FAccT Sponsorship Policy Review

Solon Barocas and Mireille Hildebrandt

July 2023

Contents

1. Background on the report

1.1. Committee members
- Solon Barocas
- Mireille Hildebrandt
- Michael Ekstrand (*ex officio*)
- Chelle Adamson (resigned in June 2022)

1.2. Mandate from the Executive Committee
- "[E]ngage seriously with the proposals to consider only pursuing foundation sponsorship, and work through the implications of such a decision" [From the EC's original email]
- "If we as a community decide to continue seeking corporate sponsorship, [we] will also need to [develop] clearly-defined rules and criteria, along with the process for implementing such rules." [From the EC's original email]
- "The proposal will be subject to vote by the SC, with ACM Conflict of Interest policies in place." [From the EC's response to the letter of concern]

1.3. Scope of review and recommendations
- "[T]he scope of the working group is solely the sponsorship policy. If during the discussion, further issues beyond sponsorship surface, we would like to ask you to document those, as input to further policy discussions."
- In light of these instructions, the following recommendations do not address concerns with sponsored research; they only apply to the sponsorship of the conference itself.

1.4. Review process
- Review of the email discussion that took place among members of the Steering Committee between November 22, 2021, and December 6, 2021 [on file]
- Review of the letter of concern submitted to the Executive Committee and the response of the Executive Committee
  - Letter of concern [on file]
  - Response to letter: [on file]
  - Response to the response [on file]
- Review of the broader debate within the academic community, focusing mainly on recent scholarship and writing
  - Klaudia Jaźwińska's blog posts on Freedom to Tinker
    - "The tech industry controls CS conference funding. What are the dangers?":

https://freedom-to-tinker.com/2022/03/11/the-tech-industry-controls-cs-conference-funding-what-are-the-dangers/

- ■ "Recommendations for introducing greater safeguards and transparency into CS conference funding": https://freedom-to-tinker.com/2022/03/23/recommendations-for-introducing-greater-safeguards-and-transparency-into-cs-conference-funding/
  - ○ Young et al.'s "Confronting Power and Corporate Capture at the FAccT Conference": https://dl.acm.org/doi/10.1145/3531146.3533194
  - ○ Abdurahman's "On the Moral Collapse of AI Ethics": https://upfromthecracks.medium.com/on-the-moral-collapse-of-ai-ethics-791cbc7df872
  - ○ Abdalla and Abdalla's "The Grey Hoodie Project: Big Tobacco, Big Tech, and the Threat on Academic Integrity": https://dl.acm.org/doi/abs/10.1145/3461702.3462563
  - ○ Whittaker's "The Steep Cost of Capture": https://dl.acm.org/doi/fullHtml/10.1145/3488666
  - ○ Phan et al.'s " Economies of Virtue: The Circulation of 'Ethics' in Big Tech": https://www.tandfonline.com/doi/abs/10.1080/09505431.2021.1990875
  - ○ Goldenfein and Mann's " Tech money in civil society: whose interests do digital rights organisations represent?": https://www.tandfonline.com/doi/abs/10.1080/09502386.2022.2042582
  - ○ Gerdes's "The tech industry hijacking of the AI ethics research agenda and why we should reclaim it": https://link.springer.com/article/10.1007/s44163-022-00043-3
- ● Review of the existing policies and current practices of other conferences
  - ○ ACM/AAAI AI, Ethics, and Society Conference [no policy, as far as we can tell]
  - ○ ACM Conference on Equity and Access in Algorithms, Mechanisms, and Optimization: https://eaamo.org/policies/
  - ○ ACM Symposium on Computer Science and Law: https://computersciencelaw.org/funding-and-sponsorship-discussion/ [policy no longer directly accessible from the conference homepage]
  - ○ ACM Conference on Computer Supported Cooperative Work [no policy, as far as we can tell]
  - ○ ACM Conference on Human Factors in Computing Systems [no policy, as far as we can tell]
  - ○ International Conference on Machine Learning [no policy, as far as we can tell]
  - ○ Conference on Neural Information Processing Systems: https://nips.cc/Sponsors/Guidelines

- ○ Annual Meeting of the Association for Computational Linguistics: https://aclweb.org/adminwiki/index.php/ACL_Sponsorship_COI_Policy [adapted directly from the FAccT policy]
- Presentation of initial findings and recommendations to the Steering Committee, eliciting feedback and further suggestions: https://docs.google.com/presentation/d/1gxbHhUY9j3e3E7Jnj0ZlRA13eD0b40Xn6YjTorxw2zA/edit#slide=id.p

2. Background on sponsorship and sponsorship policy

2.1. Current funding landscape
- Klaudia Jaźwińska performed a review of the <u>top sponsors of the top 25 computer science conferences.</u> Notably, she found that
  - ○ "No non-profit organizations, government science funding agencies, or sponsors from outside the U.S. or China appeared among the top 10."
  - ○ "[T]he National Science Foundation […] sponsored five different conferences (11 total gatherings) with donations typically ranging between $15,000 and $25,000."

