

The Warren Alpert Medical School of Brown University

Conflict of Interest and Commitment Policy

Reporting and Review Process

Purpose

This document establishes the reporting and review process The Warren Alpert Medical School of Brown University (Medical School) employs pursuant to Section 5 of the [Brown University Conflict of Interest and Commitment Policy](#) (University COI Policy), as amended from time-to-time.

Section 5.1 of the University COI Policy requires individuals to disclose potential, actual, or perceived conflicts of interest to their University Representative. The Dean of Medicine and Biological Science (Dean) or the Dean's designee is the University Representative for Academic Appointees in the Division of Biology and Medicine (Division). The Dean has established the Medical School Conflict of Interest Committee (Committee) and has designated to the Committee the authority to oversee and execute the reporting and review process contemplated by the University COI Policy.

Committee Structure

The Committee is composed of the Senior Associate Dean for Academic Affairs (Chair), Senior Associate Dean for Medical Education, Senior Associate Dean for the Program in Biology, and the Associate Dean for Clinical Affairs. The Committee may include other individuals at the discretion of the Dean of Medicine and Biological Science.

Commitment to Compliance

The Division will provide all Academic Appointees in the Division with links to the University COI Policy and this process document when Academic Appointees receive their appointment or reappointment letters. By accepting a faculty appointment, Academic Appointees acknowledge that they have received the University COI Policy and attest that they will comply with the University COI Policy, as it may be amended from time to time, for the duration of their appointments.

Additionally, all Academic Appointees who evaluate Medical School students through the Oasis system must attest annually to receipt of and compliance with the University COI Policy and to this reporting process.

Reporting Process

Academic Appointees in the Medical School who are not employed by Brown University must report any potential, perceived, or actual conflicts of interest or conflicts of commitment as defined in the University COI Policy to the Committee at the time of appointment and at the time of reappointment via a form, a link to which will be provided to Academic Appointees. Academic Appointees who evaluate Medical School students are required to submit conflict of interest forms annually via the Oasis system. All Academic Appointees must report conflicts of interest to the Committee as they arise, by submitting the form.

Information reported to the Committee includes the following:

1. The nature of the potential, perceived, or actual conflict of interest;
2. Whether the conflict has been disclosed or reported to another entity and, if so, to which entity or entities; and
3. Whether a management plan for the conflict exists and,
 - a. if so, information on the how the conflict is being managed, or
 - b. if not, information on how the conflict could be managed.

Academic Appointees who are not employed by Brown must report to the Committee in addition to any other reporting obligations that may be required by the individual's employer or institution.

Please click here to be routed to the reporting form: <Insert>

Review Process

The Committee will review reported conflicts quarterly and as otherwise necessary or appropriate. After reviewing a reported conflict, the Committee may request further information or conduct an investigation. Upon completing its review, the Committee will make a determination about the conflict in writing, and may make related recommendations. Recommendations could include implementing a plan to manage the conflict (*i.e.*, a conflict of interest management plan).

Consequences for Non-Compliance

Academic Appointees who do not comply with the University COI Policy, the reporting process discussed above, or the recommendations of the Committee are subject to the consequences stated in the University COI Policy, loss of their appointments, and/or other consequences at the discretion and upon decision of the Dean, including, for Housestaff¹, being reported to the appropriate Graduate Medical Education office.

Definitions

Capitalized terms take the definitions assigned them in this document or, if undefined in this document, the definitions set forth in the University COI Policy. Conflict of interest and conflict of commitment take the definitions set forth in the University COI Policy.

Related Information

Questions regarding the contents of this document should be directed to the Senior Associate Dean for Academic Affairs.

This document and the University COI Policy are available on the Brown BioMed Faculty Administration website, located at <https://www.brown.edu/about/administration/biomed/faculty-affairs/>.

¹ Housestaff are Academic Appointees who are physicians in training. Housestaff include interns, residents, and fellows who care for patients under the direction of attending staff in a hospital or other setting, including an outpatient facility.