

## Conflict of Interest and Conflict of Commitment Quick Reference



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

A slide titled "Policy Changes 2022" with a list of key policy changes and a background image of a courtyard. The slide content is as follows:

**Policy Changes 2022**

There have been key policy changes to the policies below:  
4.1 Conflict of Interest and Conflict of Commitment  
4.3 Consulting and Outside Professional Activities by Members of the Academic Council and University Medical Line Faculty

Key policy changes were to:

- Clarify roles and responsibilities
- Expand who must provide disclosures
- Introduce definitions
- Define activities that need prior approval
- Clarify when to use the Stanford rider
- Identify school-based mechanisms and disciplinary differences in the COI (Conflict of Interest) process
- Highlight federal requirements for disclosures of international activities

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



**Objectives**

By the end of this course, you will:

- 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
- Describe some conflict management strategies

Click NEXT> to continue.

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.

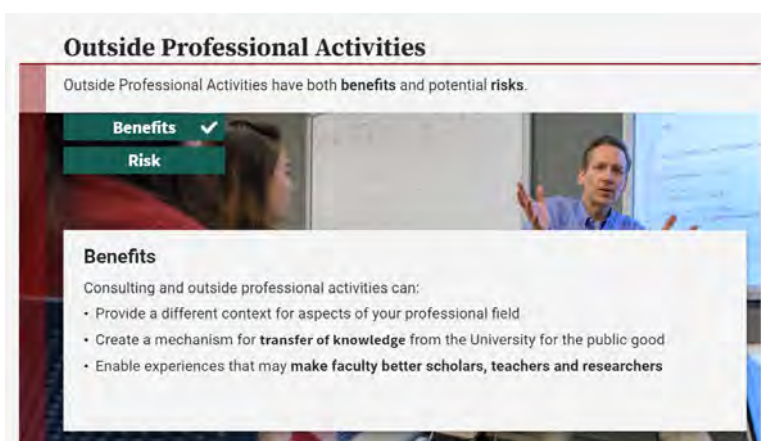
## Outside Professional Activities



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 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**

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



Click NEXT> to continue.

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

**The What, Who, and When of Disclosure**

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

- What is a conflict of interest (COI)?
- What is a conflict of commitment (COC)?
- What constitutes an outside professional activity?
- Which activities require disclosure? And which do not?
- Who should disclose outside activities?
- When should you disclose outside activities?



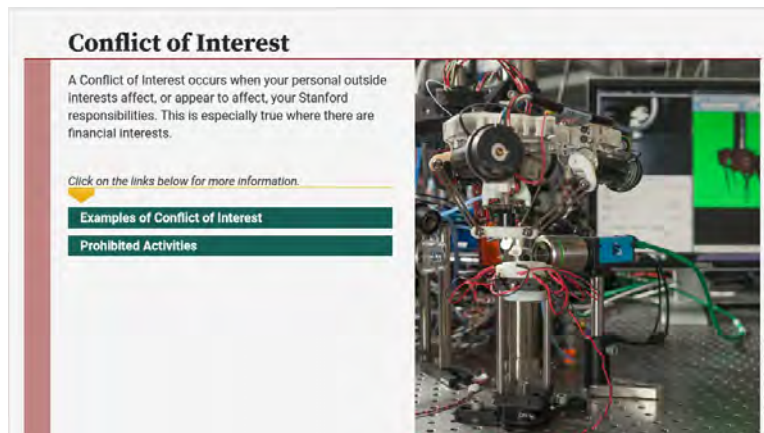
In this course, we will answer important questions regarding the disclosure of outside professional activities.

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.

