the oral examination.

**3. The Oral Examination** is scheduled after the January committee meeting and must be held by April 15. Students are responsible for scheduling the exam with the members of their Examination Committee at least four weeks ahead of the exam date, for reserving a conference room for two hours on the date of the exam, and for registering the date and location of the exam with the GSK office via the student portal.

The oral exam provides members of the Examination Committee the opportunity to assess the student’s ability to evaluate and synthesize the relevant literature, articulate and elaborate on the research project, show and evaluate preliminary data, and discuss experimental design. Students should prepare a presentation that includes the background and preliminary data, specific aims, experimental approaches, potential outcomes, and alternative approaches where necessary.

Students should be prepared to discuss in detail any aspect of what is shown on their slides, and they are advised that the discussion flow of the oral examination can be unpredictable. Generally, the student-examination committee dialogue during the exam should evolve into a broadly based discussion that establishes the breadth of the student’s grasp of key issues in the field. As a practical point, the student should expect as “fair game” any question
pertinent to points they raise:

For example, if a student is studying protein phosphorylation, it is reasonable to be expected to know the structure of phosphorylated amino acids. If a student is transfecting a gene whose product functions in the nucleus, it is fair game for the committee to ask how proteins are imported into the nucleus. If a drug or inhibitor is used as a key reagent, the committee may ask the student to discuss in detail the mechanism of action. And so forth... One common mistake that students make is to anticipate questioning only on the hypothesis and the technical aspects of the proposed experiments; the committee members are also likely to probe a student's more general knowledge and critical thinking skills.

During the oral examination, the student's mentor is not a member of the Examination Committee and is not present during the exam. The mentor is encouraged to attend the start of the exam to meet with the Examination Committee with the student excused from the room, to introduce the student and the research project, and to share any other information that might be relevant to the examination. The mentor must then leave the room before the examination begins. If the mentor cannot be present on the day of the examination, they are encouraged to send the Examination Committee chair any introductory information that they would like presented to the committee, and the chair will read this to the committee prior to the start of the exam with the student out of the room.

Evaluation of the Oral Examination:

The duration of the oral examination can be variable, and it is at the discretion of the Examination Committee chair, in consultation with the other committee members, to determine when the examination is finished. At the conclusion of the exam, the chair will excuse the student and the committee will discuss the outcome of the exam. Three out of the four (or four out of five) Examination Committee members must agree to vote “Satisfactory” for the student to pass the exam. If two or more members out of the four vote “Unsatisfactory”, the student does not pass and a retake of the oral examination must be scheduled. A final outcome of either “Satisfactory” or “Unsatisfactory” will be entered on the Oral Examination Voting Form. The Examination Committee will then invite the student back into the room to discuss the outcome of the exam. If a retake is required, the Examination Committee should discuss the deficiencies that led to the “Unsatisfactory” decision, and also discuss a plan for the student to retake the exam. This could involve retaking the entire exam, or only particular sections. The extent of the retake that will be required will be decided by the Examination Committee chair in consultation with the other committee members.

A student is permitted only one retake of the oral examination. The student and the GSK office should receive, in writing from the Examination Committee chair, a description of the extent of the retake that will be required, and the expected timetable for completion of the oral examination. The timing will depend in part on the extent of the deficiencies that were noted, and the appropriate timeframe will be decided in consultation with the student's mentor and with the Dean. The maximum allowable time for a retake of the exam is four months. The committee may also ask that revisions to sections of the written proposal be submitted and approved prior to retaking of the oral exam, when this is determined to be helpful for the student to reconsider the background information or experimental aims in the proposal.

A committee may refuse a student the opportunity to be re-examined if the student has
failed to show sufficient research progress and ability. In such an instance, the Examination Committee will meet with the Dean before the decision is officially recorded with GSK. A student whose outcome of re-examination is deemed unsatisfactory will be dismissed from the school.

Students who satisfactorily complete both the written and oral presentations will be Advanced to Candidacy.

**Deadline:**

All students must complete the **Thesis Proposal Examination by April 15th** of the second year in the program. If there are revisions and/or re-examination, these must be successfully completed within four months of the date of the initial examination. Individual students may request an extension of these deadlines under special circumstances by writing to the Dean at least one month prior to the deadline. Failure to meet this timetable can result in loss of good standing in the program and may result in Administrative Withdrawal from the program.
Guidelines for preparing the TPE Specific Aims page.

By December 15 of the second year, students must pre-register for the TPE by submitting a Specific Aims page describing their proposed research. The scope of the proposal should typically be limited to two specific aims that are listed sequentially.

Typically, a strong Specific Aims page includes the following parts:

Introductory Paragraph – Introduces the scientific problem and the critical need to solve this problem. The central hypothesis should be articulated, as well as the overall objectives of the proposed research.

Specific Aims – The title and objective of each aim, as well as some information for experimental design and the methods for accomplishing the specific aims, should be described concisely under each heading.

Guidelines for preparing the written proposal.

Document formatting:

The document should be 8 pages in length (including figures but excluding the references). The first page is the title page, the second page is the Specific Aims page, and the remaining 6 pages form the body of the Research Strategy, which should follow the format of an NIH F31 fellowship proposal. This TPE format is designed to encourage eligible students to submit their thesis proposals as NIH fellowships following successful completion of the TPE exam. Formatting, fonts, and margins should adhere to NIH guidelines found [here](#).

Title Page
This is self-explanatory.

Specific Aims
Length: 1 page
See “Guidelines for preparing the TPE Specific Aims page” above.

Research Strategy
Length: 6 pages
Must be organized into two main sections:

A. Significance
B. Approach

A. Significance
(Recommended length: 2 to 3 pages (including figures))

In this section, the student should explain the importance of the problem or critical barrier to progress in the field that the proposed project addresses. Explain how the proposed project will improve scientific knowledge, technical capability, and/or clinical practice in one or more broad fields. The student should provide background information involving a review and critical evaluation of the literature pertinent to the proposed research. The discussion of the literature should identify unresolved issues or gaps in knowledge that the proposed
experiments are intended to address.

The model or hypothesis to be tested should also be explicitly stated and described in detail; the student should make clear how the model/hypothesis is consistent with available information. The use of diagrams and/or figures can be very effective, and a diagram of the proposed hypothesis/model should be included if possible. The source of any reproduced or adapted figures/diagrams must be cited. Division of the text into discrete subsections, if possible, can also make the background material easier to read; it also focuses attention on the key themes conveyed by the subsection titles. The significance of each Specific Aim should be clearly stated.

Students who need help identifying publications that will support the background section of the written document are welcome to consult the resources and services offered by the MSK library.

B. Approach

(Recommended length: 3 to 4 pages (including figures))

This section should describe the experimental strategies and procedures that will be used to evaluate the central hypothesis or model under study in the proposal. Each specific aim should be presented as a separate section, with a series of sub-sections entitled:

A. Rationale
B. Proposed Experiments
C. Possible Results & Interpretation
D. Potential Problems & Alternative Approaches

Consider that the following aspects should be included in the Approach:

- Discussion of why a particular experimental approach was chosen, including its advantages and limitations.
- A concise description of available reagents; if desired reagents are unavailable, a brief description of how the reagents will be developed and validated.
- Consideration of proper controls, which is an integral element of experimental design.
- Prediction of possible outcomes.
- Discussion of how the results will be interpreted in the context of the working hypothesis/model.
- An indication of what will be done to follow up on the observations.
- Discussion of what alternative approaches will be considered if the proposed experimental strategy is unsuccessful.
- Most importantly, a clear explanation of how the experimental results will distinguish between the proposed hypothesis/model and alternative competing hypothesis/model(s).

It is important that students entertain more than one outcome for each experiment. Students should not confine discussion of the outcomes to those that will merely confirm the initial hypothesis.

High rigor often entails designing experiments that explicitly aim to disprove the hypothesis/model; negative results of such experiments may be more convincing to skeptics than positive results that are merely “consistent with” a model but that do not exclude other models.

Diagrams may be included and can be helpful for illustrating the rationale behind the
design and interpretation of an experiment. The source of any reproduced or adapted figure/diagram must be cited.

References
In the list of references, please include the names of all authors and the full title. There is no page limit for the References.

Some additional points to consider:

To merit approval, the written proposal should present a well-defined hypothesis that is soundly based on scientific knowledge and experimental observations reported in the literature. The logic underlying the experimental design should be clearly articulated and critical features of the experimental approaches explained so that faculty from different fields of biomedical research can readily follow and review the written proposal.

The primary objective of evaluating the written proposal at this stage is to prevent a student from advancing to the oral examination with an indefensible proposal.

Deficiencies that can lead to an unsatisfactory proposal generally fall into six areas:

1. Faulty logic
2. Poor articulation of the central hypothesis
3. Poor articulation of the rationale underlying the experimental strategy
4. Failure to design experimental approaches that test the proposed hypothesis/model
5. Experimental approaches that cannot yield a predictable outcome
6. A lack of understanding of the quantitative aspects of the data being obtained
7. Specific aims that are co-dependent on each other. For example, you cannot achieve aim 2 if aim 1 is not achieved.
8. A project that is beyond the scope of a PhD thesis project.

Dissertation

Students should follow the GSK Dissertation Guidelines available from the GSK Registrar for preparing the Doctoral Dissertation. Students are encouraged to meet with the Associate Dean and/or the GSK Registrar to receive advice regarding the timing and logistics of planning the formal dissertation. The first step in the dissertation process is to submit the signed "Dissertation Registration Approval Form", which is signed by all members of the advisory committee at the final committee meeting.

- The Written Document
- The Committee
- The Defense and Seminar
- Dissertation Deposit
- Degree Conferral
**The Written Document**

Any data presented that was not obtained by the student should be identified clearly and attributed properly. Presentation of such data should be limited to that which is essential to develop the story. Similarly, work performed for the student by any of the Core Facilities of the Center should be identified clearly and attributed properly. Descriptions of the methods for such work should be limited to that which is necessary to understand the data.

Students who wish to compile published manuscripts as the backbone of the dissertation text may do so with the following guidelines:

- a general introduction, literature review, and summary will be written for the dissertation;
- the relevant publisher must grant permission for the use of the published paper as a dissertation chapter;
- the student must be first author on the paper;
- the publication represents the writing and the scientific work of the student;
- multi-author publications must include an explanation of the work not actually performed by the student. It would be appropriate to omit those experiments that were not done by the student and cite them.

If a published paper is used in the dissertation, copyright approval must be secured from the journal. A note should be made on the paper indicating that copyright approval was granted.

Electronic copies of theses from GSK graduates can be found on the [MSK Library Page](https://www.mskcc.edu).

**The Committee**

The Dissertation Committee is composed of five members, including the mentor, who must be a silent observer during the defense. If the student has co-mentors, both may be on the committee and both must be silent observers during the defense. The four voting members will consist of the two members of the Advisory Committee, an External Examiner, and an additional member appointed by the Dean, who will also serve as the Chair of the Dissertation Committee. External Examiners cannot be members of either the GSK or MSK faculty and must be full-time, tenure track faculty of an accredited graduate school. The External Examiner may not be a present or recent (last three years) collaborator of either the student or the student’s Thesis Mentor, a recent (last five years) GSK graduate, nor a person in whose laboratory the student intends to pursue postdoctoral training. In addition, the External Examiner may not have been present at any of the student’s Thesis Committee Meetings prior to the dissertation defense. Students must submit the CV of prospective External Examiners for approval by the Dean.

For External Examiners, GSK will pay an honorarium of $400 and fully reimburse travel expenses. This includes transportation, (economy air fare), overnight accommodation for 1-2 nights, and meals. Students are encouraged to find local examiners if at all possible.

The Dissertation Committee must read and approve the dissertation prior to the oral defense. The student should upload the dissertation as early as possible, but no later than two weeks before the defense. If the committee finds that there is sufficient reason to postpone the defense, the chair must communicate the committee’s decision to the student and the GSK Registrar at least one week prior to the scheduled defense date. The committee members may also reschedule the defense if not given the appropriate amount of time to prepare for it.
**The Defense and Seminar**

All students must present a 45-55 minute seminar on their work, which is open to the Tri-Institutional community, in addition to the closed door oral defense. The Dissertation Committee members attend the seminar, but should refrain from asking questions, as their questions should be reserved for the closed door defense.

**Dissertation Deposit**

The dissertation must be deposited within eight weeks from the date of the defense for the student to be eligible for the degree.

The following deposit deadlines and enrollment requirements will determine the date of the conferral of the degree.

<table>
<thead>
<tr>
<th>For the Degree to be Awarded on:</th>
<th>Dissertation Must be Deposited by:</th>
<th>Student Must be Enrolled During:</th>
</tr>
</thead>
<tbody>
<tr>
<td>September 30</td>
<td>September 15</td>
<td>Preceding Spring Semester</td>
</tr>
<tr>
<td>January 31</td>
<td>January 15</td>
<td>Preceding Fall Semester</td>
</tr>
<tr>
<td>May (Commencement Date)</td>
<td>April 15</td>
<td>Current Spring Semester</td>
</tr>
</tbody>
</table>

**Degree Conferral**

Degrees are conferred on September 30, January 31, and the date of the GSK Commencement in May. Diplomas are prepared for distribution only at the May commencement. A student can request an interim letter testifying to the completion of the degree requirements after they have deposited their dissertation. Commencement information will be sent during the Spring semester to the last email address recorded with the GSK office.

Contingent upon the defense outcome, students maintain their student status, including stipends and housing for eight weeks.

The dissertation must be deposited in final form by the end of the indicated time period, otherwise the degree will not be awarded.

Exceptions to this schedule will be considered only under extenuating circumstances.
Academic Policies and Procedures

Grading, Course Examinations
All credited courses are assigned grades A(-), B(+/-), C(+/-), F, P (Pass), I (Incomplete), S (Satisfactory), or U (Unsatisfactory). In general, seminars and journal clubs are assigned P/F grades and ongoing research courses are assigned S/U grades.

The Core Course is the only letter-graded course at GSK. Students who have not completed the required work for a course may be given a grade of Incomplete. Students must fulfill the obligation to resolve an incomplete grade within the next two semesters that they are registered. After one year, unresolved incomplete grades will appear permanently as incomplete on the student's record and will accrue no credit toward the degree. Letter grades (A, B, C, or F) may not be changed after they have been recorded in the GSK records, unless there was a clerical error by the course director in the submission of the grade. If a course director agrees to consider additional work from a student, then an initial grade of incomplete should be recorded. Students are expected to monitor their progress toward completion of the program and the degree requirements.

If a student cannot complete course requirements by the established deadline because of health or personal issues, the instructor must be notified on or before the due date, or as soon thereafter as possible. A doctor's note must be submitted to the course director and the GSK office, and arrangements must be made for a new deadline.

GPA
All students must complete at least 68 graduate credits (a combination of course work and research credits) and maintain a GPA of 3.0 or higher.

To compute the grade point average:

1. For each course with a letter grade that counts toward the GPA, the number of credits is multiplied by the appropriate quality point value, as indicated in the table below.
2. The quality point values are added for all the courses to determine the total quality points.
3. The total quality points are divided by the total number of credits.

<table>
<thead>
<tr>
<th>Grade</th>
<th>Quality Point Value</th>
<th>Grade</th>
<th>Quality Point Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>4.00</td>
<td>C+</td>
<td>2.30</td>
</tr>
<tr>
<td>A-</td>
<td>3.70</td>
<td>C</td>
<td>2.00</td>
</tr>
<tr>
<td>B+</td>
<td>3.30</td>
<td>C-</td>
<td>1.70</td>
</tr>
<tr>
<td>B</td>
<td>3.00</td>
<td>F</td>
<td>0.00</td>
</tr>
<tr>
<td>B-</td>
<td>2.70</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The resulting figure is the GPA/cumulative index. GPA is computed to two decimal points.

