Quick Reference Guide for Completing the FY23 SLAC Annual Disclosure

Click the Enter Response button for the FY23 Annual Disclosure.

If desired, review the relevant Research Policy Handbook links relating to your annual disclosure. Note that progress is saved by clicking the “Next” button on the bottom of each page.

Complete “Conflict of Commitment and Interest Disclosure” Section.

Complete the “Outside Professional Activities and Maximum Consulting Days Policy” section.
Complete Question 1B regarding status.

If you are Full-time, click the Full-Time radio button. Clicking this button will auto-fill 100% for winter, spring, and fall quarters. Summer will remain blank, but that is fine. SLAC personnel do not work on the quarter system.

1. During FY23, was your appointment full-time or part-time and specify percent on active duty for each quarter.
   Note: 100% will pre-populate when "Full-time" is selected; for part-time SLAC staff who do not work on a quarter basis, leave the radio buttons blank and enter zero for each quarter. If you accidentally click a radio button and need to put 0% effort, clear and re-enter data by clicking the blue hyperlink below.

   Appointment:  
   [ ] Full-time  [ ] Part-time
If you are Part-time, click the Part-time radio button.

Enter 0 for active duty % for each quarter. Do not click any of the radio buttons for sabbatical, leave without salary or Other leave.

If you accidentally click one of the leave radio buttons, click the “here” hyperlink to clear the previous selections.

Question B2 regarding date range of leave is not applicable to SLAC staff and can be left blank.

Choose the box for any of the administrative roles you held at Stanford. If none apply, click “None of the above”.
Complete the "Outside Activities Section". If you answer “yes” to question D or E, regarding employment outside of Stanford, or participation in a foreign talent program, you will be required to create an entity for this activity in Section IV.
Complete the “Outside Activity Policy” question and click “Next” in the lower right corner.

Complete “Free and Open Exchange of Research Results and Use of University Resources” Section. Click “Next” in the lower right corner of the screen when all answers are complete.

II. Free and Open Exchange of Research Results and Use of University Resources
Complete Section III SLAC Questions (Stanford Admin Guide & Department of Energy Compliance).
**Conflict of Interest Policy**

The Policy on Conflict of Commitment and Interest defines “Immediate family member” as “spouse, dependent child as determined by the Internal Revenue Service, [and] domestic partner.” It defines “significant financial interest” as:

Current or pending personal interest in an entity amounting to at least one-half percent (0.5%) of the company’s equity or at least $10,000 in ownership interest (except when the ownership is managed by a third party such as a mutual fund).

The policy prohibits the following:

- **Approval** -- Participation in negotiating or giving final approval to financial or other business transactions between the University and other organizations in which the individual or an immediate family member has a Significant Financial Interest or in which the individual or an immediate family member has an employment or consulting arrangement.

All staff should also note that originating or approving financial or other business transactions between the University and other organizations with which the staff member has any financial or family ties (even those not rising to the level of Significant Financial Interest or constituting an Immediate Family Member) may create the appearance of a conflict of interest. It is required that all such situations be disclosed in writing to the designated University officer and this disclosure should be documented and retained for the duration of the business relationship.

**SLAC 3a.** During FY23, did you engage in any activities or conduct that could raise a question as to whether this prohibition may apply (or whether this further disclosure requirement is triggered)?

- No
- Yes

Because of the particular importance of conflict of interest issues, you are asked -- above and beyond the specific prohibition of the policy stated above -- to review your University activities during the period (including procurement/contracting, licensing, research and other business or administrative activities), and any involvement you may have or have had with any outside entities that were related in some way to your University activities during the period. (Such involvement might include an employment, consulting, directorship, or financial interest -- possession of size or amount -- as well as fiduciary or compensated activities, and such outside entities might include companies, partnerships, firms, foundations, government entities, etc.) The following statement on conflict of interest may be useful in this regard:

A conflict of interest occurs when there is a divergence between an individual’s private interests and his or her professional obligations to the University such that an independent observer might reasonably question whether the individual’s professional actions or decisions are determined by considerations of personal financial gain. A conflict of interest depends on the situation, and not on the character or actions of the individual.1

Indeed, a conflict of interest (or potential conflict of interest) can occur when actions or decisions may be influenced by considerations of personal gain beyond simple personal financial gain.

