Virginia Polytechnic Institute and State University

Disclosure Requirements for Activities and Interests (Conflict of Interest and Commitment Policy)

No. 1045

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Policy Owner:
President Sands

Policy Author:
(Contact Person)
Alan Fellers
Sharon Kurek

Affected Parties:
Undergraduate
Graduate
Faculty
Staff
Other

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1.0 Purpose

Virginia Tech encourages individual engagement in additional activities and interests including collaborations with other public and private institutions and services to potential university stakeholders. With such endeavors comes an inherent risk of circumstances resulting in a conflict of interest or conflict of commitment. Individuals and the university are responsible for assuring compliance with regulatory requirements and policies of research sponsors, state and federal agencies, and the university, as well as maintaining the trust of the broader public that possible personal gain does not influence or bias activity or decision-making at the university. Failure to adhere to these regulatory requirements and policies places employees and the institution at risk for corrective or disciplinary actions. Employees, through meeting their responsibility to transparently and appropriately disclose their additional activities and interests, are able to proactively safeguard their, and the university's, interests and reputations.

Conflicts can be present in many aspects of university business; therefore, this policy should be read in conjunction with other relevant policies related to professional conduct standards and objectivity, including the university's University Statement of Business Conduct Standards and Policy 5000, "University Real Property (Building, Grounds, Infrastructure) Usage and Events".

1.1 Principles

While encouraging engagement in additional activities and interests that can further individual and institutional priorities, there are some core principles that ensure an individual's primary responsibility to the university is not compromised:

- The primary professional allegiance of the employee must be, both in fact and in perception, to their primary role at the university, and their primary commitment must be to their institutional responsibilities.
- Additional activities and interests cannot be in direct competition with the business and operations of the university.
- University resources and intellectual property must be protected from being diverted to external entities or being used inappropriately for the personal gain of the employee.
- Having a potential conflict of commitment or interest does not mean a person is biased or has done something wrong – the term "conflict" refers to the risk of bias in the specific situation, whether or not bias or harm has actually occurred.

- Transparency and accountability about the type, nature, and extent of employees' additional activities or interests, including the identification, management, and/or elimination of conflicts of interest and/or commitment, must be ensured.
- Responsibilities to the university and research sponsors must be met.
- Students, trainees, and other employees must not be adversely affected by any participation in additional activities or interests.

2.0 Policy

While Virginia Tech recognizes the importance and value of additional activities and interests, this does not diminish the expectation that an individual's primary professional commitment of time and intellectual energies is to be directed to fulfilling the duties and responsibilities of their primary role in the university.

Participation in additional activities and interests (internal or external) is permitted to the extent that the activity does not negatively impact one's ability to meet the expectations of their primary role with the university, and that participation does not create an impermissible conflict of commitment or conflict of interest. To ensure that such potential conflicts are mitigated, accurate and timely disclosure of additional activities and interests allows leaders and university experts to advise employees so as to avoid such conflicts or structure arrangements to manage them appropriately.

2.1 Applicability

All faculty, staff, and employed students, whether full or part-time, are employees covered by this policy. Existing disclosure mechanisms and processes remain applicable and in effect until the revised disclosure system and processes are fully executed in FY27. Policy components not feasible through existing processes will become effective upon implementation of the revised system capable of fully supporting policy requirements.

Employees who fall into the following categories must complete the training and disclosure requirements outlined in this policy, and are referred to as "disclosing individuals":

1. Employees at .75 FTE or higher regardless of classification; or
2. Graduate students on paid assistantships; or
3. Any other individual, regardless of title or position, who is independently responsible for the design, conduct, or reporting of sponsored research at Virginia Tech, including part-time faculty, researchers, and graduate assistants; or
4. Any other individual as identified by the chief risk officer or designee as being required to disclose under this policy to address higher risk or exceptional circumstances necessitating training and disclosure.

Any other employee not designated as a "disclosing individual" must still initiate disclosure when seeking to engage in activities or interests as described in Section 2.2.3 below.

2.2 Responsibilities of Disclosers

Disclosing individuals are responsible for submitting disclosures to the university as outlined in this policy for review and approval. Certain activities or interests as described in 2.2.3 below must be disclosed and approved

before initiating them. This includes activities or interests regardless of when they occur or the individual's appointment term (such as activities occurring during summer months for 9-month appointments).