Although credits with grades of P/F or S/U count toward the degree requirement, they do not figure into the computation of the GPA.

Students who do not meet the requirements of the New York State Immunization Law will...
not be permitted to register. Student Health Services is required by New York State Law to maintain up-to-date records for each student. Students who fail to comply with this requirement will not be permitted to register and may be Administratively Withdrawn from the program.

Advisory Mechanisms
The GSK has developed an extensive advisory system to help students optimize their tenure at GSK. This advisory system is multi-pronged, and students are strongly encouraged to take full advantage of the opportunities available to them, and to discuss their decisions and progress in the program with their advisors. Together with the GSK faculty members, the Deans serve as ad hoc advisors to students throughout their tenure at GSK.

After matriculation, each student is assigned a First Year Mentor. Students can meet with their First Year Mentor to discuss rotations, courses, or any other aspects relating to their experience at GSK. Students are also encouraged to meet with the Deans, as a cohort and individually as they are fulfilling the didactic requirements of the course and moving towards identifying and selecting a thesis mentor. Students may seek the advice of their First Year Mentor and the Deans as they are deciding on their laboratory rotations and can meet to discuss the rotation experience following each rotation.

Once students have formally declared their thesis mentor in July, they will subsequently select a two-member Advisory Committee from the GSK faculty, which, with the mentor, will constitute the Thesis Committee. The Advisory Committee members should be those faculty members who are most likely to be helpful in the student’s area of research.

Students may add an additional faculty member from either the GSK faculty or another graduate school. External Members of the Advisory Committee must be full-time, tenure track faculty members of an accredited graduate school. Students should submit the CV of prospective External Members to the Dean for approval.

The Thesis Committee, chaired by the mentor, is expected to meet with the student according to the schedule below. Students are required to provide the Thesis Committee with a completed Progress Report (updated and downloaded from the GSK Student Information System) and a two-page report showing progress and changes from the last meeting (sent to the committee at least one week prior to the scheduled meeting). Students are required to prepare a PowerPoint presentation for these meetings.

Thesis Committee Meeting Deadlines
- Second year students: meeting I: January 31
- Third year students: meeting I: December 31
- Fourth year students: meeting I: September 30 and meeting II: May 31
- Fifth year students: meeting I: January 31 and meeting II: July 31
- Sixth year students: meeting I: January 31 and meeting II: July 31.

Second year students will have a planning meeting no later than January 31. The purpose of this meeting is to bring the advisors up-to-date on plans for the thesis project: what has been done, preliminary data, and future plans. The advisors are expected to provide feedback and discuss the merits and feasibility of the project. The Thesis Committee should help the student troubleshoot the project. In preparation for this meeting, students must send to the thesis committee a copy of their Specific Aims page (which was submitted to the graduate school by December 15, see TPE guidelines). In this first committee meeting
students can discuss the specific aims of their thesis project with the Advisory Committee.

**Formal progress reports must be filed by GSK students in year two and beyond according to the schedule indicated above.** Prior to meeting with the Committee, the student should review their information in the Progress Report Form in the GSK Student Information System and correct/update as necessary. Student’s should download the individualized Progress Report Form and provide it to the members of the Thesis Committee prior to the scheduled meeting. The Committee should use the Report to evaluate the student’s progress, indicate strengths and weaknesses, and discuss the student’s Individual Development Plan (IDP). Meetings should conclude with a discussion between the advisors and the student, in the absence of the mentor.

The Thesis Committee for second year students will only be asked to certify that the committee met, not to evaluate student progress. A Progress Report Form, signed by the Thesis Committee members and the student, must be submitted to the GSK office immediately following each meeting. Students should convene the Thesis Committee as needed, but Progress Reports must be submitted according to the schedule above.

Beginning in the fourth year, the committee meetings should be focused on timely completion of the thesis research and the preparation of manuscripts for publication. In addition to the overall progress, the committee members will closely monitor student's progress to timely completion of the degree.

Timely meetings with the deadlines above are required and occur to maintain satisfactory academic progress. Students are encouraged to take the initiative in scheduling meetings with the Thesis Committee or the Deans, as necessary. Both students and faculty are urged to view the advisory system as crucial in identifying and resolving problems, in maintaining realistic expectations for progress, and as a source of new ideas and approaches.

**Satisfactory Progress**

It is essential that students and the Thesis Committee monitor student progress for the duration of the Program. **Continued financial support is contingent upon maintaining satisfactory progress at all times.** Additionally, failure to achieve and maintain satisfactory progress, after advice is sought from the Thesis Committee and/or the Deans, can result in academic probation and ultimately, dismissal from the program. A student who fails to maintain satisfactory progress may be placed on an Administrative Leave of Absence by the Dean, following consultation with the student’s mentor and Advisory Committee.

Satisfactory progress is achieved and maintained by meeting the following requirements:

- matriculation on a full-time basis
- for first year students: timely completion of all course requirements, demonstration of research potential and of timely progress toward the choice of thesis mentor through rotation activities and meetings with the faculty
- timely submission of a completed Laboratory Rotation Agreement Form, Rotation Evaluation Form, Rotation Abstract and Rotation Report for each rotation
- maintaining a 3.0 GPA or higher
- no more than two Incomplete grades are allowed in any given semester, unless they resulted from an approved leave of absence that began before a final grade was assigned
• successful and timely completion of the Thesis Proposal Examination
• meetings with the Thesis Committee according to the schedule indicated in the section on Advisory Mechanisms and submitting a Progress Report immediately following each meeting
• demonstration of progress in the research project and the ability to demonstrate growth in research skills
• completion of at least 68 graduate credits (a combination of coursework and research credits)
• completion of all dissertation requirements, including defense and timely deposit

Student Publications and Citation of Student Affiliation

Students should indicate their affiliation on all publications and abstracts as: Louis V. Gerstner, Jr. Graduate School of Biomedical Sciences, Memorial Sloan Kettering Cancer Center, New York, NY.

Students are required to update their official publications with the GSK office and also on their student portal in SIS. All publications authored by GSK students will be placed on the GSK website.

Academic Dishonesty, Plagiarism and Artificial Intelligence

Students are expected to understand all standard rules associated with plagiarism. Resources available to further inform the student of what constitutes plagiarism can be found in the MSK Code of Conduct, the content of the Responsible Conduct of Research course as well as in many guides offered to explain the seriousness of any breach of not submitting one’s own work for credit. Note: Students may not use Artificial Intelligence tools such as ChatGPT to complete or enhance their work including problem sets, thesis proposal exams, and theses.

Any instance of suspected plagiarism or academic dishonesty by a student will be brought to the attention of the Dean for further inquiry and action. Proven instances of plagiarism can result in dismissal from GSK.

Grievance Policy

Students who have a concern about a matter related to the PhD program, whether it concerns a course, instructor, or mentorship, are encouraged to discuss their concern with their thesis committee and/or First Year Mentor. If the issue cannot be resolved in session with these mentors or if these mentors have a conflict of interest, the student may choose to present the grievance to the Associate Dean and Dean. Matters that require additional focus will be elevated to the Curriculum Committee or a special Ad Hoc Committee called by the Dean.

Appeals Policy

Issues concerning the grading and evaluation of student performance in courses will be discussed with the course director. If the student feels there is a need for further resolution, the issue should be brought to the attention of the Dean. The Dean may discuss the issue with the Executive Committee, if needed.

Students who have been placed on probationary status or asked to leave the program based on lack of Satisfactory Progress may appeal these decisions by petitioning the
Dean to have an ad hoc Academic Appeals Committee convened. The student and the student's mentor (and/or First Year Mentor) will have an opportunity to speak with the Academic Appeals Committee. The committee will make a recommendation to the Dean; the student must abide by this decision.

A student will be permitted to maintain student status, with some student privileges, during the appeals process or until June 30 of that academic year, whichever comes first.

Core Course Attendance Policy
All students are expected to attend the Core Class regularly. If a student is going to be absent from the Core Class, they must notify the Registrar/Curriculum Specialist prior to the absence. A student is allowed a total of three absences from the Core Class over the course of the semester. Any absences in excess of three will result in two percentage points being subtracted from a student's participation grade per absence.

Additionally, students are expected to be ON TIME for class - being late to class can be considered an absence at the discretion of the teaching fellow, and could affect your participation and final grade.

Vacation Policy
In general, GSK anticipates that students in the second year and on will take up to three weeks of vacation each year, exclusive of travel to scientific meetings. Individual circumstances may dictate that a student along with the mentor design a vacation plan that is appropriate given the nature of the student's efforts over a period of time, in particular family circumstances, parental leave, etc. Students must be sensitive to their obligation to inform the mentor (or the rotation mentor, Deans and the First Year Mentor) of planned absences to minimize any disruption of work in the laboratory.

In the event of an unanticipated absence, students should make every effort to communicate with the laboratory and the Deans as soon as possible. Any unexplained absence will constitute lack of Satisfactory Progress in the program and can result in academic probation, administrative Leave of Absence, and ultimately, dismissal from the program.

Parental Leave
Thesis mentors are expected to allow students to take up to eight weeks of paid time off for parental leave for the birth or adoption of a child.

Leave of Absence and Withdrawal
A student wishing to interrupt doctoral study for one academic year or less, for serious illness or compelling personal reasons, may request a leave of absence. If the leave is approved by the Dean, the student will be reassured of readmission at the end of the approved leave. Such approval can only be obtained if the student is in good academic standing and has the approval of the mentor. Students who fail to follow any conditions of the approval of the leave of absence will be administratively withdrawn from the program. If the student wishes to return at a later date, that student must apply for re-admission to the program.

Students on a leave of absence are not eligible for the benefits associated with maintenance of student status, including stipend, health insurance, travel award, and student housing for the duration of the leave. Students on a medical leave of absence
may petition for continuation of health insurance and housing privileges; this request will be considered on an individual basis.

Students must submit a Request for a Leave of Absence Form with the appropriate documentation to the Dean. A student requesting a personal leave of absence must include a written statement that explains a "compelling personal reason." A student requesting a medical leave of absence must submit documentation from a physician.

_N.B._ – The period of an authorized leave is included in the program time limit. A student who was on an approved leave of absence may petition the Dean for an extension of the program time limit, to include the time period of the leave of absence. This petition must have the support of the student’s mentor and Advisory Committee. Such requests will be considered under special circumstances.

International students can only request a leave of absence for medical reasons.

Request for voluntary withdrawal from the program must be made by submission of the Request for Withdrawal Form. To resume doctoral study a former student must apply for re-admission.

**NOTE:** Students who are out of school for any extended period of time are responsible for ensuring that they abide by financial aid (such as loans) regulations as stipulated by the relevant agencies/institutions.

**Involuntary Student Leave**

The Graduate School is committed to the health, safety and well-being of all students and members of the community. In situations where a student is unable to care for themselves on a regular basis, is unable to perform their duties as a student, or presents a substantial risk of self-harm or harm to others, and the student declines to take a voluntary leave, the dean of the Graduate School has the authority to place the student on an involuntary leave.

An involuntary leave is not a disciplinary sanction and may not be intended or interpreted as punitive in nature. The leave does not count towards the statute of limitations for obtaining a degree. Operating under the umbrella of MSK, the Graduate School will consult certain MSK departments including Employee Health, HR Legal & Regulatory Affairs, Environmental Health & Safety, and Security in assessing an individual student’s situation. The Dean will form an ad hoc committee to determine the appropriate action and issue an official letter to the student of its decision. The student will have 5 days to submit a rebuttal.

Subject to approval by the Dean, a student placed on involuntary leave may remain in Graduate School housing, and for a period of six (6) months may continue to receive medical coverage, and may access available services including counseling and the Employee Assistance Program. At the end of the six-month period if the student does not submit a formal request for re-enrollment as set forth below, the ad hoc committee will review their case to determine next steps.

**Request for Re-enrollment**

A formal request for re-enrollment must be submitted to the Dean. The student’s re-enrollment request will be reviewed by the Dean, who, in consultation with the relevant MSK departments, must approve the re-enrollment and may impose such conditions as they may recommend to ensure the student’s successful return to the Graduate School. Upon receiving the student’s formal request for re-enrollment, the student will be notified of any applicable eligibility requirements, including medical clearance or other confirmation of their fitness to return/re-enroll. A student denied re-enrollment and return
from an involuntary leave of absence may submit an appeal to be re-considered by the Dean in consultation with the relevant MSK departments. The final decision will be made by the Dean and communicated to the student.

Policy for Return from Medical Leave
Students who wish to return from medical leave of absence should submit a formal letter to the Associate Dean along with the appropriate documentation from a physician clearing them to return as a student. Students must also be cleared to return as a student by MSK’s Employee Health and Wellness unit.

Maximum Time for Completion of All Degree Requirements
GSK allows students to be matriculated for a maximum of six years. Failure to complete all degree requirements within this time period may result in loss of good academic standing. Extension of this time period may be granted by the Dean upon consideration of a Petition for Extension by the student. Such petition, which may be downloaded from the student portal, must be co-signed by the student and Thesis Mentor and include a description of progress to degree, explanation of any extenuating circumstances, and an estimate of the additional time required for completion. Petitions must be filed by April 15th of the student’s sixth year in the program for extension to a seventh year of residence. Additional petitions for extension of residence must be filed by February 1 of the student’s seventh year and will be reviewed by the Curriculum Committee.
Student Services

Career and Professional Development
GSK actively supports career guidance for its students. It organizes regular seminars and workshops to increase students’ awareness of the wide range of career options available to them. Invited speakers include individuals from a wide range of careers.

GSK also participates in the activities and events of the New York Academy of Sciences. Paid memberships to the NYAS for all students are renewed each year. Students are encouraged to join the membership of the Academy to take advantage of its many scientific and career development programs. In particular, students can participate in the Science Alliance for Graduate Students and Postdocs. The Academy has partnered with the major educational institutions in New York City to provide a number of services, including: mentoring, networking, and career development. This is accomplished through local events and via a [dynamic website].

The Office of Career and Professional Development
SKI’s Office of Career and Professional Development (OCPD) works to enhance the professional development of our graduate students and postdoctoral researchers while assisting the faculty in training the next generation of leading biomedical scientists. The goal of the OCPD is to prepare the students for success during their graduate training and to help in planning for fulfilling careers in academia, industry, business, or government.

OCPD’s services are offered in a number of ways, including professional development workshops, seminars, and courses to complement the training at the bench. Individual guidance on interview processes and different career paths is readily available for GSK students, and individual career counseling, are provided through panel discussions and networking events.

Complete information about the services offered by the OCPD and on how to schedule an Individual appointment is available on the Office of Career and Professional Development website.

International Student Services
The GSK office coordinates services for international students with the MSK Immigration Office. Upon acceptance into GSK, students will be guided through the process of obtaining an F-1 student visa.

In addition to the issuance of an F-1 visa, students will be directed to resources on professional advisement on immigration, financial, employment, and other matters through personal appointments, specialized orientations, and workshops.

Students will be provided with information on Government Regulations and Procedures on issues such as maintaining legal status, employment options, travel and re-entry, and other matters.

