Conflict of Interest (COI) and Recusal Policy

Roles and Responsibilities

Policy Contact(s)	Director for Quality, Compliance, and Accreditation
Responsible	UME Committee Chairs
Accountable	Associate Dean of Admissions (CoA), Associate Dean for Medical Education and Student Experience (CCC), Associate Dean for Student Affairs (Advancement)
Consulted	General Counsel, SOM COI Officer
Informed	Office of Medical Education, Office of Student Affairs, Office of Admissions, Office of Student Research, SOM Faculty, Staff, and Medical Students

Purpose

To ensure integrity, transparency, and accountability in committee decision-making by identifying and managing conflicts of interest and establishing clear procedures for recusal.

Scope

This policy applies to all members serving on committees and in various roles related to undergraduate medical education, including admissions (committee members, screeners, and interviewers), curriculum, and advancement.

Policy Statement

Members of standing UME Committees and subcommittees must disclose any actual, potential, or perceived conflicts of interest that may compromise—or appear to compromise—their impartiality in decision-making. Members must recuse themselves from discussions and decisions where a conflict exists. A conflict of interest is defined as a situation where a personal, financial, professional, or other interest could interfere with a member's duty to act in the best interest of the medical education program and/or the School of Medicine. A recusal is the act of withdrawing from participation in a decision or

discussion due to a conflict of interest. Any member who believes their recusal is necessary to preserve the integrity of the process should recuse themself.

Examples of the types of COI covered by this policy include, but are not limited to:

Admissions Committee

- Member/Interviewer has or has had a family relationship with the applicant, such as that of a current or former significant other, partner, spouse, child, sibling, or parent/guardian.
- Member/Interviewer has or has had a significant social relationship with the applicant.
- Member/Interviewer has or has had a significant social relationship with a colleague who is related to the applicant.
- Member/Interviewer is or was in a workplace environment in which a colleague is related to an applicant.
- Member/Interviewer has a private or professional financial interest in the outcome of the decision related to the applicant.
- Member/Interviewer has a political interest in the outcome of the decision related to the applicant.
- Member/Interviewer believes their recusal is necessary to preserve the integrity of the admissions process.

Curriculum Committees

- Financial interests in educational materials or platforms under review
- Significant social or personal relationships with faculty whose courses are being evaluated

Advancement Committee

- Significant social or personal relationships with students (positive or negative)
- Current/prior “advisor” or “mentor” to a student included on a meeting agenda
- Involvement in appeals related to adverse student decisions
- Financial or reputational interests in student outcomes

Appeals Committee

- Significant social or personal relationships with students (positive or negative)
- Current/prior “advisor” or “mentor” to a student appealing an adverse decision by the Advancement Committee
- Involvement in previous discussions related to adverse student decisions
- Financial or reputational interests in student outcomes

Procedures

1. Disclosure of Conflicts of Interest

- All committee members must complete an annual COI disclosure form.
- Members must update their disclosure promptly if a new conflict arises.
- Disclosures are reviewed by the Committee Chair or their designated representative.

2. Identification and Assessment of Potential Conflicts

- Before each meeting, agenda items are reviewed for potential conflicts.
- Members are responsible for self-identifying conflicts related to specific agenda items and notifying the Chair.
- The Chair may also flag potential conflicts of interest and notify affected members when that occurs.

3. Recusal Process

- Members with a conflict must:
    - Notify the Committee Chair before the meeting. Committee members can email or direct message the chair using the chat feature in Zoom (or other video conferencing platform) at the start of a scheduled meeting.
    - Refrain from participating in discussions or votes related to any agenda items for which a potential COI has been identified.
    - Leave the room physically or be assigned to the waiting area/breakout room in a virtual meeting during the relevant portion of the meeting.
- Recusals will be documented in the meeting minutes for each committee.

4. Oversight and Enforcement

- The Office for Undergraduate Medical Education monitors adherence to this policy.

5. Recordkeeping

- All disclosures and recusals are retained for the duration of an individual's service on a UME committee.
- Records are maintained electronically and confidentially by the Office for Undergraduate Medical Education.

Exceptions

There are no noted exceptions to this policy. Each committee chair makes the final decision about the existence of a conflict of interest disclosed by any committee member.

Sanctions

Failure to disclose or recuse appropriately may result in disciplinary action, including removal from the committee to which the individual was elected or appointed. These

matters will be referred to the Senior Associate Dean for Medical Education, the Senior Associate Dean for Faculty Affairs and Professional Development, the COI Officer in the School of Medicine, and/or to the UMB Office of Accountability & Compliance for further review and action.

Forms

Annual COI Disclosure Form

Related Policies/Procedures

UMSOM Policies Concerning Professionalism, Consulting, and Other Interactions

UMB Policy on Identifying and Addressing Institutional Conflicts of Interest to Preserve Integrity of Research and Other Academic Activity

Non-Involvement of Providers of Student Health Services

History

Revised: N/A
Approved: CCC, January 20, 2026