Disclosing individuals are responsible for complete, accurate, and timely disclosure of additional activities and interests. Determining whether an additional activity or interest constitutes a conflict is the responsibility of the university, not the disclosing individual. The university will ensure review of disclosures to determine whether an additional activity or interest is a potential conflict that could interfere with or inappropriately influence the discloser's actions or decisions. If such a conflict exists, the university must manage or eliminate it.

Disclosing individuals with no reportable additional activities or interests are still required to submit a disclosure at least once a year. If no additional activities or interests exist for a disclosing individual, the disclosure will document this acknowledgement.

2.2.1 Training Requirement

Disclosing individuals must complete training on additional activities, interests, and disclosures prior to their first disclosure under this policy. New hires and current employees newly identified as disclosing individuals must complete the training and disclosure within 30 days of their initial hire or becoming a disclosing individual. On an ongoing basis, the university will provide guidance and resources related to common additional activities and interests, best practices, and considerations. The disclosure system will also provide necessary guidance, examples, and information to support accurate and timely disclosure by employees.

Additionally, Investigators must also complete Financial Conflict of Interest training either 1) prior to the expenditure of sponsored project funds or 2) within 30 days of being named as an Investigator on an existing sponsored project, and at least every four years thereafter.

2.2.2 Disclosure Timing

To best maintain compliance with laws, regulations, and policies, the university requires regular disclosures of all such activities and interests from disclosing individuals as follows:

1. Initial disclosure of additional activities and interests within 30 days of their date of hire or being newly identified as a disclosing individual with the university,
2. Updated disclosure of additional activities and interests annually while employed if no changes have occurred since the last disclosure,
3. Updated disclosure for any new activities and interests **prior** to engaging in them, and
4. Updated disclosure within 30 days of changes to ongoing activities and interests already included in the prior disclosure, when needed.

2.2.3 Activities and Interests Requiring Disclosure

Disclosing individuals must disclose activities undertaken beyond their primary role and ongoing responsibilities with the university, which include the following, whether compensated or not:

1. **Additional Employment or Appointments** (internal or external to the university)

Holding additional roles of employment inside or outside of the university must be disclosed for approval in advance of accepting any such position. For additional positions held within the university, standard Human Resources practices and policies apply, including consideration of the Fair Labor Standards Act, and there may be limits to how many total hours can be worked per week due to benefits implications.

Graduate students on paid assistantships may seek additional employment (restrictions may apply to international students based on their visa status) and should consult with their academic advisor and/or assistantship supervisor as applicable regarding the fulfillment of their assistantship and graduate study responsibilities.

Release time from university work is not available for additional employment; employees must use pre-approved leave or leave without pay in cases where outside personal work creates a potential conflict with regularly scheduled university responsibilities.

All academic, professional, scientific, or institutional appointments outside of the university must be disclosed, including courtesy or honorary appointments. Advanced approval is required if the appointment's total value (compensation, complimentary travel) equals $5,000 or more, provides access to resources or funding for research, or is with a non-US institution.

2. **External Consulting**
Consulting arrangements must be disclosed in advance and may be entered into by university employees during periods of university employment provided that;

   a. The consulting would not typically be provided as part of their university responsibilities or through the Virginia Cooperative Extension, outreach programs, or other component of the university, and

   b. The work can be accomplished without interference with their assigned duties.

Requirements for consulting arrangements are as follows:

- Consulting work should involve advisory services based on an employee's store of knowledge and experience and:
    - not involve conducting research, development, or testing, which may interfere or overlap with the performance of the employee's university duties or conflict with university interests.
    - not involve data, research materials, or other resources of Virginia Tech.
    - for faculty, the use of annual leave for consulting focused on areas outside the faculty member's primary area of expertise.
- Employees whose appointments are funded in whole or in part by sponsored projects may participate in consulting when consistent with their responsibilities and in compliance with federal contract compliance and state regulations.

- For faculty, university time available for consulting is in proportion to base salary funding/time from non-sponsored sources. With management approval, additional consulting days may be charged to annual leave.

- When an employee testifies as an expert witness, the following conditions apply:
  - a disclaimer is given in court indicating that the employee is speaking as a professional and not as a representative of the university;
  - when an employee is under subpoena, the university civil leave policies apply; and
  - an employee may not testify in civil suits involving the Commonwealth of Virginia, except under subpoena.