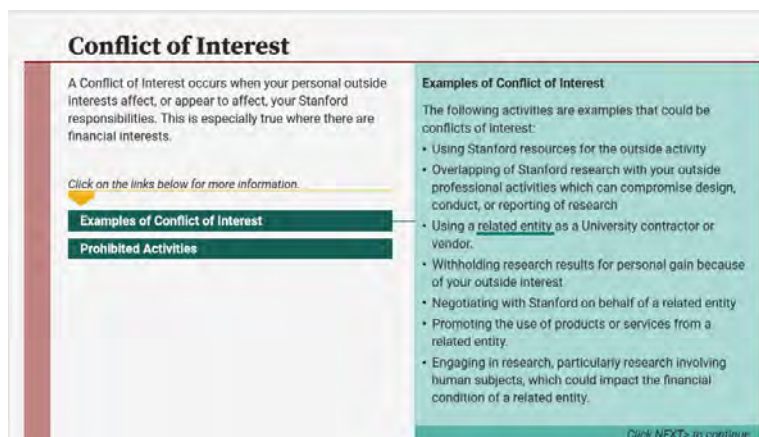
## **Conflict of Interest**



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.

### **[on click Examples of Conflict of Interest]**



### **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]

The screenshot shows a webpage titled "Conflict of Interest". On the left, there is a definition: "A Conflict of Interest occurs when your personal outside interests affect, or appear to affect, your Stanford responsibilities. This is especially true where there are financial interests." Below this is a link: "Click on the links below for more information." Two buttons are visible: "Examples of Conflict of Interest" and "Prohibited Activities". The "Prohibited Activities" button is selected, and its content is shown in a light blue box on the right. This box contains the following text: "Prohibited Activities", "When engaging in activities with a related entity, personnel may not:", a bulleted list of three items, "Part-time Faculty and Staff may not engage in paid or unpaid work activities that:", a bulleted list of three items, and "Postdoctoral Scholars need the approval of the Office of Postdoctoral Affairs to conduct outside activities." At the bottom right of the box is a link: "Click NEXT to continue."

**Prohibited Activities**

When engaging in activities with a related entity, **personnel** may not:

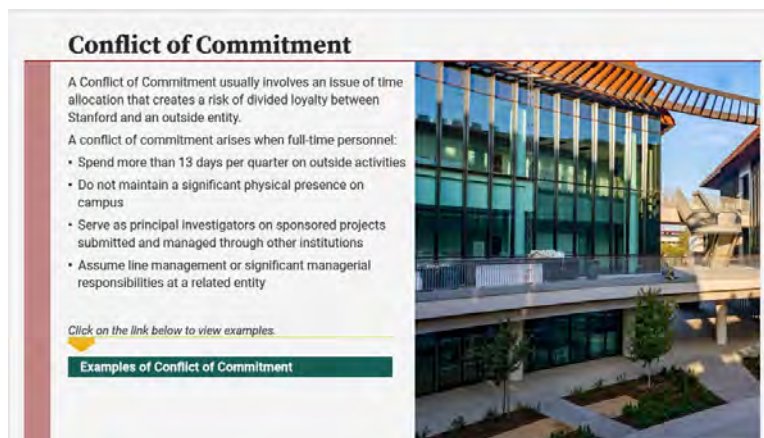
- Receive gifts, industrial affiliation memberships, or sponsored research funding
- Involve Stanford employees or students in activities at a related entity
- Conduct or supervise investigators on human-subjects research that could affect a related entity

**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.

## ***Conflict of Commitment***



**Conflict of Commitment**

A Conflict of Commitment usually involves an issue of time allocation 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
- Assume line management or significant managerial responsibilities at a related entity

Click on the link below to view examples.

[Examples of Conflict of Commitment](#)

The image also features a photograph of a modern, multi-story building with a glass facade and a wooden roof structure, situated in an outdoor courtyard area.

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Click on the link below to view examples.



[on click Examples of Conflict of Commitment]

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[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

[Click NEXT to continue](#)

### Examples of Conflict of Commitment

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## Outside Professional Activity


**Outside Professional Activity**

An outside professional activity is one that:

- You or a member of your household undertakes with an outside entity
- Is related to (but not part of) your Stanford responsibilities
- Paid or unpaid
- Part-time or full-time

The outside entity can be:

- For-profit
- Not-for-profit
- Governmental
- Domestic
- International



Click NEXT to continue.


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?