# of different conferences sponsored by top 10 sponsors between 2019 and 2021
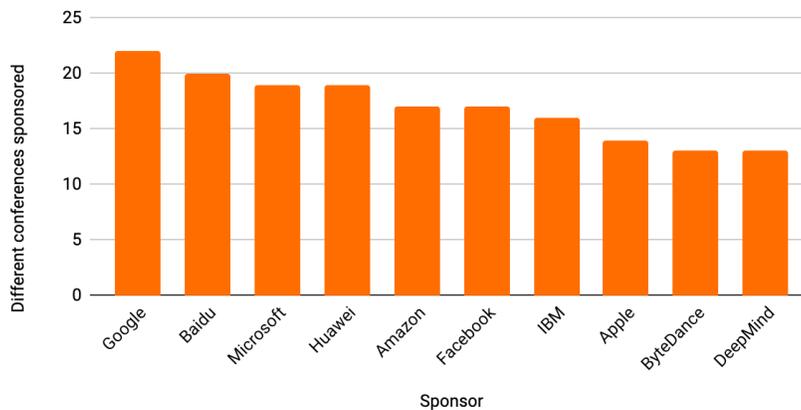
Figure 1: Klaudia Jaźwińska's findings from a review of the top 25 computer science conferences

2.2. Funding for FAccT 2022
- FAccT draws on non-corporate funding more than other CS conferences, but is still heavily dependent on corporate funding.
- In 2022, 71% of the sponsorship funding came from corporate sponsors, while the remaining 29% came from non-corporate sponsors (in this case, foundations).
- In keeping with most of Klaudia Jaźwińska's findings, state sponsors (e.g., the

National Science Foundation) are absent from this list.

Total Sponsorship		$365,000	100.0%
	DeepMind	$75,000	20.5%
	Luminate	$75,000	20.5%
	Sony AI	$75,000	20.5%
	Amazon	$75,000	20.5%
	Sloan	$20,000	5.5%
	MacArthur	$10,000	2.7%
	Naver	$10,000	2.7%
	LG	$10,000	2.7%
	Twitter	$10,000	2.7%
	Microsoft	$5,000	1.4%

Table 1: Michael Ekstrand's review of the sponsorship for FAccT 2022 (corporate sponsors are in orange; non-corporate sponsors are in blue)

2.3. Fraction of FAccT's overall budget covered by sponsorship

- Nearly 50% of conference expenses is covered by sponsorship funding.
- The ACM Special Project fund was a one-time gift that is set to expire this year.

Income	$775,000
Registration	$187,000
Sponsorship	$365,000
ACM Special Project fund	$223,000

Table 2: Michael Ekstrand's review of the funding sources for FAccT 2022

Expense	$786,500
Venue Hire (Rooms, Wi-Fi, …)	$96,500

Catering	$130,000
Streaming Costs (Audio/Video, …)	$40,000
Online Platform + Transcription	$35,000
Event Management + Project Support	$55,000
Invited Speakers	$50,000
Travel Support + Accessibility Grants	$190,000
DEI Scholars + Community Keynote	$80,000
ACM Fee	$110,000

Table 3: Michael Ekstrand's review of the expenses for FAccT 2022

2.4. The benefits of sponsorship

- Lowers the registration fees that need to be collected to cover the costs that are strictly necessary to stage the conference
    - In so doing, makes the conference more broadly accessible, especially to those who are cost-sensitive, particularly students, members of civil society, and scholars from less wealthy schools or countries.
    - In 2022, the cost associated with the essential elements of the conference (i.e., venue, streaming, online platform, events management, and ACM fee) was $386,500, while registration fees only brought in $187,000. Absent sponsorship funding, this would have resulted in a nearly $200,000 shortfall.
- Offsets the cost of providing other desirable, if strictly inessential, benefits, including catering, honoraria for invited speakers, travel support and accessibility grants, and grants for DEI scholars and community keynotes.
    - In so doing, makes the conference more broadly accessible, especially to those who are cost-sensitive, particularly students, members of civil society, and scholars from less wealthy schools or countries.

2.5. The risks posed by sponsorship

- Based on our review of relevant materials and our own reflections, we have identified 6 main risks posed by sponsorship. Note that these risks apply to all sponsors, not just corporate sponsors.

    - **Distorting the research agenda**
        - Affecting the research questions that are asked in ways that align with or advance the interests of the sponsor

- ○ Affecting how problems are conceptualized in ways that align with or advance the interests of the sponsor
- **Compromising research integrity**
  - ○ Affecting the substance and presentation of arguments and results
    - ■ Stifling unfavorable findings and promoting favorable framings
  - ○ Undermining trust in research and willingness of potential research subjects to participate in future studies
- **Conferring legitimacy**
  - ○ Offering a tacit endorsement of the sponsor, thereby improving their public perception, even if not warranted
- **Dissuading participation**
  - ○ Potential participants may not want to attend if they perceive their own presence as a tacit endorsement of the sponsor
  - ○ Potential participants may feel that a conference comfortable with such a sponsor cannot be a welcoming community or safe environment for them
- **Steering career paths**
  - ○ Giving sponsors a leg up in recruitment
- **Fostering vulnerability to coercion**
  - ○ Difficult to refuse demands when the conference is structurally dependent on the funds of interested parties

