Welcome to the Conflict of Interest and Conflict of Commitment Training for Stanford University.

In this 30-minute course, we will discuss the policies that require disclosure of outside professional activities related to your Stanford responsibilities. Topics include:

- Value and risks outside activities can bring to scholarly endeavors
- The importance of mitigating risks that arise when faculty or researchers engage in outside activities
- What needs to be disclosed and when
- Key policy definitions that govern the disclosure process and what does not require disclosure
- Specific federal agency requirements
- Management, elimination or reduction of identified conflicts of interest and commitment, and
- Navigating the OPACS system
Some learners may be familiar with Stanford's policies regarding outside professional activities. Be aware that there are important changes to the policies.

In 2022, the Faculty Senate approved changes to policy 4.1 Conflict of Interest and Conflict of Commitment and policy 4.3 Consulting and Outside Professional Activities by Members of the Academic Council and University Medical Line Faculty in the Research Policy Handbook.

Whenever Stanford modifies these policies, federal regulations require individuals to participate in education on new and existing policy requirements.

Key policy changes were to:

• Clarify roles and responsibilities,
• Expand who must provide disclosures in the Stanford Outside Professional Activities Certification System, known as OPACS,
• Introduce definitions of outside professional activities, outside professional service, and Stanford responsibilities,
• Define activities that need prior approval,
• Clarify when to use the Stanford rider,
• Identify school based mechanisms and disciplinary differences in the COI process, and
• Highlight new federal requirements for disclosures of international activities.

Objectives

By the end of this course, you will be able to:

• Describe what constitutes a conflict of interest or conflict of commitment,
• Identify activities that require disclosure,
• Explain when and how to disclose outside professional activities, and
• Describe some conflict management strategies.
Outside Professional Activities

At Stanford, we recognize both the value and potential risk that consulting and outside professional activities can have for faculty and staff and by extension, the University. Click the buttons on this page to learn more.

[on click Benefits]

Consulting and outside professional activities can:

- Provide a different context for aspects of your professional field
- Create a mechanism for transfer of knowledge from the University for the public good, and
- Enable experiences that may make faculty better scholars, teachers and researchers.

[on click Risk]

**Outside Professional Activities**

Outside Professional Activities have both **benefits** and potential **risks**.

**Risk**

Outside activities can introduce a perception of:
- Bias in research or purchasing activities due to a conflict of interest,
- Over-commitment of time,
- Misallocation of Stanford resources including staff, students, infrastructure or intellectual property, and
- Loss of public trust that can jeopardize the University's mission.

[After links have been clicked]

Stanford’s Conflict of Interest and Conflict of Commitment policies strike a necessary balance between outside interests and commitments and University responsibilities. They also provide guardrails to protect the individual and the institution.

The key to upholding research and scholarly integrity begins with disclosure of outside interests that are related to Stanford responsibilities. This training provides a summary of:
- What disclosures Stanford requires, and
- How situations identified as potential conflicts can be effectively reduced, managed or eliminated.
Disclosure of Outside Activities

Disclosure of outside activities is key to:
- Maintaining public trust
- Protecting yourself from questions regarding integrity and bias
Once you disclose these activities, Stanford will:
- Review the activity for real or perceived bias
- Adopt management strategies

Disclosure of outside professional activities related to your Stanford responsibilities is critical to maintain public trust and protect yourself from questions regarding integrity and bias in your decisions with teaching, research, clinical care and administrative duties. However, not all outside activities that require disclosure will result in an actual conflict of interest or conflict of commitment.

Once disclosed, Stanford will review the outside interests for real or perceived conflict and adopt management strategies when needed to safeguard students, staff, resources, research, human subjects and patient care.

The What, Who, and When of Disclosure

In this course, we will answer important questions regarding the disclosure of outside professional activities.

However, it is the responsibility of Stanford employees to review the policies and reach out to the COI manager in their school with questions.
Click on the first question, "What is a conflict of interest?" to learn more about these policies and how they may affect you and your outside activities.

**Conflict of Interest**

A Conflict of Interest can occur when your personal outside interests or activities affect, or appear to affect, your Stanford responsibilities. This is especially true where there are financial interests.

Click on the links below to learn more.

**Examples of Conflict of Interest**

The following activities are examples that could be conflicts of interest:

- Using Stanford resources for the outside activity
- Overlapping of Stanford research with your outside professional activities which can compromise design, conduct, or reporting of research
• Using a related entity* as a University contractor or vendor.
• Withholding research results for personal gain because of your outside interest
• Negotiating with Stanford on behalf of a related entity
• Promoting the use of products or services from a related entity.
• Engaging in research, particularly research involving human subjects, which could impact the financial condition of a related entity.