All international students are required to adhere to the laws of the Department of Homeland Security and the US State Department. Students must provide a validated I-20 form before their fellowship package can be activated. Students are responsible to make
sure that they are always in compliance as mandated by the Department of Homeland Security and the US State Department.

All questions regarding the visa status should be addressed to the GSK Designated School Officials (DSO) in the MSK Immigration Office, or to the GSK office.

**Internship and Externship Policies**

GSK students in their third year or beyond in good standing and firmly established in their laboratory research are allowed to pursue full-time internships or part-time externships to enhance their development as scientists. Students who wish to enhance their scientific training outside of MSK may pursue **Internships**, which are full-time, temporary (up to three months) positions that will contribute to the student’s scientific development and advance their thesis research.

Moreover, some students may wish to learn about non-research career paths for scientists or develop their transferable skills by pursuing **Externships**, which are paid or unpaid, part-time experiences that are pursued on a student’s own personal time and do not need to benefit a student’s thesis research.

Students should note that internships and externships are a privilege and not a right. Students interested in pursuing either an Internship or Externship should initiate contact with the Dean to discuss their plans and to request the written guidelines and application form.

N.B. - All employment agreements will be reviewed by MSK’s Vice President (VP), Human Resources (HR) Legal & Regulatory Affairs. All technology transfer agreements must be approved by MSK’s Chief Intellectual Property (IP) Counsel. Students with questions about internships or externships should consult with the Deans in advance.

**The Library**

The MSK Library’s mission is to proactively partner with Library users by delivering innovative services and targeted published content in support of quality patient care, research excellence, and ongoing learning for the progressive control and cure of cancer.

The MSK Library subscribes to a full range of abstracting and indexing databases covering key science, medical and healthcare information. Library clients have access to large number of journal titles and textbooks that reflect the research and medical activities of the Center with over 85% of these titles available electronically.

Most of the Library’s content is available 24x7 via the [MSK Library Website](#). These online resources can be accessed either on campus or remotely. Students are encouraged to become familiar with the wide range of services available to them and to consult with library staff should they need assistance.

The MSK Library has expanded support in response to the [NIH Public Access Policy](#) and the mandate for compliance. Students who publish and associate their manuscripts with MSK can learn more about compliance by contacting us.

**Other Facilities**

Memorial Sloan Kettering’s main campus, home to the Gerstner Sloan Kettering Graduate School, is located on Manhattan’s Upper East Side. Its research space totals
approximately 618,500 net square feet of research space divided between the Mortimer B. Zuckerman Research Center, the Schwartz Research Building, and the Rockefeller Research Laboratories. The Rockefeller Laboratories house the 4 Basic Research Programs in state-of-the-art facilities. Although the building was originally opened in 1992, it is currently undergoing a floor-by-floor renovation. Among the upgrades are a CryoElectron Microscopy Facility, a dedicated epigenetics research center, and addition of computational biology workspace on 3 floors. To facilitate the expansion in the Bridge Research Programs, the Mortimer B. Zuckerman Research Center was built on the site of the original Kettering Research building. It was completed in 2014 and is home to the 4 Bridge Research Programs as well as the laboratories of the Clinical Research Program. It also has dry lab space for computational biology, a GMP cell engineering facility, and additional vivarium space. The Schwartz Building accommodates clinical and translational research laboratories, including members of Cancer Biology and Experimental Pathology, Imaging and Radiation Sciences, and Experimental Therapeutics Programs. A new 3,700 net-square foot cyclotron facility was completed in 2014 in its basement that supports the development of new imaging, therapeutic, and theranostic probes.

Dozens of Research Core Facilities — ranging from bioinformatics to high-throughput drug screening and x-ray crystallography — serve both basic and clinical research needs. These shared facilities offer state-of-the-art instruments and technical staff support to graduate students as they train and conduct research projects.

The Student Center, equipped with communications and audio-visual equipment, is the hub of activities for graduate students. It is adjacent to the offices of the graduate school. A student lounge is designed to accommodate student meetings, journal clubs and small seminars.

Memorial Sloan Kettering’s Student and Faculty Club offers students an informal setting to interact with colleagues, including fellow students, faculty, postdoctoral fellows, and students from joint programs with Weill Cornell Medical College and The Rockefeller University.
Student Benefits

Medical Insurance

All students are provided with a comprehensive health insurance package as part of the fellowship package. Insurance benefits also cover students’ spouses, domestic partners and dependents. Medical insurance coverage begins on the first day of the subsequent month in which the student matriculates and will end on the last day of the month in which the student status is no longer effective. If a spouse, domestic partner, and/or dependent child is added to your insurance plan, the value of this additional coverage is also considered taxable as imputed income (see student tax regulations in Appendix 1).

Mental Health

All students are offered full mental health coverage as part of their health insurance plan. In addition to benefits offered through health insurance, GSK and MSK have invested in additional resources to make counseling services more accessible.

Short-Term Counseling (up to six sessions for each resource)

- The Magellan Employee Assistance Program (EAP)
  - Offers free, confidential short-term counseling and supportive services 24/7/365 to all students and members of their household. Licensed counselors are available in person, by text message, live chat, phone or video conference to support students and household members with challenges such as stress, anxiety, grief, substance misuse, relationships, parenting and more.

  - Magellan’s services also include access to Dr. Penni Morganstein, Clinical Psychologist, who is dedicated to serving all MSK postdocs and students. Dr. Morganstein offers free, in-person and virtual counseling services exclusively to support MSK/GSK trainees with challenges of stress, anxiety, adjustment challenges, grief, relationship concerns, parenting, substance misuse and more. Daytime sessions are available. To speak confidentially with Dr. Morganstein and to schedule an appointment, please use the following link or contact her via morgansteinp@magellanhealth.com.

  - Note, all discussions with Dr. Morganstein remain confidential and are not shared with MSK/GSK.

- GSK students can also seek short term counseling from Dr. Chanchal Sharma, Assistant Attending, Clinical Psychologist. Dr. Sharma offers free, confidential, on-site and virtual short-term psychotherapy and interventions as well as assistance with linkage to external clinical SW, psychologists and psychiatrists. For more information, please see the mental health contact information page below.

Long-Term Counseling and/or Psychiatric Prescription Management, if needed

- Students have access to long-term counselors through their health insurance provider.
  
  Students who need assistance identifying healthcare providers and long-term mental health counselors who are within their insurance network can either contact their health
insurance provider directly or use MSK’s Health Advocate program.

- **Health Advocate** helps you **navigate the healthcare system** and make the most of your MSK medical plan. Turn to them throughout the year at (866) 695-8622 for help:
  - Finding doctors, hospitals, and other providers in your plan network
  - Scheduling appointments and tests, and transferring medical records
  - Resolving billing and insurance claims issues
  
  [https://mskbenefits.mskcc.org/keyword/health-advocate/](https://mskbenefits.mskcc.org/keyword/health-advocate/)

- **Telemedicine for Mental Health Through Your MSK Medical Plan:** If you are enrolled in any of the MSK medical plans, you and your covered dependents have access to free mental health services through your medical carrier’s telemedicine provider. You can schedule virtual visits with licensed psychiatrists, psychologists, counselors, and social workers. Depending on which MSK medical plan you’re enrolled in, you can use Teladoc, LiveHealth Online, or Virtual Visits to schedule confidential telemedicine visits with licensed mental health clinicians. You have the freedom to choose your healthcare provider, and you may continue your future visits with the same provider, if you choose. And Teladoc, LiveHealth Online, and Virtual Visits adhere to all HIPPA requirements, so you can feel confident knowing your health information is secure.

**Dental Insurance**

All students are provided with dental coverage through MetLife. The plan pays up to $1,000 in benefits for each covered person in a calendar year for preventive, diagnostic and restorative service.

**Vision Coverage**

All students are provided with the VSP Vision Care Plan, which provides an annual benefit for eye exams, glasses or contacts.

**Housing and Cost of Living**

Students who matriculate in GSK are offered affordable housing owned by MSK located in the Upper East Side neighborhood of Manhattan. The most available and guaranteed housing option will be studio apartments, which include a kitchenette and bath, with a 2023 monthly rent of $1,570. Shared units may also be available on a limited basis. The cost of housing is subsidized to approximately 40 percent below the market value in the same area. Rent for housing is deducted from the student’s stipend payments.

The occupancy agreement should be read carefully because it is a contract between MSK and the student. The housing contract is in effect for the duration of study and is automatically renewed each year. If a student wishes to vacate MSK housing before completion of the program, the student must abide by the vacate policy of the Housing Division.

Students who are finishing their degrees have to comply with the GSK sign-out process, which includes a 30-day notice for termination of the occupancy agreement with MSK.
Student Progress and Outcomes

Gerstner Sloan Kettering Graduate School has matriculated 220 students since our first class enrolled in 2006. We have a retention rate of 91% and the average time to degree is 6 years. Our students have been very successful, publishing over 480 papers and competing successfully for 69 independent graduate research fellowships such as those from the NIH and NSF. Directly after graduation, our alumni have pursued postdoctoral and full-time research positions in academia and industry as well as science-related careers in business and finance including positions as a biotech analyst, science writer, biotech firm manager, and consultant.

*As of Fall 2023*
Compliance Policies

- Code of Conduct
- Special Considerations for GSK Students Working on Conflicted Faculty/Mentor Research
- Prohibition on the Marketing of Credit Cards
- Policy Against Harassment and Discrimination
- Policy for the Prevention of and Response to Sexual Misconduct
- Amendments to the Educational Law
- Campus Security Rules & Regulations
- Drug-Free Schools And Communities Act (DFSCA) Substance Abuse Policy
- Family Education Rights and Privacy Act (FERPA)
- Student Resources
- Compliance Hotline

N.B., MSK’s Required Regulatory Training, which all MSK employees are subject to, includes the following online courses that cover a subset of regulatory and compliance-related topics:

1. Workplace Conduct
2. Safety & Emergency Preparedness
3. Information Technology (IT) Security
4. Privacy Basics

Memorial Sloan Kettering Cancer Center Code of Conduct

The Code of Conduct describes the governing values and standards of conduct for everyone associated with MSK. All MSK workforce members are required to follow the standards described in this Code when performing work in support of the Center's mission. The full Code of Conduct may be accessed via MSK website: Code of Conduct. A hard copy is distributed to incoming students.

Special Considerations for GSK Students Working on Conflicted Faculty/Mentor Research

MSK has adopted the Policy on Conflict of Interest and Commitment ("MSK Individual COI Policy"), which encompasses GSK, to identify, review, and manage outside interests and relationships that may give rise to conflicts of interest ("COI") in the context of an individual’s institutional responsibilities. GSK students engaged in research at MSK are considered “Covered Persons” under the MSK Individual COI Policy and are therefore subject to the training, disclosure, and other requirements outlined in this policy.

GSK student involvement in research related to a company in which a GSK faculty member maintains a financial interest, including a start-up company founded by that faculty member, requires special considerations from a COI perspective to ensure that both the student and educational mission are protected. Particular challenges arise when a GSK faculty member also serves as a mentor to a GSK student (including First Year Mentor, Rotation Mentor, or Thesis Mentor), and directs that student on a project that appears to benefit a company that the mentor founded or maintains a financial interest in.
To manage such potential conflicts, the following strategies should be employed:

1. **Disclosure of Faculty Member Interests under COI Management.** GSK faculty members, including mentors, under a COI Management Plan issued by the MSK COI Office, must provide full disclosure of their financial interests and relationship with any company that they have founded and/or maintain a financial interest in, to the following:
   - Any students working on research related to the company (i.e., research involving the company as a funder, collaborator, or sub-contractee, and/or involving intellectual property owned by, licensed to, or intended to be commercialized by the company);
   - Any students for whom the faculty member serves as mentor; and
   - The Thesis Committees of students working in that faculty member’s lab.

2. **Notification of Interests to GSK Dean.** The GSK Dean’s Office will be notified by the MSK COI Office of any faculty member covered under a COI Management Plan and whose interests may impact GSK students working on related research or under that faculty member’s supervision.

3. **Questions/Concerns.** Students may direct questions or concerns related to the effect of a faculty member’s conflict on their work to the GSK deans and/or the MSK COI Office (ecoi@mskcc.org), and/or the Office of the Ombudsperson (ombudsiac@mskcc.org).

**Prohibition on the Marketing of Credit Cards**

In accordance with New York State Law (Article 129-A, Section 6437), the advertising, marketing or merchandising of credit cards on the GSK campus to students is prohibited.

**Policy Against Harassment and Discrimination**

**Scope**

This policy applies to all applicants for employment, MSK employees, remote workers, contingent workers, contractors and vendors. This policy prohibits harassment, discrimination and retaliation, whether engaged in by fellow employees, by a manager, or by someone not directly connected to MSK (e.g., an outside vendor, consultant, customer conducting business with the institution, patient, or visitor who uses MSK’s resources or who visits patients). Conduct prohibited by this policy is unacceptable in the workplace as well as in any work-related setting outside the workplace, such as during business trips or at business meetings and business-related social events, or in any other situations that might adversely impact the workplace.

**Introduction**

MSK is committed to a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that prohibits harassment, discrimination and retaliation. MSK expects that all work relationships among employees or between employees and persons outside the institution will be business-like and free of discrimination, harassment and retaliation.
Policy
MSK abides by all applicable federal, state and local laws which prohibit discrimination or harassment on the basis of race, color, religion, creed, gender, age, sex (including sexual harassment), national or ethnic origin, marital, caregiver, familial or partnership status, sexual orientation, gender identity or expression or transgender status, pregnancy, sexual and reproductive health choices, citizenship status or alienage, disability, status in the uniformed services of the United States (including veteran status), credit and salary history, unemployment status, genetic pre-disposition or carrier status, status as a victim of domestic violence, sexual violence or stalking, arrest and conviction record or any other status protected by law in any employment program, policy, or practice of MSK. The prohibition of discrimination on the basis of race, color, religion or creed also prohibits grooming or appearance policies that ban, limit, or otherwise restrict natural hair or hairstyles associated with racial, ethnic, or cultural identities, or restrictions on attire, clothing or facial hair that would require an employee to violate or forego a sincerely held practice of their religion.

In accordance with these laws, MSK also prohibits retaliation against anyone who has complained about harassment or discrimination or has otherwise exercised rights guaranteed by these laws. All employees of MSK have an obligation to cooperate in the application of this policy and the investigation into alleged violations of this policy. Employees found to have engaged in acts of discrimination, harassment and/or retaliation will be subject to corrective action, up to and including termination.

Definitions:
Sexual harassment is a form of gender-based discrimination and is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example: (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

Discrimination based on sex stereotypes, gender expression and perceived identity are all forms of sexual harassment. The gender spectrum is nuanced, but the three most common ways people identify are cisgender, transgender, and non-binary. A cisgender person is someone whose gender aligns with the sex they were assigned at birth. A transgender person is someone whose gender is different than the sex they were assigned at birth. A non-binary person does not identify exclusively as male or female.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different gender. Harassment does not need to be severe or pervasive to be illegal. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; intentional misuse of an individual’s preferred pronouns; verbal abuse of a sexual nature; commentary about an individual’s body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation of pictures, videos or electronic communications; and other physical, verbal or visual conduct of a sexual nature.

Harassment or discrimination on the basis of any other protected characteristic is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, creed, sex, national or ethnic origin,
age, disability, citizenship status or alienage, sexual orientation, veteran status, marital, caregiver, familial or partnership status, gender identity or expression or transgender status, pregnancy, sexual and reproductive health choices, credit and salary history, unemployment status, genetic pre-disposition or carrier status, status in the uniformed services of the United States (including veteran status), status as a victim of domestic violence, sexual violence or stalking, arrest and conviction record or any other status protected by law or that of his or her relatives, friends or associates, and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities (such as a promotion, pay increase or performance evaluation).