2.6. Reasons to consider accepting sponsorship from potentially conflicted organizations

- Sponsors may take a keener interest in the work coming out of the conferences that they support. To the extent that the impact of the research presented at the conference depends on it being taken up by sponsors, being informed by the practical experience of sponsors, or standing up to sponsors' scrutiny, this could help to increase the impact of the work.
  - ○ Of course, this can cut both ways: bringing issues to sponsors' attention that they might otherwise overlook or encouraging sponsors to only support conferences that align with their interests.
- While graduated registration fees based on organizational affiliation (i.e., charging less cost sensitive attendees higher fees, while charging more cost sensitive attendees lower fees) can help to realize some of these same benefits, there are limits to how much such an approach can achieve.
  - ○ Barriers to participation often extend beyond the registration fee alone to the cost of travel and lodging.
- It might not be possible to raise registration fees beyond a certain point before dissuading members of industry from participating. Just this past year, many past sponsors have engaged in significant layoffs and have cut back on costs, including expenditures related to conference attendance.

- - Of course, these financial constraints are likely to affect sponsorship decisions as well. It is unclear whether conferences will be able to attract more money from industry via increased registration fees or via sponsorship, but the continued sponsorship of many other conferences suggests that sponsors have not pulled back significantly so far, even as they have limited expenditures related to conference attendance. It will be important to track if sponsorship of other conferences changes over the coming year as well as the total number of people from industry attending FAccT.
- Conference sponsorship serves as a tax on actors who are perhaps most actively contributing to the problems that are the focus of the conference and who are also likely to benefit from what comes out of the conference. Ideally, this would happen via actual taxation and redistribution administered through independent and democratically governed national funding bodies, but the political reality in many countries limits the degree to which this is currently happening.
  - Note that this is true even of philanthropic foundations, many of which depend on the donated fortunes of industry actors whose past work might have contributed to the problems that are the focus of the conference and who remain voting members of the boards of these foundations. Foundations are a means by which such actors get to dictate how the "tax" is allocated—and are thus rarely fully independent and never democratically governed.
  - Foundations protect their endowments by investing in the market, often in the very companies whose sponsorship we might try to avoid by seeking foundation support.
- Finally, to the extent that the conference can avoid competing with civil society organizations when seeking funding from philanthropic foundations, there may be an ethical obligation to consider doing so. A largely academic conference should probably not be taking money away from civil society organizations that do frontline work on these topics—especially when the conference has access to alternative (i.e., industry and government) sources of funding that these civil society organizations do not.

2.7. Current FAccT sponsorship policy
- Sponsors have no say over the paper selection process, tutorial selection process, choice of invited speakers, the composition of the program committees, the best paper awards, or any other part of the conference organization or content. The substance and structure of the conference are determined independently by the relevant chairs and program committees.
- All papers are chosen through a rigorous, mutually anonymous (double-blind) peer review process. Authors of submitted papers must also disclose conflicts of interest by identifying institutions and potential reviewers with whom they have existing relationships.
- We will always acknowledge our sources of financial support.

- We will always disclose the benefits that funders receive as a condition of their contributions.
- Sponsors can only contribute to a general fund; they cannot specify how their contributions are spent.
- To ensure conference sponsorships advance the FAccT principles and Strategic Plan, sponsors are subject to approval by the Steering Committee.

3. Recommendations

3.1. Klaudia Jaźwińska's six recommendations

- In what follows, we attempt to describe how to address each of these risks, organized according to Klaudia Jaźwińska's helpful six recommendations.
    1. **Evaluate sponsors** through the lens of your organization's mission and values. Determine which lines you're not willing to cross.
    2. Be **transparent** about who is sponsoring your conference, how much they are contributing, and what benefits they receive as a condition of their contributions.
    3. Develop rigorous policies to **prevent sponsors from influencing** the content or speakers of conference events.
    4. Encourage **open discussion** during the conference about the implications of accepting corporate funding and potential alternatives.
    5. Make sure the industry in general, or any one company in particular, is **not over-represented** among sponsors or conference organizers [we combine points 5 and 6 below, as the issues are tightly intertwined].
    6. Consider seeking **alternative, industry-independent sources** of funding whose interests are less likely to conflict with the subject/mission of your conference [we combine points 5 and 6 below, as the issues are tightly intertwined].

3.2. Evaluating sponsor contributions
3.2.1. Current policy
- The current process for evaluating sponsor contributions is as follows:
    - For returning sponsors:
        - Steering committee members will have at least 1 week from notification to submit an objection to the proposed sponsor by e-mail to the Executive Committee. Objections should be specific to the sponsor in question, cite relevant evidence, and argue why sponsorship from this organization would impede FAccT's mission as expressed in the Strategic Plan.