**What activities require disclosure?**

- Activities that require disclosure
- Activities that do not require disclosure
- International Activities



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.

[on click Consulting Defined]

The screenshot shows a web page titled "Activities that Require Disclosure". On the left, a list of activities includes Consulting, Equity holdings in a for-profit company, Positions, employment and appointments, Receipt of items of monetary value from non-Stanford entities, and Any participation in a foreign government talent program. A link labeled "Consulting Defined" is highlighted. On the right, a teal box defines consulting as using professional capabilities for a third party's agenda for gain, and lists disclosure requirements: acting as an independent contractor, providing a service related to one's field, and receiving a fee-for-service from a third party.

## 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.



[on click Stanford Activities]

**Activities that Do Not Require Disclosure**

**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

[Click NEXT to continue.](#)

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- **Participating in a professional conference**
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[on click Moonlighting]

The screenshot shows a web page titled "Activities that Do Not Require Disclosure". On the left is a vertical sidebar menu with the following items: "Stanford Activities", "Moonlighting", "Scholarly Communications", "Professional Services", "Income from mutual funds and retirement", and "Household member's outside activities or employment". The "Moonlighting" item is highlighted. Below the menu is a small icon and the text "Click on each one to learn more." The main content area on the right is titled "Moonlighting" and contains the following text: "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." Below this is a sub-heading "An examples that does not require disclosure:" followed by a bullet point: "• 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." Further down, it says "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." A "Note" follows: "Note: Faculty in the School of Medicine must adhere to policies on moonlighting when it involves providing clinical care." At the bottom right of the content area, there is a small link that says "Click NEXT to continue."

## 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.

[on click Scholarly Communications]

**Activities that Do Not Require Disclosure**

**Stanford Activities**

- Moonlighting
- Scholarly Communications**
- Professional Services
- Income from mutual funds and retirement
- Household member's outside activities or employment

Click on each one to learn more.

**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

Click NEXT to continue.

### 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
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[on click Professional Services]

The screenshot shows a web page titled "Activities that Do Not Require Disclosure". On the left is a sidebar menu with the following items: "Stanford Activities", "Moonlighting", "Scholarly Communications", "Professional Services", "Income from mutual funds and retirement", and "Household member's outside activities or employment". The "Professional Services" item is highlighted. Below the menu is a link that says "Click on each one to learn more." The main content area on the right is titled "Professional Services" and contains the following text: "Professional Services refers to outside activities that are remunerated by no more than a modest honorarium and involves service to:" followed by a bulleted list: "• 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", and "• Income from seminars, lectures, or teaching engagements sponsored by a US government agency or a US public or non-profit institution of higher education". Below the list, it states: "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." At the bottom right of the content area is a link that says "Click NEXT to continue."

### 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.

[on click Income from mutual funds and retirement]



**Income from mutual funds and retirement accounts** where you do not directly control the investment decisions do not require disclosure.

[on click Household member's outside activities or employment]



**A spouse or household member's outside activities or employment** that is unrelated to an individual's Stanford responsibilities does not require disclosure.



## International Activities

**International Activities**

Stanford's policy requires disclosure of **all outside professional international activities and services, unless** all three of the criteria below are met.

The outside international activity does not need to be disclosed if 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



Click NEXT to continue

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 (such as, giving a visiting lecture or reviewing a student paper) **AND**
- Does not result in receipt of resources or compensation, both monetary and in-kind.


## Knowledge Check #1

**Knowledge Check #1**

A faculty member engages in the outside professional interests listed below. Which of these activities would require disclosure? Choose all that apply.

- A. Member of the Board of Directors for a pharmaceutical company.
- B. Member of a review panel for the National Institutes of Health
- C. Scientific Advisory Board member and consultant for a non-profit entity in the US with a \$50,000 payment for these services.
- D. Unpaid Adjunct Professor at an international institution.
- E. Speaking engagement at a professional conference held in Germany to disseminate Stanford research results with nominal reimbursement.

[Submit](#)



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?