Harassing conduct includes, but is not limited to: epithets, slurs or stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and display, circulation, or electronic communication in the workplace of written or graphic material that denigrates or shows hostility or aversion toward an individual or group. Intent does not affect whether conduct is considered harassment.

**Retaliation**
MSK prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting discrimination or harassment or for participating in an investigation of a claim of discrimination or harassment is a serious violation of this policy and, like harassment or discrimination, will be subject to corrective action, up to and including termination.

**Confidentiality**
Cases involving discrimination, harassment and/or retaliation are particularly sensitive, and confidentiality is taken very seriously. Dissemination of information relating to the case will be limited to individuals who have a legitimate “need to know” or who have information regarding the matter.

**Complaint and Investigation Procedures**
MSK strongly urges the prompt reporting of all incidents of harassment, discrimination and/or retaliation, regardless of the offender’s identity or position, so that rapid and appropriate action can be taken. Generally, if practical, an employee who believes he or she is being harassed, discriminated and/or retaliated against should inform the individual who is the source of the perceived harassment, discrimination and/or retaliation that the employee is offended by the behavior and request that it be stopped.

If, for any reason, the employee does not feel comfortable discussing the perceived harassment, discrimination and/or retaliation directly with the individual who is the source of the perceived conduct, or if the employee has requested that the behavior stop and it has not stopped, the employee should immediately report the conduct to his or her manager, any other management-level employee of MSK, an Employee Relations Advisor, any representative of the HR Legal & Regulatory Affairs Department or the MSK Compliance Hotline (866-568-5421 or https://mskcc.ethicspoint.com). Employees may complain verbally or in writing by submitting a complaint using the complaint form available here. There is no requirement to use the complaint form.

If the harassment, discrimination and/or retaliation complaint is reported to someone other than a representative of the Human Resources Department, the individual hearing the complaint must report it to an Employee Relations Advisor or the HR Legal & Regulatory Affairs Department. The HR Representative will promptly and thoroughly investigate the
complaint, ensuring confidentiality to the extent possible throughout the investigation process. The investigation may include individual interviews with parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Based on the findings of the investigation, the HR Representative will recommend appropriate action, if any, to be taken. Such action may include training, referral to counseling and/or corrective action, such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension with or without pay, or termination of employment, as MSK determines is appropriate under the circumstances.

An HR Representative, in connection with appropriate management, will inform both the employee complaining of harassment, discrimination and/or retaliation and the individual alleged to have engaged in said behavior of the results of the investigation, and will ensure that any agreed-upon action is carried out. Managers and supervisors have a responsibility to address the needs of those who have experienced harassment or discrimination to ensure the workplace is safe, supportive, and free from retaliation.

**Bystander Intervention**

Any employee witnessing harassment, discrimination and/or retaliation as a bystander is encouraged to report it. A manager or supervisor that is a bystander is required to report it. There are five standard methods of bystander intervention that can be used when anyone witnesses harassment or discrimination: (i) interrupt the harassment by engaging with the individual being harassed; (ii) ask a third party to help intervene; (iii) record or take notes on the harassment to benefit a future investigation; (iv) check in with the person who experienced harassment or discrimination; (v) if safe, confront the harasser(s) and name the behavior as inappropriate.

**Legal Protections and External Remedies**

Discrimination, harassment and retaliation are prohibited not only by MSK, but also by state, federal and local law. Employees who bring claims in these external venues and prevail on those claims will be entitled to remedies, which could include a monetary award.

Aside from MSK’s internal processes, employees also may choose to pursue legal remedies with the following governmental entities.

**New York State Division of Human Rights**

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to employers in New York State regarding discrimination, harassment and retaliation, and protects employees, paid or unpaid interns and non-employees regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with New York State Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with DHR may be filed any time within one year of the discrimination, harassment or retaliation. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged discrimination, harassment or retaliation. An individual may not file with DHR if they have already filed an HRL complaint in state court. In addition, New York State has established a free and confidential hotline (1-800-HARASS-3) to connect with pro bono attorneys on sexual harassment issues, or submit a complaint.
United States Equal Employment Opportunity Commission (EEOC)
The EEOC enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the discrimination, harassment or retaliation. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination, harassment or retaliation has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

Local Protections
Many localities enforce laws protecting individuals from discrimination, harassment and retaliation. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of discrimination, harassment or retaliation with the New York City Commission on Human Rights.

Anti-Discrimination, Harassment and Retaliation Training
All MSK employees and contingent workers must complete anti-discrimination, harassment and retaliation training on an annual basis. Training will be provided through MSK’s Required Regulatory Training.
Policy for the Prevention of and Response to Sexual Misconduct

To the extent that this Policy overlaps with Gerstner Sloan Kettering Graduate School's Non-Discrimination, Anti-Harassment, and Anti-Retaliation Policies, this Policy will control in cases involving sexual misconduct, including but not limited to sex discrimination (to the extent described below), sexual harassment, and/or sexual violence, sexual assault, domestic violence, dating violence, and stalking against a student.

1. Policy Statement

The Policy for the Prevention of and Response to Sexual Misconduct (“Policy”) is for the benefit of students at the Louis V. Gerstner, Jr. Graduate School of Biomedical Sciences (“GSK” or “the School”), Memorial Sloan Kettering Cancer Center (“MSK”). GSK is committed to maintaining an educational environment for students that is free from sexual misconduct. GSK does not discriminate on the basis of sex, gender, parental, family or marital status in its education programs and activities, and it is required by Title IX of the U.S. Education Amendments of 1972 not to discriminate in such a manner.

GSK strongly encourages every member of our community who is a victim of, or has knowledge of sexual misconduct, including but not limited to sex discrimination, sexual harassment, and/or sexual violence, sexual assault, domestic violence, dating violence, and/or stalking, against a student to report that conduct as set forth below. GSK is committed to responding to such reports promptly, with sensitivity for all concerned, and with a fair and equitable process.

2. Controlling Law

   A. Title IX. GSK complies with Title IX of the Educational Amendments of 1972 (“Title IX”), which is a federal law that prohibits any person in the United States from being discriminated against on the basis of sex in seeking access to any educational program or activity receiving federal financial assistance. The U.S. Department of Education, which enforces Title IX, has determined that Title IX’s prohibition on sex discrimination includes various forms of sexual harassment and sexual violence that may interfere with a student’s ability to equally access education programs or activities.

   B. Article 129-B. Article 129-B of the New York Education Law (“Article 129-B) is a state law that also provides protections for students who are the victims of sexual misconduct, including the right to report the incident to GSK or law enforcement, to be protected by GSK from retaliation for reporting an incident, and to receive assistance and resources from GSK.

3. Individuals and Conduct Covered

This Policy covers any occurrence of sexual misconduct, including but not limited to sex discrimination, sexual harassment, and/or sexual violence, sexual assault,
domestic violence, dating violence, and stalking, regardless of whether the accused is a student, employee or third party, or whether the prohibited conduct occurred on or off campus.

GSK will address reported sexual misconduct against a student whether the report is made by the alleged victim or a reporting individual. GSK will also ensure that a student who is the victim of sexual misconduct is afforded the protections outlined in the Students’ Bill of Rights, which appears at the end of this Policy, including the right to make a report to local law enforcement and to be protected from retaliation.

4. Definitions

“Affirmative Consent” is a knowing, voluntary, and mutual decision among all participants to engage in sexual activity. Consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in the sexual activity. Silence or lack of resistance, in and of itself, does not demonstrate consent. The definition of consent does not vary based upon a participant’s sex, gender, sexual orientation, gender identity, or gender expression. The following principles are provided as guidance for the GSK community regarding the concept of Affirmative Consent:

a) Consent to any sexual act or prior consensual sexual activity between or with any party does not necessarily constitute consent to any other sexual act.

b) Consent is required regardless of whether the person initiating the act is under the influence of drugs and/or alcohol.

c) Consent may be initially given but withdrawn at any time.

d) Consent cannot be given when a person is incapacitated, which occurs when an individual lacks the ability to knowingly choose to participate in sexual activity. Incapacitation may be caused by the lack of consciousness or being asleep, being involuntarily restrained, or if an individual otherwise cannot consent. Depending on the degree of intoxication, someone who is under the influence of alcohol, drugs, or other intoxicants may be incapacitated and therefore unable to consent.

e) Consent cannot be given when it is the result of any coercion, intimidation, force, or threat of harm.

f) When consent is withdrawn or can no longer be given, sexual activity must stop.

“Complainant” is any individual who has reported being or is alleged to be the victim of conduct that could constitute sexual misconduct. A complainant may also be referred to as a Reporting Individual.

“Dating Violence” is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. The existence of such a relationship shall be determined based on the complainant’s statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

“Domestic Violence” is also considered relationship violence and includes any felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a
A “Hostile Environment” is created when prohibited conduct is sufficiently severe or pervasive as to limit or deny a student’s ability to participate in or benefit from GSK’s educational programs or activities.

“Respondent” is an individual who has been reported to be the perpetrator of conduct that could constitute sexual misconduct under this Policy.

“Sex Discrimination” is inequitable treatment of an individual on the basis of the individual’s actual or perceived gender or sex.

“Sexual Assault” is any type of sexual contact or behavior that occurs without the explicit consent of the recipient, including instances where the victim is incapable of giving consent. Examples of such contact or behavior include rape, fondling, incest, and statutory rape.

“Sexual Harassment as defined by Title IX” conduct that includes one or more of the following: (1) an employee of the School conditioning the provision of an aid, benefit, or service of the School on an individual’s participation in unwelcome sexual conduct (i.e., quid pro quo); (2) unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the School’s education program or activity; or (3) sexual assault, domestic violence, dating violence and stalking. (Sexual harassment is defined more broadly under other laws and under other School policies, including the MSK Policy Against Harassment and Discrimination).

“Sexual Misconduct” includes sexual discrimination, sexual harassment, sexual violence, sexual assault, domestic violence, dating violence and stalking. For sexual misconduct to fall under Title IX, it must: (1) meet the definition of sexual harassment as defined by Title IX; (2) occur in GSK’s education program or activity; and (3) within the United States. Incidents of sexual violence, sexual assault, domestic violence, dating violence and stalking that occur off campus or outside of the United States, in which a student is a complainant or respondent, violate New York State law, and will follow the procedures set forth below, except there is no live hearing process for such claims – the investigator’s Investigative Report will be reviewed by the Designated Arbiter, who will determine whether there has been a violation of this Policy. Sexual harassment that occurs outside of the School’s education program or activities, or incidents that do not meet the definition of sexual harassment in this Policy, may fall under other GSK and MSK policies and will be addressed consistent with those policies.

“Sexual Violence” is an actual or attempted physical sexual act performed against a person’s will or without a person’s affirmative consent, including where the person is incapable of giving consent due to a disability or the use of drugs and/or alcohol.

“Stalking” is a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others or suffer substantial emotional distress.
5. Reporting a Violation of this Policy

A. Title IX Coordinators. GSK has designated and authorized the following individuals as Title IX Coordinators to address concerns or inquiries regarding discrimination on the basis of sex, including sexual harassment, sexual assault, dating violence, domestic violence, stalking, and gender-based harassment:

Leslie Ballantyne, Esq.
Vice-President, HR Legal & Regulatory Affairs
633 Third Avenue
Telephone: (646) 227-2742
Email: ballantl@mskcc.org

Lindsay Cornacchia, Esq.
Associate Director of Compliance & Assistant General Counsel
1275 York Avenue
Telephone: (212) 639-2496
Email: cornaccl@mskcc.org

Any individual may report a violation of this Policy (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex misconduct) to the Title IX Coordinators at any time, including during non-business hours, by mail, phone, or email.

The Title IX Coordinators oversee implementation of GSK’s Policies and must be informed of all reports and complaints of sexual misconduct, including but not limited to sex discrimination, sexual harassment, and/or sexual violence, sexual assault, domestic violence, dating violence, and stalking against a student, even if the report or complaint was initially made to another individual or if the investigation will be conducted by another individual or office.

The Title IX Coordinators are responsible for:
- Activating GSK’s Title IX grievance fact-finding, hearing, and determination procedures;
- Evaluating confidentiality requests;
- Determining the resources required to conduct an investigation, if warranted;
- Conducting and/or managing a grievance investigation and appeal, including designating other GSK employees or third parties to assist, as needed and working with law enforcement when necessary;
- Determining appropriate interim measures for a complainant, including providing support and counseling resources, and taking steps to protect public safety during the course of an investigation;
- Determining appropriate sanctions against an offender and remedies for the complainant;
- Enforcing sanctions with the assistance of GSK and MSK’s administrative leadership; and
- Recommending necessary changes to GSK’s policies or procedures, as needed.

B. Other Options for Reporting. In addition to the Title IX Coordinators, reports can also be made to:
• **Reporting to Law Enforcement:** Members of the GSK community have the option of reporting sexual misconduct to law enforcement. Formal complaints of sexual misconduct can be made to local law enforcement authorities by contacting the NYPD (by calling 911 or reporting the crime to a local police precinct), the District Attorney of New York Sex Crimes Unit at (212) 335-9373, or the New York State Police Sexual Assault Victims Unit.

• **Reporting to the MSK Compliance Hotline** (by calling 866.568.5421 or by going to https://mskcc.ethicspoint.com). The MSK Compliance Hotline is available 24 hours a day, every day of the year, and is managed by an outside company. Reports can be made anonymously.

• **Reporting to the School Security Department or Vice-President of Security:** The School Security Department can be reached by dialing (212) 639-7866. Mark Moodie, the Vice-President of Security, can be reached at (212) 639-7863 or moodiem@mskcc.org.

• **Reporting to the MSK Human Resources Department:** Melissa Maxwell-Avila, MSK Human Resources Business Partner, can be reached at (646)227-3888 or maxwellm@mskcc.org.

6. **Confidentiality & Privacy**

GSK values the privacy of its community members, and individuals should be able to seek the assistance they need without fear that the information they provide will be shared more broadly.

A. **Confidentiality.** Some resources on campus are confidential and will not share any identifying information with others, except as required by law in emergency circumstances. If an individual complainant wishes to keep their identity anonymous, they can use a confidential resource. Confidential resources can and will maintain the confidentiality of information provided to them by a complainant, accused, or reporting individual. A list of available confidential resources can be found on the GSK website.

B. **Privacy.** Other resources are not confidential but will protect students' privacy to the greatest extent possible and share information with others only on a need-to-know basis to comply with the School's obligations under the law and School policies. This includes the Title IX Coordinators, as well as certain GSK and MSK personnel (including officials with authority) who have a duty to report conduct prohibited under this Policy to the Title IX Coordinator or take action to redress such conduct. These personnel will share a complaint or report only as necessary for the Title IX Coordinators to investigate and/or seek a resolution and, if required, with law enforcement.

C. **Requests for Confidentiality.** Where a victim of sexual misconduct wishes to maintain confidentiality, GSK must weigh the request(s) against its obligation to provide a safe, non-discriminatory environment for all members of the community, including the victim, and its legal obligations. The Title IX Coordinators will evaluate requests for confidentiality once the Title IX Coordinators are on notice of alleged sexual misconduct.
7. Complainant's Rights

A. A complainant has the right to make a complaint, withdraw a complaint at any time, or not report a complaint. A complainant also has the right to file a criminal complaint or to pursue his or her rights under Title VII of the Civil Rights Act of 1964, before, during, or after (i) reporting a Title IX complaint, or (ii) activating GSK's internal Title IX investigation or appeal process.