Release time from university work is not provided for consulting activities, except as detailed here for faculty employees:

- Faculty members (all categories) may engage in consulting activities as long as they do not ordinarily involve more than one day per week, and do not exceed five consecutive days in a five-week period, and all other university policies and requirements are met (specifically consulting related items in Policy 5000 and the University Statement of Business Conduct Standards).

3. **Professional Service**
While professional service activities are encouraged and approved leave is not required for their completion, disclosure and review in advance of these activities is still important to protect against the risk of potential conflicts. Specifically, the following must be disclosed:
   - Professional service activities resulting in compensation over the threshold specified by the Division of Enterprise Risk and Integrity (see COI/C Standard Operating Procedures), and
   - Professional service activities that may interfere with the university's ability to serve its mission, compete for research funding, or accomplish other key goals.

4. **Additional Research Support outside of Virginia Tech**
Disclosing individuals must disclose in advance the receipt of any research support received outside of Virginia Tech that is not tracked through the Office of Sponsored Programs.

5. **Board Service/Officer Roles with Fiduciary Responsibility**
Serving on an external board or in an executive role with fiduciary responsibilities typically involves providing guidance and governance to a company or entity (including non-profits), and must be disclosed in advance. While service in these roles, compensated or otherwise, may also fit into one of the categories above, it is especially important to disclose roles where an individual has fiduciary responsibility to the entity.

6. **Activities with Foreign Entities**
   International collaborations are valued and encouraged but must comply with all applicable laws, regulations, and university policies such as export controls, sanctions, and research security (reference Policies 1070, 13045, and 13046). Therefore, all additional activities and interests involving foreign entities must be disclosed in advance and will require a security assessment. In addition to security assessments, activities and interests with foreign entities may require additional prior approval from United States Government agencies.

Beyond activities undertaken in addition to one's primary role with the university, certain additional interests must also be disclosed. Specifically:

7. **Significant Financial Interests**
   Disclosing individuals must disclose the following financial interests related to Virginia Tech operations which could happen in the context of an employment contract with Virginia Tech, a purchase, or a sponsored project held in the 12 months prior to the date of disclosure by themselves, their spouse, dependent children, or other dependents residing in their household:

   - **Payments received totaling $5,000 or more per entity:** Payments include salary, income, travel reimbursements, and any other type of remuneration received by the disclosing individual or member of their immediate family. Note that these payments may be related to activities disclosed above, or additional businesses or interests.

   - **Any equity interest held in a company:** Any directly controlled stock, stock option, or other ownership interest in a company.

8. **Employment of Immediate Family Members**
   Employees must avoid being in a position of authority over a spouse or a member of the immediate family who is also employed by the university where the spouse or family member earns $5,000 or more during a fiscal year. An employee and their spouse or another member of the immediate family may both be employed by the university so long as one employee does not exercise any control over the employment conditions and activities (such as initial appointment, retention, promotion, tenure, salary, travel approval, leave of absence, or grievance review) of the other employed spouse or immediate family member and is not in a position to influence those activities.

   Employees being considered for transfer or promotion or applicants for employment at the university will be required in the hiring process to disclose the identity of an immediate family member working at the university.

Disclosing individuals must also provide additional relevant information concerning disclosed or undisclosed matters as may be requested for the purpose of evaluating potential conflicts. Disclosing individuals may be required to provide copies of contracts for employment, appointments, research grants/projects, or other additional activities and interests as needed.

3.0 Activities or Interests Not Requiring Disclosure

Payments from investment vehicles, such as mutual funds and retirement accounts, do not need to be disclosed if the investment decisions made in these vehicles are not directly controlled by the employee or immediate family member.

Professional service activities deemed necessary or expected for academic appointment progression that include payments below the threshold specified in the COI/C Standard Operating Procedures, do not otherwise have adverse effects on the university, or are not international in nature do not require disclosure.

Technical assistance agreements, approved per the Continuing and Professional Education Technical Assistance Program described in the Faculty Handbook, do not need to be duplicated on the university disclosure.

Only activities or interests that fail to meet **any** criteria for disclosure as described in 2.2.3 above do not need to be disclosed. Any uncertainty or doubt on if an activity needs to be disclosed should be resolved in favor of disclosure.