- ■ If at least two objections are received, the sponsor will be submitted to the SC for a vote.
  - ○ For new sponsors:
    - ■ Steering committee members will have at least 1 week from notification to discuss the sponsor and document objections.
    - ■ All new sponsors will be submitted to the SC for a vote.
- The current process for deliberation and voting is as follows:
  - ○ For all sponsors for which a vote is required, the SC will be provided with a ballot. The ballot will contain a link to the documented discussion of the objections for the sponsor with their supporting evidence, and a vote to Accept or Decline the sponsorship.
  - ○ A sponsor will be accepted unless
    - ■ a quorum (50% + 1) of the steering committee votes AND a majority of non-blank votes decline the sponsor
    - ■ a quorum of the SC is not reached and a majority of the executive committee votes (in a separate ballot) to decline the sponsor.
  - ○ Sponsorship Chairs will provide the sponsor a summary of the SC deliberations.
- The 2022 deliberation and vote resulted in the rejection of two potential sponsors: Google and Meta. These results suggest that we might have some difficulty avoiding only rejecting sponsors who have been the subject of recent public controversy, even if other sponsors share much in common with those who have been rejected. We believe, however, that detailed criteria to decide which sponsors to accept or reject will not solve that problem and may instead create many new problems (see below under 3.2.3).
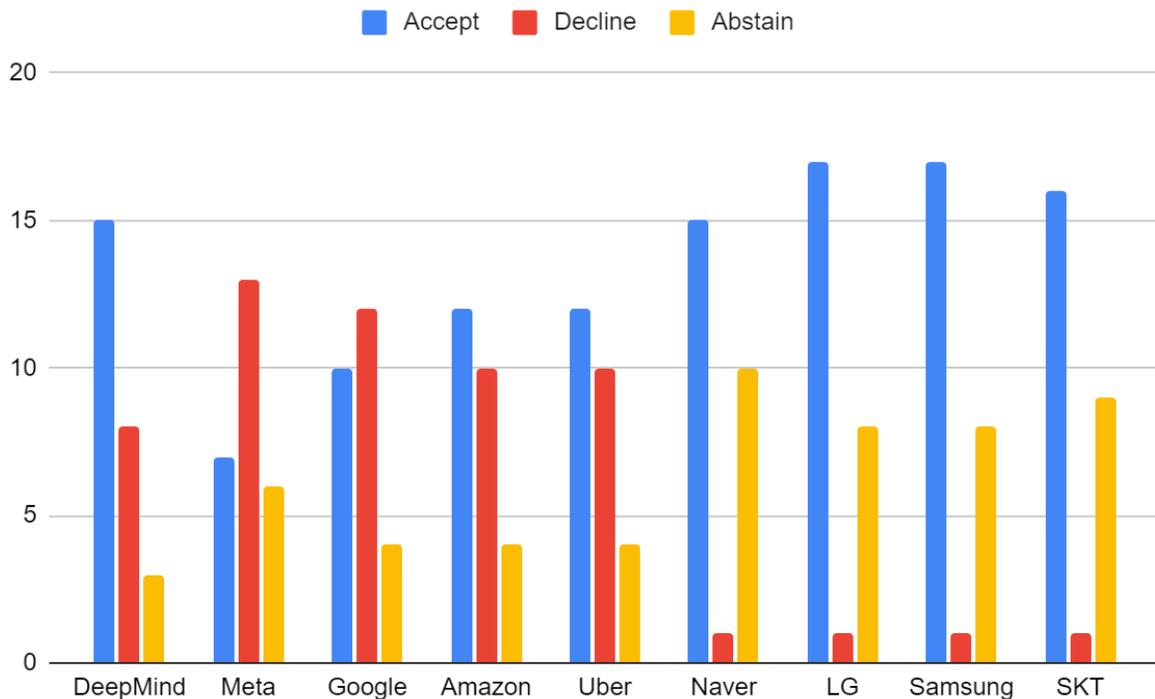
Figure 2: Steering Committee votes on potential sponsors for FAccT 2022

3.2.2. Conflicts of interest

- The current composition of both the Executive Committee and the Steering Committee raises concerns about conflicts of interest.
  - Executive Committee: 2/6 or ~33% of the members of the committee have ties to companies that often serve as sponsors:
    - Carlos Castillo, Universitat Pompeu Fabra
    - **Alexandra Chouldechova, Carnegie Mellon University and Microsoft Research**
    - Maria De-Arteaga, University of Texas at Austin
    - Michael Ekstrand, Boise State University
    - **Madeleine Clare Elish, Google**
    - Seth Lazar, Australian National University
  - Steering Committee: 18/72 or 25% of the members of the committee have ties to companies that often serve as sponsors:
    - Abigail Z. Jacobs, University of Michigan
    - Alan Mislove, Northeastern University
    - **Alexandra Chouldechova, Carnegie Mellon University and Microsoft Research**
    - **Alexandra Olteanu, Microsoft Research**
    - **Alice Xiang, Sony**
    - Angela Xiao Wu, NYU