B. Individuals that choose to make a complaint of sexual misconduct, including but not limited to sex discrimination, sexual harassment, and/or sexual violence, sexual assault, domestic violence, dating violence, and stalking are afforded the right to:

- Notify GSK's Vice President of Security, local law enforcement, and/or state police;
- Have emergency access to the Title IX Coordinators who will provide information regarding options to proceed, the importance of preserving evidence, and detailing the criminal justice process and the standards of proof that apply;
- Disclose confidentially the incident to institution representatives who may assist in obtaining services;
- Disclose confidentially the incident and obtain services from the state or local government;
- Disclose the incident to GSK or MSK representatives who can offer privacy or confidentiality, as appropriate;
- File a report of sexual assault, domestic violence, dating violence, and/or stalking and the right to consult the Title IX Coordinators and other appropriate GSK or MSK representatives;
- Disclose the incident to MSK's Human Resources division or the right to request that a confidential or private employee assist in reporting to the appropriate human resources representative; and
- Withdraw a complaint or involvement from the GSK or MSK process at any time.

C. Supportive Measures

Complainants who report allegations that fall under this Policy, have the right to receive supportive measures from GSK regardless of whether they desire to file a complaint. Supportive measures are non-disciplinary and non-punitive. They may be made available free of charge and kept confidential except as necessary to facilitate the supportive measure. Supportive measures may include, but are not limited to, the following:

- Counseling
- Extensions of deadlines or other course/resource-related adjustments
- Modifications of work or class schedules
- Campus security escort services
- Restrictions on contact between the parties (no contact orders)
- Changes in work or housing locations
- Leaves of absence
- Increased security and monitoring of certain areas of the campus

8. **Grievance Process for Addressing Complaints of Sex Discrimination**

Any complaint of sex discrimination alleged by a student – i.e., alleged unfavorable treatment of a student on the basis of the student’s gender – shall be subject to the complaint procedures set forth in GSK’s Non-Discrimination, Anti-Harassment, and Anti-Retaliation Policy, including prompt investigation and responsive action, if appropriate.

9. **Grievance Process for Addressing Complaints of Sexual Misconduct**

A. **Initial Assessment**

1. Following receipt of a report of sexual misconduct, the Title IX Coordinator will conduct an initial assessment. As part of the initial assessment, the Title IX Coordinator will take the following steps:

   a) Assess the nature and circumstances of the complaint/report.
   
   b) Address the immediate needs and concerns of the complainant, including physical safety and emotional well-being needs.
   
   c) Provide copies of or direct the complainant to GSK’s Policy and accompanying procedures.
   
   d) Provide the complainant with information about resources, including information about intervention, mental health counseling and medical services, sexually transmitted infections, and sexual assault forensic examinations.
   
   e) Provide information regarding options to proceed, the importance of preserving evidence, and detailing the criminal justice process and the

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1 On May 19, 2020, the U.S. Department of Education issued a Final Rule under Title IX that: (1) defines the meaning of “sexual harassment”; (2) addresses how this institution must respond to reports of misconduct falling within that definition of sexual harassment; and (3) mandates a grievance process that this institution must follow to comply with the law in these specific covered cases before issuing a disciplinary sanction against a person accused of sexual harassment. Under the Final Rule, GSK must narrow both the geographic scope of its authority to act under Title IX and the types of “sexual harassment” that it must subject to its Title IX adjudication process. Incidents that fall outside the definition of sexual harassment under Title IX will follow the procedures set forth below, except there is no live hearing process for such claims – the final Investigative Report will be reviewed by the Designated Arbiter, who will determine whether there has been a violation of this Policy.
standards of proof that apply.

f) Direct the complainant to information regarding on-campus and off-campus resources and the range of appropriate and available supportive and protective measures.

g) Explain GSK’s policy prohibiting retaliation.

2. If the Title IX Coordinator determines that the circumstances warrant proceeding to an investigation, the School will ask for consent from the complainant before commencing an investigation, and whether the complainant wants to file a formal complaint. A formal complaint is a document filed by the complainant (in person, by mail, or by electronic mail) with the Title IX Coordinator alleging sexual misconduct against a respondent. At the time of filing a formal complaint, a complainant must be participating in or attempting to participate in the education program or activity of the School.

3. A complainant may decline to file a formal complaint and request that GSK not investigate or take action. GSK will honor the complainant’s request unless the School, through the Title IX Coordinator, determines in good faith that it is necessary to proceed in order to limit the risk of harm to the complainant or other members of the School Community, in which case the Title IX Coordinator may sign the formal complaint. The School will inform the complainant of this decision in writing, and the complainant need not participate in the process further but will receive all notices issued under this Policy and Process. Nothing in this Policy prevents a complainant from seeking the assistance of state or local law enforcement alongside the appropriate on-campus process.

4. The following factors will be used when determining whether to honor a request to not investigate or take action:

a) Whether the accused has a history of violent behavior or is a repeat offender;

b) Whether the incident represents escalation in unlawful conduct on behalf of the accused from previously noted behavior;

c) The increased risk the accused will commit additional acts of violence;

d) Whether the accused used a weapon or force;

e) Whether the complainant is a minor; and

f) Whether the institution possesses other means to obtain evidence such as security footage, and whether available information reveals a pattern of perpetration at a given location or by a particular group.

B. Determining Jurisdiction under Title IX or other GSK Policies

1. In the first instance, the Title IX Coordinator or designee shall determine
whether the alleged conduct falls under the definition of sexual misconduct under Title IX – including the requirement that the conduct occur in the School’s educational program or activities and within the United States.

2. If the Title IX Coordinator determines that a complaint does not fall under the definition of sexual misconduct under Title IX – for example, if the alleged incident did not occur in the School’s education program or activity – the School will promptly send a Notice of Dismissal of the action under Title IX to both parties. Dismissal at this stage may be reviewed on appeal.

3. Where the complainant or respondent is a student, the Title IX Coordinator or designee will then assess whether the complaint alleges sexual misconduct under this Policy, outside of the Title IX definition, including sexual assault, stalking, domestic violence and/or dating violence that occurred off campus. Conduct in this category will be investigated and assessed pursuant to the procedures set forth below, except that there will not be hearings in such matters – rather, the Investigative Report will be reviewed by the Designated Arbiter, and the Designated Arbiter will make a determination as to whether a violation of this Policy occurred.

4. If the conduct alleged does not constitute sexual misconduct as defined by this policy, it may still violate other School policies, and it may be investigated consistent with applicable School policies and procedures. If the actions alleged in a complaint do not fall under this policy, but they may fall under another policy, the Title IX Coordinator will inform the appropriate individual(s) of the matter for further investigation and consideration.

C. Notice of Allegations

1. The Title IX Coordinator will draft and provide the Notice of Allegations to any party (complainants and respondents) to the allegations of sexual misconduct. Notice will go out to the parties promptly after complainant files a formal complaint or the School decides to proceed with a formal complaint.

2. Parties will be provided sufficient time to review the Notice of Allegations and prepare a response before any initial interview. The Title IX Coordinator may determine that the formal complaint must be dismissed under Title IX on the mandatory grounds identified above and will issue a Notice of Dismissal. If such a determination is made, any party to the allegations of sexual misconduct identified in the formal complaint will receive the Notice of Dismissal in conjunction with, or in separate correspondence after, the Notice of Allegations.

3. **Contents of Notice.** The Notice of Allegations will include the following:

   a) Notice of GSK’s Grievance Process and a hyperlink to a copy of the process.

   b) Description of the date, time, location and factual allegations concerning the violation – including who was involved.

   c) A reference to the specific rules and/or code of conduct/policy provisions alleged to have been violated.
d) A statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process.

e) A statement that the parties may have an advisor of their choice, who may be, but is not required to be, an attorney.

f) A statement that the parties can request to inspect and review evidence, and the parties will be provided an opportunity to do so.

g) A statement that information protected by legal privilege – e.g., attorney-client privilege or doctor-patient privilege – cannot be used during the investigation unless the person holding that privilege waives it.

h) A statement that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.

4. **Updated Notice.** An updated notice will be provided if GSK decides to investigate allegations about the respondent or complainant that are not included in the initial notice.

5. **Interim Measures.** Prior to and during an investigation, interim measures may be issued based on a party’s request or at GSK’s own initiative. Potential interim measures include but are not limited to:

a) Following an individualized safety and risk analysis, GSK may seek to remove a respondent from campus on an emergency basis if GSK determines that there is an immediate threat to the health or safety of any student or other individual arising from the allegations. The respondent will be afforded the opportunity to challenge the decision immediately following the removal.

b) GSK may impose reasonable accommodations that effect a change in academic class, work schedules, housing arrangements, employment, transportation, and other applicable arrangements in order to help ensure safety, prevent retaliation, and avoid an ongoing hostile environment.

c) When the respondent is a GSK student, the complainant may request a “no contact order” consistent with GSK and MSK policies and procedures.

d) Both parties may (i) request any of the above protections or accommodations, (ii) request to be afforded a reasonably prompt review by the Title IX Coordinator or designee of the need for and terms of any of the above protections or accommodations (even if the victim does not file or continue to pursue a complaint), including potential modification, and (iii) will be allowed to submit evidence in support or defense of the request. The Title IX Coordinator will be responsible for coordinating with appropriate offices on campus to implement appropriate measures.
D. Investigation Process

1. The Title IX Coordinator and/or an investigator designated by the Title IX Coordinator ("Title IX investigator") will perform an investigation of the conduct alleged to constitute sexual misconduct after issuing the Notice of Allegations.

2. The sexual misconduct investigation may involve, but is not limited to: (1) conducting interviews of the complainant, the respondent, and any witnesses or other third-parties who may have information or evidence regarding the allegations; (2) reviewing documents and records, including law enforcement investigation documents, student and personnel files, and written statements regarding the allegations; and (3) gathering and examining other relevant documents and evidence, including video, audio, photographs, e-mails, text-messages or social media posts that may be relevant to the allegations.

3. The following principles will guide all investigations of alleged sexual misconduct:
   a) The investigation will be fair, impartial, timely, and thorough, taking into consideration any request by the complainant or reporting individual for confidentiality and/or privacy.
   b) GSK, and not the parties, has the burden of proof and the burden of gathering evidence, i.e., the responsibility of showing a violation of this Policy has occurred.
   c) GSK cannot access, consider, or disclose medical records without a waiver from the party (or parent, if applicable) to whom the records belong or of whom the records include information.
   d) Equal opportunity will be provided for the parties to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence, (i.e., evidence that tends to prove and disprove the allegations) as described below. All parties must submit any evidence they would like included in the investigation prior to beginning of the inspection and review period.

4. **Timeframe.** To the extent possible and consistent with a full and fair process, the School will seek to resolve complaints within approximately 100 calendar days of an initial report, not including the time for any appeal. The School will seek to resolve appeals within 50 calendar days. Time frames will vary depending on the complexity of the investigation and the severity and extent of the alleged misconduct. The School will give the parties periodic status updates.

5. **Advisor of Choice.** Parties will be allowed equal access to advisors and support persons; any restrictions on advisor participation will be applied equally. Students participating as complainant or respondent in this process may be accompanied by an Advisor of Choice to any meeting or hearing to which they are required or are eligible to attend.

6. **Notice of Meetings and Interviews.** The School will provide, to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other
meetings with a party, with sufficient time for the party to prepare to participate.

7. **Investigative Report.**

   a) The Title IX Coordinator or Title IX investigator will create an Investigative Report ("Report") that fairly summarizes relevant evidence discovered during the course of the investigation, and the investigator’s findings.

   b) The parties will receive a draft of the full Report and any evidence directly related to the complaint. The parties will have ten (10) calendar days to respond to the Report and the evidence in writing. Witnesses will also be given a copy of a summary of their witness interview in the draft Report and be given least ten (10) calendar days to confirm its accuracy or make any necessary corrections.

   c) The Title IX Coordinator or Title IX investigator will consider any written response to the Report or evidence by the parties before finalizing the Report. The respondent and complainant will receive a final copy of the Report at least ten (10) calendar days before the hearing or review before a Designated Arbiter.

   d) The final Report will be submitted to the appropriate Designated Arbiter. The appropriate Designated Arbiter will be determined on a case-by-case basis and will be appointed by the Dean of GSK or designee.

E. **Hearing Procedures for Allegations of Sexual Misconduct under Title IX**

1. **General Hearing Rules.** For allegations of sexual misconduct under Title IX, upon receipt and consideration of the Investigative Report, the Designated Arbiter will hold a live hearing. The live hearing may be conducted with all parties physically present in the same geographic location, or—at GSK’s discretion—any or all parties, witnesses, and other participants may appear at the live hearing virtually through secure remote video conferencing as prescribed by GSK. All reasonable measures will be taken to ensure that proceedings are conducted in a manner that does not inflict additional trauma on the complainant. A recording or transcript will be made of the hearing and will be made available for the parties to review.

2. **Participants in Hearing.** Live hearings are not public, and the only individuals permitted to participate in the hearing are as follows:

   a) **Complainant and Respondent (The Parties).** The parties cannot waive the right to a live hearing. If a party does not appear at the hearing or is not subject to questioning/cross-examination, the Designated Arbiter will exclude and not rely on that party’s statements in reaching a determination regarding responsibility. The decision-maker cannot draw an inference about the determination regarding responsibility based solely on a party’s absence from the live hearing or refusal to answer cross examination or other questions.

   b) **Designated Arbiter.** A hearing body will consist of a single Designated Arbiter. No member of the hearing body will also have
served as the Title IX Coordinator, Title IX investigator, or advisor to any party in the case, nor may any member of the hearing body serve on the appeals body in the case. No member of the hearing body will have a conflict of interest or bias in favor of or against complainants or respondents generally, or in favor or against the parties to the particular case. During the hearing, the Designated Arbiter will determine the order of witnesses and has the discretion to ask the witnesses questions.

c) **Advisor of choice.** The parties have the right to select an advisor of their choice, who may be, but does not have to be, an attorney. The advisor of choice may accompany the parties to any meeting or hearing they are permitted to attend, but may not speak for the party, except for the purpose of cross-examination. The parties are not permitted to conduct cross-examination; it must be conducted by the advisor. As a result, if a party does not select an advisor, GSK will select an advisor to serve in this role for the limited purpose of conducting the cross-examination at no fee or charge to the party. If a party does not attend the live hearing, the party’s advisor may appear and conduct cross-examination on their behalf. If neither a party nor their advisor appear at the hearing, GSK will provide an advisor to appear on behalf of the non-appearing party.

d) **Witnesses.** Witnesses cannot be compelled to participate in the live hearing and have the right not to participate in the hearing free from retaliation. If a witness does not appear at the hearing or is not subject to questioning/cross-examination, the Designated Arbiter will exclude and not rely on that witness’ statements in reaching a determination regarding responsibility.

3. **Cross-Examination Procedure.** Each party’s advisor will conduct live cross-examination of the other party or parties and witnesses. During this live-cross examination the advisor will ask the other party or parties and witnesses relevant questions and follow-up questions, including those challenging credibility. Questions must be relevant and must not pertain to complainant’s past sexual behavior or sexual predisposition – with two exceptions – where evidence of prior sexual behavior is offered to prove someone other than the respondent committed the alleged offense, or where prior sexual behavior evidence is specifically about the complainant and the respondent and is offered to prove consent. Before any cross-examination question is answered, the Designated Arbiter will determine if the question is relevant. A lawyer from the Office of General Counsel will serve as counsel to the Designated Arbiter and may consult with the Designated Arbiter concerning such determinations.