**Who should disclose outside professional interests?**

The policy requires all faculty as well as anyone identified as Key or Senior Personnel on sponsored projects (staff, Post Docs, students) to disclose outside interests.

These activities should be disclosed online in OPACS (Outside Professional Activities Certification System).



[Click NEXT to continue](#)

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?***

**When should you disclose outside professional interests?**

Disclosures of outside activities are required:

- Upon hire
- During the annual certification (at least every 12 months)
- For Ad-hoc disclosure
- For Transactional disclosures
- For activities that require Prior Approval

Click on the links below for more information.

[Transactional Disclosures](#)

[Prior Approval](#)

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 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



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## Prior approval

**Prior approval**

Prior approvals of outside professional activities:

- Enhance transparency
- Allow Stanford to adopt appropriate management mechanisms before the start of the activity

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

**Faculty** must obtain prior approval for activities that include:

- Employment or appointment with similar responsibilities
- The formation of a new entity
- The acquisition of an ownership interest of 5% or more of an outside entity
- Serving on a board of directors or science advisory board
- Participation in a foreign government-sponsored talent program

Click on the links below for more information.

[Foreign Government-Sponsored Talent Program](#)



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



[on click Foreign Government-Sponsored Talent Program]

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Click on the links below for more information.

[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.

Click NEXT to continue.

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## Case Scenario A


**Case Scenario A**

**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.

[Answer Question](#)



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.


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**Case Scenario A**

Which of the following statements are true? Choose all that apply. [Read Scenario](#)

- A. The faculty member must seek prior approval for consulting and ownership of >5% with the start-up company.
- B. The Business School staff member does not need prior approval.
- C. The faculty member must obtain prior approval for her spouse's service as CEO of the start-up company.
- D. A transactional disclosure is required prior to licensing the technology to the start up company.
- E. The staff member and faculty member should disclose these outside interests in their annual certification.

[Submit](#)



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

**Case Scenario B**

A Stanford faculty member receives an invitation from a prestigious University in the UK to serve as a visiting scholar providing education and research consultation in their area of expertise. The terms of the invitation include a requirement that the UK University receive acknowledgement in all publications arising out of the work conducted at the University and disclosure of all inventions. The expected in-person time commitment is one month annually.

**Question:**

This invitation is for a "foreign government sponsored talent recruitment program" that would require Stanford approval prior to accepting the invitation. True or False?

True  
 False

[Submit](#)



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

## Conflict of Interest and Commitment – Special Considerations

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

Click on each link below for more information.

- [Use of the Stanford Rider](#)
- [Stanford Intellectual Property](#)
- [Human Subjects Research](#)
- [Clinical Care](#)
- [Visiting Scholars](#)



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.

[on click Use of the Stanford Rider]

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

**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.

[Click NEXT to continue.](#)

### Use of the Stanford Rider

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[on click Stanford Intellectual Property]

The screenshot shows a web page titled "Conflict of Interest and Commitment - Special Considerations". On the left, there is a vertical navigation menu with five items: "Use of the Stanford Rider", "Stanford Intellectual Property", "Human Subjects Research", "Clinical Care", and "Visiting Scholars". The "Stanford Intellectual Property" item is highlighted. The main content area on the right is titled "Stanford Intellectual Property" and contains the following text:

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

At the bottom right of the content area, there is a small link that says "Click NEXT to continue."

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[on click Human Subjects Research]

The screenshot shows a web page titled "Conflict of Interest and Commitment - Special Considerations". On the left, there is a vertical navigation menu with five items: "Use of the Stanford Rider", "Stanford Intellectual Property", "Human Subjects Research", "Clinical Care", and "Visiting Scholars". The "Human Subjects Research" item is highlighted. The main content area on the right is titled "Human-Subjects Research" and contains the following text: "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:" followed by a bulleted list: "• 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", and "• Personnel have a financial interest in an entity that could be impacted by the outcome of the study". Below this list, it states: "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." and "If allowed, Stanford will require you to:" followed by another bulleted list: "• Implement a written management plan OR", "• Reduce your financial interest to a level below \$10,000 OR", and "• Discontinue the work at Stanford". At the bottom right of the content area, there is a small link that says "Click NEXT to continue."

