Staff COI Review and Management at Brown University

University Human Resources administers and manages the staff COI review process. In cases where a disclosure is made that identifies a potential conflict, the disclosure form is forwarded to a UHR review team for a determination whether the conflict is substantial enough that a management plan is required. A partial list of items that will require additional review can be found on the Staff COI Disclosure Guidelines page.

COI Management

When a management plan is required because a Brown familial relationships may indicate a conflict of interest or commitment, the plan must identify how the family member whose position holds more institutional seniority or authority will ensure they will not participate in, influence, or shape the terms and conditions of employment or engagement of the less senior family member. A management plan requires signatures of the staff member and supervisor, and acknowledgement from the senior administrator of the staff member’s division.

When a management plan is required because of outside employment or financial interests or public service, the plan must ensure the staff member’s Brown position is not being leveraged to enable these outside interests, and that the Brown employment will be their priority. Management plans required to address these conflicts must also ensure Brown systems, equipment and supplies will not be used in support of these outside commitments.

A management plan’s length and complexity depends on the nature and specifics of the conflict. At a minimum, it should state measures designed to mitigate any potential for conflict of interest or commitment and include the following elements:

1. Employee’s name, title, and department
2. Supervisor’s name and title
3. Name and title of employee’s assigned senior administrator
4. A description of the employee’s primary duties at Brown
5. Specific identifying information concerning the person, business, or entity that is the basis for the conflict (e.g., name, business address, dates or hours of involvement with employee and/or Brown, and relationship to Brown as vendor, consultant, donor, student, parent, employee, business partner, or investment holding)
6. A description of the relationship or situation that poses the conflict
7. A description of the circumstances presenting a conflict between these interests, indicating if this conflict is something that might happen (potential) or already exists (actual), including examples of how an employee could act in favor of the non-Brown interest and what the detriment or risk to Brown could be.
8. A description of the management mechanisms for addressing the conflict and detailing how Brown’s interests will be protected.

University Human Resources
February 2018
9. Dated signatures of the employee, the supervisor, the assigned senior administrator, and any other parties with specific responsibilities incorporated in the management plan.
CONFIDENTIAL
Conflict of Interest & Commitment Management Plan
Sample – Two Family Members

Name of Brown Staff Member with More Opportunity to Influence Decisions: Jane Doe
Title/Department: Department Manager, Business Administration
Campus Box Number: Z_________________Campus Telephone: 3-0000
Supervisor’s Name: Marcus Johnson, Department Chair
Senior Officer: Mary Jones, Dean of the Faculty

This management plan is intended to provide information related to the potential conflict of interest between me and my brother, (name), who is employed as (title) in the (name) department

First, I am aware in detail of the relevant policy of Brown University, having reviewed the appropriate parts of the University Human Resources webpage about Conflicts of Interest and Commitment, and specifically Administrative Policy 20.065, Conflict of Interest and Commitment. I further understand and acknowledge that this policy prohibits my participation in decisions involving a direct benefit (e.g., initial employment, salary, work assignments, performance evaluations, etc.) to family members.

Second, at no time has there been any coercion or influence on my part during interviewing, hiring, establishing position grade or salary, or in the subsequent performance of job activities in any way, shape or form, in reference to my brother.

Third, because I am in a position with the potential to influence his direct supervisor, the Manager of (title), I have always taken and will continue to take affirmative steps to ensure that independent and objective assessments are made in terms of salary increases, job performance, benefits, and any related decisions about the management or continuance of his position or department. I understand that, if deemed necessary, a disinterested and qualified third party in a supervisory role may be assigned, (Person’s Name), to ensure that my position at Brown has not shaped actions in matters such as performance evaluations, disciplinary actions, and salary decisions. I would immediately recuse myself from any discussion or dialogue with those individuals about their supervisory assessments.

Finally, I will in all other ways act to ensure my relationship will not negatively impact Brown in any way.

Signatures:

___________________________________________  ______________________
Jane Doe                                            Date

University Human Resources
February 2018