



MEDICAL SCHOOL POLICY

# Conflict of Interest & Non-Disclosure in Admissions

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**Senior Leader:** Medical School Dean

**Responsible University Officer:** Vice Dean, Medical Education and Academic Affairs

**Policy Owner:** Associate Dean, Admissions - TC  
Assistant Dean, Admissions - DU  
Director, MSTP

**Policy Contact:** Director, Accreditation, Compliance and Quality Improvement

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## POLICY STATEMENT

This policy establishes guidelines and guidance regarding Conflicts of Interest (COI) and disclosure of Private Information in the admissions process of the University of Minnesota Medical School (UMMS).

In addition, this policy includes an attestation about COIs and disclosures of Private Information that all Medical School Admissions Committee (MSAC) members, subcommittee members, interviewers, and reviewers must review and agree to on an annual basis in order to participate in the admissions process. (See Appendix 1).

### Scope

This policy applies to all individuals who are involved in and contributing to the evaluation of, or decision about, an applicant's admission into the UMMS. Covered parties include:

- Medical School Admissions Committee (MSAC) members
- Subcommittee members
- Interviewers
- Reviewers

### What Constitutes a Disclosure and Conflict of Interest (COI)

The following is a list of circumstances in which a COI exists and the types of student information that should not be disclosed. These situations are intended to be inclusive rather than exclusive. Individuals are expected to report any instances they believe constitute a COI or raise concerns about disclosure to the appropriate Admissions officer for guidance.

#### COIs occur when the individual evaluating the candidate:

- is a CLOSE relative or is personal friends with the candidate (See *Definitions*)
- has a healthcare relationship with a candidate or their CLOSE relatives, such as providing health services including psychiatric/psychological services (See *Definitions*)
- has a financial interest with, or relating to, the candidate or the candidate's CLOSE relatives
- has a pressing political interest in the candidate or the candidate's CLOSE relatives (See *Definitions*)
- Stands to benefit in some manner (eg. financial or political benefits, receiving favors) from the success or failure of the candidate

Disclosures occur when the individual evaluating the candidate: <sup>1</sup>

- Uses or shares Private Information in ways beyond those needed to perform their responsibilities as an MSAC member, subcommittee member, interviewer, or reviewer (first and/or second reviewer) or as required by law
- Discusses or discloses Private Information to others outside of the Committee except as directed by UMMS officials to meet legal or institutional requirements. The obligation to maintain Private Information is not lifted when participation as an MSAC member, subcommittee member, interviewer, or reviewer has ended
- Fails to maintain and secure Private Information as directed by UMMS official and in accordance with State and Federal Law
- Fails to turn over any documents, reports, notes, or any other materials containing Private Information, whether copies or originals, to UMMS officials at the end of an Admissions Cycle or once participation as an MSAC member, subcommittee member, interviewer, or reviewer has ended

**Responsibilities of Members with COIs**

- If at any point during the candidate review process a COI arises individuals must:
  - Make such COI fully known to the appropriate Admissions Officer immediately or as soon as is reasonably possible
  - Recuse themselves from any further review of the candidate pending candidate reassignment
  - If an individual who would serve in an Admissions capacity has a child applying to the UMMS, that individual will not be able to serve in that capacity for the entirety of the Admissions Cycle

MSAC members, subcommittee members, interviewers, or reviewers who have a COI where reassignment or other action would be deemed insufficient to resolve the COI (ie, the AEC Member is the parent of the candidate) will not be permitted to serve in any capacity in the Admissions process for the entirety of that Admissions Cycle. Admissions officers have sole discretion in determining whether a COI merits precluding participation in, or the removal of, an MSAC member, subcommittee member, interviewer, or reviewer in these instances.

**COI or Disclosure Violations**

- Violations will result in removal as an AEC member, Admissions Committee member, interviewer, or reviewer; such removal does not remove any obligation to maintain Private Information
- Violations may be grounds for disciplinary action by the UMMS Dean or applicable supervisor

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**REASON FOR POLICY**

This policy and its associated attestation process is intended to remove, as much as possible, bias in the decision making process in admissions. While it is acknowledged that it may not be possible to remove all bias, the goal is to manage bias to the extent possible by the Offices of Admissions and the UMMS.

In addition, UMMS takes the confidentiality of student information seriously. Individuals involved in the Admissions process will have access to information about individual applicants and/or Committee evaluations and deliberations considered private educational data under the Minnesota Government Data Practices Act.

This policy also ensures the medical school meets LCME Accreditation requirements as follows:

**Element 1.2: CONFLICT OF INTEREST POLICIES.** “A medical school has in place and follows effective policies and procedures applicable to board members, faculty members, and any other individuals who participate in decision-making affecting the medical education program to avoid the impact of conflicts of interest in the operation of the medical education program, its associated clinical facilities, and any related enterprises.”