- Aniko Hannak, University of Zurich
- **Anupam Datta, Carnegie Mellon University and Truera**
- Atoosa Kasirzadeh, University of Edinburgh
- Aws Albarghouthi, University of Wisconsin, Madison
- Aziz Huq, University of Chicago
- **Been Kim, Google**
- Berk Ustun, University of California San Diego
- Bettina Berendt, KU Leuven
- Bill Howe, University of Washington
- **Brent Hecht, Northwestern University and Microsoft**
- Carlos Castillo, Universitat Pompeu Fabra
- Charles Isbell, Georgia Tech
- Chenhao Tan, University of Chicago
- Christina Harrington, Carnegie Mellon University
- Christo Wilson, Northeastern University
- Cynthia Dwork, Harvard University
- Dallas Card, University of Michigan
- Damini Satija, Amnesty International
- **David Robinson, OpenAI**
- Elisa Celis, Yale
- **Fernando Diaz, Carnegie Mellon University and Google Research**
- Frederik Zuiderveen Borgesius, Radboud University
- Gabriela Zanfir-Fortuna, Future of Privacy Forum
- **Hal Daumé, University of Maryland, College Park, and Microsoft Research**
- **Hanna Wallach, Microsoft Research**
- Inioluwa Deborah Raji, UC Berkeley
- Ivana Feldfeber, DataGénero
- Jammie Morgestern, University of Washington
- Jat Singh, University of Cambridge and Alan Turing Institute
- **Jenn Wortman Vaughan, Microsoft Research**
- Jessica Hullman, Northwestern University
- Jon Kleinberg, Cornell University
- Joshua Kroll, University of California, Berkeley
- Julia Stoyanovich, Drexel University
- Karen Levy, Cornell University
- **Kush R. Varshney, IBM Research**
- Lilian Edwards, Newcastle University
- Lilly Irani, University of California, San Diego
- Linnet Taylor, University of Tilburg
- Linus T. Huang, Hong Kong University of Science and Technology

- **Madeleine Clare Elish, Google Research**
- Manuel Gomez Rodriguez, Max Planck Institute for Software Systems
- Maria De-Arteaga, University of Texas, Austin
- Matthew Dennis, Eindhoven University of Technology
- Michael Ekstrand, Boise State
- **Michael Kearns, University of Pennsylvania and Amazon**
- Michael Veale, University College London
- Min Kyung Lee, University of Texas, Austin
- Mireille Hildebrandt, Vrije Universiteit Brussel and Radboud University Nijmegen
- Moon Choi, KAIST
- Nathan Srebro, Toyota Technological Institute at Chicago
- **Orestis Papakyriakopoulos, Sony AI**
- Peaks Krafft, University of Arts London
- Rediet Abebe, University of California, Berkeley
- Rich Zemel, University of Toronto
- Ryan Calo, University of Washington
- Salvatore Ruggieri, University of Pisa
- Sarah Brown, University of Rhode Island
- Sarah Fox, Carnegie Mellon University
- Seda Guerses, KU Leuven
- Seth Lazar, ANU
- Sharad Goel, Stanford University
- **Solon Barocas, Microsoft Research**
- Vinhcent Le, The Greenlining Institute
- **William Isaac, DeepMind**
- **Zachary Lipton, Carnegie Mellon University and Abridge**

- In April 2022, the Executive Committee sought to address concerns with conflicts of interest by mandating funding Disclosure for all members of the committee: https://facctconference.org/ec_funding_disclosure.html
  - Members must attest that
    - "we act in an individual capacity, and not as representative of our employer(s) and/or funder(s)."
    - "we have not received any instruction on our decisions in the EC from any representative of our employer(s) and/or funder(s)."
  - Individual statements of funding and disclosures of interests follow the same instructions for authors: https://facctconference.org/2022/funding_sources_disclosure.html
- In contrast, there is no equivalent requirement for the Steering Committee

- ○ No required attestation
- ○ No required funding disclosure

> **Recommendation #1:** People should not be able to serve on the Executive Committee and Steering Committee at the same time, given that the Steering Committee may have to vote on issues that implicate the Executive Committee.

> **Recommendation #2:** Require that all members of the Steering Committee complete the same attestation and disclosure as currently required of members of the Executive Committee. These attestations and disclosures should be made publicly available.

- Even with such disclosures in place, there would remain a serious issue with representation on both committees
  - ○ Microsoft is particularly over-represented on the Steering Committee (7/72 or ~10% overall; 7/18 or ~39% of those with corporate ties)
- Such an over-representation of members from these organizations threatens the perceived (and perhaps real) independence of the body charged with governing the conference.
- Developing a policy regarding sponsorship and the evaluation of specific sponsors requires that we reflect critically on who will get to make these decisions.
  - ○ Solon is himself conflicted.
- The response to the response to the letter of concern asks that "the sponsorship policy and who has decision-making power in writing and approving it should be informed by a clearly stated, widely understood, and rigorously enforced conflict of interest policy."
  - ○ Co-signed by the following members of the Steering Committee: Seda Guerses, Lilly Irani, Linnet Taylor, and Michael Veale

> **Recommendation #3a:** Ensure that no more than one member of the Executive Committee is from the same organization.

> **Recommendation #3b:** Ensure that no more than one member of the Executive Committee is from industry. Consider setting additional quotas for the other positions on the committee such that there is either some minimum or maximum representation from a range of sectors (e.g., academy, civil society, industry, etc.).

