**Summary of Policy 13010 Changes**

**Overview**

Policy 13010 is being revised based on recommendations from the 2020 Conflict of Interest (COI) Task Force, convened at the request of President Sands and whose membership represents leadership across the university. The COI Task Force’s final recommendations report has been endorsed by President Sands and the proposed changes to Policy 13010, as contained in the report, are outlined below. The requirements will remain the same but will be streamlined and clarified, as needed.

Policy 13010 currently addresses:

1. Disclosure of additional work commitments to Virginia Tech (e.g., consulting and outside employment) to address *conflicts of commitment*
2. Disclosure of financial interests to Virginia Tech to address *conflicts of interest* due to a financial interest in:
	1. An immediate family member’s employment at Virginia Tech
	2. A business related to a university purchase
	3. A business related to a sponsored research project *[silent on non-research sponsored projects]*
3. Additional responsibilities for researchers
4. Other conflicts of interest that are not requirements of Policy 13010’s informing state law or federal regulations
5. Disclosure by certain employees to the Commonwealth of Virginia (i.e., the Statement of Economic Interests)

Policy 13010 will now address:

1. ~~Disclosure of additional work commitments to Virginia Tech (e.g., consulting and outside employment) to address~~ *~~conflicts of commitment~~**[covered in other university policies]*
2. Disclosure of financial interests to Virginia Tech to address *conflicts of interest* due to a financial interest in:
	1. An immediate family member’s employment at Virginia Tech
	2. A business related to a university purchase
	3. A business related to a sponsored research project
	4. A business related to a non-research sponsored project *[added]*
3. ~~Additional responsibilities for researchers~~ *[combined with the above sponsored research section]*
4. ~~Other conflicts of interest that are not requirements of Policy 13010’s informing state law or federal regulations~~

*[covered in other university policies]*

1. Disclosure by certain employees to the Commonwealth of Virginia (i.e., the Statement of Economic Interests)

**Summary of Changes**

Specifically, the COI Task Force recommends that:

* The disclosure requirements that pertain to conflict of commitment/disclosure of additional work commitments be removed because there are already policies that address this (i.e., the Faculty Handbook at section 2.24, “Consulting and Outside Employment”, or Policy 4070, “Additional/Outside Employment Policy for Salaried Classified and University Staff “, respectively).
	+ This will reduce disclosure confusion among employees and align university practices with federal guidance that recommends a clear distinction between COI and COC.
* The disclosure requirements that pertain to financial interests related to university operations remain; they apply to all employees. This includes financial interests related to an immediate family member’s employment at Virginia Tech, university purchases, and sponsored projects.
	+ The policy revision will separate requirements based on the type of COI (personnel, procurement/purchasing, and research/sponsored projects). Each section will outline disclosure requirements, the university program/unit responsible for making COI assessments, and next steps.
* The disclosure and training requirements pertaining to research (namely, to certain researchers on sponsored research projects called “Investigators”) remain.
	+ This section of the policy will be combined with the section above for financial interests related to sponsored research projects to create a comprehensive section for researchers. Again, disclosure requirements, the university program/unit responsible for making COI assessments, and possible next steps will be clarified.
	+ This section, like the current version of Policy 13010, will include a provision related to safeguarding the academic progression of graduate students participating in research sponsored by a company in which their advisor has a financial interest; this approach has been discussed and agreed upon with the Graduate School.
* The disclosure requirements pertaining to certain employees who must disclose to the Commonwealth of Virginia (via a process called Statement of Economic Interests filing) should be clarified.
	+ Certain employees in senior leadership positions, as determined by HR, or with an identified financial interest related to a university purchase or sponsored project must take state-based training and disclose to the Commonwealth of Virginia, in addition to their Virginia Tech disclosures.
* The principles of state law pertaining to standards of conduct and other provisions that apply to all employees (e.g., restrictions on receiving certain gifts) remain and should be clarified.
	+ Statement of Economic Interests filers have additional gift receipt considerations, which will be added to the Policy 13010 revision.
	+ On the advice of university legal counsel, detailed nuances of state law that do not tell the policy reader what they are required to do will be removed since the law provisions are subject to change at any time.
* The policy name was changed to “Conflicts of Interest”.

Other relationships that pose a conflict more broadly (e.g., faculty with students in their class who are family members) will be removed as they are fully covered in other university policies and are not requirements of Policy 13010’s informing state law or federal regulations. As recommended by the [policy pyramid](https://policies.vt.edu/assets/policiespyramidnew.pdf) developed by the Office of the Vice President for Policy and Governance, internal operating procedures will be removed. For example, "organizational conflicts of interest", an internal procedure addressing the perceived institutional advantage derived from the university’s employees advising federal agencies, will be removed from Policy 13010 and addressed in an Office of Sponsored Programs standard operating procedure.