**SLAC 3b.** During FY23, did you or any immediate family member have any other personal, professional, or financial relationships, commitments or activities with outside entities that might present or appear to present a conflict of interest with your University position or activities?

- No
- Yes

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**Gratuities and Special Favors Policy**

The Policy on Conflict of Commitment and Interest states that the following is prohibited:

- **Gratuities and Special Favors** -- Acceptance of gratuitous, unsolicited gifts exceeding $50 in value, solicited gifts in any amount or special favors from private or public organizations or individuals with which the University does or may conduct business or extending gratuities or special favors to employees of any sponsoring government or other agency or entity.

**SLAC 4a.** During FY23, did you or an immediate family member engage in any activities or conduct that could raise a question as to whether the first portion of this prohibition (relating to the acceptance of gifts, etc.) may apply?

- No
- Yes

**SLAC 4b.** During FY23, did you or an immediate family member engage in any activities or conduct that could raise a question as to whether the second portion of the prohibition (relating to the extending of gifts, etc.) may apply?

- No
- Yes
Use of University Resources Policy

The policy on Conflict of Commitment and Interest states that the following is prohibited:

University Resources — Use of University resources including, but not limited to, facilities, departmental parking permits, personnel, or equipment, except in a purely incidental way, for any purposes other than the performance of the individual’s University employment. Note: Acceptable use of University vehicles is covered in Guide Memo 8.4.2, Vehicle Use.

SLAC 5. During FY23, did you or an immediate family member engage in any activities or conduct that could raise a question as to whether this prohibition may apply?

[ ] No  [ ] Yes

Business Relations Policy

The policy on Conflict of Commitment and Interest states that the following is prohibited:

Business Relations — Acceptance of or continuing in employment, an official relationship, or a consulting arrangement with another concern which has or seeks to have a business relationship with the University

SLAC 6. During FY23, did you or an immediate family member engage in any activities or conduct that could raise a question as to whether this prohibition may apply?

[ ] No  [ ] Yes

Commitment Policy

The policy on Conflict of Commitment and Interest states that the following is prohibited:

Commitment — For staff members exempt from governmental regulations regarding compensation for overtime work: acceptance of employment, consulting, public service, or pro bono work which can result in conflicts or the appearance of conflicts with a staff member’s primary commitment of time and energy to the University.

SLAC 7. During FY23, did you engage in any activities or conduct that could raise a question as to whether this prohibition may apply?

[ ] No  [ ] Yes

Department of Energy Rules

The Department of Energy (“DOE”) has conflict of interest rules (“DOE Rules”) that apply to its managing & operating (M&O) contractors’ employees. The DOE Rules thus apply to employees of Stanford University who are formally rostered at SLAC National Accelerator Laboratory. These rules also apply to employees jointly appointed by SLAC and Stanford, as well as any Stanford employees who conduct work within the scope of the SLAC M&O contract, or who receive funding from SLAC (together with SLAC employees, referred to as “Designated Personnel”).

Although the below DOE Rules may seem similar to those in Stanford University’s Staff Policy on Conflict of Commitment and Interest (Administrative Guide Memo 1.5.2), related to which you have answered the above questions, the next six DOE specific questions are distinct and equally important to answer.

If you have any questions regarding your responses to any of those questions, please contact the SLAC Legal Office at ConflictOfInterest@SLAC.stanford.edu.

Rule 1

As Designated Personnel, you shall not, under circumstances, which might reasonably be interpreted as an attempt to influence SLAC employee(s) in the conduct of their duties, accept any gratuity or special favor from individuals or organizations with whom SLAC is doing business, or proposing to do business, in accomplishing the work under the DOE Prime Contract. (As modified from DE-930.0321-4—Gratuity.)

SLAC 8. During FY23, did you accept any gratuity or special favor from any person or organization with whom SLAC is doing business or proposing to do business, in accomplishing SLAC work?

