

NEOMED ACADEMIC POLICY	Policy No: 3349-AC-412
ACADEMIC POLICY TITLE: Conflicts of Interest - Academic	EFFECTIVE DATE: 10/13/2015 REVISED: 5/16/2023 (updated 7/11/2023)
RESPONSIBLE DEPARTMENT: Academic Affairs, College of Medicine	Approval Authority: Dean, College of Medicine Responsible Office: Office of the Dean and Medical Education, College of Medicine

(A) PURPOSE

The purpose of this Policy is to establish guidelines regarding conflicts of interest for assessment and promotion of students. This Policy is intended to remove, as much as possible, bias in assessment of a student’s performance, assigning a student’s grade or in decisions of student promotion in accordance with the Liaison Committee on Medical Education (LCME). The relevant LCME Elements are as follows (*LCME Functions and Structure of a Medical School, effective July 1, 2023*):

- Element 12. 5 - Non-Involvement of Providers of Student Health Services in Student Assessment/Location of Student Health Records
- Element 9.9 - Student Advancement and Appeal Process

(B) SCOPE

This Policy applies to credit-bearing courses in the College of Medicine (COM) curriculum, and to the Committee on Academic and Professional Progress. This policy does not apply to co-curricular activities at any level, student independent study effort or student employment.

(C) DEFINITIONS

- (1) **Committee on Academic and Professional Progress (CAPP):** CAPP evaluates students’ academic performance, assesses professional readiness for continued studies and determines appropriateness of curricular leave. (NEOMED Appendix G, College of Medicine, College of Medicine Standing Committees)
- (2) **Conflict of Interest:** The ability of a faculty member to improperly influence a decision about a student due to a preexisting relationship between the faculty member and the student.
- (3) **Course Director:** The appointed faculty member who is responsible for the overall design, conduct, student assessment within and evaluation of a credit-bearing course.

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- (4) **Credit-bearing Course:** A course offered by the College of Medicine in which a student is enrolled, the course appears on the student’s official transcript with either contact hours or credit-bearing acknowledgment, and a grade is assigned.
- (5) **Faculty:** Faculty is defined as any instructor responsible for assignment of a course grade or a major component thereof to a student, or a person responsible for contributing to a promotion decision regarding a student.
- (6) **Clinical Site:** Instructional sites not located on the NEOMED campus where students are engaged in curricular experiences of a clinical nature.

(D) POLICY STATEMENT

- (1) This Policy applies to credit-bearing courses within the COM curriculum. This policy does not apply to courses in which the principle means of assessment is a multiple-choice examination for which cut lines for grading are predetermined or assigned using a distribution of scores in which individual students are anonymous. This Policy is applicable to Course Directors, those who contribute substantially to a course grade, and those who are members of a Committee on Academic and Professional Progress (CAPP).
- (2) A Conflict of Interest is deemed to exist when Faculty has a close personal or professional relationship with a student.
 - (a) A Conflict of Interest is deemed to exist when Faculty are or have been providers of health care including psychiatric or psychological counseling to a student. This Conflict does not apply to Faculty who provide emergent or urgent care to a student in exceptional circumstances and also does not apply to Faculty who provide urgent care to a student with the student’s consent.
 - (b) In the case of CAPP, a Conflict of Interest exists when a course director has assigned a failing grade to a student in a course to which this policy applies.

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- (3) This Policy is designed to remove, as much as possible, bias in assessment of a student, assigning a grade to a student, or making a promotion decision regarding a student.
- (a) The goal is to avoid Conflicts of Interest to the extent possible by not assigning students to Faculty with a Conflict of Interest.
 - (b) The goal is to avoid Conflicts of Interest to the extent possible by not assigning students to Faculty with a Conflict of Interest.
- (4) Faculty responsibilities:
- (a) Faculty assigned to evaluate medical students or to make decisions regarding the promotion or possible disciplinary action of medical students to whom they have provided psychiatric/psychological counseling or other sensitive health services are obliged to report the Conflict of Interest to the course director prior to the inception of a course or a meeting of CAPP by acknowledging any Conflicts of Interest (Attachment 1), so that the student or Faculty/staff can be reassigned, **if feasible** to preclude any Conflict of Interest, real, perceived, or potential.
 - (b) Members of CAPP must recuse themselves from discussions concerning and decisions about students for whom they are the Course Director or have contributed in a substantial way to a Course Grade of fail if the grade was assigned in a manner that was not anonymous.
- (5) Student responsibilities:
- (a) Students who have been assigned to a preclinical experience or clinical clerkship rotation in which they would be evaluated by a member of the Faculty or staff who has provided them with psychiatric/psychological counseling or other sensitive medical or health services, should report the real, perceived, or potential Conflict of Interest using the disclosure form (Attachment 2) at the start of an academic year or as soon as they receive the assignment so that there will be no involvement of said Faculty/staff in the academic evaluation or promotion of the student.