*A Related Entity is any domestic or international, public or private, for-profit, non-profit or governmental organization at which Personnel have Outside Professional Activities, or in which Personnel or their spouse, domestic partner, or dependent children, hold a Financial Interest related to Personnel's Stanford Responsibilities.

[on click Prohibited Activities]

Prohibited Activities
When engaging in activities with a related entity, personnel may not:
• Receive gifts, industrial affiliation memberships, or sponsored research funding
• Involve Stanford employees or students in activities at a related entity
• Conduct or supervise investigators on human-subjects research that could affect a related entity

**Part-time Faculty and Staff** may not engage in paid or unpaid work activities that:
• Are not separate and distinct from their Stanford Responsibilities,
• Make use of Stanford personnel or resources, and
• Sum to greater than full-time employment (100% effort) when considered alongside Stanford employment

**Postdoctoral Scholars** need the approval of the Office of Postdoctoral Affairs to conduct outside activities.

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**Conflict of Commitment**

A Conflict of Commitment usually involves an allocation of time or resources that creates a risk of divided loyalty between Stanford and an outside entity.

A conflict of commitment arises when full-time personnel:
• Spend more than 13 days per quarter on outside activities,
• Do not maintain a significant physical presence on campus,
• Serve as principal investigators on sponsored projects submitted and managed through other institutions, and
• Assume line management or significant managerial responsibilities at a related entity.

Click on the link below to view examples.
Examples of Conflict of Commitment

- A full-time faculty member dedicates more than one day per week to an outside activity
- Personnel accept a paid or unpaid position on a company's Scientific Advisory Board with the opportunity to divulge confidential information from their Stanford research
- Personnel use Stanford resources, including office and lab space, students, staff and equipment in support of their outside activity
- A faculty member conducts research at the outside entity that overlaps with research being conducted at Stanford and activities cannot be identified as separate and distinct
- An individual has an interest in an outside entity that is providing technology or materials to conduct research at Stanford
Outside Professional Activity

An outside professional activity is an activity that you, a spouse/domestic partner or dependent child, undertake at an outside entity, and the activity relates to but is not part of your Stanford responsibilities. These outside activities can be:

- Paid or unpaid,
- Part-time or full-time, and
- Voluntary relationships, positions, or appointments at any entity other than Stanford, including for-profit, not-for-profit, governmental, domestic or international organizations.

What activities require disclosure?

Let’s take a look at the activities you must disclose and those you do not need to disclose.
Select the first link: Activities that require disclosure.

**Activities that Require Disclosure**

Some examples of outside professional activities that require disclosure include, but are not limited to:

- Consulting
- Equity holdings in for-profit companies that are related to your Stanford responsibilities
- Positions, employment and appointments such as serving on a board of directors, academic appointments, science advisory board
- Receipt of items of monetary value from non-Stanford entities, and
- Any participation in a foreign government talent program.
Consulting

Consulting is when employees agree to use their professional capabilities to further the agenda of a third party in return for an immediate or prospective gain.

You must disclose consulting services when you:

- Act as an independent contractor, and
- Provide a service related to your field or discipline, and
- Receive a fee-for-service or equivalent relationship from a third party.
Activities that Do Not Require Disclosure

There are a number of activities that do not require disclosure. Some examples of outside professional activities that do not require disclosure are:

- Stanford Activities
- Moonlighting
- Scholarly Communications
- Professional Services
- Income from mutual funds and retirement accounts, and
- A spouse or household member’s outside activities or employment

Click on each one to learn more.
Stanford Activities

Stanford activities refer to any activities you engage in on behalf of Stanford, such as:

- **Salary and royalties paid by Stanford**
- **Licensing of Stanford IP** through the Office of Technology Licensing (OTL) and royalties for IP paid to you through Stanford
- **Grants and contracts** that are managed through the University
- **Dual appointments** with the VA
- **Participation as a HHMI scholar** and other specific relationships identified by your School procedures
- **Participating in a professional conference**
- **Speaking engagements** conducted primarily to disseminate research results and not for monetary gain
Moonlighting

Moonlighting refers to activities unrelated to their Stanford responsibilities. These efforts are considered part of the faculty member’s private life and do not come under University regulation or this policy.