## 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

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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



[on click Clinical Care]

The screenshot shows a slide titled "Conflict of Interest and Commitment - Special Considerations". On the left is a sidebar menu with five items: "Use of the Stanford Rider", "Stanford Intellectual Property", "Human Subjects Research", "Clinical Care", and "Visiting Scholars". The "Clinical Care" item is selected and highlighted. The main content area on the right is titled "Clinical Care" and contains the following text: "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:" followed by a bulleted list: "• Medical devices", "• Implants", "• Pharmaceuticals", "• Biologics", "• Diagnostics", and "• Other medical care". Below this list, it states: "A financial interest in a company could create a conflict of interest if the physician:" followed by another bulleted list: "• 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", and "• Is involved in evaluating products made or supplied by this entity". At the bottom right of the slide, there is a small text that says "Click NEXT to continue".

## 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

[on click Visiting Scholars]



## 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

**Managing Conflict of Interest and Conflict of Commitment**

When Stanford identifies a conflict of interest or commitment related to an individual's outside activity, the University works with the individual to develop an appropriate plan. Plans are adjustments to activities that could include:

- Elimination or reduction
- Management

Click on the links below for more information.

[Elimination or reduction](#)

[Management](#)

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.

[on click Elimination or Reduction of Conflict]

**Managing Conflict of Interest and Conflict of Commitment**

When Stanford identifies a conflict of interest or commitment related to an individual's outside activity, the University works with the individual to develop an appropriate plan. Plans are adjustments to activities that could include:

- Elimination or reduction
- Management

Click on the links below for more information.

[Elimination or reduction](#)

[Management](#)

**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

Click NEXT to continue.

### 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

[on click ]



### 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

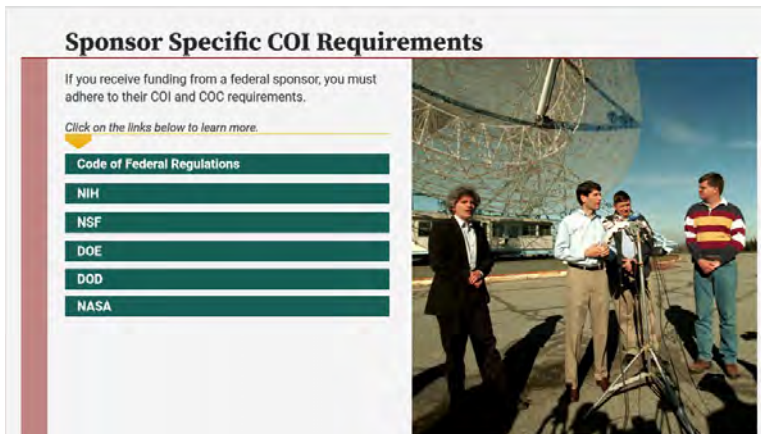


There are many potential strategies that can be employed to mitigate and manage conflict.

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



**Sponsor Specific COI Requirements**

If you receive funding from a federal sponsor, you must adhere to their COI and COC requirements.

Click on the links below to learn more.

- [Code of Federal Regulations](#)
- [NIH](#)
- [NSF](#)
- [DOE](#)
- [DOD](#)
- [NASA](#)

The image also features a photograph of four people standing in front of a large radio telescope dish. One person is speaking into a microphone on a stand.

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](#)




## Knowledge Check

### Knowledge Check

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?

[Answer Question](#)



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?

**Knowledge Check**

Choose all appropriate strategies. [Read Scenario](#)

- 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.

