		Туре:	Tier * (2)	
Wake Forest Baptist Medical Center	Conflict of Interest Related to Student Assessment Policy	Original Effective Date:	8/20/2015	
		Current (Revised) Date:	1-13-17	
		Contact:	Assistant Dean for Medical Education Administration	
Approval Signature:	Thealt	Date of Signature:	1-13-17	
Typed Name and Title:	yped Name and Title: Edward Abraham, MD Dean, Wake Forest School of Medicine			
Approval Signature:	Michael Rest	Date of Signature:	1-12-17	
Typed Name and Title:	Michael Rieker, DNP, CRNA Director, Certified Registered Nurse Anesthesia Program			
Approval Signature:	Dog Godi	Date of Signature:	1-11-17	
	Dwayne Godwin, PhD			
Typed Name and Title:	Dean, Graduate School of Arts & Sciences			
	Biomedical Sciences-Bowman Gray Campus			
Approval Signature:	Auganne Reich	Date of Signature:	1-6-17	
Typed Name and Title:	Suzanne Reich, MPAS, PA-C Director, Physician Assistant Program			
Approval Signature:	ODN	Date of Signature:	1-10-17	
Typed Name and Title:	Mary Claire O'Brien, MD Associate Dean, Academic Affairs, Undergraduate Medical Education			

1) General Policy Statement:

Faculty members and other university representatives who provide academic assessment of students should be free from conflicting relationships with the students.

- a) Scope: All Wake Forest Baptist Medical Center (WFBMC) faculty and staff, as well as Third Parties responsible for assessing Students and Students are responsible for complying with this policy.
- b) Responsible Department/Party/Parties:
 - i. Policy Owner: Dean, Wake Forest School of Medicine
 - ii. Procedure: Program Manager as defined below
 - iii. Supervision: Program Manager as defined below
 - iv. Implementation: Program Manager as defined below
- 2) **Definitions:** For purposes of this Policy, the following terms and definitions apply:
 - a) WFBMC: Wake Forest Baptist Medical Center and all affiliated organizations including Wake Forest University Health Sciences (WFUHS), North Carolina Baptist Hospital (NCBH), all onsite subsidiaries as well as those off-site governed by WFBMC policies and procedures.
 - b) Student: any person enrolled in or taking courses in an educational program of Wake Forest School of Medicine.

- c) Program Manager of applicable program as follows:
 - i. Undergraduate Medical Education Program (MD): Associate Dean for Academic Affairs
 - ii. Physician Assistant (PA) Program: Program Director
 - iii. Certified Registered Nurse Anesthesia Program: Program Director
 - Graduate School of Arts & Sciences, Biomedical Sciences, Bowman Gray Campus: Dean, Graduate School of Arts & Sciences, Biomedical Sciences
 - d) Assessment: The systematic use of a variety of methods to collect, analyze, and use information to determine whether a Student has acquired the competencies (e.g., knowledge, skills, behaviors, attitudes) established by and for the Student's applicable program.
 - e) Third Party: an individual who is not employed by Wake Forest Baptist Medical Center, but is in a position of assessing a Student on behalf of Wake Forest School of Medicine.
 - f) Immediate Family Member: includes the following individuals
 - i. Spouse
 - ii. Child
 - iii. Parent
 - iv. Sibling
 - v. Mother/Father-in-law
 - vi. Sister/Brother-in-law
- vii. Grandparent
- viii. Step-parent
- ix. Step-sibling
- x. Step-child
- xi. Member of the immediate household
- g) Personal Financial Relationship: a relationship in which the Student receives financial support from the faculty/staff member/Third Party. An exception is permitted when the Student is performing research activities on a grant-funded project.

3) Policy Guidelines:

- a) General Requirements/Applicability: Faculty/staff/Third Parties and Students should disclose any conflict of interest, as defined in section 3) b), below.
 - i. Faculty/staff/Third Parties who serve on a School of Medicine standing committee(s) or program-specific committee(s) which assesses and votes on Student acceptance, progress, or promotion (including graduation) should inform the Chair of the committee(s) on which the faculty/staff/Third Party serves when conflict of interest exists and recuse themselves from participating in the assessment of, or voting on, matters pertaining to the Student with whom the faculty/staff/Third Party has a conflict of interest.
 - ii. Any faculty/staff/Third Party who assesses Students should disclose in writing the presence of a conflict of interest to the appropriate Program Manager.
- iii. Students should disclose any conflict of interest following the process specified in the

Student Handbook for their specific program.

- iv. In the event of a conflict of interest, the appropriate Program Manager will develop a plan to remove the faculty/staff/Third Party from the assessment of the Student with whom the faculty/staff/Third Party has a conflict of interest. Each program is required to establish a process to manage the avoidance of conflicts of interest in Student assessment once a conflict of interest has been identified.
- v. Once identified, a conflict of interest exists until the Student is no longer a Student, as defined above in section 2) b).

b) Conflicts of interest include:

- i. The Student is an Immediate Family Member of the faculty/staff/Third Party who is assessing the Student.
- ii. The Student has a consensual relationship with the faculty/staff/Third Party (as defined in the Wake Forest Baptist Medical Center Nepotism and Consensual Relationships policy).
- iii. The Student has a Personal Financial Relationship with the faculty/staff/Third Party.
- iv. Healthcare relationships:
 - (a) For Undergraduate Medical Education (MD) Program Students: The Student has received medical or mental healthcare from the faculty/staff/Third Party.
 - (b) For all other programs' students (not enrolled in the MD program): The Student has a current therapeutic relationship to receive medical or mental healthcare from the faculty/staff/Third Party.
- v. The Student, faculty/staff/Third Party perceives a conflict of interest exists that is not specified in items 3) b) i-iv above. Additional information about the nature of the perceived conflict may be requested under this circumstance.

4) Sanctions for Breach of Policy

- a) Students, faculty, staff, and Third Parties have an obligation to comply with this policy. Examples of conduct that violate this policy include (Note: these examples are not intended to be exhaustive):
- Intentional deception or dishonesty in disclosures
- Omission of relationship disclosures
- Failure to comply with plans to avoid conflict of interest in student assessment
- b) Reports of suspected violations may be made to any of the individuals listed below, or anonymously through the Compliance Hotline (1-877-880-7888). Suspected violations will be investigated and referred to the following for sanctioning as appropriate:

Students: Program Director, as applicable

Staff: Human Resources

Faculty: Dean, School of Medicine/designee and/or President/Chief Medical

Officer of Wake Forest Baptist Health

House Staff: Dean, School of Medicine/designee and/or Associate Dean for Graduate

Medical Education/Chief Medical Officer

- c) Possible sanctions may include:
 - · Written advisory for placement in the employee or student record
 - Ineligibility to participate in grant applications or on committees
 - Dismissal from an educational or training program
 - Termination of employment

4) Review/Revision/Implementation

- a) Review Cycle: This policy shall be reviewed by the Dean, Wake Forest School of Medicine (or his/her designee) every year from the effective date.
- b) Office of Record: After authorization, the Legal Department shall house this policy in a policy database and shall be the office of record for this policy.

5) Related Policies:

- a) Wake Forest Baptist Medical Center Nepotism and Consensual Relationships
- b) Code of Conduct
- c) Policy on Conflict of Commitment and Conflict of Interest
- 6) Governing Law or Regulations None
- 7) Attachments: None
- 8) Revision Dates: 8/20/2015