4.0 Prohibited Activities or Interests

Some activities or interests are prohibited for employees by state or federal law. Specifically:

1. Employees are prohibited from giving or accepting gifts or favors (including travel expenses) from bidders, vendors, contractors, or customers, which either create, or give the impression of favorable business treatment. (See Statement of Business Conduct Standards.)
2. Employees cannot accept gifts, gratuities, or favors for any services they perform in connection with their positions. (See Statement of Business Conduct Standards.)
3. Personal use of university assets is prohibited, although some limited personal use of computer or communications systems may be permitted. This must always be in accordance with university policy and departmental procedures and must not be detrimental to job performance or department operations. However, the use of university assets for personal gain or non-university employment is expressly prohibited. (See Statement of Business Conduct Standards.)
4. Employees are prohibited from participating in additional activities or interests meeting criteria as a malign foreign talent recruitment program. (See Policy 13046)
5. Additional activities or interests including collaborations involving individuals or entities listed on certain denied persons or debarred lists as determined by the Office of Export and Secure Research Compliance.
6. The use of university resources, name/other identifiers, and/or employees for an individual's additional activities or interests is prohibited unless by established contractual agreements. Employees may not use the university's name, trademarks, logos, indicia, or the fact that they are affiliated with the university in a manner that suggests that the university approves, disapproves, endorses, or promotes their individual interests, work, or services outside of their primary university role.
7. Paid consulting by employees is not permitted for work done for a group within the university or on any sponsored projects. For example, if a faculty member advises or assists the principal investigator on a grant, there shall be no pay for the services. Such consulting is considered part of the usual duties of faculty members.
8. Employees are prohibited from engaging in commercial activities on university property, including the following: (a) the solicitation or sale of products, services, or personal property; (b) the solicitation of orders

for such products or services; or (c) the distribution of catalogs and literature promoting products or services by individuals, including university employees. (See Policy 5215).

5.0 Compliance Requirement and Consequences for Non-Compliance

Compliance with this policy is a condition of employment and/or participation in research for all disclosing individuals. Under rules set forth in applicable handbooks, other university policy, and codes of conduct, those who fail to comply are subject to discipline, up to and including termination of employment, as well as potential ineligibility to submit grant applications or supervise students, disqualification from further participation in research, or ineligibility for pay increases. Further, certain conflicts violate state or federal law and may result in criminal or civil penalties.

Non-compliance with the provisions of this policy includes, but is not limited to, failing to complete training requirements; failing to timely disclose additional activities and interests; intentionally filing an incomplete, erroneous, or misleading disclosure; failing to provide additional information as requested or required; or failing to follow an approved plan for preventing, managing, or eliminating a conflict.

Failure to meet one's primary university responsibilities will be addressed immediately by the supervisor through established university policies and procedures for performance management appropriate to the situation (for example, coaching conversation, counseling memo, formal reprimand, or dismissal for cause).

6.0 Procedures

The university disclosure process is managed within the Office of Conflicts of Interest and Commitment (COI/C) Services within the Division of Enterprise Risk and Integrity, with direct oversight by the Director for Conflicts of Interest and Commitment Disclosures.

A centralized disclosure system will prompt disclosing individuals to update their current disclosure at least 30 days prior to its expiration, and for individuals newly identified as a disclosing individual to submit an initial disclosure within 30 days of their initial hire date or becoming a disclosing individual. Individuals will also have ongoing access to the disclosure system to submit updates as needed and required by this policy.

Disclosures acknowledging no additional activities or interests exist do not require management approval and will be recorded and stored in the disclosure system for compliance purposes.

New activities or interests required to be disclosed in advance may not be initiated until after the disclosure has been fully approved by the responsible approvers.

Submitted disclosures meeting minimum thresholds for review will first be reviewed centrally for potential conflicts of interest and commitment. The following table details university roles that will engage in making appropriate conflict of interest or commitment evaluations, and this policy provides delegated authority to their respective offices to develop and oversee related standards and procedures.

