

Having technical difficulties when trying to submit your disclosure?: If you are filling out a disclosure on Convercent and it won't save/submit, double-check any field that asks for a numeric answer, and **make sure that your answer does not include any characters other than numbers**. For example: 12000, NOT 12,000 or \$12,000.

Conflicts of Interest and Commitment

FAQs

1. What are conflicts of interest or commitment?

- A **conflict of interest** (COI) occurs when outside interests or relationships (financial, personal, or other) create a risk that professional judgment or actions regarding university interests will be unduly influenced by a secondary or personal interest.
- A **conflict of commitment** (COC) occurs when outside activities interfere with or compromise an individual's ability to meet university responsibilities or obligations, consistent with their employment or appointment.

2. How have outside activities and interests previously been reported at VCU?

- In decentralized systems or "buckets" throughout the university, including:
 - Faculty Outside Professional Activity (OPA) disclosures: this was previously done through CP-1 and CP-2 forms, which are being replaced by Convercent.
 - Virginia Statement of Economic Interest Annual Filers - A small group of employees at VCU who are identified as holding "positions of trust" (example: cabinet-level employees) submit an annual disclosure required by the Commonwealth of Virginia. This is not changing.
 - Annual Financial Interest Report in AIRS - Faculty who are designated as COI Investigators ([see policy here](#)) in the research enterprise at VCU submit annual reporting to disclose any potential conflicts of interest pertaining to their research projects and programs. This is not changing.

3. What will I be asked to do?

- Employees who are in Positions of Trust (POT) will respond to an annual questionnaire, sent via Convercent or VCU email, asking about potential conflicts in multiple risk areas.
- **For faculty only:** Use a link ([here](#)) to disclose outside activities and interests as they occur throughout the year.
- Continue to complete the annual Ethics & Compliance training, which will include material on understanding the COI&C policy.

4. What will I be asked to disclose?

- The annual questionnaire will include 7-10 categories, such as:
 - Outside Professional Activities

(Keep going, there are more questions answered on the next page!)

- Relationships Within Our Organization
- Personal Services (e.g.: if a student in your program babysits for you)
- Gifts or Services Donated
- Gifts or Services Received
- Outside Financial Interests (e.g.: if you own stock in a vendor company *with which VCU partners*)
- Potential Conflicts: Immediate Family (e.g.: if your daughter is the CEO of a vendor company *with which VCU partners*)
- You will **not** be asked to disclose personal information such as:
 - Charitable or Religious Donations
 - Political Activity or Donations
 - Membership in Community Organizations (ex: Little League or Condo Association)

5. Who will be reviewing my disclosures?

- This may vary by unit, but your disclosures will most likely primarily be reviewed by your supervisor. In complex cases or instances where a conflict of interest actually exists, your supervisor may get help from the dean, next level supervisor, or the Integrity and Compliance Office to review and mitigate the potential conflict.

6. Why am I being asked to disclose?

- **To protect you.** By allowing VCU to proactively review situations that could be conflicts of interest, we can advise you on how to mitigate potential risk to your professional reputation or goals. We can also help you avoid accidentally violating the Virginia State Code!
- **To be compliant.** As a public university, VCU employees in visible or leadership positions are expected by governing bodies, accrediting bodies, and the public, to disclose any potential conflicts of interest.
- **To protect VCU.** We want to maintain the public's trust in our decision making by avoiding any appearance of impropriety or dishonesty.

7. Are you saying that my outside professional activities are automatically conflicts of interest and commitment?

- In most cases, no! An outside activity, commitment, or relationship only becomes a conflict if it creates a risk that your professional judgment or actions will be compromised, or if it compromises your ability to meet your university responsibilities. Disclosing outside activities allows your supervisor to proactively review them to ensure no conflicts exist, and to manage any that do arise.

8. (Faculty) Do I need to disclose activities that are part of my professional expectations, such as scholarly writing or creative endeavors? 12

- In general, no. Please reference [OPA disclosure guidelines here](#), from the Office of the Provost. If you need more detailed and specific guidance, please contact the Office of the Provost.

9. Is there a policy about this?

- Yes! Please see the [Conflict of Interest and Commitment policy](#).
- The policy does not replace the Annual Financial Interest Report in AIRS; OVPRI will continue to administer the annual FIR for research-related disclosures.
- This policy does not replace the [State and Local Statement of Economic Interests \(SOEI\)](#), which is an annual filing required for a small group of employees at VCU.
- Excluded from the policy are dually-employed clinical faculty. They will disclose conflicts through the VCU Health System, which is also updating its COI&C policy and procedures.

10. What if I've already disclosed OPAs using the former tool? Do I need to disclose them again in Convercent?

- Please follow guidance from your dean or unit leadership about this. The two systems are unique and do not “speak” to one another; the OPA tool is managed through the Office of the Provost and will be shut down within the year. Disclosures made in the previous tool will not automatically be populated into Convercent. However, the important point is that you're disclosing somewhere; we recommend not duplicating efforts, and focusing on disclosing new and ongoing OPAs in Convercent moving forward, rather than retroactively entering old data again.

11. Are there any other resources or guides to help me understand and navigate this?

- Here is a visual guide to walk you through disclosing an outside activity or interest in Convercent.
- Here is a guide to walk you through filling out a questionnaire in Convercent.

12. What if I am a dual employee?

- If you are a dual-employee with both a VCU Health (@vcuhealth.org) and a VCU (@vcu.edu) email address, and your primary employment is with VCU Health, **you must log into the VCU Health Convercent system with your @vcuhealth.org email to complete your questionnaire** and any subsequent disclosure forms you need to submit. You DO NOT need to complete a disclosure for both VCU Health and VCU.