> **Recommendation #4:** Ensure that no more than two members of the Steering Committee are from the same organization. Consider setting a quota for the remaining positions on the Steering Committee such that there is always representation from a range of sectors (e.g.,

academy, civil society, industry, etc.).

Recommendation #5: Require that members of the Executive or Steering Committee are not invited to vote on potential sponsors if members are currently employed or funded by these potential sponsors or direct competitors or if they have family ties to anyone who works for the potential sponsors or direct competitors.

Corollary #1a: We also suggest introducing similar attestation and disclosure requirements for members of the Program Committee, but that is beyond the scope of our mandate

Corollary #1b: We also suggest introducing similar representation rules for the members of the Program Committee, but this is beyond the scope of our mandate.

3.2.3. Possible evaluation procedures

- There seem to be four options to consider when it comes to evaluating potential sponsors
    - Accept all sponsors
    - Accept all sponsors, but explicitly disclaim endorsement of sponsors' values or actions
        - The ACM Symposium on Computer Science and Law's sponsorship principles include: "Acceptance of support from any donor organization does not imply explicit or implicit approval of the donor organization's values or actions."
    - Selectively accept sponsors based on some sort of evaluation of their values or actions
    - Selectively accept sponsors based on some sort of evaluation of their values or actions, but still explicitly disclaim endorsement of sponsors' values or actions

Recommendation #6: We propose to clarify that accepting a contribution from a sponsor does not imply that we endorse the values or actions of that sponsor.

Recommendation #7: Add a disclaimer in our sponsorship policy and on our sponsorship page that accepting support from a funder does not imply endorsement of the organization's values or actions.

- We considered five different processes for evaluating potential sponsors:
    - Fully specified evaluation criteria

- Principle-based evaluation informed by Strategic Plan, with discretion left to the Sponsorship Chairs and GCs
  - Rule out egregious cases (e.g., Palantir)
  - Balance competing concerns (e.g., benefits and risks of sponsorship)
- Principle-based evaluation informed by Strategic Plan, with discretion left to the Sponsorship Chairs and GCs, but with the opportunity to seek advice from the EC or SC when unsure how to proceed
- Principle-based evaluation informed by Strategic Plan, with discretion left to the Sponsorship Chairs and GCs, but with the opportunity for members of the EC or SC to register objections, which can then go up for a vote
  - EC or SC receives prioritized budget prior to vote
- Vote by the EC or SC
  - EC or SC receives prioritized budget prior to vote
- While developing explicit evaluation criteria is intuitively attractive, it is far from clear what those can or should be.
  - The APC2018 / Palantir statement (https://fundingmatters.tech/statement/), for example, called for "[t]he development of rigorous criteria and guidelines for corporate sponsorship, for example, based on Human Rights Impact Assessments." Yet we are unaware of any conference, including the Amsterdam Privacy Conference or CPDP, that have developed such "rigorous criteria".
  - The ACM Symposium on Computer Science and Law raised a number of questions about potentially disqualifying factors without adopting any as a basis for their own sponsorship policy and without making any disclosures at all about their 2022 sponsors:
    - Capabilities or services: Are there certain technical features, capabilities, or services that, if offered by the source, should disqualify it under any circumstances?
    - Customers or users: Are there certain classes of customers or users who make a company unacceptable as a donor? What fraction of a company's business would trigger this disqualification?
    - Tools vs tailored services: How should these rules apply in the case of general-purpose services (data analytics systems, office productivity software, etc) that can be used for a wide variety of purposes?
  - Ranking Digital Rights is perhaps the only organization that has attempted to develop formal evaluation criteria for the technology industry:

- - Methods and standards:
      https://rankingdigitalrights.org/methods-and-standards/
    - 2022 scorecard: https://rankingdigitalrights.org/bts22/
  - We believe that detailed criteria to decide which sponsors to accept or reject will not solve the problem that such decisions may still be based on ad hoc reputation management (see above under 3.2.1), and we are concerned that such detailed criteria may instead create many new problems. Their formal articulation in a policy may result in under- and over-inclusion, as it is often difficult to foresee which behavior will or will not fall within its scope. Detailed articulation will also cause myriad interpretation problems, burdening the EC and SC with the task of dealing with potentially legalistic nitpicking.
  - By making clear that accepting funding from, for example, Google or Meta, we do not endorse Google or Meta's behavior (noting we have only limited access to how they actually behave behind closed doors), we should distance ourselves from a moral evaluation and make sure that we only reject support from sponsors that act against our the goals we commit to in our Strategic plan. In other words, accepting a sponsor does not mean we thereby legitimate their behavior, while rejecting a sponsor signals that we find their behavior illegitimate. This relates to the previous point: once we have detailed criteria in place, accepting a sponsor will more easily be seen as an endorsement of the sponsor and may even be used by that sponsor to claim legitimacy.
  - It is unreasonable to charge the Sponsorship Chairs with performing an assessment of equivalent rigor as Ranking Digital Rights; they simply lack the resources and time for such an undertaking. At the same time, we might not want to rely on Ranking Digital Rights's own assessment, in no small part because it only covers commercial actors (we might have similar concerns around particular kinds of sponsors, like foundations, as well) and does not even include all companies that might seek to serve as a sponsor. We also note that rights may differ per jurisdiction, as is notably the case for both the right to privacy and that to non-discrimination. Finally, even if we relied on the ratings from Ranking Digital Rights, it would be difficult to justify any particular choice of threshold.
  - It is also unreasonable to deprive the General and Sponsorship Chairs with some degree of autonomy when making these decisions, given the many contingencies and the complexity of the conference planning process. They will often have a much better sense of what it will really take to stage the conference and the trade-offs that would be involved in accepting or rejecting particular sponsors. As such, we need to be prepared to delegate some authority to the General and Sponsorship Chairs.