[ ] No  [ ] Yes
Rule 2

Designated Personnel shall not use privileged information for personal gain, or make or improper use of privileged information, which is acquired in connection with their work at SLAC. For the purposes of this subsection, the term ‘privileged information’ includes, but is not limited to, unpublished information relating to technological and scientific developments; medical, personnel, or security records of individuals; anticipated materials’ requirements or pricing action; possible new sites for DOE program operations; internal DOE decisions; policy development; and knowledge of selections of contractors or subcontractors in advance of official announcement. (As modified from 10CFR70.371-5 – Use of privileged information.)

DOE 2. During FY23, did you use SLAC privileged information obtained through your work at SLAC for personal gain?
- No
- Yes

Rule 3

Designated Personnel shall not be permitted to make or influence any decision on behalf of SLAC, which directly or indirectly affects the interests of the DOE, if the employee’s personal concern in the matter may be incompatible with the interests of the DOE. For example: Designated Personnel will not negotiate, or influence the award of, a subcontract with a company in which such Designated Personnel has an employment relationship or significant financial interest; and Designated Personnel will not be assigned to the preparation of an evaluation for DOE or for SLAC of some technical aspect of the work of another organization with which such Designated Personnel has an employment relationship, or significant financial interest, or which is a competitor of an organization (other than the contractor who is the individual’s regular employer) in which the individual has an employment relationship or significant financial interest. A “significant financial interest” constitutes greater than or equal to a 5% stake in an entity and includes the financial interests of your immediate family or household. (As modified from 10CFR70.371-5 – Incompatibility between regular duties and private interests.)

DOE 3. During FY23, did you make a decision or influence any decision on behalf of SLAC, which directly or indirectly benefited an outside company with which you are also employed or in which you have a significant financial interest, or which put your outside company’s competitor at a disadvantage?
- No
- Yes

Rule 4

No Designated Personnel performing work on a full or part-time basis under a DOE management and operating contract may engage in employment outside official hours of duty or leave if such employment will:
- [ ] appear to create a conflict-of-interest situation, or
- [ ] appear to subject DOE or the contractor to public criticism or embarrassment.

(As modified from 10CFR70.371-7 – Outside employment of contractor employees)

DOE 4. During FY23, did you work for or consult for an outside company that implicated or resulted in any of the three situations listed above?
- No
- Yes

Rule 5

The following question applies to investigators and sub-investigators who recipients of NIH research funding, or who are planning to participate in NIH-funded research. The requirements of 42 CFR Part 50, Subpart F, Objectivity of Research, apply to any institution, domestic and foreign, that applies for or receives Public Health Service (PHS) research funding in the form of grants or cooperative agreements. Stanford and SLAC are subject to this regulation, also known as the Financial Conflict of Interest (FCOI) regulation. Further, Notice Number NOT-OD-18-160, issued by the National Institutes of Health (NIH), a PHS agency, states that investigators and sub-investigators who are recipients of NIH research funding, or who are planning to participate in NIH-funded research, must disclose any financial interests in foreign entities. If you qualify for the foregoing, please answer the following question.

DOE 5. Do you work on research with, consult for, provide services to, or receive income, support, subsistence, or funding from, a foreign government, foreign institution of higher education, foreign publicly offered-for-profit entity, foreign private-for-profit entity, foreign not-for-profit entity, foreign foundation, scientific or professional society, or other foreign collaborator or foreign entity, outside of a SLAC-authorized Cooperative Research and Development Agreements (CRADA), Strategic Partnership Project Agreements (SPP), Memorandum of Understanding (MOU), subcontract or other contract?
- No
- Yes
Complete Section IV Outside Financial Interests and Commitments

The screening questions in this section are meant to determine if you have any outside professional activities to disclose in detail. This is a three-part question, and if the criteria from a, b and c pertain to the entity you wish to disclose, you will click the “yes” button to add, modify, or remove entities. If the criteria in both a, b and c do not pertain to the entity you wish to disclose, you will click the “no” button and certify your annual disclosure. The yellow policy box at the top of the page gives examples of activities that require pre-approval for SLAC employees, PIs, and those who receive Department of Energy funding through SLAC.