Responsible Role	Office	Area of Institutional Responsibility and Conflict Evaluation Expertise	Related Standard Operating Procedures
Director of COI/C Disclosures	Division of Enterprise Risk and Integrity	Conflicts of Interest and Commitment (COI/C)	COI/C Standards and Operating Procedures
Director of the Research COI Program	Division of Scholarly Integrity and Research Compliance	Financial conflicts of interest (FCOI) in sponsored projects	Research FCOI Standards and Operating Procedures
Chief Research Security Officer	Office of Export and Secure Research Compliance (OESRC)	Compliance with export controls, sanctions, and research security regulations	OESRC Standards and Operating Procedures
Director of Procurement	Procurement Department	Conflicts of interest related to purchasing and contracting	Purchasing and Contracts Standards and Operating Procedures

The central reviewers will provide guidance and recommendations to responsible approvers prior to their review and approval or disapproval of submissions. In most cases, such disclosures will be approved or disapproved by a Department Head and Senior Leader or designee. Department Head and Senior Leader disclosures will only require one level of approval. Additional approval may also be required in limited circumstances based on the nature of the activity or interest, or based on the potential risk associated with an identified conflict. In cases where the Department Head is not the disclosing individual's supervisor, relevant information may also be shared with the supervisor for awareness.

Disclosure approval indicates that:

- Any additional activity or employment does not represent an overcommitment of time and is not anticipated to impede the individual's primary responsibility to the university.
- There does not appear to be an inappropriate overlap of resources between Virginia Tech and an external entity, or any diversion of funding or intellectual property from the university.
- The supervisor will be able to monitor for any workplace impacts of additional activities and interests disclosed so that performance is maintained.
- The approver acknowledges the disclosure of additional activities and interests and will engage with other university officials as necessary to support management of potential conflicts of interest or commitment.

Disclosing individuals will be notified upon completion of the review through the centralized disclosure system. The notification will include if any conflict of interest or commitment identified and what steps or requirements are necessary to appropriately manage the conflict, if applicable. All disclosers will have access to the current status of their disclosure, including automated approvals and final status, through the centralized disclosure system.

The Division of Enterprise Risk and Integrity will ensure that disclosing individuals have access to a clearly defined appeal process should they wish to request additional review in the event of a dispute on the outcome of a review (except those governed by Research FCOI Standards and Procedures). This process will include the opportunity to have the submitted disclosure and any additional relevant information further reviewed by the appropriate senior or executive leadership in the disclosing individual's reporting structure.

Access to disclosures is limited to authorized employees in the course of their official university responsibilities. Information will not be shared with anyone outside of the university except where required contractually or by law.

7.0 Additional Disclosures to External Entities

Some university employees, depending on their role and particular work, may be subject to additional disclosure requirements not addressed by this policy. Employees subject to these additional disclosures are responsible for ensuring compliance with these requirements.

- **Disclosures to Research Sponsors**

  Investigators are required to provide complete and accurate disclosures of required information to research sponsors at the time of proposal submission and throughout the life of the award, in proposal documents like the biosketch, current and pending support, and other forms.

  It is critical for Investigators to note there must be consistency between their disclosures to the university and to sponsors in proposals submitted by the Office of Sponsored Programs. An Investigator's disclosure to the university does not alleviate their responsibility to disclose to sponsors.

- **Disclosures to the Commonwealth of Virginia**

  The Commonwealth of Virginia requires employees in roles meeting certain criteria to regularly complete the state's training and submit a Statement of Economic Interests (SOEI) disclosure. The university regularly reviews and compiles a list of roles to which this requirement applies. Additionally, individuals with an approved exception for a financial conflict of interest related to university contracting will be required to complete the SOEI training and disclosure requirement.

8.0 Definitions

Additional Activities: Any additional employment or appointment (either within the university or outside), external consulting, or professional activities performed in addition to or beyond the regular responsibilities of an individual's primary role with the university (regardless of compensation).

Additional Interests: Relationships, professional or personal, that exist outside of an individual's primary university employment role that may impact their work at the university, have financial implications, or intersect with business conducted by the university.

Conflict of Commitment (COC): A situation where an individual is at risk of undertaking additional activities that may interfere with their primary obligations and commitments to the university in terms of time, responsibilities, resources, and dedication. This can be the case even if the activity is valuable to the university or contributes to professional development and competence. Conflicts of commitment include situations in which the additional commitments would create an overlap of resources between Virginia Tech and an external entity, or actions of the individual indicate a prioritization of additional activities over those to the university, including students, research, or colleagues.

Conflict of Interest (COI): A situation in which an individual's professional judgment is at risk of being biased by a secondary interest (financial or otherwise), resulting in possible harm or the implication of personal gain. A COI assessment is a factual evaluation based on the existence of certain parameters that could lead to biased judgement or inappropriate personal gain in university operations such as research, contracting, or purchasing. State law and federal research regulations allow for certain conflicts of interest when specified conditions are met, as outlined in this policy.