F. **Determination Regarding Responsibility**

1. **Standard of Proof.** The preponderance of the evidence standard will apply for investigations and determinations regarding responsibility of formal complaints covered under this Policy. This means that the investigation and hearing will determine whether it is more likely than not that a violation of this Policy occurred.

2. **Written Determination.** The Designated Arbiter will issue a written determination regarding responsibility with findings of fact, conclusions about
whether the alleged conduct occurred, rationale for the result as to each allegation, any disciplinary sanctions imposed on the respondent, and whether remedies will be provided to the complainant. Designated Arbiters are empowered to impose what they believe to be the appropriate sanctions and/or remedial actions following a determination that this Policy was violated. Such sanctions and remedies include, but are not limited to:

a) Disciplining the respondent, up to and including expulsion and discharge/termination;
b) Providing counseling for complainants, respondents, and other parties as appropriate;
c) Issuing “No Contact” orders;
d) Providing effective escorts to ensure the complainant can move safely between classes and activities;
e) Ensuring that the complainant and the respondent do not share classes, workspaces, or extracurricular activities;
f) Moving the complainant (if the complainant requests to be moved) or respondent to a different residence hall or housing assignment; and
g) Placing notations on the respondent’s transcript regarding the subject violations.

3. **Notification of Outcome.** The written determination will be sent simultaneously along with information on how to file an appeal.

4. **Record Retention.** Records of each formal complaint of alleged sexual misconduct under Title IX, including any actions taken, including supportive measures, in response to a report or formal complaint of sexual misconduct under Title IX, will be maintained for seven years.

G. **Appeals.**

1. Each party may appeal the dismissal of a formal complaint or any included allegations and/or a determination regarding responsibility. An appeal may be based on the following grounds:

   a) Procedural irregularity that affected the outcome of the matter;
   b) New evidence discovered that was not reasonably available at the time the Designated Arbiter made the determination; or
   c) Conflict of interest on the part of the Title IX Coordinator, investigator(s) or Designated Arbiter that affected the outcome of the matter.

2. To appeal, a party must submit their written appeal to the Title IX Coordinator within ten (10) calendar days of being notified of the decision, indicating the grounds for the appeal. The submission of appeal stays any sanctions for the pendency of an appeal. Supportive measures and remote learning opportunities
remain available during the pendency of the appeal.

3. If a party appeals, the institution will as soon as practicable notify the other party in writing of the appeal.

4. Appeals will be decided by an Appeals Panel who will be free of conflict of interest and bias, and will not serve as investigator, Title IX Coordinator, or hearing decisionmaker in the same matter. The outcome of appeal will be provided in writing simultaneously to both parties and include rationale for the decision.

10. Prohibition Against Retaliation

GSK prohibits retaliation against any individual who reports sexual misconduct, including but not limited to sex discrimination, sexual harassment, and/or sexual violence, sexual assault, domestic violence, dating violence, and stalking, or participates in an investigation of such reports.

11. Amnesty Policy for Alcohol And/or Drug Use by Reporting Individuals

The health and safety of every student at GSK is of utmost importance. GSK recognizes that students who have been drinking and/or using drugs (whether such use is voluntary or involuntary) at the time that sexual misconduct, including but not limited to sex discrimination, sexual harassment, and/or sexual violence, sexual assault, domestic violence, dating violence, and stalking occurs may be hesitant to report such incidents due to fear of potential consequences for their own conduct. GSK strongly encourages students to report sexual misconduct to the Title IX Coordinator, GSK administration, MSK Security and/or any other reporting/compliance channels. A bystander, complainant, or reporting individual who in good faith discloses any incident to MSK officials or law enforcement will not be subject to disciplinary action for violation of GSK’s Substance Abuse Policy occurring at or near the time of the commission of the act.

12. Students’ Bill of Rights Concerning Response to Sexual Misconduct

All students have the right to:

a) Make a report to local law enforcement and/or state police;

b) Have disclosures of sexual violence, including domestic violence, dating violence, stalking, and sexual assault treated seriously;

c) Make a decision about whether or not to disclose a crime and/or violation and to participate in GSK/MSK’s investigation, hearing, and decision-making process and/or criminal justice process free from pressure by GSK/MSK;

d) Participate in a process that is fair, impartial, and provides adequate notice and a meaningful opportunity to be heard;

e) Be treated with dignity and receive from GSK/MSK information concerning access to courteous, fair and respectful health care and counseling services;

f) Be free from any suggestion that the complainant is at fault when
these crimes and/or violations are committed, or should have acted in a different manner to avoid such crimes and/or violations;

\[g\)] Describe the incident to as few GSK representatives as practicable and not be required to unnecessarily repeat a description of the incident;

\[h\)] Be protected from retaliation by GSK, any student and/or the accused, and/or their family, friends and acquaintances within the jurisdiction of the institution;

\[i\)] Access at least one level of appeal of a determination;

\[j\)] Be accompanied by an advisor of choice who may assist and advise a complainant, reporting individual, accused or respondent throughout the investigation process, including during all meetings and hearings related to such process; and

\[k\)] Exercise civil rights and practice of religion without interference by the grievance investigation, hearing, and decision-making process of GSK/MSK.

Policy Adopted as Revised March 2021
Amendments to the Educational Law

Current New York State law requires colleges and universities to report violent felonies within 24 hours, with the exception of sexual offenses, and to report missing students.

In the event of a sexual assault, students are advised that a Special Victims Division exists for them to call directly at

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Hotline:  
Tel: 646-610-7272  
24 hours a day 7 days a week
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The hotline will provide the victim direct access to policy professionals who are experts in this field.

In the event of emergency, students are reminded not to hesitate to

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Call 911
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The President of MSK and GSK has signed a Memo of Understanding with the Police Commissioner of the City of New York in April 2015 that a formal agreement exists between the two entities stipulating that GSK will follow the procedures set forth by the law.
Campus Security Rules and Regulations

In case of emergency, individuals may contact the MSK Security Department, or the New York Police Department at 911.

MSK Security Department
Bobst Basement RM C-G43 (open 24/7)
Primary: (212) 639-7866
Secondary: (212) 639-7867
Email: securitd@mskcc.org
Security Webpage
(Link accessible via OneMSK while on the MSK Network)

Overview

The MSK Security Department is dedicated to prioritizing the well-being and safety of all MSK patients, employees, and visitors. Additional information, including guidance for reporting complaints, relevant MSK security policies, and crime prevention tips, may be found on the Security Webpage. In addition, MSK has established the Office of Threat Management to further address and resolve any incidences of incivility occurring on MSK premises. For information on reporting an incident of incivility, please contact the Threat Management Department (securethreatfac@mskcc.org; 646-888-8555) or visit the Threat Management Webpage.

General Provisions Pertaining to Crimes of Hazing

The MSK Security Department will investigate any violations pertaining to and surrounding reports of conduct that support any reckless or intentional situation that endangers the mental health, physical health or forced consumption of liquor or controlled substance for the purpose of initiation into or affiliation with any organization. The Security Department will assist in the prosecution of any crimes consistent with the crime of Hazing or related crimes as described in the Penal Law under section 120-16.

Campus Security Advisory Committee

The Campus Security Advisory Committee is comprised of a broad representation of constituents that have a stake in promoting the health and safety of the GSK community, including representatives from GSK leadership, MSK Compliance, MSK Security, GSK faculty, and current GSK students. The Committee will meet as required under applicable law to review current campus security policies and procedures and solicit recommendations for potential improvement from all stakeholders.

Security Orientation and Training

All incoming students will receive an orientation by the MSK Security Department, which will include the following topics:
• An overview of applicable security-related policies and procedures;
• How to report an incident or concern;
• Fire safety and other personal safety tips;
• The importance of securing personal property and wearing identification badges while on campus; and
• The availability of on-campus and off-campus student resources dedicated to student mental health, safety, and wellness.

All MSK employees are required to take Required Regulatory Training courses, including Workplace Conduct and Safety & Emergency Preparedness, on an annual basis. Additional training and education on security-related topics is available via the MyLearning portal in Workday, including Active Shooter Training and Threat Management Course.

Crime Statistics

Campus crime statistics are available upon request by either visiting the United States Department of Education's web site or by contacting the Security Department at 212-639-7866.

Violent Felony Offenses and Related Crimes Investigation

Violent offenses and related crimes must be immediately reported to the MSK Security Department. The Security Department will make an initial assessment and conduct an investigation to determine the need for further notification to the New York City Police Department at the 19th precinct or detective squad.

MSK Security Officers License and Authority

All MSK Security Officers are licensed by the State of New York and have received 16 hours of classroom instruction and 120 hours of field training with a superior officer. All Security Officers also receive an additional eight hours of in-service training annually, in addition to roll-call training daily on matters of importance that directly impact the safety of the institution. The campus is patrolled during non-business hours. Security officers will respond to and investigate all crimes and serious incidents.
Drug-Free Schools And Communities Act (DFSCA) Substance Abuse Policy

The Louis V. Gerstner, Jr. Graduate School of Biomedical Sciences ("GSK") is committed to a drug-free environment and protecting the safety, health and well-being of all employees and students. In accordance with the Drug-Free Schools and Campuses Regulations (34 CFR Part 86) of the Drug-Free Schools and Communities Act ("DFSCA"), GSK has adopted and implemented a program to prevent the use of illicit drugs and abuse of alcohol by students and employees. As part of its program, GSK has adopted this policy which sets forth the standards of conduct for employees and students related to unlawful possession, use or distribution of illegal drugs, as well as the range of sanctions that can be imposed for violation of GSK's policies regarding substance abuse. GSK is the degree-granting arm of Memorial Sloan Kettering Cancer Center ("MSK"), and both institutions equally apply and enforce the standards, policies and sanctions set forth below.

1. Standards of Conduct

Student use, misuse, or abuse of alcohol, any illegal drug, or any controlled substance on MSK premises or while acting in any capacity as a representative of MSK, shall be considered misconduct, and will subject the student to a drug test and/or disciplinary action, up to and including dismissal from the GSK. Such misconduct includes, but is not limited to, being under the influence of alcohol, any illegal drug, or any controlled substance. “Under the influence” includes, but is not limited to, the presence of a physically detectable quantity of alcohol, any illegal drug, or any controlled substance in the body considered significant by MSK.

MSK prohibits the unlawful manufacture, possession, use, sale, and distribution of drugs in the workplace. MSK also prohibits workforce members from being under the influence of alcohol, any illegal drug, or any non-prescribed controlled substance while at work or conducting business as a representative of MSK. MSK reserves the right to search employees' belongings while they are on MSK premises. This helps to ensure the safety and protection of our employees, as well as of patients and visitors.

A violation of either of these policies shall be grounds for immediate discipline, up to and including dismissal from the GSK and/or termination of employment from MSK.

Conviction for a drug-related offense on or off MSK premises shall be grounds for disciplinary action, up to and including dismissal from the GSK and/or termination of employment from MSK.

Students and employees are expected to cooperate fully in any required testing or prescribed treatment program, and with all monitoring requirements. Failure to cooperate may result in disciplinary action, up to and including dismissal from the GSK and/or termination of employment from MSK.

Requirements and procedures related to academic and/or job performance and conduct continue to be applicable when a student or employee:

- has been referred for drug testing and/or treatment;
- is treated for substance abuse; or
- has re-enrolled or return to work after treatment for substance abuse
MSK and GSK substance abuse policies do not apply to the student’s or employee’s use of prescription drugs in accordance with a physician’s orders, the consumption of reasonable amounts of alcohol at MSK or GSK-sponsored activities or the consumption of reasonable and appropriate amounts of alcohol by a student or employee when they are acting as a representative of MSK.

2. Legal Sanctions

MSK complies with and abides by all federal, state and local laws and regulations pertaining to drug and alcohol abuse and trafficking. A student or employee who violates substance abuse policies may be subject to criminal sanctions provided by federal, state, and local law in addition to any sanctions MSK may impose.

As required by the Drug-Free Workplace Act of 1988, an employee working on projects funded through federal contracts or grants must notify Human Resources or the Dean’s Office of a conviction of a criminal drug violation that occurred on MSK property within five (5) days of such conviction. The Institution is required to notify the relevant federal contracting or granting agency within ten (10) days and to take the appropriate personnel action within (30) days of receipt of the notice. A conviction includes: a plea or finding of guilty, any plea of “nolo contendere,” or an imposition of a fine or penalty.

Federal Sanctions:
Federal law has numerous penalties for the illegal possession of controlled substances, possession of crack cocaine, and trafficking in methamphetamine, heroin, cocaine, cocaine base, PCP, LSD, fentanyl and fentanyl analogue. An up to date list of federal drug trafficking penalties (by schedule) can be found online. See http://www.dea.gov/druginfo/ftp3.shtml for a complete listing of drugs by schedule.

Possession sentences range from up to one-year imprisonment and $1,000 fine to 20 years imprisonment and fines up to $250,000. Forfeiture of personal and real property used to possess or to facilitate possession of a controlled substance can be a sanction for convictions. Sanctions can also include denial of federal benefits, such as student loans, grants, contracts, public housing tenancy, eligibility to receive or purchase firearms, and professional and commercial licenses.

New York State Sanctions:
New York State law also forbids the possession, use, or distribution of illicit drugs and imposes criminal penalties, which may include imprisonment. The penalty imposed for a conviction will generally depend upon the specific drug and the amount of the drug held or sold, as well as the individual’s history of prior convictions. Judges have some discretion to consider the circumstances in sentencing. The following are a few examples of potential criminal penalties for drug infractions under New York law:

- The possession of less than 500 mg of cocaine is classified as criminal possession in the 7th degree, a Class A misdemeanor which carries a penalty of up to one year in jail.
- The possession of one-half an ounce of cocaine or more is a Class B felony punishable by up to 9 years in prison.

This list is not intended to be exhaustive and is subject to change. The full list of New York State drug crimes and their penalties can be found in the New York Penal Code.
Penalties for Unlawful Distribution of Alcohol:
Under both Federal and New York State laws, selling or otherwise furnishing alcohol to an individual under the age of 21 is a misdemeanor punishable by fine and/or imprisonment. Selling alcohol without a license or permit is unlawful and punishable by a fine and/or imprisonment. See New York State Laws and Regulations: http://www.health.ny.gov/professionals/narcotic/laws_and_regulations/

3. Health Risks of Substance Abuse

The health consequences of alcohol abuse and substance use may be immediate and unpredictable, such as fatalities associated with alcohol poisoning and drug overdose, or more subtle and long-term, such as liver and brain damage associated with prolonged use of alcohol.

In addition to health-related problems, alcohol abuse and substance use are associated with financial difficulties, interpersonal conflicts, domestic violence, deterioration of the family structure, accidental injuries or fatality, and may significantly impact academic and work performance.