An example that does not require disclosure:

- A faculty member who has partial interest in a local restaurant and their position at Stanford is not related to the food/restaurant industry, nor would they utilize that outside entity for any catering or events at Stanford.

Even though this type of activity does not generally require disclosure, they should not detract in a significant way from your full-time commitment to Stanford.

**Note:** Faculty in the School of Medicine must adhere to policies on moonlighting when it involves providing clinical care.
Scholarly Communications

Scholarly Communications refers to:

- Books
- Movies
- Television productions
- Art works, etc.

These types of activities are not viewed as outside consulting requiring disclosure and management.

Exception

If a faculty member is listed as an author on any publication resulting from performance of consulting services, they should include a disclosure that states that the work was:

- Done as a paid consultant
- Not part of the individual's Stanford duties and responsibilities
[on click Professional Services]

Professional Services

Professional Services refers to outside activities that are remunerated by no more than a modest honorarium and involves service to:

- US national commissions
- US governmental agencies and boards
- Peer review panels and speaking engagements for US governmental agencies
- US based philanthropic organizations or charities
- US professional societies
- Visiting committees or advisory groups to other US universities
- Income from seminars, lectures, or teaching engagements sponsored by a US government agency or a US public or non-profit institution of higher education

Because professional service activities are not undertaken for personal financial gain, they do not fall within the definition of Consulting under Stanford policy and do not require disclosure.
Income from mutual funds and retirement accounts where you do not directly control the investment decisions do not require disclosure.

A spouse or household member’s outside activities or employment that is unrelated to an individual’s Stanford responsibilities does not require disclosure.
Recent changes and sensitivities to foreign activities by the US federal government require more transparency for international activities. Stanford’s policy requires disclosure of all outside professional international activities and services, unless the activity is:

- Considered to be part of your Stanford Responsibilities AND
- A “one off” or ad hoc in nature AND
- Does not result in receipt of resources or compensation, both monetary and in-kind.
**Knowledge Check #1**

Options A, C and D need to be disclosed.

Option B is considered professional service and option E is considered part of your Stanford responsibilities for dissemination of research results and no more than nominal reimbursement is received.

**Who should disclose outside professional interests?**

The policy requires all faculty and any staff, post docs or students who are identified as “Key or Senior Personnel” on sponsored research activities to disclose their outside professional activities in the Outside Professional Activity Certification System called OPACS.
When should you disclose outside professional interests?

Now that you know what types of activities do and do not require disclosure, let's discuss when you should disclose outside activities.

You must disclose these activities:

- Upon hire
- During the Annual Certification (at least every 12 months)
- Ad-hoc disclosure within 30 days of acquiring a new interest or when there has been a significant change in an interest that has already been reported.
- Transactional disclosures are submitted in order to associate Stanford activities with any related outside activities you might have.
- All staff are required to receive prior approval for their outside activities. Faculty are required to obtain prior approval of certain activities.
Transactional Disclosure

Transactional disclosures are submitted in order to associate your disclosed outside interests with Stanford activities when you submit a proposal or protocol or receipt of the following:

- Sponsored awards
- Gifts
- Technology licensing arrangements
- Material transfers
- Collaboration agreements
- Animal or human subject research
- Stem cell transfer research
- Specific procurements from a related entity
Prior approval

Prior approvals of outside professional activities enhance transparency and help you and Stanford by allowing appropriate management mechanisms and expectations to be adopted before commencing the activity instead of trying to manage a commitment after it has already begun.

Beginning July 1, 2023, academic staff and post docs must obtain prior approval for any outside professional activities.

Faculty must obtain prior approval for the following types of activities:

- Employment or appointment at any outside entity where the Personnel's responsibilities may be similar to their Stanford Responsibilities.
- Formation of a new entity or acquisition of an ownership interest of 5% or more either in an outside entity related to Personnel's Stanford Responsibilities or in an entity that licenses Stanford intellectual property.
- Service on the board of directors or science advisory board, unless such service constitutes Professional Service.
- Participation in a foreign government-sponsored talent program.
Foreign Government-Sponsored Talent Program

The term “foreign government-sponsored talent recruitment program” or “foreign government-sponsored talent recruitment programs” means an effort directly or indirectly organized, managed, or funded by a foreign government or institution to recruit S&T professionals or students (regardless of citizenship or national origin, and whether having a full time or part-time position). Some foreign government-sponsored talent recruitment programs operate with the intent to import or, otherwise acquire from abroad, sometimes through illicit means proprietary technology or software, unpublished data and methods, and intellectual property to further the military modernization goals and/or economic goals of a foreign government. Many, but not all, programs aim to incentivize the targeted individual to relocate physically to the foreign state for the above purpose. Some programs allow for or encourage continued employment at United States research facilities or receipt of Federal research funds while concurrently working at and/or receiving compensation from a foreign institution, and some direct participants not to disclose their participation to United States entities. Compensation could take many forms including cash, research funding, complimentary foreign travel, honorific titles, career advancement opportunities, promised future compensation, or other types of remuneration or consideration, including in-kind compensation.
Case Scenario A

A faculty member in the School of Engineering has invented a new “smart material” that can be used in wearable devices to track blood glucose levels in real-time.