Recommendation #8: The General and Sponsorship Chairs should have the authority and discretion to independently evaluate whether seeking support from those sponsors is consistent with the broad goals outlined in the Strategic Plan. The General and Sponsorship Chairs should still inform the Executive and Steering Committee of their plan to accept or reject potential sponsors, giving members of both committees the opportunity to register formal objections, in line with the current process.

All initially-registered objections should be viewable by all members of both committees.

If two or more committee members register objections, then the sponsor will be subject to open deliberation and a vote by the entire Steering Committee, again in line with the current process. The General and Sponsorship Chairs must abide by the outcome of the vote. If members of the committee register no or only one objection, then the General and Sponsorship Chairs can proceed with their plan without a vote.

If possible, when informing the Steering Committee of their plan, the General and Sponsorship Chairs should also share a conference budget worked out in line with Recommendation #16, with the goal of helping the committee better understand what might be at stake with the sponsorship decision.

Corollary #2: We also suggest revisiting the Strategic Plan to ensure that it (1) continues to be a good reflection of our values as a community and (2) provides enough guidance to help the General and Sponsorship Chairs navigate questions about sponsors, but this is beyond the scope of our mandate.

3.3. Transparency around sponsorship

- We currently disclose who is a sponsor, but not how much they have contributed.
- We currently disclose what benefits sponsors receive at different levels of sponsorship, but, because we do not disclose the amounts offered by specific sponsors, it is impossible to know what benefits each sponsor has actually received.
- Our existing policy prohibits sponsors—even non-corporate sponsors—from specifying how their funds are spent, obviating the need for further disclosure around what they support.

Recommendation #9: The conference budget should be published online. The expenses should be reported with a similar degree of granularity as reported in table 3 above, with some degree of discretion left to the General Chairs, who may need a bit of breathing room. But the reported income should provide a full breakdown of the specific amounts offered by each sponsor. This should also be accompanied by the text explaining the benefits that each sponsor receives at a certain level of contribution.

- We should be careful about the timing of the disclosures; ideally, sponsorship should not be sprung on people after they've registered or made travel plans, as

they may not want to participate if they believe doing so will be a tacit endorsement of the sponsors.

> Recommendation #10: Release information about confirmed sponsors as soon as possible, even if the budget is far from finalized. Ideally (though this seems unrealistic in practice), such disclosure would be made before the deadline for the call for papers. More realistically, this should take place before the camera-ready deadline or registration deadline, when people need to decide if they're actually going to participate.

- The range of current benefits for sponsors include:
    - "A single, standardized report back to sponsors on the conference outcomes"
        - This is more for our dealings with foundations than corporate sponsors, as foundations often have enormous reporting requirements that are difficult for the Sponsorship Chairs to meet in their voluntary capacities.
    - Verbal acknowledgement in opening and closing remarks
        - This brings sought-after attention to sponsors while also ensuring appropriate disclosure.
    - Signage during one meal
        - This is currently reserved for the highest tier ($75,000) sponsor
    - Signage, proportional to funding, with link on website
    - Opt-in database of attendees' contact information
    - Free registration for a fixed number of people

> Recommendation #11: Ensure that the process for opting into the database of attendees' contact information complies with the European Union's General Data Protection Regulation and other relevant privacy laws, including providing a specific purpose for which the data is being collected, among other requirements.

> Recommendation #12: To counteract well-resourced sponsors' ability to steer the potential career paths of conference attendees, attendees should have the additional choice of opting into a database that will be shared with interested organizations from the academy, government, and civil society. To gain access to the database, members of the academy, government, and civil society should submit a brief application explaining their connection to the conference, the reasons for their interest in attendees' information, and their willingness and ability to comply with relevant privacy laws. The responsibility for inviting and reviewing these applications should fall to the General Chairs or a person in a new chair position.

3.4. Limit influence of sponsors

- The current sponsorship policy seems to be up to the task already:
    - Sponsors have no say over either the substance or structure of the conference.

- ○ Furthermore, sponsors have no say over how the funding is used, limiting their ability to selectively support preferred activities or abstain from supporting disfavored activities.

3.5. Foster open and ongoing debate

- Beyond the transparency measures discussed above, there are additional ways to foster open and ongoing debate about sponsorship.