Selected drugs and their effects

Alcohol and Other Depressants (barbiturates, sedatives, and tranquilizers)
- Alcohol, tranquilizers, and sedatives are all considered depressants. These drugs depress the central nervous system by mimicking either the brain's natural sedating chemicals or by diminishing the brain's natural ability to produce stimulating chemicals.
- Short-term effects: Alcohol consumption causes a number of marked changes in behavior; even low doses significantly impair judgment and coordination. Moderate to high doses cause significant impairments in higher mental functions, severely altering a person's ability to learn and remember information. Very high doses can cause respiratory depression and death. The effects of other depressants are similar to those of alcohol: large doses can cause slurred speech, poor motor coordination, altered perception, psychosis, hallucinations and paranoid delusions, coma, or death.
- Long-term effects: Long-term effects of using alcohol include addiction, depression, accidents as a result of impaired ability, ulcers, gastritis, pancreatitis, fatty liver, alcoholic hepatitis, chronic active hepatitis, and cirrhosis. Long-term use of other depressants can also lead to addiction, including both physical and psychological dependence. Regular use over time may result in a tolerance to the drug. Withdrawal symptoms may range from restlessness, insomnia, and anxiety, to convulsions and death.

Nicotine
- Nicotine, one of more than 4,000 chemicals found in the smoke from tobacco products, is the primary component in tobacco that acts on the brain. Nicotine is absorbed through the skin and mucosal lining of the mouth and nose or by inhalation in the lungs. Nicotine increases the levels of dopamine in the brain. The acute effects of nicotine dissipate in a few minutes, causing the smoker to continue dosing frequently throughout the day to maintain the drug's pleasurable effects and prevent withdrawal.
- Effects: Select effects include addiction, high blood pressure, emphysema, heart and lung disease, and cancer.
Marijuana
• THC (delta-9-tetrahydrocannabinol) stores itself in the fatty tissue of the brain, reproductive organs, liver, lungs, and spleen, where it causes tissue damage and hinders normal body function. In the brain, THC widens the gaps between nerve cells causing decreased transmission of impulses.
• Effects: Use can result in speech, memory and learning problems, physical impairment, and can interfere with judgment, and cause difficulty thinking and solving problems. Use can also elevate anxiety and cause a panic reaction. Long-term use can cause permanent memory problems. There is also an increased risk of developing respiratory problems including, but not limited to, cancer.

Stimulants (cocaine, amphetamines, “speed, “uppers”)
• Cocaine use interferes with reabsorption of dopamine causing euphoria, which constricts blood vessels, dilates pupils, and increases heart rate and blood pressure.
• Effects: Acute cardiovascular or cerebrovascular emergencies such as heart attack or stroke can result from use, regardless of frequency. Cocaethylene, created by the liver when cocaine and alcohol are used, increases the chance of sudden death. Addiction, lung damage, depression, paranoia, and toxic psychosis are also possible. Similar risks are presented by the use of speed and uppers.

Ecstasy (MDMA, Molly)
• Ecstasy is a synthetic drug, and is similar to both methamphetamine and mescaline, which is a hallucinogenic.
• Effects: The drug mainly affects the body by affecting neurons that use the chemical serotonin, which can greatly affect mood, aggression, sexual activity, sleep, and sensitivity to pain. In high doses, MDMA can interfere with the body’s ability to regulate temperature, which can lead to a sharp increase in body temperature (hyperthermia), resulting in liver, kidney, and cardiovascular system failure.

Hallucinogens (LSD, PCP)
• PCP is a white powder that is readily soluble in water or alcohol. LSD [lysergic acid diethylamide] is manufactured from lysergic acid, which is found in ergot, a fungus that grows on rye and other grains. The effects of these substances are unpredictable, and depend on the amount taken, the user’s personality and mood, and the surroundings in which the drug is used.
• Short-term effects: These drugs alter users’ perception of time and space by changing the way the brain interprets stimuli. They also increase heart rate and blood pressure, which can lead to coma, or heart and lung failure. High doses can cause symptoms that mimic schizophrenia, such as delusions, hallucinations, paranoia, disordered thinking, a sensation of distance from one’s environment, and catatonia. Speech is often sparse and garbled. PCP can be addictive.
• Long-term effects: Flashbacks can occur days, months, or even years after use. Users can also experience decreased motivation, prolonged depression, increased anxiety, increased delusions and panic, and psychosis such as schizophrenia or severe depression.

Narcotics (opium, morphine, codeine, heroin)
• Narcotics include opium, opium derivatives, and semi-synthetic substitutes of opium derivatives. Narcotic use is associated with a variety of unwanted effects
including drowsiness, inability to concentrate, apathy, lessened physical activity, constriction of the pupils, dilation of the subcutaneous blood vessels causing flushing of the face and neck, constipation, nausea and vomiting, and most significantly, respiratory depression. As the dose is increased, the subjective, analgesic (pain relief), and toxic effects become more pronounced.

- **Short-term effects:** Short-term effects include restlessness, irritability, loss of appetite, nausea, tremors, and drug craving.
- **Long-term effects:** Long term effects include addiction, accidental overdose, risk of hepatitis and AIDS infection from contaminated needles.

**Prescription Drug Abuse**
- The most commonly misused prescription drugs are: painkillers (codeine, Oxycontin, Vicodin, Demerol), CNS depressants (Nembutal, Valium, Xanax), and stimulants (Ritalin, Dexedrine, Adderall).
- **Short-term effects:** Stimulants and CNS depressants present risks for irregular heartbeat, greatly reduced heart rate, seizures, dangerously increased body temperature, and can cause aggressive or paranoid behavior.
- **Long-term effects:** The greatest risk from these drugs is the significant chance for dependence. This can lead to greater doses and increased frequency of use. Attempting to cease use without proper medical help after dependence has been established can be dangerous and even fatal.

**Inhalants (gas, aerosols, glue, nitrites, nitrous oxide)**
- Inhalants are breathable chemical vapors that produce psychoactive effects. A variety of products common in the home and the workplace contain substances that can be inhaled:
  - **Solvents:** paint thinners or removers, degreasers, dry-cleaning fluids, gasoline, and glue Art or office supply solvents: correction fluids, felt-tip marker fluid, and electronic contact cleaners
  - **Gases:** (used in household or commercial products): butane lighters and propane tanks, whipped cream aerosols (whip-its), and refrigerant gases
  - **Household aerosol propellants:** contained in items such as spray paints, hair or deodorant sprays, fabric protector sprays, and aerosol computer cleaning products Medical anesthetic gases: ether, chloroform, halothane, and nitrous oxide
  - **Nitrites:** volatiles including cyclohexyl, butyl, and aryl nitrites, commonly known as “poppers”. Volatile nitrites are often sold in small brown bottles and labeled as “video head cleaner,” “room odorizer,” “leather cleaner,” or “liquid aroma.”
- **Short-term effects:** These chemicals slow down the body’s functions, and can cause momentary intoxication which, if continued, can lead to stimulation, reduced inhibition, and ultimately loss of consciousness. Using solvents or aerosol sprays can induce heart failure and death, known as “sudden sniffing death.” This effect is mostly associated with butane, propane, and chemicals in aerosols.
- **Long-term effects:** These chemicals can cause severe damage to the brain, liver, and kidneys. Specifically, they can cause hearing loss, peripheral neuropathies (limb spasms), central nervous system damage, and even bone marrow damage.

**GHB**
- GHB (gamma hydroxybutyrate) is a central nervous system depressant. It is made from gamma butyrolactone and sodium or potassium hydroxide, which means that it is essentially degreasing solvent or floor stripper combined with...
drain cleaner. In liquid form it is usually clear and looks like water. GHB and two of its precursors, gamma butyrolactone (GBL) and 1,4 butanediol (BD) have been characterized as predatory drugs used to commit acts of sexual violence.

- Effects: Abuse of GHB can cause amnesia, coma and/or seizures, inability to move, or impaired speech. There is also a risk of death, especially when combined with alcohol or other drugs.

Substance abuse, whether alcohol or drug, is harmful to your health. Please take the time to read more information about the harmful effects of alcohol and drug abuse cited below:

National Institute on Alcohol Abuse and Alcoholism
Website: [https://www.niaaa.nih.gov/alcohol-health](https://www.niaaa.nih.gov/alcohol-health)

National Institute on Drug Abuse
Website: [https://www.drugabuse.gov/drugs-abuse/commonly-abused-drugs-charts](https://www.drugabuse.gov/drugs-abuse/commonly-abused-drugs-charts)

More information about controlled substances can be found in Title 21 United States Code (USC) Controlled Substances Act, Section 811.

4. Drug and Alcohol Programs- Available Resources

If you have questions or issues about alcohol and other drugs, there are resources at MSK where you can get help. You may contact the Magellan Employee Assistance Program (EAP) and/or Employee Health & Wellness Services (“EH&WS”). These services are readily available to students and employees who voluntarily seek counseling and rehabilitation. The EAP offers free, professional, confidential counseling and referrals for a broad range of issues. On demand resources are also available. Go to MagellanAscend.com to sign up. For in-person counseling and Telehealth support, you may call (800) 327-7893 or visit MagellanAscend.com to find care online. Students, employees and family members are eligible to use the service at no cost. Counselors are available to assist 24/7.

For convenience and privacy, Memorial Sloan Kettering Cancer Center’s Magellan EAP can be reached by calling 1-800-327-8793.

Employee Health & Wellness Services is located at 222 E. 70th Street, has a satellite office in room MG-03 at 1275 York Avenue, and can be reached at (646) 888-4000.

If a student or staff member shows signs or symptoms of illness or impairment, you should notify your supervisor, Human Resources, EH&WS, or the confidential MSK Compliance Hotline (by calling [866.568.5421](tel:866.568.5421) or by going to [https://mskcc.ethicspoint.com](https://mskcc.ethicspoint.com)).

- MSK Main Security: 212-639-7866
- Administrator on Call: Beeper: 1521: iPhone: 646-581-3582
- Page Operator: 212-639-2000 (main line) 212-639-6680
- Emergency Dial: 212-639-6000
- Alcoholics Anonymous: 212-647-1680
- Women for Sobriety: 215-536-8026
- Smart Recovery Self Help: 212-631-1198
- Narcotics Anonymous: 212-929-6262
- Cocaine Anonymous: 212-262-2463
5. Disciplinary Sanctions

Procedures
Anyone observing something in an individual's performance or behavior that indicates that this individual may be violating GSK's Substance Abuse policy should refer the matter to the Dean of the GSK. The Dean will contact an HR Legal & Regulatory representative for evaluation and advice and may contact EH&WS when appropriate.

If the observation occurs outside of normal business hours, the available Administrator on Call and/or Nursing Supervisor should be contacted. In consultation with the Dean, the AOC and/or Nursing Supervisor will determine whether or not to refer the employee to the Urgent Care Center. The Nursing Supervisor can be contacted by calling the Page Operator at telephone 639-7900 and asking to speak to the Nursing Supervisor. The AOC can be contacted at the above numbers.

The student exhibiting concerning behavior or performance may be placed on academic probation and informed not to return to class/laboratory pending a discussion with the mentor, an HR Legal & Regulatory representative, and the EH&WS Medical Director of Employee Health Service (or designee). The employee demonstrating this behavior or performance may be suspended with or without pay and subject to additional corrective action up to and including termination of employment.

The student or employee may be asked to undergo drug and alcohol testing to determine whether or not GSK's policy has been violated. At this time the student or employee will be required to sign a release giving EH&WS permission to release drug and alcohol test results to HR, if such testing is done. The signing of this release is mandatory and a condition of continued enrollment and/or employment. If the student or employee refuses to sign the release, it should be so indicated on the Consent Form, and EH&WS will contact HR to discuss next steps.

If it is suspected or known that a student or employee has violated GSK's Substance Abuse policy, including refusal to be tested for drugs and alcohol, to release the results of those tests or to cooperate in a required or recommended treatment program, the matter should be referred to the Dean of the GSK or HR Legal & Regulatory Affairs. A determination will then be made as to the action to be taken. This determination will result from discussion between the student's mentor, the Dean of the GSK, an HR Legal & Regulatory representative and, when appropriate, a representative from EH&WS, and actions that may be required include, but are not limited to:

- referral to the EAP;
- referral to an outside program for either in patient or out-patient treatment;
- periodic medical follow-up by EH&WS or EAP;
- disciplinary action, up to and including dismissal from the GSK and/or termination of employment; and
- referral for prosecution

Revised October 2021
Family Education Rights and Privacy Act (FERPA)

Gerstner Sloan Kettering Graduate School of Biomedical Sciences Notification of Rights under FERPA

The Family Educational Rights and Privacy Act (FERPA) affords eligible students certain rights with respect to their education records. An "eligible student" under FERPA is a student who is 18 years of age or older or who attends a postsecondary institution at any age.

These rights include:

The right to inspect and review the student's education records within 45 days after the day the School receives a request for access. A student should submit to the registrar/curriculum specialist, dean, associate dean or other appropriate official, a written request that identifies the record(s) the student wishes to inspect. The school official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the school official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.

The right to request the amendment of the student's education records that the student believes is inaccurate, misleading, or otherwise in violation of the student’s privacy rights under FERPA.

A student who wishes to ask the School to amend a record should write to the School official responsible for the record, clearly identify the part of the record the student wants changed and specify why it should be changed.

If the School decides not to amend the record as requested, the School will notify the student in writing of the decision and the student’s right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

The right to provide written consent before the School discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent. The School discloses education records without a student’s prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is typically includes a person employed by the School in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff); a person serving on the board of trustees; or a student serving on an official committee, such as a disciplinary or grievance committee. A school official also may include a volunteer or contractor outside of the School who performs an institutional service of
function for which the school would otherwise use its own employees and who is under the direct control of the school with respect to the use and maintenance of PII from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist another school official in performing his or her tasks. A school official typically has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the School.

The right to file a complaint with the U.S. Department of Education concerning alleged failures by the [School] to comply with the requirements of FERPA. The name and address of the office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education 400 Maryland Avenue, SW Washington, DC 20202

Schools may disclose appropriately designated “directory information” without written consent, unless you have advised the School to the contrary in accordance with School procedures. The primary purpose of directory information is to allow the School to include information from your education records in certain school publications. Examples include:

A lecture poster, showing your role in the presentation; The annual yearbook; Honor roll or other recognition lists; Graduation programs; and Directory information, which is information that is generally not considered harmful or an invasion of privacy if released, can also be disclosed to outside organizations without prior written consent. Outside organizations include, but are not limited to, companies that manufacture class rings or publish yearbooks. In addition, two federal laws require local educational agencies (LEAs) receiving assistance under the Elementary and Secondary Education Act of 1965, as amended (ESEA) to provide military recruiters, upon request, with the following information – names, addresses and telephone listings – unless parents have advised the LEA that they do not want their student's information disclosed without their prior written consent.

If you do not want the School to disclose any or all of the types of information designated below as directory information from your education records without your prior written consent, you must notify the School in writing within 10 days of the first day of the semester of enrollment. The School has designated the following information as directory information:

Student's name Address Telephone listing
Electronic mail address Photograph
Date and place of birth Major field of study Dates of attendance Grade level
Participation in officially recognized activities and sports

Degrees, honors, and awards received
The most recent educational agency or institution attended

Student ID number, user ID, or other unique personal identifier used to communicate in electronic systems but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user’s identity, such as a PIN, password, or other factor known or possessed only by the authorized user.
A student ID number or other unique personal identifier that is displayed on a student ID badge, but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user's identity, such as a PIN, password, or other factor known or possessed only by the authorized user.
Student Resources

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maxwellm@mskcc.org
Mental Health Resources Contact Information

GSK is committed to safety and respect within the campus community, and to the support of those in need of help. The following are resources available both on and off campus to members of the GSK community.