IV. Outside Financial Interests and Commitments
Below is a list of how entities may reasonably be related to your Stanford duties.

If you click the “no” button indicating that the interests that you have previously disclosed are not related to your Stanford institutional responsibilities, a pop-up window will appear to alert you that all previously disclosed companies will be inactivated for this year’s disclosure.
If you click the “yes” button, you will proceed to the next screen to add or modify the entities. Clicking yes will also advance you to the OEA questions. A list of your current entities will appear on this first screen, but this is only for your reference. Click the “Next” button in the lower right corner of the screen to continue to Company Selection.
Company Selection

The next screen will be the company selection screen where you can add or modify an entity to disclose a new paid or unpaid relationship.

To add an entity to disclose a new paid or unpaid relationship, click the red “Add New Entity” button on the lower left of the screen. To Update an existing entity, click the blue “Update” button on the right side of the entity table.
Once you click the “Add New Entity” or “Update” button, you will be presented with a series of questions about your relationship with the entity to determine if the interest is a short, one-time activity that is not related to your Stanford duties, allowing for a shortened disclosure form.

The correct form will be generated and ask the following questions:

- **Is this a one-time, short duration (1-3 days) and minimal remuneration activity (<$3,000)?**
  - No
  - Yes

- **Are you adding a nature of interest that includes one or more of the following (these activities require prior approval for faculty, students and affiliates):**
  - Service on the board of directors, advisory board, or other board of an outside entity, unless such service constitutes Professional Service
  - Consulting activities
  - Employment at an outside entity
  - Appointment or affiliation at an outside entity
  - Formation of a new entity, or acquisition of an economic interest of 10% or more either in an outside entity related to an individual's Stanford responsibilities or in an entity that licenses Stanford intellectual property
  - Participation in a foreign government-sponsored talent program

  All staff must obtain prior approval for any new outside activities that are related to your Stanford responsibilities.
  - No
  - Yes

1. **Name of company or organization (Corporation, society, etc.). Note: Each company, organization, firm or other outside entity must be entered separately.**

2. **Relationship is with:**
   - [ ] Self
   - [ ] Spouse/ Domestic partner
   - [ ] Other family member

3. **If the relationship is at an outside entity, what is your role or position?**

4. **What is your planned time commitment per week?**
   - [ ] 5 days/week
   - [ ] 6-7 days/week

5. **What is your proposed schedule for performing work at this entity (i.e., data after work hours, weekend, during vacation days).**

6. **Estimate average number of hours per week you plan to work for this entity.**

7. **What is the term of the agreement (period of performance cannot be more than 1 year from approved date)?**

8. **Is the firm or entity a DOD/R&D grant or laboratory; prime contractor managing a laboratory, site, or facility; or a firm doing business in the atomic energy field? (Note: As used herein “atomic energy” means “all forms of energy released in the course of nuclear fusion or nuclear transformation.”)**
   - No
   - Yes

9. **Where is the entity located?**

10. **Explanation:**
A question has been generated to determine if you are listed as a senior/key personnel on an award from certain funding agencies. This is not an exhaustive list of your funding sources, but rather four funding agencies that may require additional information. This information is pulled from our SeRA system. You are not required to fill out this information.

The next section is optional, and external agreements can be uploaded. If you are an NIH-funded investigator and you have external international agreements involving an appointment or employment with an entity, it can be uploaded here.
The Other Attachments section is also optional. If you have a document that you feel is pertinent to the disclosure, you may upload it here.
3. What is the nature of your activity/financial interest with Company Y? (Check all that apply)

- Board of Directors membership
- Advisory Board membership
- Consultant (other than Advisory Board or Board of Directors membership)
- Licensing of intellectual property that you developed at Stanford to Company Y
- Ownership of Stock and/or Stock Options or other ownership interests
  (excluding investments for which you do not directly control investment decisions, such as mutual funds)
- Payment of royalties for inventions developed outside Stanford and licensed to Company Y
- Payment for lectures
- Payment for preparation of papers or reports
- Payment for product evaluation
- Legal consultant or expert witness
- Executive or other employee position
- Scientific, Research, or Academic Appointments
- Other

a. Is providing you any material data, in-kind support for your research endeavors?
   - No ☐ Yes ☐

