**Conflict of Interest and Commitment Frequently Asked Questions for Staff**

# Why do I need to submit a Conflict of Interest and Commitment Disclosure form?

The University’s Conflict of Interest and Commitment Policy which is approved by the Corporation of Brown University requires annual and ongoing disclosures of staff conflicts of interest or commitment. Brown University requires you to complete a Conflict of Interest and Commitment Disclosure form annually, which also helps to ensure you are aware of the obligation to comply with the highest ethical standards when performing their duties. All decisions and actions taken by you as a member of the Brown community in the conduct of University business should be made in a manner that promotes the best interests of Brown University.

# Are all staff required to submit a Conflict of Interest and Commitment Disclosure form annually?

Yes, you are required to submit the form annually. The annual 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 you to submit an updated form (see Question 4 below).

# When and how do I submit my annual Conflict of Interest and Commitment Disclosure form?

The annual process takes place between the end of February and the end of March each year. Annual reporting is completed electronically in [Workday](http://infoed.brown.edu/). When the annual process begins in February, you will receive an email with [a link to this job aid](https://www.brown.edu/about/administration/human-resources/sites/human-resources/files/2020%20Conflict%20of%20Interest%20and%20Commitment%20Process%20-%20Job%20Aid.pdf) that lists the steps required 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.

# Can I access the Conflict of Interest and Commitment Disclosure process via the Workday mobile app?

# No, the Conflict of Interest and Commitment Disclosure process is not available via the Workday mobile app.

# 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, you 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 an academic program or begin employment at Brown.

# I submitted a management plan last year with my annual Conflict of Interest and Commitment Disclosure form, where can I find this in Workday?

# You can view the Conflict of Interest and Commitment Disclosure form you submitted last year by running the *My Conflict of Interest and Commitment Forms* report in Workday. This report will also allow you to view your management plan and any other attachments you added to your disclosure form.

# 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 you have a conflict rests solely with Brown University. In many cases, it is crucial to consider whether others may perceive there to be a conflict of interest or commitment, regardless of whether it actually exists. This can be difficult to do when you are evaluating potential conflicts involving yourself. This is why the Conflict of Interest and Commitment process does not ask you whether you have a conflict. Instead, it asks you to provide a list of your financial and other outside interests so that the parties responsible for reviewing the disclosure can evaluate these against your University responsibilities to determine if potential conflicts exist.

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

Yes, you are required to disclose your child’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.

# What is the definition of family member?

Brown University’s Conflict of Interest and Commitment Policy defines family member as:

* Spouse or domestic partner
* Parent, stepparent, or parent-in-law
* Child, stepchild, child-in-law
* Sibling, stepsibling, or sibling-in-law
* Grandparent or step-grandparent
* Grandchild or step-grandchild
* Guardian, ward, or other member of one’s household

# 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. Staff members are required to obtain their supervisor’s approval to receive remuneration from Brown and an outside source for the provision of identical services. While it is permissible to hold a second position outside of Brown, disclosing outside employment helps ensure any potential, actual, or perceived conflict of interest or commitment is documented and adequately managed.

# 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.

# 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.

# 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 are related to your University responsibilities and professional expertise.

# Are there specific personal gifts that cannot be accepted from donors; current, prospective or former students or parents; or others with whom there is a potential or existing business or professional relationship?

Yes, personal gifts from these individuals in excess of $100 or of undetermined value must be returned immediately. Individual departments may have stricter gift restrictions. This does not apply to personal gifts received outside of your relationship with Brown, such as birthday gifts between relatives.

# Are there specific gifts that can be accepted from donors; current, prospective or former students or parents; or others with whom there is a potential or existing business or professional relationship?

Yes, personal gifts valued at up to and including $100 can be accepted, but staff are required to report the gift both to their supervisor when received and during the annual Conflict of Interest and Commitment Disclosure process.

# 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 requires 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 Univeristy Risk Management, Audit & Compliance; University Human Resources; and others as deemed appropriate. If necessary, the Office of General Counsel may also review and advise.

1. **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 the management plan and suggest revisions.