COI Frequently Asked Questions

1. Why do I need to submit a COI disclosure form?

The Corporation of Brown University and the Corporation’s Audit Committee require annual disclosure of staff conflicts of interest or commitment. Brown University requires all staff to complete a COI Disclosure form annually to ensure staff are aware of the obligation to comply with the highest ethical standard when performing their duties. All decisions and actions taken by members of the Brown community in the conduct of University business shall be made in a manner that promotes the best interests of Brown University.

2. Are all staff required to submit a COI disclosure form annually?

Yes, staff in regular and fixed-term positions are required to submit a staff disclosure form annually. The disclosure requirement does not apply to seasonal/intermittent staff. In some instances, changes during the year may require a staff member to submit an updated form (see below).

3. I submitted my annual COI Disclosure form. Do I need to submit updates at other times during the year?

If a situation develops during the year that presents a potential conflict of interest or commitment, you are required to submit an updated COI disclosure form. Items requiring disclosure include (but are not limited to) starting a new business or taking a second job, joining the board of an outside organization, being elected to a government office, having a family member enroll in a Brown academic program or begin Brown employment.

4. Am I required to participate in the staff COI disclosure process if I also complete a disclosure as Brown faculty member or Brown Investigator?

Certain staff may also be required to submit COI reporting forms based on their role as an officer of instruction and research. The staff process requires a disclosure of conflicts of commitment which is specific to the staff disclosure form, as well as a separate disclosure of financial information. If you receive instructions for staff and faculty annual disclosures, you are required to complete both forms.

5. I do not have any conflicts. Why do I still need to submit a COI Disclosure form?

An annual disclosure form is required to document whether or not you have any conflicts of interest or commitment.
6. I have a child attending Brown. Do I have to report that?

Yes, staff are required to disclose their children’s enrollment at Brown. As many staff positions could influence a student’s experience in and outside of the classroom, disclosure is required to ensure that any necessary steps will be taken to avoid the appearance of differential treatment.

7. Do I need to report my second job?

It depends. If your second position will result in earnings of $5,000 or more, you must disclose the position, even if it is a consulting arrangement and not formal “employment” with another company. Disclosing a position that will result in earnings below this threshold will confirm that the second position will not interfere with scheduling and performing your Brown duties. In all instances, staff are required to act in the best interests of Brown in the course of their employment. While it is permissible to hold a second position outside of Brown, as a best practice you may wish to disclose outside employment to ensure any potential conflict of commitment is documented and adequately managed.

8. Last year, I founded a company. At this point, the company has no employees and exists only as a website. Am I required to disclose the company?

Yes, you are required to disclose any equity or ownership interest in a privately-held company. Therefore, any ownership interest in a legal entity (whatever its business structure) must be disclosed even if the company has no assets and generates no income for you.

9. I hold stock in mutual funds. Do these need to be reported?

No, these do not need to be reported. In general, any investment vehicle where you have no control over the acquisition of individual stock, are excluded from reporting.

10. I hold stock as part of an investment portfolio. Do I need to report these stock holdings?

It depends. If the investment portfolio is such that you have control over individual stock purchases, even if you rarely or never exercise it, the stock holdings are reportable if they meet the reporting criteria and threshold value of $5,000 during the calendar year or 12-month period and related to your University responsibilities and professional expertise.