

Yale University
Conflict of Interest Disclosure Form for Senior Administrators

Every Yale University employee has an obligation to act in the best interests of the University when performing his or her job. Outside financial interests and legal commitments should not be permitted to create conflicts of interest that interfere with that primary obligation. Such a conflict of interest exists if an employee has an external financial interest or fiduciary or other legal obligation that reasonably could be seen as creating an incentive for the individual to modify the conduct of his or her University activities or to influence the conduct of others. Conflicts of interest can arise from stock ownership, board memberships, consulting relationships, and any activity from which the individual derives legal obligations or expects to receive remuneration from an entity outside the University. Conflicts can arise from many ordinary and appropriate activities; the existence of a conflict does not imply wrongdoing on anyone's part. But when conflicts do arise, they must be recognized and disclosed, and then eliminated or appropriately managed. Some relationships may create an appearance of conflict; those, too, are important to eliminate or manage so that we may maintain public confidence in the integrity of our activities.

You have been asked to complete this form because, as a senior administrator, your job vests in you decision-making authority that could be compromised, actually or apparently, by your external financial interests or legal commitments. This form seeks to identify any conflicts of interest of the sort described above, and to ensure that they are formally reported to the University and eliminated or appropriately managed. Please answer the questions below as fully as you can; feel free to add pages if needed. Submit the completed form to your supervisor for review; your supervisor will transmit it to the Office of the Vice President and General Counsel. You will be contacted if there is need for any further action.

These forms will be treated confidentially. You must complete one each year, and you must update this form if there are any significant changes in your outside interests or commitments or your Yale position during the year. If you have any questions about the form or about specific potential or actual conflicts of interest, please feel free to contact the Office of the General Counsel, at 432-4949. For further general information, please see the *Yale University Policy on Conflict of Interest and Commitment*, available at the Provost's website, www.yale.edu/provost/; and *Yale University Personnel Policies and Practices Manual §505*, www.yale.edu/ppdev.PersPracWeb/505.html.

By signing here, you are certifying that the information that you provide in this form is accurate to the best of your knowledge as of the date of your signature, and you commit to providing an updated form to your supervisor whenever a material change occurs in the information you have provided.

Signature: _____

Print Name: _____

Job Title: _____

School, Department, and/or Office: _____

Date: _____

The Supervisor's signature here reflects that he or she has reviewed this form.

Supervisor's signature: _____

Print supervisor's name: _____

Date: _____

COI Office Use: _____

A. Financial Relationships with Outside Organizations

1. Do you, your spouse or domestic partner, or any of your dependent children, have an equity interest (including stock, stock options, or other securities, BUT NOT stock owned through mutual funds or stock in a public company if the stock is \$10,000 or less in value), or any ownership interest in any business entity whose business operations are related or potentially related to your responsibilities at the University? Yes No (circle "yes" or "no")

For purposes of this form, "related" means so linked or associated that a reasonable person would believe that your judgment about or conduct in your Yale activity could be or appear to be influenced or affected.

If yes, please identify the business organization(s) and financial interest and explain, using additional pages if necessary.

Example: You own stock in a company that produces lab safety equipment. At Yale, your responsibilities include purchasing such equipment for your department.
Example: Your spouse owns 30% of an architectural firm. At Yale, your responsibilities include managing design and construction projects.

2. During the past twelve months, did you, or your spouse or domestic partner, or any of your dependent children receive a salary, royalties, consulting fees, honoraria, gifts of more than nominal value or other payments from any person or entity that is related or potentially related to your responsibilities at the University, or in the next twelve months do you expect to do so?
Yes No

Example: You consult for a software manufacturer that designs software for use by universities. Your Yale responsibilities include software acquisition for your school.
Example: Your spouse is employed by a firm that designs office furniture. At Yale, your responsibilities include purchasing office equipment for your school.

B. Fiduciary and Management Activities

During the past 12 months, have you had a fiduciary or management role (such as service as a president, chief financial officer, director or trustee), or other legal obligation to any organization other than Yale, or in the next twelve months do you expect to do so? If yes, please provide the following information: name of organization and its for-profit/non-profit status; position(s) held; estimated time devoted to activity; and annual compensation, if any. (Note that service in a fiduciary or management role in a for-profit entity requires prior approval by the Vice President for Finance and Administration of the University.) Yes No

C. Managed Conflicts

If you have identified any actual or apparent conflict of interest related to your job responsibilities at Yale, please complete and sign Appendix A setting forth your conflict of interest management plan.

Appendix A
Senior Administrator Annual Conflict of Interest Disclosure Form
Conflict of Interest Management Plan

On my Annual Disclosure Form for this year, I have identified an actual or apparent conflict of interest related to my job responsibility at Yale arising from my or a family member's financial relationship, or my fiduciary relationship, with the company(ies) or organization(s) identified below [Please list]:

This is my conflict of interest management plan:

1. I will be recused from participating in any negotiation or decision-making with respect to any transaction with or on behalf of the University that involves any of the listed companies or organizations, and I will request that any related responsibilities be assigned to another individual, except as my supervisor may otherwise specify.

2. *[If applicable]* My supervisor and I have also agreed on the following specific actions that I or we will take to manage this conflict of interest effectively: *[Name involved company or organization entity and describe plan; use additional pages if needed]*

3. If my conflict arises from holding a management or fiduciary position in a **for-profit entity concurrent with my University employment, I have sought and received prior approval of my accepting the outside position from the Vice President for Finance & Administration or his or her designee. (Attach written approval.)** [Note that management or fiduciary positions in non profits need not receive such approval absent a more specific conflict.]

Agreed:

Staff member: _____ Date: _____

Supervisor: _____ Date: _____