## Conflict of Interest Related to Student Assessment Policy

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<tr>
<td>Edward Abraham, MD</td>
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<td>Michael Rieker, DNP, CRNA</td>
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### 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 on-site 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
iv. 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
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