Disclosure: A formal declaration by employees providing required information to responsible authorities as required by law or policy.

External consulting: A professional activity related to an individual's area of expertise where that individual generally receives compensation from a third party and is not acting as an agent of the university. Consulting may take many forms, but the guiding principle is that a person agrees to use their professional capabilities to further the agenda of a third party in return for an immediate or prospective gain. Consulting does not involve employment, appointments, or engaging in research with the external entity.

Foreign Entities: Foreign entities include any non-U.S. individual or organization that may be involved in additional activities or interests, such as foreign governments or their agents, foreign institutions, foreign organizations or businesses, or individuals, regardless of citizenship, employed by or acting on behalf of a foreign government or organization.

Immediate Family: For purposes of this policy, immediate family includes, your spouse, dependent children, and other dependents residing in your household.

Professional service: A professional activity considered part of an employee's institutional responsibilities for participation in the larger scholarly academic, higher education, or professional community. This includes service on commissions, boards of governmental agencies, granting agency peer review panels, visiting committees or advisory groups to other universities, professional associations, and analogous bodies.

Total Value: For purposes of this policy, the value of an activity or financial interest is calculated as the combined benefits received by or made available to the individual including all compensation, complimentary travel, covered fees or registration costs, and resources (e.g. funding, personnel, equipment, space, data) as a result of, or resulting from, the activity or interest.

9.0 Legal Requirements and References

There are several state and federal laws and statutes that provide the basis for requirements outlined in this policy. Most notably:

Code of Virginia, State and Local Government Conflict of Interests Act
https://law.lis.virginia.gov/vacodepopularnames/state-and-local-government-conflict-of-interests-act/

Code of Federal Regulations related to Research Objectivity: 42 C.F.R. 50, Subpart F, "Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought" as implemented in the 2011 Final Rule for grants and cooperative agreements and 45 C.F.R., Part 94, "Responsible Prospective Contractors"
https://www.ecfr.gov/current/title-42/chapter-I/subchapter-D/part-50/subpart-F
https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-94

NASA, Conflict of Interest Policy for Recipients of NASA Financial Assistance Awards
https://www.federalregister.gov/documents/2023/08/31/2023-18802/conflict-of-interest-policy-forrecipients-of-nasa-financial-assistance-awards

Department of Energy, Interim Conflict of Interest Policy
https://www.energy.gov/management/department-energy-interim-conflict-interest-policy-requirements-financial-assistance

NSF, Conflict of Interest Policies
https://www.nsf.gov/pubs/policydocs/pappg19_1/pappg_9.jsp

Creating Helpful Incentives to Produce Semiconductors and Science Act of 2022 (CHIPS and Science Act, Public Law No. 117-167)
https://www.congress.gov/bill/117th-congress/house-bill/4346

National Security Presidential Memorandum 33 (NSPM-33) Implementation Guide
https://bidenwhitehouse.archives.gov/wp-content/uploads/2022/01/010422-NSPM-33-Implementation-Guidance.pdf

University Policy 1070 – Global Travel Policy 5000
https://policies.vt.edu/assets/1070.pdf

University Policy 5000 – University Real Property (Building, Grounds, Infrastructure) Usage and Events
https://policies.vt.edu/assets/5000.pdf

University Policy 5215 – Sales, Solicitation and Advertising on Campus
https://policies.vt.edu/assets/5215.pdf

University Policy 6210 – Management of Graduate Assistantships and Tuition Remission
https://policies.vt.edu/assets/6210.pdf

University Policy 6362 – Policy on Continuing and Professional Education
https://policies.vt.edu/assets/6362.pdf

University Policy 13045 – Export Control, Sanctions, and Research Security Compliance Policy
https://policies.vt.edu/assets/13045.pdf

University Policy 13046 – Participating in Malign Foreign Talent Recruitment Programs
https://policies.vt.edu/assets/13046.pdf

Statement of Business Conduct Standards
https://financialmanagement.vpfin.vt.edu/content/dam/financialmanagement_vpfin_vt_edu/20230612_Business-Conduct-Standards.pdf

Faculty Handbook
https://faculty.vt.edu/academic-personnel/academic-policies-and-resources/faculty-handbook.html

Conflict of Interest Mitigation Guidelines for Graduate Education
https://graduateschool.vt.edu/academics/expectations/COI.html

10.0 Approval and Revisions

Recommended by the Commission on Research. Approved by University Council: January 20, 1992. Approved by the President: January 20, 1992.