[Submit](#)

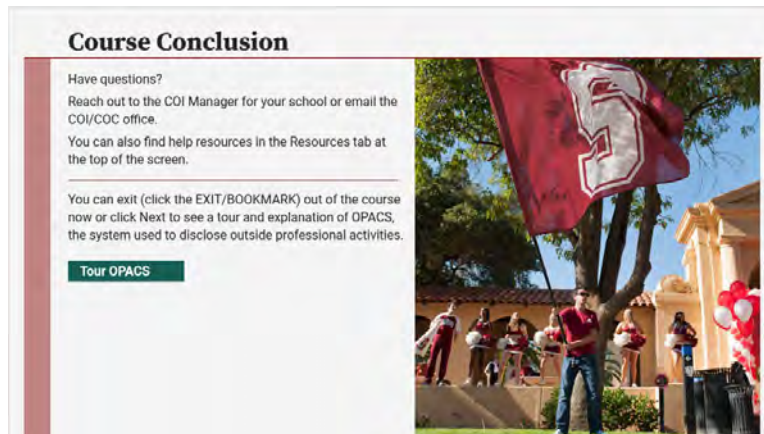


Choose all appropriate strategies.

- 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

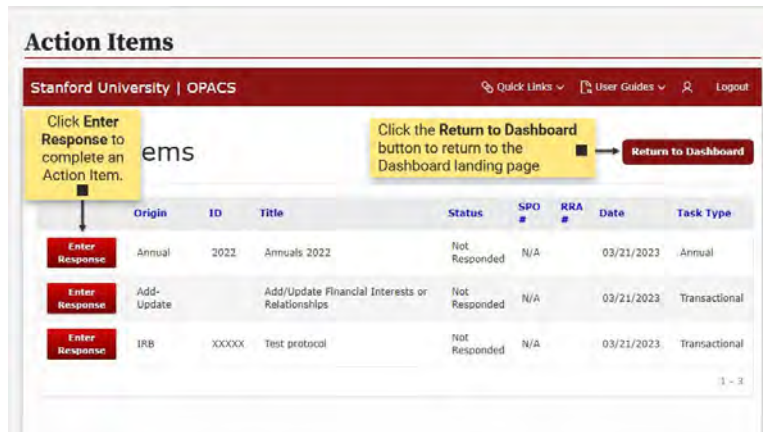
### OPACS Dashboard



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

**Disclosure Form**

Stanford University | OPACS Quick Links User Guides Logout

### I. Conflict of Commitment and Interest Disclosure

Annual reporting on outside professional activities and certification of compliance is required of all members of the Academic Council and Medical Center Line faculty by Stanford's Faculty Policy on Conflict of Commitment and Interest (Research Policy Handbook 4.1, 4.2 and 4.3). Clinician Educators and Instructors in the School of Medicine must also comply with this policy. Disclosures of financial interest related to your institutional responsibilities will be assessed to identify potential conflicts of interest. These reports are considered confidential and will be reviewed by the cognizant school Dean, the Dean of Research and designated individuals, who may include an Associate Dean, the Department Chair, senior administrative staff and University officials in Internal Audit and Office of the General Counsel. Disclosures that are identified by the review as financial conflicts of interest (FCOI) related to PHS (NIH)-funded research must be reported to the NIH and made available to the public. Depending on funding source, some disclosures that meet federal criteria may be required to be reported to external funding agencies in accordance with their policies and may be made available to the public (see RPH 4.2 for additional information).

This disclosure is for the period of \_\_\_\_\_, through \_\_\_\_\_.

Disclosures are due \_\_\_\_\_.

Please be familiar with the requirements of these policies before completing your Annual disclosure.

Policies

- Research Policy Handbook 4.1 - Faculty Policy on Conflict of Commitment and Interest

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

The screenshot shows the 'Screening Questions' interface. At the top, it says 'Stanford University | OPACS' with navigation links for 'Quick Links', 'User Guides', and 'Logout'. Below this is a breadcrumb trail 'Home > Action Items' and the title 'Outside Interest Declaration' with a 'Return to Dashboard' button. The user information section shows: 'Source/ID: IRB-XXXXX', 'Protocol Director: Jane Doe', and 'SPO: pending'. The main section is titled 'Personal Outside Interests' and contains question 1: 'Do you have any personal outside interests that could reasonably appear to be related to this research?'. A sub-question asks: 'Does this research make use of devices, compounds, purchase equipment, or anything else from an entity in which you have an outside relationship?'. Two radio button options are shown: 'Yes, I do have a personal outside interest that could reasonably appear to be related to this research' (selected) and 'No, I do not have any personal outside interests that could reasonably appear to be related to this research'.

