**Staff Conflict of Interest and Commitment Annual Disclosure Form: Preview of Questions in Workday**

Please review the University’s [Conflict of Interest and Commitment Policy](https://www.brown.edu/about/administration/policies/sites/brown.edu.about.administration.policies/files/uploads/Univ-COIC-Policy-10-26-19.pdf) and its related policies and guidelines. By answering the questions below and submitting the form in Workday, you affirm, as an employee of Brown University, that you have read and agree to comply with the University’s Conflict of Interest and Commitment Policy and its related guidelines. You also agree to submit an updated Conflict of Interest and Commitment Disclosure form if any additional conflicts arise during the year. Submission of this questionnaire serves as your electronic signature.

**All yes answers require additional information.**

1. During the past 12 months, did you receive salary or consulting compensation or other forms of payment from an outside, non-Brown affiliated entity exceeding $5,000? Payments you received prior to your date of hire as a Brown employee do not need to be reported.

Brown University’s Conflict of Interest and Commitment Policy defines *reportable financial interest* as:

* Receipt of anything of monetary value from a single source exceeding $5,000 annually, such as salary, royalties, and payments for services (including consulting fees and honoraria). It does not include inheritances, income from debt obligations of the U.S., state, or local governments, certificates of deposit, blind trusts, and broadly diversified mutual funds and brokerage accounts managed by third parties.
* Ownership of an equity interest exceeding the lesser of 5% or $100,000 in any single entity, excluding U.S., state, or local government debt obligations, certificates of deposit, blind trusts, and broadly diversified mutual funds and brokerage accounts managed by third parties.

1. During the past 12 months, did you have a reportable financial interest in an entity that you know does business, indirectly or directly, with Brown?
2. During the past 12 months, did you invest personally or own stock in a privately held business venture of a subordinate or student or trainee under your direct supervision or mentorship?

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

1. Do you currently have a [family member](https://www.brown.edu/about/administration/policies/employment-relatives-20012) who is employed by the University, is a consultant or independent contractor doing business with the University, or is a student at the University?

Brown University’s Conflict of Interest and Commitment Policy defines *associate* as any individual or organization with whom you have a close personal or business relationship.

1. Have you been in the past, or are you now able, to exercise control or influence over [a business relationship between Brown and an associate](https://www.brown.edu/about/administration/purchasing/about/procurement-standards/business-ethics)?
2. Do you serve in any uncompensated or minimally compensated position of responsibility, such as Officer, Director, or member of the Board of Directors, at a non-Brown entity or organization?
3. Do you hold or do you intend to seek election or appointment to a [public office](https://www.brown.edu/gcr/resources/guidelines-political-activities)?

In order to avoid a conflict of interest or the appearance of a conflict of interest, members of the Brown community are prohibited from accepting personal gifts and favors from a donor; current, prospective, or former student or parent; or others with whom there is a potential or existing business or professional relationship, in most circumstances as noted below:

* Personal gifts valued in excess of $100 or of undetermined value are prohibited and must be returned immediately.
* Personal gifts valued up to and including $100 may be accepted, but if accepted, must be reported to your supervisor when received, and during the annual Conflict of Interest and Commitment process.
* The following are excluded from mandatory disclosure:
* Payment for a modest meal
* Copies of professional materials
* Modest gift basket(s) or nominal food item(s) shared widely with colleagues
* Promotional item(s) of nominal value routinely distributed by vendors to clients
* Personal gifts received outside of your relationship with the University, such as birthday gifts between relatives.

1. During the past 12 months, did you receive a personal gift or favor from a donor; current, prospective, or former student, or parent thereof; or other individual(s) with whom there is a potential or existing business or professional relationship?

1. Do you currently use or intend to use [University facilities](https://www.brown.edu/about/administration/policies/use-campus-space-external-third-parties), personnel or Brown students, or Brown’s name or likeness, for the benefit of any outside interest or activity or a non-Brown entity?
2. The previous questions ask you to describe your affiliations and activities. Are there other conflicts of interest or commitment that you have as a result of these or other interests, activities, or relationships?