

### Conflict of Interest Review

Stanford has had a long history of entrepreneurial activity by faculty, staff, students and alumni and the University is, in general, supportive of its entrepreneurs. On the other hand, Stanford is an institution of public trust, with education and research as its mission, and a requirement to maintain openness in research. Therefore, entrepreneurial activity must be balanced by careful review of the proposed relationships, which may or may not be allowed. Appropriate management of conflict of interest may be required to assure openness in research, unbiased conduct of research and academic freedom for trainees. In addition, there must be a clear understanding about how intellectual property (IP) will be handled when companies license Stanford IP.

Stanford is committed to avoiding conflict of interest (COI) issues with respect to licensing to companies in which the faculty have a financial interest (“Company”). The principles apply generally when a company wants to license Stanford IP. Particular attention is paid to COI when Stanford licenses to a start-up company in which Stanford faculty have a financial interest (“Start-up Company”). Both Stanford University and its faculty have responsibilities to optimize technology transfer and mitigate COI.

In this context, this COI disclosure asks:

Name of company/organization for which this review applies:

What is the nature of your CURRENT OR PROPOSED activity and your financial interest with the company/organization? (*Check all that apply*)

- Founder
- Board of Directors membership  
Briefly describe your duties as a Board of Directors member:  
\_\_\_\_\_
- Advisory Board membership  
Briefly describe your duties as an Advisory Board member:  
\_\_\_\_\_
- Consultant (other than Advisory Board or Board of Directors membership)  
Briefly describe your consulting duties:  
\_\_\_\_\_
- Ownership of stock 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 (*not paid through Stanford*)
- Payment for lectures  
Briefly describe your lecturer duties:  
\_\_\_\_\_

Payment for preparation of papers or reports

Briefly describe your duties preparing papers or reports:

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Payment for product evaluation

Briefly describe your duties evaluating products:

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Legal consultant or expert witness

Briefly describe your duties as a legal consultant or expert witness:

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Executive or other employee position with company/organization

Please explain:

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This is a financial interest/activity of my spouse/domestic partner or dependent child

Please explain:

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Other

Please explain:

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And, you are asked to agree to comply with the following requirements:

1. Faculty must limit all consulting, including consulting for the licensee Company, to a total maximum of 13 days/quarter, per University policy.
2. Faculty must serve only in advisory or consultative roles at the Company. While a full-time faculty at Stanford, faculty must not take managerial roles or have titles (i.e. CTO) suggesting management responsibility.
3. Faculty must separate and clearly distinguish on-going University research from work being conducted at the Company.
4. Faculty must not receive gifts or sponsored research from a Start-up Company licensee of IP they created at Stanford, unless through an SBIR/STTR Phase I funded research study through a subcontract awarded to Stanford.
5. Faculty must not involve research staff, other University staff, or trainees in activities at or for the Start-up company. Start-up Company personnel cannot be affiliated with the University or involved in Stanford research. In addition, current students or junior faculty for whom the faculty member has supervisory responsibility must not be involved in Start-up Company activities. When both junior faculty member and his/her faculty chair/division chief are co-founders, an alternative senior faculty supervisor must be identified.

6. Faculty must not use University resources and facilities for Company purposes.
7. Faculty involved in Start Up companies are not be permitted to participate in human subjects research at the University unless a compelling justification and a plan to manage the conflict has been approved by the Conflict of Interest Committee. Institutional leaders (department chairs, division chiefs) who are involved in a Start-up Company may not supervise faculty who are PI/protocol directors for human subjects research related to the Start-up Company.
8. Stanford may not function as the location for research & development activities of the Start-up Company or serve as a lab for a 'virtual' company.
9. New follow-on or improvement inventions developed after the original dominating technology has been licensed to the Company will still be marketed to all potentially interested parties and exclusive licenses will not always be granted to the Company, even if there is no other interest.
10. Faculty-inventors must terminate down on-going research in the particular area that is going to be commercialized by the Start-up Company over a six month period.

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Printed Name

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Signature

Date

Reviewed and approved by  
Dean's Office: \_\_\_\_\_

Process:

1. OTL initiates a conflict of interest review by writing a letter to the relevant School Dean, or designee, and the Dean of Research.
2. The School Dean, or designee, reviews this attestation and OTL's letter. If the School finds the COI manageable, then the School notifies the Dean of Research and OTL of its review and determination, including any management required.
3. The Dean of Research makes an independent determination and the Dean of Research notifies the School Dean and OTL of approval or denial of the recommendation from OTL.
4. OTL will sign the license agreement.