- Revision 2
  - Complete revision of policy in all aspects to reflect broader range of external activities, new reporting and approval mechanisms, and other changes.

  Recommended by the Commission on Research: April 26, 2000.
  Approved by University Council: May 1, 2000.
  Approved by the President: May 1, 2000.
  Approved by the Board of Visitors: June 5, 2000.

- Revision 5
  - Recommendations for complete revision made by the Taskforce on Consulting and Conflicts of Interest and Commitment charged by the senior vice president and provost. Substantive changes intended to improve understanding of the policy and thereby encourage faculty compliance; to update the policy in light of changing federal regulation and expectations of research sponsors; to increase protection of students; and to adopt best practices related to conflicts of interest as recommended by federal agencies, professional societies, and other major research institutions. Eliminated references to Categories I, II, and II for assessing external activities. An extensive set of examples of activities that do, and do not, need to be reported are now available on comprehensive COI website.
  - Eliminated section on Committee on Conflicts of Interest and Commitment and revised section on appeals.

- Added requirements of newly promulgated federal regulations including adoption of $5,000 threshold for disclosure of financial interests; mandatory training; prompt response to FOIA request concerning possible investigator conflict of interest related to an NIH research project; retrospective review for relevant cases of non-compliance; and annual reports for management plans.

- Added sections on potential conflicts involving students and postdoctoral fellows/trainees, other employees, and spouses and immediate family members.

- Added reference to organizational conflict of interest, and sections on Statement of Economic Interest, Faculty Authored Instructional Materials, and Procurement-Related Conflicts.

- Clarified procedures for disclosures and for development of management plans once a potential conflict has been identified.

- Changed oversight of conflict of interest reporting from the senior vice president and provost to the vice president for research.

- Revised policy title from "Faculty Conflicts of Interest and Commitment" to "Individual Conflicts of Interest and Commitment."

Approved by the Commission on Research: February 8, 2012.
Approved by University Council: March 19, 2012.
Approved by the President: March 19, 2012.
Approved by the Board of Visitors: June 4, 2012. Policy effective date: August 10, 2012.

- Revision 7
  - Complete revision based on recommendations from the 2020 COI Taskforce charged by the president and vice president for research and innovation. The requirements remain the same but were streamlined and clarified, as needed.
  - Removed provisions covered by other university policies, including conflict of commitment.
  - Revised policy title from "Individual Conflicts of Interest and Commitment".

  Approved June 7, 2022, by the Board of Visitors.

- Revision 10
  - Revised policy title to "Disclosure Requirements for Activities and Interests (Conflicts of Interest and Commitment Policy".
  - Revised applicability to cover all faculty, staff, and employed students, whether full or part-time.
  - Revised to incorporate provisions of the Faculty Handbook, the University Statement of Business Conduct Standards, Policy 4070: Additional/Outside Employment Policy for Salaried Classified and University Staff, Policy 5000: University Real Property (Building, Grounds, Infrastructure) Usage and Events, and Policy 6210: Management of Graduate Assistantships and Tuition Remission.
  - Added requirement for all Disclosing Individuals to submit a disclosure at least annually.

- Added requirement for Professional Service activities be disclosed in advance over when valued over a threshold (documented in procedures) or when activities could interfere with the university's ability to serve its mission, compete for research funding, or accomplish other key goals.
- Updated disclosure requirements to include activities or interests regardless of when they occur or the individual's appointment term.
- Added requirement that employees provide additional relevant information including personal contracts or grant applications as may be requested for the purpose of evaluating potential conflicts.
- Added requirement for mandatory training on disclosure requirements to be completed within 30 days of start date, and prior to first disclosure under this policy for existing employees.
- Updated prohibited activities to include participating in additional activities meeting criteria as a malign foreign talent recruitment program (as defined in Policy 13046).
- Updated non-compliance section to reflect compliance with the policy is a condition of employment and/or participation in research.
- Updated procedures to reflect the university's disclosure process is managed centrally by the Office of COI/C Services within the Division of Enterprise Risk and Integrity.