

Summary of Conflict of Interest Rules *for Resident Scholars*

The following updated guidelines govern the approval and disclosure of outside activities for resident Brookings scholars, including those in the overseas centers. Resident scholars should familiarize themselves with the full [Conflict of Interest Policy](#). This summary is designed to provide a guide to preventing conflicts of interest or the appearance of conflicts of interest. Scholars will need to exercise their judgment when applying these guidelines. If they have any doubts, they should consult with their Research Vice Presidents.

I. Activities Requiring Advance Approval and Disclosure

Full-time scholars should disclose their outside activities as directed on the annual disclosure form.

In addition, Scholars must now seek **prior** permission from their RVPs and the General Counsel **before** agreeing to begin any one of the following activities:

- One-time activities resulting in compensation in excess of \$15,000.
- Ongoing paid outside activities including consulting, litigation support, teaching, writing projects, and meetings with clients for a consulting firm.
- Appointments to a fiduciary board or advisory board of a for-profit enterprise or non-profit organization. These arrangements must be approved regardless of the amount or form of compensation (e.g., cash, equity, or options that track equity) if any.
- Formal paid or unpaid advisory roles for any government entity.

RVPs and the GC may give blanket approval to a scholar for certain of the above activities, such as speeches, certain nonprofit advisory boards, and other activities.

II. Process for Seeking Approval

In determining whether or not an activity will be permitted, RVPs and the General Counsel will take into account the following:

- Whether there is conflict of interest or perceived conflict of interest.
- The entity or individual involved and the relationship, if any, to the scholar's research.
- Whether the amount of time involved will interfere with the scholar's responsibilities at Brookings.

If the RVP or General Counsel is the individual with a potential conflict, then permission must be sought from the Executive Vice President.

Where permission is denied, or granted subject to conditions by the RVP, scholars may appeal to the Executive Vice President.

III. Process for Disclosure

Activities that require prior permission from the RVP and General Counsel (except for those that have been given blanket approval) must be disclosed on the scholar's bio posted on the website—either in the main bio or in a separate section noting outside activities and affiliations (the heading should read: "Affiliations and External Activities"). Other outside activities not requiring prior approval must still be disclosed on internal conflict of interest disclosure forms and the CV.

Unless national security concerns preclude disclosure, any outside work for a government agency should also be disclosed on the scholar's bio and CV.

Items disclosed must remain on the bio for one year after they have ended and should always remain on the scholar's CV.

Scholars are required to update their website bios, CVs, and conflict of interest disclosure forms within a month of beginning a new activity. In approving new activities, RVPs should remind scholars to update their bios, CVs, and COI disclosure forms.