Short-Term Counseling

Magellan Employee Assistance Program (EAP)
Tel: (800) 327-8793
Website:  MagellanAscend.com

Penni Morganstein, PsyD
Magellan counselor dedicated to MSK trainees
Free, no copays, no use of insurance, Magellan Employee Assistance Program
morgansteinp@magellanhealth.com
Appointments available in-person and virtually: http://mskbookme.magellanhealth.com/
Available during the day

Chanchal Sharma, Psy.D; MS.Ed
Employee Health Psychologist
646-888-4128
sharmac1@mskcc.org
Available by appointment: Monday – Friday, 9 AM – 5 PM

Faith-Based Counseling
Protestant, Catholic, Muslim, Jewish
212-639-5982

Social Workers at MSK
212-639-7020

National Suicide Prevention Line (non-MSK)
1-800-273-8255
Available: 24/7

Long-Term Counseling

- Health Insurance Providers
  - Aetna: www.aetna.com
  - Empire: www.empireblue.com
  - UHC: mskcc.welcometouhc.com
    To help find a counselor who is takes your insurance and is seeing new patients, you can use either contact your health insurance provider directly

- Health Advocate helps you navigate the healthcare system and make the most of your MSK medical plan. Turn to them throughout the year for 24/7 at (866) 695-8622
  https://mskbenefits.mskcc.org/keyword/health-advocate/.
Telemedicine for Mental Health: If you are enrolled in any MSK medical plan, you and your covered dependents have access to telemedicine through your respective medical plan carrier at no cost to you.

- **Aetna EPO, Aetna POS**: To get started, sign in or register at teladoc.com/aetna, download the app, or call (855) 835-2362.
- **Empire POS**: To get started, sign in or register at livehealthonline.com or download the app.
- **UnitedHealthcare (UHC) EPO, UHC CDHP**: To get started, sign in or register at uhc.com/virtualvisits. https://mskbenefits.mskcc.org/keyword/telemedicine/

**MSK Professional and Mentoring Resources**

Office of Scientific Education and Training  
oset@mskcc.org

Office of Career and Professional Development  
op@mskcc.org

Gerstner Sloan Kettering Graduate School of Biomedical Sciences  
gradstudies@sloankettering.edu

HR Business Partners  
646-227-3456

**Other Resources:**

**Victim Intervention Program (New York-Presbyterian Hospital/Weill Cornell Medical Center)**: Free, confidential services for survivors of crime, including sexual assault and domestic violence, as well as for family and friends. The Victim Prevention Program is located at 525 East 68th Street, New York, NY 10065, NYPVIP@nyp.org, (212) 746-9414.

New York State Domestic and Sexual Violence Hotline: 800-942-6906

New York State Office of Victim Services: 800-247-8035 or www.ovs.ny.gov

Safe Horizon’s Rape/Sexual Assault and Domestic Violence Hotline: 800-621-HOPE (4673)

Anyone observing something in an individual’s performance or behavior that indicates that this individual may be violating GSK or MSK’s Code of Conduct policies should refer the matter to the Dean of GSK. The Dean should contact an HR representative for evaluation and advice. HR will contact Employee Health Service when appropriate.

**Other Resources:**

MSK Main Security - 212-639-7866  
Administrator on Call - Beeper:1521; iPhone: 646-581-3582

Page Operator: 212-639-2000 (main line) 212-639-6880 (private line)

Emergency Dial - 212-639-6000

Alcoholics Anonymous (AA) - 212-647-1680
If you are not comfortable raising an issue in your department, or if you have raised a concern and feel that it has not been addressed, you can call the MSK Compliance Hotline. It provides a way for employees as well as vendors and contractors to report concerns about how MSK does business. You can report anonymously — without identifying yourself — when you make a report to the hotline.

The MSK Compliance Hotline is available 24 hours a day, every day of the year, and is managed by an outside company. You can submit a concern by calling **866.568.5421** or by going to [https://mskcc.ethicspoint.com](https://mskcc.ethicspoint.com).

If you make a report through the Compliance Hotline, you will be asked to call back in ten days for a status report. It’s important to remember to call back — especially if you did not give your name — because we may need more information in order to complete our review.
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Our Special Contributing Faculty

Faculty members who do not serve as dissertation mentors but who make contributions to the education of our students by teaching or serving as clinical mentors are appointed as Gerstner Sloan Kettering Special Contributing Faculty.

The following is a list of current members of the contributing faculty:

Cameron W. Brennan  
MD, Cornell University Medical College

Murray F. Brennan  
MD, University of Otago

Jacqueline F. Bromberg  
MD, PhD, The University of North Carolina at Chapel Hill

Marinela Capanu  
PhD, University of Florida

Paul Chapman  
MD, Cornell University Medical College

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MD, Harvard Medical School  
PhD, Cambridge University (UK)

Hironori Funabiki  
PhD, Kyoto University

Christian Grommes  
MD, RWTH Aachen Medical School (Germany)

John L. Humm  
PhD, South Bank University

Mary Louise Keohan  
MD, St. George's University School of Medicine

Mark G. Kris  
MD, Cornell University Medical College

Robert J. Motzer  
MD, University of Michigan Medical School

Larry Norton  
MD, Columbia University College of Physicians and Surgeons

Jae H. Park  
MD, Johns Hopkins School of Medicine

Philip B. Paty  
MD, Stanford University School of Medicine

Michael A. Postow  
MD, New York University School of Medicine

Diane Reidy-Lagunes  
MD, State University of New York Downstate Medical Center

Victor E. Reuter  
MD, Pedro Henriquez Urena National University (Dominican Republic)

Howard I. Scher  
MD, New York University School of Medicine

Eytan M. Stein  
MD, Northwestern University Medical School

William P. Tew  
MD, University of Rochester School of Medicine and Dentistry

Tiffany A. Traina  
MD, Weill Cornell Medical College

Agnes Viale  
PhD, Universite de Nice-Sophia Antipolis

Phillip A. Watson  
PhD, University of Wisconsin - Madison

Harel Weinstein  
DSc, Technion-Israel Institute of Technology

James W. Young  
MD, Vanderbilt University

Pat Zanzonico  
PhD, Cornell University
Introduction

The Louis V. Gerstner Jr. Graduate School of Biomedical Sciences, Memorial Sloan Kettering (GSK) provides PhD candidates with the following:

- An annual award of full tuition
- A stipend to cover living and incidental expenses
- Health, Vision and Dental insurance for individual students and spouse/children/domestic partners, if requested
- Reimbursement for relocation costs
- A laptop
- Annual membership to the New York Academy of Sciences ($35 per year)

GSK PhD students do not perform any services in exchange for the amounts they receive.

The purpose of this document is to explain how payments made to students are classified for tax purposes.

Payment Types:

The types of cash payments made to GSK students include:

- Scholarships and fellowships to pay for fees, books, supplies, computers, equipment
- Stipends (both regular stipend and bonus of $5000 per year for anyone who receives external fellowship)
- Prizes and awards
- Other reimbursements
- Travel reimbursements
- Moving Expense reimbursements
- One-time payments for students who are appointed as Teaching Fellows

Other noncash benefits that GSK students are recipients of are:

- Full tuition which is waived by Memorial Sloan Kettering
- Health, Vision and Dental insurance which is paid by MSK on behalf of the student (for individual and spouse/children/domestic partner, if requested)
Payment Categories:
The Scholarship payments made to GSK students or on behalf of GSK students are classified as either Qualified Expenses or Nonqualified Expenses for US tax and reporting purposes.

Qualified Scholarship Expenses – A "qualified scholarship" is the amount of a scholarship or fellowship grant that can be excluded from the recipient's income and is limited to the amount used for:

• tuition and fees
• books
• supplies
• equipment required for courses

These items must be required of all students in a course of instruction for the scholarship or fellowship grant to be tax-free (Prop. Reg. 1.117-6(c)(2)).

These amounts are not taxable.

Non-Qualified Scholarship Expenses – A portion of the scholarship/fellowship paid may be considered non-qualified. A non-qualified scholarship or fellowship is a nonqualified payment when it is used for expenses that are not qualified tuition or related expenses. Some examples of non-qualified scholarship expenses are stipends used to pay for:

• biweekly living allowance
• prizes and awards
• travel reimbursements (see section “e” below to determine taxation)
• moving expense reimbursements
• Medical, Vision and Dental Benefits provided to student and spouse/children/domestic partner
• personal expenses
• Non-MSK course reimbursement
• optional fees

All non-qualified scholarship/fellowship payments may be subject to income tax withholding. Determination of whether there will be withholding on the non-qualified portion of the scholarship is based on the student’s immigration status. Once the immigration status is determined the student will receive either Form 1098-T, Form 1042-S or Form 1099-MISC. The student should maintain the documentation necessary to support information reported to the Internal Revenue Service (IRS).
Appendix 1  

GSK Students Tax Treatment

a. **Stipend:** Stipend paid by Memorial Sloan Kettering biweekly is taxable. It is not payment for services. Stipends are considered taxable income to the recipient and are reported by Memorial Sloan Kettering on Forms 1098-T or 1042-S (reporting for Non-Resident Aliens, “NRAs”).

b. **Prizes and Awards:** Prizes and awards are sometimes given to GSK students and are always taxable. If the prize or award is equal to or exceeds $600, Memorial Sloan Kettering reports the prize or award to the IRS and the student on Form 1099-MISC, Miscellaneous Income: (http://www.irs.gov/instructions/i1099msc/ar02.html), or on Form 1042-S, Foreign Person’s U.S. Source Income Subject to Withholding. The form sent to each student is determined based on the immigration status of the student. (Income Subject to Withholding: http://www.irs.gov/pub/irs-pdf/f1042s.pdf.)

c. **Other Payments:** Payments for travel that do not meet the criteria listed in section “g” below, cash, non-required fees, books, supplies, equipment and reimbursement for courses taken outside of MSK. The expenses are considered taxable income to the recipient and reported as taxable income by Memorial Sloan Kettering on Forms 1098T, 1042-S (reporting for Nonresident Aliens, “NRAs”) or 1099-MISC.

d. **Teaching Fellows Payments:** One-time payments for students who are appointed as Teaching Fellows. These expenses are considered taxable income to the recipient and reported as taxable income by Memorial Sloan Kettering on Forms 1042-S (reporting for Nonresident Aliens, “NRAs”) or 1099-MISC.

e. **Moving and Relocation Expenses:** Moving expenses and Relocation reimbursements provided to GSK student are taxable and not considered part of qualified scholarship. These expenses are considered taxable income to the recipient and reported as taxable income by Memorial Sloan Kettering on Forms 1042-S (reporting for Nonresident Aliens, “NRAs”) or 1099-MISC.

f. **Medical, Vision and Dental benefits provided by MSK to the student and spouse/children/domestic partner:** The cost to cover the student is not taxable. The costs to cover the student’s spouse/children/domestic partner are considered taxable income to the recipient and reported as taxable income by Memorial Sloan Kettering on Forms 1042-S (reporting for Nonresident Aliens, “NRAs”) or 1099-MISC.

g. **Travel Expenses:** Travel expense reimbursements are non-taxable if the following criteria are met:
   - Travel must be for legitimate training purposes.
   - Students must adequately account for the expenses within a reasonable time period, generally within 60 days.
   - If the student receives payment in advance of the expenses, the students must return any excess reimbursement or allowance within a reasonable time period, generally within 120 days.
Appendix 1

GSK Students Tax Treatment

The chart below outlines the different categories of payments made to GSK students and how their taxation and reporting will be handled depending on which of the following four categories they fall into:

- US citizens
- US Resident Aliens: not eligible for a tax treaty
- US Resident Aliens: tax treaty eligible
- Non-Resident Alien: tax treaty eligible
- Non-Resident Alien: not eligible for a tax treaty

<table>
<thead>
<tr>
<th>Residency Status</th>
<th>Qualified Scholarship Expenses: Tuition, fees, books, supplies and equipment required for courses of instruction. Cost of Student’s MSK provided Medical, Vision and Dental Coverage</th>
<th>Non-Qualified Scholarship Expenses: Biweekly Stipend Paid by MSK, room and board, and misc. expenses.</th>
<th>Other Non-Qualified Payments: Prizes and Awards, Teaching Fellow and Other Payments, Moving Expenses, Non-MSK course reimbursement, MSK provided Medical, Vision and Dental Coverage to the student’s Spouse/Children/Domestic Partner</th>
</tr>
</thead>
<tbody>
<tr>
<td>Taxation</td>
<td>Tax Withholding by MSK</td>
<td>Tax Forms received at Year end</td>
<td>Taxation*</td>
</tr>
<tr>
<td>US Citizen</td>
<td>Not Taxable</td>
<td>No Withholding</td>
<td>No Tax Forms</td>
</tr>
<tr>
<td>US Resident Alien: not eligible for tax treaty</td>
<td>Not Taxable</td>
<td>No Withholding</td>
<td>No Tax Forms</td>
</tr>
<tr>
<td>US Resident Alien: tax treaty eligible</td>
<td>Not Taxable</td>
<td>No Withholding</td>
<td>No Tax Forms</td>
</tr>
<tr>
<td>Non-Resident Alien: tax treaty eligible</td>
<td>Not Taxable</td>
<td>No Withholding</td>
<td>No Tax Forms</td>
</tr>
<tr>
<td>Non-Resident Alien: not eligible for a tax treaty</td>
<td>Not Taxable</td>
<td>No Withholding</td>
<td>No Tax Forms</td>
</tr>
</tbody>
</table>

To determine your Tax Treaty eligibility, please reach out to Payroll Department at mskpayroll@mskcc.org. Certain Tax Treaties are subject to income limits and amounts that exceed the limit are considered taxable.

* For all categories that are considered taxable income, students are required to self-report taxable income to the IRS as a part of their US tax return.

1 MSK will withhold at predefined rates stipulated by the IRS. The rates are dependent on individual’s status.
Appendix 1

**Resources for Filing Individual Tax Returns and Making Estimated Payments**

The following resources are for general information purposes only and should not be considered advice given by or sanctioned by MSK/GSK. Since individual circumstances vary based on citizenship, tax treaty, income, year of study, and more, you may want to consult with a tax advisor regarding your individual circumstances.

**Filling Taxes:**

To determine if and how to file a return and pay taxes you may consult the [IRS website](https://www.irs.gov) for federal taxes and [New York State Department of Taxation and Finance](https://www.tax.ny.gov) for state taxes. Nonresident and resident aliens may also consult IRS Publication 519, *US Tax Guide for Aliens* for additional information.

**Estimated Tax Payments:**

You may be required to make federal and/or state quarterly estimated income tax payments. You may refer to guidance from the [IRS website](https://www.irs.gov) for federal estimated taxes and the [New York State Department of Taxation and Finance](https://www.tax.ny.gov) for state estimated taxes to determine if and when estimated taxes must be made.

**Domestic Student Resources:**

US Citizens and US resident aliens (who are not eligible for a tax treaty) may choose to use the [IRS's Free File](https://www.irs.gov) to file their individual taxes if they meet the eligibility requirements. Students are also eligible for discounted tax preparation assistance and filing services offered to all MSK staff and trainees through Lifemart and Magellan. Check the MSK [employee discounts page](https://www.mskcc.org) to learn more.

**International Student Resources:**

Nonresident aliens and resident aliens (who are eligible for a tax treaty) may consider using Sprintax, a tax preparation software designed by persons unrelated to MSK/GSK. Students will be notified of how to use this software during tax filling season. Students who wish to use this software will be asked to sign a waiver acknowledging that the guidance provided is not from or validated by MSK.
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Zuckerman Research Center, Suite 669
417 E. 68th Street
New York, New York

Mailing Address:
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