The faculty member wants Stanford to license the technology to a new start-up company where her spouse will serve as the CEO. She will consult with the company for commercialization of the invention and will hold 25% of available company equities. A part-time staff member in the Business School wants to consult with the company to provide accounting support on weekends.

A, D, and E are correct.

Policy requires prior approval for faculty outside consulting and for all staff outside activities. Prior approval is not required for a spouse’s outside activities, but a transactional disclosure is necessary if technology will be licensed to the company where a household member has a significant interest. The outside interests would also be captured in the annual certification.
**Case Scenario B**

This involves a visiting scholar appointment with terms that are suggestive of a foreign talent program.

**Conflict of Interest and Commitment – Special Considerations**

Once an individual has disclosed outside interests in accordance with Stanford policies, Stanford must then assess whether an actual conflict of interest or conflict of commitment exists. Certain types of activities raise special considerations you should be aware of. You can learn more about each of these considerations by clicking on each item below.
Use of the Stanford Rider

The Stanford Rider is a contractual addendum that can be used to ensure an outside consulting, employment appointment or advisory service agreement aligns with Stanford and federal sponsor requirements.

Individuals must provide the Stanford Rider to an outside entity when entering into agreements to perform:

- Consulting
- Employment
- Scientific Advisory work
- Appointments requiring extensive or significant work related to Stanford responsibilities

The Stanford rider is not necessary when:

- No written agreement is entered into
- Outside activities constitute professional services (e.g., peer review for a US institution, a speaking or lecture engagement for a short duration)
- Non-disclosure agreements are entered into
- Agreements to serve on an outside entity’s board of directors

Copies of the executed Stanford Rider can be provided to Designated Officials upon request or if a consulting agreement must be provided to a federal sponsor.

A COI manager might ask for copies of external agreements for review to ensure adherence to Stanford policies. Inclusion of the Rider can serve to expedite this review and can mitigate risk when engaging in outside activities.
Stanford Intellectual Property

The mission of the Stanford’s Office of Technology Licensing:

• Encourages effective technology transfer for the public benefit
• Generates royalty income for Stanford to benefit research and education

In keeping with this mission, personnel must:

• **Not promise or assign intellectual property** conceived in the course of University responsibilities to an outside entity

• **Not use or share Stanford research or academic work** in outside professional activities

• Conform to the **rules** set forth in [RPH 9.2 Copyright Policy](#) regarding the **distribution and use of teaching materials** developed by Personnel while they are employed by Stanford University
Human-Subjects Research

Human-subjects research requires particular care to protect the rights of the human subjects.

Stanford considers there to be a conflict of interest while conducting human-subjects research related to their outside professional activity when:

- The value of the outside professional activity or financial interest is $10,000 or more
- The interest is any amount of stock or stock options in a privately held company
- Personnel hold a leadership role in an outside entity that is funding the research
- Personnel have a financial interest in an entity that could be impacted by the outcome of the study

In these cases, you may provide justification for critical research. However, the Stanford Institutional Review Board has the final authority in determining the conditions under which the research is allowable.

If allowed, Stanford will require you to:

- Implement a written management plan OR
- Reduce your financial interest to a level below $10,000 OR
- Discontinue the work at Stanford
Clinical Care

Stanford requires physicians to disclose financial relationships with companies that produce, manufacture, or provide the following products that may be used in the care of their patients:

- Medical devices
- Implants
- Pharmaceuticals
- Biologics
- Diagnostics
- Other medical care

A financial interest in a company could create a conflict of interest if the physician:

- Prescribes pharmaceuticals made or supplied by this entity
- Uses a medical device or implant made or supplied by this entity
- Refers patients to a health care facility with which they have a financial relationship
- Is involved in evaluating products made or supplied by this entity
**Visiting Scholars**

Visiting scholars are:

- Faculty or other qualified individuals who are appointed or employed at another institution, and
- Are formally invited by a Stanford faculty member to visit Stanford for an extended period.