**Note:** In Kind Support refers to office/laboratory space, equipment, supplies, datasets or employees or students supported by an outside source.
Federal Regulations for PHS-funded research states: Investigators must disclose the occurrence of any reimbursed or sponsored travel (i.e. that which is paid on behalf of the Investigator and not reimbursed to the Investigator), related to their Institutional responsibilities. The details of this must include the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. In accordance with the Institution’s FCOI policy, the Institutional official(s) will determine whether the travel constitutes an FCOI with the PHS-funded research. This disclosure does not apply to travel that is reimbursed or sponsored by a U.S. Federal, state, or local government agency, a U.S. Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

If you receive or will receive sponsored research funding from PHS/NIH you must report travel related to your institutional responsibilities that was paid for by an external organization.

This is your previously reported value of reimbursed or sponsored travel for this period from Company Y: $0 (View current PHS Travel):

Update your travel status by selecting one of the following:

- Did not Travel during this period
- All travel reported for this period
- Not Applicable. As I have no PHS/NIH proposals or funding

5. If you are entering into a consulting or non-disclosure agreement with an outside entity, you are required to provide the entity with a copy of the Stanford University Required Addendum to Consulting or Related Agreement.

☐ I have or will provide this addendum to the entity
☐ Not applicable to this type of relationship

SLAC Outside Employment and Professional Engagements (OEA) Form

Conflicts of interest occur when employee’s outside activities could influence their professional conduct, including allocation of time and energies, due to considerations of personal gain (financial or otherwise). At a minimum, Stanford and DOE require SLAC employees to disclose to, and obtain approval from, the SLAC Director before engaging in any outside employment and professional engagements (including acquiring a significant financial interest in a firm) in addition to their employment at SLAC. Approval of such activities must be obtained before the activity has started.

6. Have you received prior approval of this activity?

- Yes, I have an OEA previously approved and on file with SLAC
- No, this is a new OEA request
7. What is your Stanford Appointment/SLAC Position Status?

- Full-Time
- Part-Time
- Casual
- Hourly
- Temporary
- On (or planned) Sabbatical or Leave of Absence

8. Describe the scientific area or technology that will be the subject of effort, if any:

9. Is the proposed activity affiliated with a talent recruitment program, foreign government, or foreign entity, each of a "foreign country of risk"? Please review DOE Order 456.1A for information on prohibited or restricted activities before answering this question.

- No
- Yes

10. Do you or any member of your immediate family or household have or expect to have a significant financial interest in the firm (greater than or equal to 5% stake)? If the answer is yes, then provide details.

- No
- Yes

11. Are you or will you be receiving any compensation, support, funding, or benefits of any kind from the entity (including, for example, paid travel or in-kind benefits)? If you, please provide the rate of compensation or amount you will be paid or provide a description of any other support, funding, or benefits. Include justification for this request. Please review the definition of "Support" in DOE Order 456.1A before answering.

- No
- Yes

12. Provide justification for this request.

Explanation:
13. What is the outside entity’s current/prospective business relationship with SLAC, Stanford or DOE? If none, write "none".

Explanation:

14. Please give a detailed description of the work to be performed.

Explanation:

15. Describe any overlap between your SLAC work and the proposed activity and outside firm/entity (if none, write "none")

16. Is the work you will be performing with the entity work that SLAC could be performing?

17. Have you signed a Non disclosure Agreement (NDA) with this firm/entity?

☐ No  ☐ Yes

18. Do you declare that you are aware of and will abide by the Patent and Copyright Agreement for Stanford Personnel (Form SI-18) which requires that you not enter into any agreement creating copyright or patent obligations that conflict with your disclosure and assignment obligations to the University?

☐ No  ☐ Yes
If you have disclosed an entity that could be related to your Stanford duties, additional questions will be asked.

Research and Scholarship
You will be asked if the entity that you are reporting may reasonably appear to be related to your research/scholarship responsibilities. If the answer is no, click the “no” button and then click the “Next” button on the lower right.