This screenshot shows the continuation of the 'Screening Questions' page. It displays question 2: 'Has this interest been previously disclosed as being related to this research?'. A link 'View Previously Disclosed Relationships' is provided. Two radio button options are shown: 'Yes, this interest has been previously disclosed as being related to this research' (selected) and 'No, this interest has not been previously disclosed as being related to this research'. Below this is question 3: 'Has anything changed since the last time you disclosed this related interest such as financial value, the nature of your relationship with the entity, or scope of the research?'. Two radio button options are shown: 'Yes, something has changed with the relationship, interest, or scope of the research since the last time I disclosed' (selected) and 'No, nothing has changed with the relationship, interest, or scope of the research since the last time I disclosed'. A 'Next >>' button is visible at the bottom right.

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 disclosed 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 screenshot shows a web form titled "Decision Tree" for "Company 1". The form is part of the Stanford University OPACS system. It contains two main questions with radio button options for "No" and "Yes".

**Question 1:** Does this relationship meet one of the types of professional services listed?  
Professional Service is a form of Outside Professional Activity that both is remunerated by no more than a modest honorarium or equivalent and involves service to:  
1. United States (US) national commissions, US governmental agencies and boards; peer review panels and speaking engagements for agencies or state and local governmental entities within the US.  
2. US based philanthropic organizations or charities, US professional societies, visiting committees or advisory groups to other US universities, and analogous domestic bodies.  
Options:  No  Yes

**Question 2:** Is this a one-time, short duration (1-3 days) and minimal remuneration activity (<\$5,000)?  
NOTE: By selecting "Yes", you verify this relationship is not related to your research/scholarship, teaching/education, clinical care, or administrative duties; this includes research sponsored by the entity. This will generate a shortened disclosure. If the relationship is related to one of those duties, then you must select "No" to disclose your full relationship with the entity.  
Options:  No  Yes

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 screenshot shows the 'My OPACS Record/Submitted Disclosures' page. At the top, there is a navigation bar with 'Stanford University | OPACS', 'Quick Links', 'User Guides', and 'Logout'. Below this is a 'Home' link and the page title 'My OPACS Record/Submitted Disclosures' with a 'Return to Dashboard' button. A search bar and 'Go' button are present. The main content is a table of disclosures:

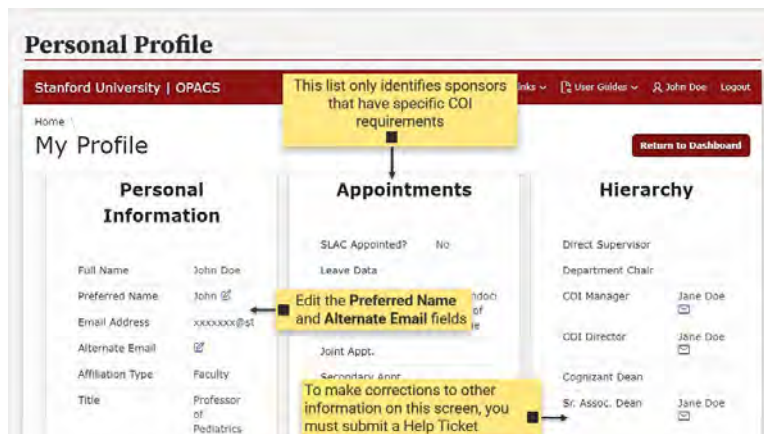
Title	Source	Source ID	SPO #	RRA #	Certified Date	Status	COI Review Date	View Disclosure
Add/Update Financial Interests or Relationships	Add-Update				19-MAR-2023			View Disclosure
Add/Update Financial Interests or Relationships	Add-Update				26-JUN-2022	Completed - Closed	27-JUN-2022	View Disclosure
Add/Update Financial Interests or Relationships	Add-Update				01-JUL-2022	Completed - Closed	02-JUL-2022	View Disclosure
Annual OPACS Disclosure	Annual	2021			11-APR-2022	Completed - Closed	18-APR-2022	View Disclosure

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.*

## Personal Profile



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.