Stanford faculty may invite visiting scholars to Stanford to advance a collaborative research activity.

Stanford faculty must:

- Disclose any outside professional activity they have in relation to the home institution of the visiting scholar

International scholars, students and faculty and post docs should also be aware of any visa restrictions on outside activities and consult with appropriate counsel prior to engaging in any outside activities.
Managing Conflict of Interest and Conflict of Commitment

When Stanford identifies an actual conflict of interest or commitment related to an individual’s outside activity, the University works with the individual to develop an appropriate management plan.

Stanford must eliminate, reduce or manage any identified conflicts.

Click on the links to learn more.

Elimination or Reduction of Conflict

Elimination of a conflict may happen by:

- Divesting a financial interest
- Terminating the relationship or sponsored project that gives rise to the Financial Interest
- Abandoning the project
- Reducing the amount of time or value of the outside interest
**Management of Conflict**

A **management plan** can be created when:

- The individual does not want to eliminate the conflict AND
- The University has determined that they can effectively manage the conflict

The University will work with the individual to write a **management plan** to ensure outside professional activities are separate and distinct from Stanford activities and free from bias.

Management plans include:

- A description of the activity
- Analyses of how the activity relates to the individual's Stanford responsibilities
- Steps personnel need to take to mitigate any bias or risk
- An agreement to update the plan if circumstances change

Management plans must be reviewed at least annually for as long as the conflict exists.
Management Strategies

There are many potential strategies that can be employed to mitigate and manage conflict.

A few examples of management strategies include:

- Disclosure of the conflict in publications and presentations related to the research
- Disclosure of the conflict to research personnel, staff, and students
- Additional oversight of research data by a non-conflicted investigator
- Alternate supervision for staff or students by a non-conflicted investigator
- Role restrictions such that a conflicted investigator may not conduct a certain portion of the research where bias may be introduced
Sponsor Specific COI Requirements

Faculty and key personnel who receive funding from particular federal sponsors must adhere to sponsor specific COI and COC requirements.

To learn more about any particular sponsor that you are engaged with, please click on the links below.

**Code of Federal Regulations**

- NIH
- NSF
- DOE
- DOD
- NASA
A faculty member is a founder of a start-up company that has licensed intellectual property from Stanford where the faculty member is an inventor.

The company has applied for a Small Business Innovation Research Grant from NIH. The faculty member wants to be PI (Principal Investigator) on the company award and subcontract a portion of the work to their lab at Stanford because the study involves human-subjects research and IRB (Institutional Review Board) approval is necessary. The drug to be used in the study will be procured from the start-up company. What management mechanisms might be warranted in this situation?
Choose all appropriate strategies.

A. Sub-contract to a non-conflicted Stanford investigator instead of running the study in the conflicted investigator’s lab.

B. Have the faculty member divest all interests in the start-up company.

C. Ask one of the faculty member’s current students to serve as PI on behalf of the company.

D. A non-conflicted investigator needs to serve as PI of the human-subjects research and disclose any financial interests of Stanford in informed consent forms.

E. Allow the conflicted investigator to purchase the drug from their start-up company.

A, B, and D are correct. To avoid the appearance of a conflict of interest, the faculty member must either remove financial benefit from the outside entity or not act as PI.
**Course Conclusion**

This concludes the conflict of interest and conflict of commitment educational program. Remember, there are people to help you with any questions you might have regarding disclosure requirements, prior approvals, management mechanisms or strategies related to your outside professional activities.

Each School has identified leadership and support staff for this endeavor. Please reach out with any questions or concerns you might have.

**Disclosure in OPACS**

Once you have determined that an outside activity requires disclosure, you will visit the OPACS website.
OPACS

OPACS Dashboard

Stanford has developed the OPACS system to align with Stanford policy requirements and to make the system user-friendly. When you login to OPACS, you will see this dashboard with eight icons, each of which takes you to another screen in OPACS.

Click on each icon to learn more.
**Action Items**

The **Action Items** screen provides a list of items requiring your immediate attention.

Action items could include completion of an annual disclosure or transactional disclosures related to your grant and contract activities in SeRA, human or animal subject protocols, licensing disclosures in the Office of Technology Licensing and gifting activities.

The first action item shown here is an annual OPACS disclosure.

To complete an action item, you will click the **Enter Response** button.

You can also click the **Return to Dashboard** button to return to the Dashboard landing page.