Recommendation #13: Integrate the topic of sponsorship into the call for papers, tutorials, CRAFT sessions, etc. (in line with Young et al.'s "Confronting Power and Corporate Capture at the FAccT Conference": https://dl.acm.org/doi/10.1145/3531146.3533194).

Recommendation #14: Explicitly set aside time during the town hall meeting to discuss the topic.

Recommendation #15: Make a version of this report publicly available and seek feedback from the broader community (along the lines of what the ACM Symposium on Computer Science and Law has done in seeking feedback on its open questions about sponsorship: https://docs.google.com/forms/d/e/1FAIpQLSfkxn8DJ-hNbqlEw09z2G0pO-LJh09lY8cRgOfV E5lBjIoMLw/viewform; the conference organizers promised issue a report that includes recommendations on funding and sponsorship principles (though nothing has been released so far).)

The responsibility for publishing the report, setting up a process of collecting feedback, and reviewing feedback should rest with either the General Chairs or the Sponsorship Chairs. The General Chairs or the Sponsorship Chairs could also invite the members of this Sponsorship Policy Committee to participate in the process or establish a new Sponsorship Policy Committee to assume these responsibilities.

3.6. Limit or eliminate dependency

- The 5th goal of the Strategic Plan states that we aim to "[m]aintain our status as an independent conference not beholden to anyone". To that end, the Sponsorship Chairs should work to avoid becoming too dependent on any one funder, on returning funders, and on industry funding.

Recommendation #16: Develop a prioritized budget that clearly distinguishes between absolutely essential elements of the conference and their associated costs (e.g., the venue, event management, etc.)—the elements that need to be in place for the conference to happen at all—and desirable elements of the conference and their associated costs (e.g., travel support, honoraria for invited speakers, etc.).

To ensure that the most pared-down version of the conference does not depend whatsoever

---

on sponsorship, operate on the assumption that all of the costs associated with the essential elements of the conference will need to be covered by registration fees. Note, however, that ACM will act as a financial backstop in the case of a shortfall (and will retain any of the surplus), so don't be too conservative in determining this figure.

Based on the experience in previous years, estimate the amount of additional funding that sponsorship is expected to bring in. With this figure in mind, consider how these additional funds would be spent, specifically comparing the benefits of possibly lowering the registration rate by a specific amount to the benefits of possibly providing travel support and the like.

Recommendation #17: Any one sponsor should not account for more than 20% of the total funding raised through sponsorship. (In 2022, this was the highest amount that any one sponsor contributed to the total funding, as seen in Table1.)

Recommendation #18: Set quotas on the desired fraction of funding that comes from the academy, foundations, the government, and industry. (In 2022, 71% of the sponsorship funding came from corporate sponsors, while the remaining 29% came from foundations.) Ideally, the fraction of funding from industry would be less than the fraction from other sources, but this may take a number of years to achieve through long-term planning, if it's even possible at all.

3.7.   Practical considerations for the Sponsorship Chairs
- To help realize these recommendations, it is also important to consider a number of practical challenges that will be faced by the Sponsorship Chairs.

Recommendation #19: The Sponsorship Chairs should be relatively senior, ideally with some degree of job security (e.g., tenure), given that they may have to engage in difficult interactions with potentially powerful sponsors.

Recommendation #20: Sponsorship Chairs should serve for at least 2 years, given the amount of work that goes into developing the necessary expertise and relationships to effectively fulfill their responsibilities.

Recommendation #21: There should be at least two Sponsorship Chairs at any given time and they should cycle off the committee in a staggered manner to help ensure continuity of knowledge and relationships.

Recommendation #22: If the conference begins to rely more heavily on non-industry sponsors, the total number of Sponsorship Chairs should increase, given that non-industry

funding comes with much greater administrative burdens.	

4.   Summary: How well does our policy respond to the risk posed by sponsorship?

Distorting the research agenda	- Sponsors cannot exercise any direct influence on the substance or structure of the conference, and are thus limited in how much they can steer the research agenda - Sponsors cannot specify how their funding will be spent - Disclosure of the benefits of sponsorship
Compromising research integrity	- Sponsors cannot exercise any direct influence on the substance or structure of the conference, and are thus limited in how much they can steer what or how research is presented - Fully anonymous (i.e., double blind) peer review - Attestations and disclosures by members of the EC, SC, and PC - Disclosures by paper authors
Conferring legitimacy	- Sponsors must meet the general principles laid out in the Strategic Plan; otherwise, they will be rejected - The conference disclaims any kind of endorsement of the values or actions of its sponsors
Dissuading participation	- Sponsors must meet the general principles laid out in the Strategic Plan; otherwise, they will be rejected. - The conference disclaims any kind of endorsement of the values or actions of its sponsors - Disclosure of the sponsors, their financial contributions, and the benefits they received
Steering career paths	- Attendees can opt into sharing their information with non-corporate actors - Reduced registration rates for non-corporate attendees - Travel support for non-corporate attendees - Invited talks from a diverse range of speakers, not just members of industry or the academy

	● No job fairs or corporate parties
Fostering vulnerability to coercion	● Upper limit on the fraction of the total funding that comes from any one sponsor ● Limit on the number of people from any specific organization or sector