Staff COI Disclosure Guidelines

These guidelines contain examples of (1) prohibited conflicts, (2) conflicts that may not be prohibited but must be disclosed for resolution or management, and (3) activities that are unlikely to involve conflicts. This is not a complete listing. The University relies on members of the Brown community to apply the University’s mission statement, Conflict of Interest and Commitment Policy, and commonly accepted rules of ethical and professional conduct to identify additional instances of conflicts not listed below.

Prohibited Activities

The following conflicts of interest or commitment are prohibited:

- Hiring/supervising household members as employees
- Receiving remuneration from Brown and an outside source for identical services or activities
- Using privileged University information for personal gain, or assisting an outside organization in obtaining a preferred position with respect to such information
- Authorizing a consulting contract at Brown for a family member
- Advocating for or requesting employment at Brown for a family member
- Soliciting gratuities, favors, or anything of monetary value from students, donors, vendors, or contractors of the University for personal benefit
- Authorizing University-paid travel for a family member
- Voting on the award of University business to a vendor in which one has a significant financial interest or by which one is employed
- Authorizing a Brown donation to or purchase from an organization on whose Board one serves (see exception 3.b., below)

Activities Requiring Disclosure and Review

The following are examples of possible conflicts of interest or commitment. While all such conflicts must be disclosed, they may not all be prohibited. Some may be managed through administrative oversight and/or recusal of the disclosing individual in certain decisions at the University. Others may be considered sufficiently resolved through disclosure alone.

Supervisors, senior officers, or others who review disclosures are responsible for making these determinations and, when they determine there is a conflict that must be managed or eliminated, documenting the plan for resolution and communicating it to affected parties.

- Receiving remuneration of $5,000 or more from another organization
- Having a significant financial interest in an organization that either has Brown as a large customer or supports the individual’s University activities.

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- Accepting gratuities, favors, gifts, or any other benefit of monetary value in one year equal to or greater than two hundred dollars ($200) from vendors, donors, students/parents, or employees whom you supervise or evaluate at the University
- Serving as an administrative supervisor of a spouse or child who is employed at Brown or otherwise subject to this policy
- Negotiating forgiveness of Brown debt for a company in which one is invested
- Providing consulting services to an outside agency or (non-Brown affiliated) foundation that may give the University a preferred position with respect to grants or contracts
- Candidacy, election, or appointment to a public office
- Outside activities in which there is more than an incidental use of University facilities, equipment, and/or services
- Management, employment, consulting, and other contractual activities with, or ownership interest in, a business entity that competes with the University
- Participating in the negotiation of a contract between the University and an organization in which the Brown community member, a member of his or her family, or an associate has a significant financial interest
- Receiving consulting fees or other remuneration from Brown University if one is a member of the Corporation or one of its Standing Committees

**Activities Unlikely to Involve Conflict**

The following activities are unlikely to involve a conflict of interest and do not need to be reported unless they involve an amount of time or effort that introduces a conflict of commitment.

- Consultant services making use of the individual’s general research or professional background that do not involve a significant financial interest
- Authorization of payment of dues and/or conference fees for professional organizations on whose board the individual serves