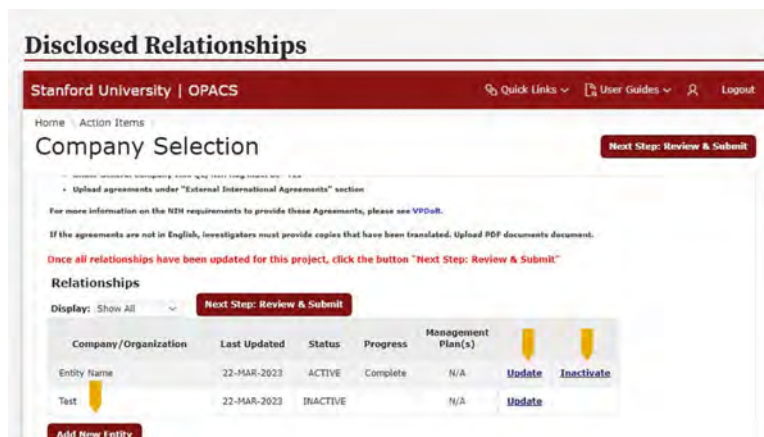


## Training/Education



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

## Disclosed Relationships

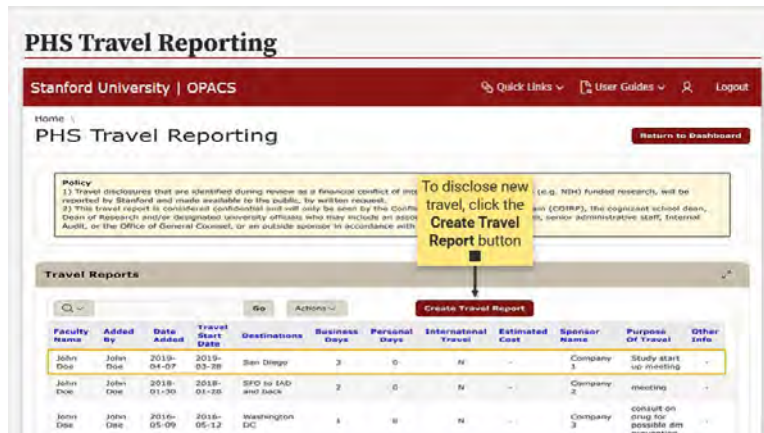


Clicking on the **Disclosed Relationships** icon takes you to the **Company Selection** screen that displays a list of all active and inactive entities that have been disclosed.

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

Click Next when you have finished viewing this screen.

## PHS Travel Reporting

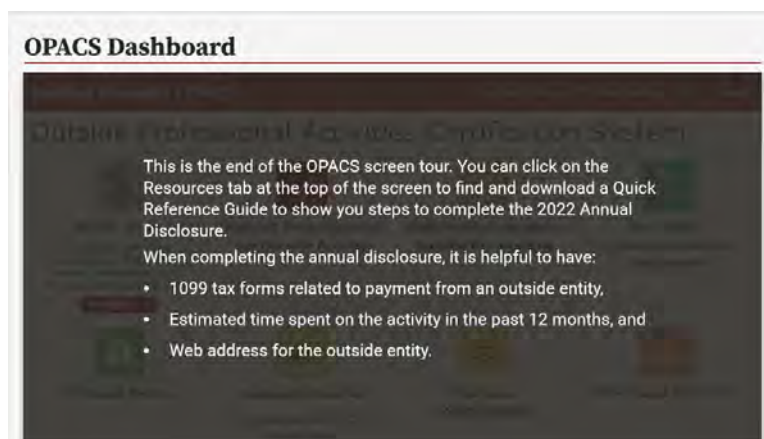


The **PHS Travel Reporting** screen displays previously disclosed PHS-funded travel.

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.