If you answer yes, check the box for all instances that would apply to this entity.
If you are named as a senior/key personnel on any grants, contracts, or subawards in the Stanford SeRA system, you will need to provide details about how the entity could reasonably be related to the research.

### Grants, Contracts, and Subawards

2. Listed below are the grants, contracts, and subawards for which you are included in key personnel. Please check the box if the aims of any of these research projects reasonably appear to be related to your activities/relationship with Company Y. Check all that apply and review or update as needed.

No grants, contracts or subawards found.

If you are named as a researcher on any protocols, you will need to answer how the entity could reasonably be related to the research.
If you have a Veterans Affairs (VA) appointment, answer “yes” in question 4, otherwise, answer “no”.

4. If you have a Veterans Affairs (VA) appointment, do you have any federally funded research through PAVIR or the VA that might reasonably appear to be related to your activities with Company Y?
   - No
   - Yes

If you have PHS funding, answer “yes” and complete any missing travel reporting for the year; or if you have PHS funding, and have not traveled this year, state this. If you do not have any PHS funding, answer “no”.

5. If you do not have PHS funding, please disregard the following section.

**PHS Travel Reporting**

Federal Regulations for PHS-funded research states: Investigators must disclose the occurrence of any reimbursed or sponsored travel (i.e. that which is paid on behalf of the investigator and not reimbursed to the Investigator), related to their Institutional responsibilities. The details of this must include the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. In accordance with the Institution’s FCOI policy, the Institutional official(s) will determine whether the travel constitutes an FCOI with the PHS-funded research. This disclosure does not apply to travel that is reimbursed or sponsored by a U.S. Federal, state, or local government agency, a U.S. Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

During 2021, if you were the recipient of any sponsored or reimbursed travel related to your PHS-funded research, paid by any entity (see exceptions above) then you must complete a PHS Travel Report. This link is also at the end of your Annual disclosure and on your OPMCS dashboard.
Teaching and Education

You will be asked if the entity that you are reporting may reasonably appear to be related to your teaching and educational responsibilities. If the answer is no, click the “no” button, skip question 1 and then click the “Next” button on the lower right.

If the answer is yes, you will click the “yes” button and check the box for all entities that could reasonably be related to your teaching and educational responsibilities. Then click the next button in the lower right.
Administrative Duties
You will be asked if the entity that you are reporting may reasonably appear to be related to your administrative responsibilities, including procurement of goods and services, oversight of personnel who have an outside interest, or other administrative activities. If the answer is no, click the “no” button, skip questions 1, 2, and 3, then click the “Next” button on the lower right.
If the answer is yes, you will click the “yes” button and answer the three questions regarding how the entity could reasonably be related to your teaching and educational responsibilities. Then click the “next” button in the lower right.

Clinical Duties
You will be asked if the entity that you are reporting may reasonably appear to be related to your clinical duties and responsibilities. If the answer is no, click the “no” button, skip question 1, review the Stanford policies, and then click the “Next” button on the lower right.
If the answer is yes, you will click the “yes” button, check the boxes for all ways that the entity could reasonably be related to your clinical duties and responsibilities, review the two Stanford policies regarding clinical duties, then click the “next” button in the lower right.
When you have successfully completed the entry for the entity that you were disclosing, you will get the following notification.

Add Another Entity or Modify Another Existing Entity

You may now enter another entity or modify an existing entity for additional outside professional activities. Repeat the steps above, as needed. When your entities are complete and up to date, click the red “Next Step: Review & Submit” button above the entity table, or in the upper right of the screen to the certification step.
Certification

Once you have completed the FY 2023 Annual Disclosure, review the certification statement and click the red “Certify” button on the lower left.

If you have disclosed outside entities that require OEA approval, you will need to choose your SLAC approvers. Enter the names of any and all approvers that pertain to you. If you are uncertain, leave the boxes blank and the COI manager will assist.

Choose “Save Without Certifying” if you would like to save your progress without certifying. You can provide additional information by starting the disclosure again and updating the information as needed.
If you would like to review/print your disclosure, please click the “Review/Print Disclosure” button. You can also view your disclosure online at any time.