

Conflict of Interest and Commitment Frequently Asked Questions

1. Why do I need to submit a Conflict of Interest and Commitment 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 members to complete a Conflict of Interest and Commitment Disclosure form annually to ensure their awareness 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 Conflict of Interest and Commitment Disclosure form annually?

Yes, staff in regular and fixed-term positions are required to submit a disclosure form annually. The disclosure requirement does not apply to seasonal/intermittent staff; however, they are still subject to the policy. In some instances, changes during the year may require a staff member to submit an updated form (see Question 4 below).

3. When and where do I submit my annual Conflict of Interest and Commitment Disclosure form?

The annual cycle runs between the end of February and the end of March each year. Annual reporting is completed electronically in Workday. When the annual cycle begins in February, regular and fixed-term staff will receive an email with [a link to this job aid](#) that lists the steps to complete the disclosure form. The information collected on the form is for the previous calendar year (January through December) to align with the receipt of income forms/statements and preparation of taxes.

4. I submitted my annual Conflict of Interest and Commitment 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, actual, or perceived conflict of interest or commitment, staff members are required to submit an updated Conflict of Interest and Commitment 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, or having a family member enroll in a Brown academic program or begin Brown employment.

5. I do not have any conflicts. Why do I still need to submit a Conflict of Interest and Commitment Disclosure form?

The responsibility of determining whether or not a staff member has conflicts rests solely with Brown University. In many instances, the perception of conflict is a critical factor to consider. Perception, however, is seldom considered when one evaluates one's own potential conflicts. Therefore, the institution does not ask whether you have a conflict; rather, it asks you to

provide a list of your financial and other outside interests and then evaluates these against your University responsibilities to determine if these interests create potential conflicts.

6. I have a child attending Brown. Do I have to report that?

Yes, staff members 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 necessary steps will be taken to avoid the appearance of differential treatment.

7. What is the definition of family member?

A family member is defined as a spouse, domestic partner, parent, child, sibling, grandparent, grandchild, in-laws, step parents, guardian, and ward or member of one's household.

8. 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 members are required to act in the best interests of Brown during 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, actual, or perceived conflict of commitment is documented and adequately managed.

9. 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.

10. 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 is excluded from reporting.

11. 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.

12. Who reviews the Conflict of Interest and Commitment Disclosure form?

Managers are responsible for reviewing all Conflict of Interest and Commitment Disclosure forms for their direct reports to ensure the information accurately reflects their knowledge and determine whether the conflict is substantial enough to require a management plan. Some reported disclosures may require further review by a Conflict of Interest and Commitment

Review Committee consisting of staff representation from the Finance Division; Institutional Risk Management, Audit & Compliance; University Human Resources; and others as deemed appropriate. If necessary, the Office of General Counsel may also review and advise.

13. Who else serves on the Conflict of Interest and Commitment Review Committee?

Depending on the conflict, subject matter experts from across the University may be brought in to review and clarify the management plan.