**Element 10.2: FINAL AUTHORITY OF ADMISSION COMMITTEE .** “The final responsibility for accepting students to a medical school rests with a formally constituted admission committee. The authority and composition of the committee and the rules for its operation, including voting privileges and the definition of a quorum, are specified in bylaws or other medical school policies. Faculty members constitute the majority of voting members at all meetings. The selection of individual medical students for admission is not influenced by any political or financial factors.”

**Element 12.5: NON-INVOLVEMENT OF PROVIDERS OF STUDENT HEALTH SERVICES IN STUDENT ASSESSMENT/LOCATION OF STUDENT HEALTH RECORDS.** “The health professionals who provide health services, including psychiatric/psychological counseling, to a medical student have no involvement in the academic assessment or promotion of the medical student receiving those services. A medical school ensures that medical student health records are maintained in accordance with legal requirements for security, privacy, confidentiality, and accessibility.”

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## ADDITIONAL CONTACTS

Subject	Contact	Phone	Fax/Email
<b>Primary Contact</b>	<b>Name</b>	<b>Phone</b>	<b>Fax/Email</b>
Admissions Director - TC	Crystal Esparza	Phone	<a href="mailto:crystale@umn.edu">crystale@umn.edu</a>

## DEFINITIONS

### Close Relative

For purposes of this policy, close relatives refer to parents, siblings, spouse, grandparents, aunts/uncles, or cousins, including in-law and step relationships

### Private Information

Any and all data about individual candidates applying to the UMMS, and Committee evaluations and deliberations regarding candidate admissibility

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## HISTORY

**Approved:** Associate Dean, Admissions - TC, Assistant Dean, Admissions - DU, Director, MSTP - August 2021

## APPENDIX 1

Individuals on the Medical School Admissions Committee (MSAC) or its subcommittees or who serve as interviewers or reviewers will be notified annually to confirm agreement with the following attestation in order to receive access to Admissions documents and reports

### UNIVERSITY OF MINNESOTA MEDICAL SCHOOL CONFLICT OF INTEREST & NON-DISCLOSURE ATTESTATION

*As a Medical School Admissions Committee (MSAC), interviewer, reviewer of student applications (first and/or second reviewer) and/or member of any Admissions Committee, I understand and agree to the following:*

- *I am expected to be familiar with, and to comply with, the UMMS' Conflict of Interest & Non-Disclosure in Admissions Policy*
- *If I am aware of any current conflicts of interest, before completing this attestation I must contact an Admissions Officer and make the conflict fully known. I further understand that perceived or actual conflicts of interest may preclude me from participating in ANY aspect of the Admissions process during this Admissions Cycle*
- *If I have a child applying to the UMMS during the upcoming Admissions Cycle I am ineligible to participate in the admissions process for the entirety of the Admissions Cycle*
- *If I become aware of any conflicts of interest during the review, interview, or discussion of a candidate I must immediately make such conflicts fully known to an Admissions Officer and recuse myself from further involvement in the review, interview, or discussion of the candidate*
- *Admissions Officers will take any and all appropriate actions deemed necessary to resolve any actual or perceived conflicts of interest including reassigning candidates or removing me from the Admissions process for the remainder of this Admissions Cycle*
- *I will have access to Private Information about individual applicants and/or Committee evaluations and deliberations as defined in the Conflict of Interest & Non-Disclosure in Admissions Policy that are considered private educational data under the Minnesota Government Data Practices Act*
- *I must only use Private Information in ways needed to perform my duties as an AEC member, Admissions Committee member, interviewer, or reviewer (first and/or second reviewer) or as required by law*
- *I must not share Private Information with others outside of the Committee except as directed by UMMS officials to meet legal or institutional requirements. I further understand that this obligation is not lifted when my participation as a Medical School Admissions Committee (MSAC), subcommittee member, interviewer, or reviewer has ended*
- *I must maintain and secure Private Information in accordance with UMMS policies and State and Federal law*
- *I must turn over any documents, reports, notes, or any other materials containing Private Information, whether copies or originals, to UMMS officials at the end of an Admissions Cycle or once my participation as a Medical School Admissions Committee (MSAC), subcommittee member, interviewer, or reviewer has ended*
- *Violating any of the conditions outlined in the Conflicts of Interest & Non-Disclosure in Admissions Policy will result in my removal from any/all roles associated with Admissions, may subject me to disciplinary and legal action based on the severity of the violation. I understand that my removal from any role does not relieve me of the obligation to maintain the confidentiality of Private Information.*