*Click the Enter Response button now.*
Disclosure Form

If your action item is an annual OPACS disclosure, clicking the **Enter Response** button will take you to the disclosure form.

If you have no outside activities to report on your annual disclosure, there are a few short questions to fill out. If you answer yes to some of the questions, you will be asked to add additional information about those outside activities.

Click Next to continue.
Screening Questions

If you need to complete a transactional disclosure for an IRB, or APLAC protocol or a proposal or award in the SeRA system, you will see a list of questions to answer.

The **first question** asks if you have an outside interest that could be related to the research.

- If the answer is no, the disclosure is complete and you will click **Next** to submit.
- If the answer is yes, question #2 pops up and asks if the interest has been previously disclosed as being related to the research. Click the **View Previously Disclosed Relationships** link to see which entities have been previously linked to this research.
- The **final question** asks if anything has changed since the last time the interest was related to the research.
  - If nothing has changed, you may click **No** and then the **Next** button to submit the disclosure without further input.
  - If you click **Yes**, that something has changed with the interest since the last time you related the entity to the research, a full disclosure form will open for completion.

When you have finished viewing this screen, click Next.
Prior Approval of Outside Activity

The **Prior Approval of Outside Activity** screen allows you to disclose outside interests that require prior-approval.

On this screen, you can click the **Start** button to start a prior approval request for a previously disclosed entity. This would be necessary if the nature of the interest has changed such that prior approval is needed for the new relationship with this entity.

Click the **Add New Entity** button to request prior approval before starting a relationship with a new entity.

*Click Next when you are finished viewing this screen.*
Add/Modify/Inactivate Outside Relationship

The Add/Modify/Inactivate Outside Relationship screen allows you to add a new relationship. You can also modify or inactivate previously disclosed relationships by clicking on the icon for the action you want to take.

Click Add Outside Relationship now to see the Decision Tree that guides you in answering questions about a new relationship.
**Decision Tree**

The Decision Tree screen displays a series of questions you must answer to determine if the relationship is:

- A professional service,
- Eligible for a shortened disclosure, or
- Requires prior approval.

The first question determines if the interest is a professional service. If you answer Yes, you do not need to disclose the activity. The system will take you back to the dashboard.

If you answer No, answer the next question.

This question asks if the interest is a one time, short-duration and minimal remuneration activity that is not related to your research, teaching, clinical care or administrative duties at Stanford.

If you answer Yes, you will complete a shortened disclosure form. If you answer No, you will complete the full disclosure form.

Answer the last question to determine if the interest requires prior approval. The system will then generate the appropriate form needed for approval.

Click the Next button when you have finished viewing this screen.
My OPACS Record/Submitted Disclosures

The My OPACS Record/Submitted Disclosures screen displays a list of all disclosures that have been submitted.

You can click the View Disclosure button to see an individual disclosure or the View My OPACS Record button to see all active or inactive entities that you have disclosed.

Click the Next button when you have finished viewing this screen.
The **Personal Profile** screen is a new feature that displays your pertinent information. The information you enter here drives the specific questions you receive throughout the disclosure process in OPACS.

For example, if you are SLAC-appointed, you will receive different questions than if you are in the School of Medicine and have NIH funding.

You can edit the preferred name and alternate email fields. The other information in this screen is pulled from SeRA (Stanford electronic Research Administration System). To make corrections to that information, you must submit a Help Ticket.

The sponsors identified on the Funding Information card is not a comprehensive list of your sponsored research. It only identifies sponsors that have specific COI requirements. Click Next when you have finished viewing this screen.
Training/Education

The Training/Education screen displays the expiration date for COI training as well as links to helpful policy references.
**Disclosed Relationships**

Clicking on the **Disclosed Relationships** icon takes you to the **Company Selection** screen that displays a list of all active and inactive entities that have been disclosed.

On this screen, you can update, inactivate or add new entities.

Click Next when you have finished viewing this screen.
**PHS Travel Reporting**

The **PHS Travel Reporting** screen displays previously disclosed PHS-funded travel.

To disclose new travel, click the **Create Travel Report** button.

Click Next when you have finished viewing this screen.

**OPACS Complete**

This is the end of the OPACS screen tour. You can click on the Resources tab at the top of the screen to find and download a Quick Reference Guide to show you steps to complete the 2022 Annual Disclosure.

When completing the annual disclosure, it is helpful to have:
- 1099 tax forms related to payment from an outside entity,
- Estimated time spent on the activity in the past 12 months, and
- Web address for the outside entity.