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- (i) Students will be made aware of the need to disclose Conflicts of Interest in orientations and via the NEOMED Compass.
- (b) Disclosure of such relationships must be prior to the start of a graded experience.
- (c) Should the student fail to disclose the relationship until the graded experience has begun and it is discovered, the Course Director will either move the student to avoid the Conflict or reassign the supervision to minimize its impact. Inability to complete a required experience related to student non-disclosure of a Conflict of Interest may result in failure to meet graduation requirements on time.
- (d) Failure to disclose a potential Conflict of Interest prior to the start of a graded experience is a conduct concern that will be reported.

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Attachment 1



Attestation Regarding Conflicts of Interest

The Liaison Committee on Medicine Education (LCME), which accredits medical education programs, requires that NEOMED adhere to Standard 12.5 – that health professionals who provide or have provided health services to students, including psychiatric/psychological counseling, to a medical student have no involvement in the academic assessment or promotion of the medical students receiving those services. This conflict does not apply to faculty who provide or have provided emergent or urgent care to a student in exceptional circumstances and also does not apply to Faculty who provide urgent care to a student with the student’s consent. NEOMED also considers it to be a conflict of interest when a faculty member who is involved in the summative or formative assessment or promotion of a medical student:

- a) has a familial or close personal relationship with the student, including but not limited to blood relatives (ex., parents, grandparents, siblings, cousins) and others with whom there is a familial or close personal or professional relationship (ex., step-parents, in-laws, fiancé, godparents, mentor) and/or
- b) In the case of CAPP. has assigned a final grade of fail in a course to a student or contributed in a substantial way to the final grade.

Following is a list of students for whom you will have direct assessment responsibility or will be involved in an academic promotion decision. Please review the list to determine and report potential conflicts of interest.

Course/CAPP: _____ Academic year: _____
Date(s) of course/CAPP meeting: _____

Students assigned to your group/service/CAPP review:

{list students }

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Please check (or double click) the box that corresponds best regarding potential conflicts of interest, sign and date the form and return it by the date indicated.

- I attest that I have no conflicts of interest regarding the academic assessment or promotion of the medical student(s) listed above.
- I have a conflict of interest regarding the academic assessment or promotion of the medical student(s) listed below, and they should be assigned to another group/service.
Please list students:
- I have a conflict of interest regarding the academic assessment or promotion of the medical student(s) listed below. Because it is not possible to assign them to another group/service, I will recuse myself from direct assessment of the student's performance or participation in any discussion or decision regarding their academic promotion or standing.

Please list students with whom you have a conflict. Beside each name, indicate the faculty member who will be responsible for evaluation of the student's academic performance, if applicable, or if you will need to recuse yourself from a promotion decision.

Faculty name: {insert name} _____

Faculty signature: _____ Date: _____

Return completed form by { insert date } to: {name}
{title}
College of Medicine
Northeast Ohio Medical University
{email} Fax: {fax number}

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Attachment 2



Student Conflict of Interest Disclosure Form (online at <https://www.neomed.edu/studentservices/>)

This form is for medical students who may be impacted by the University and College of Medicine policies on conflicts of interest regarding family members, health care providers and close personal associates (friendships and professional relationships (for details, refer to The Compass). Information submitted will be reviewed by course leadership, and students will be notified of the decision in time to plan their schedule accordingly.

Student Name: _____

Date of Request: _____

Please check if applicable:

- I am disclosing a family member or close personal associate on staff at a hospital teaching site, as outlined in [The Compass: Disclosing a Professional Relationship](#)

If disclosing a relationship that may impact clinical assignments and/or the assignment of a grade, please provide the following information about each person with whom you have a potential conflict of interest:

1. a. Name of family member, close personal associate or health care professional: _____
b. Relationship to you: _____
c. Hospital(s)/practices affected: _____
d. Title/department of person listed in 1.a.: _____

2. a. Name of family member, close personal associate or health care professional: _____
b. Relationship to you: _____
c. Hospital(s)/practice(s) affected: _____
d. Title/department of person listed in 2.a.: _____

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3. a. Name of family member, close personal associate or health care professional:

b. Relationship to you: _____

c. Hospital(s)/practice(s) affected: _____

d. Title/department of person listed in 3.a.: _____

(attach additional page(s), if necessary)

You will be notified accordingly regarding the status of a conflict.