

Faculty Outside Professional Activity & Employment Guidelines and Procedures

The guidelines in this document apply to the outside professional activities of full-time faculty members during their period of contractual obligation to the university. Part-time (adjunct) faculty members have an obligation to deliver the full amount of time or effort committed by the terms of their appointment, and to ensure that their other activities and employment do not infringe on their university obligations or create conflicts of interest with the university; however, they are exempt from the specific procedures outlined in this document. These guidelines apply to activities external to VCU, which are considered distinct and separate from secondary assignments within the university.

Note that per the Conflict of Interest and Commitment Disclosure and Management Policy, faculty are permitted to engage in outside professional activities for up to one day (8 hours) per calendar week, on average, during their period of contractual obligation to the university. Exceptions to this limitation are at the sole discretion of the respective dean or unit head.

Responsibilities

Faculty members are responsible for:

- 1) Being aware of and complying with the Conflict of Interest and Commitment Disclosure and Management policy and other applicable university policies and procedures.
- 2) Accepting no professional service or outside consulting that presents a conflict with university responsibilities.
- 3) Disclosing and obtaining approval in advance of engaging in outside professional activities.
- 4) Indicating to outside parties that the faculty member is acting in the capacity of an independent professional and not a university representative when participating in outside consulting.

Department chairs/supervisors are responsible for:

- 1) Evaluating the extent to which outside activities complement or interfere with faculty members' performance or obligations to the university or create a potential conflict of interest and communicating that assessment to the faculty member in a timely manner.
- 2) Consulting with the Integrity and Compliance Office and/or the respective Senior Vice President's Office, as needed, when a faculty member raises a question of a potential conflict of interest regarding outside professional activity.
- 3) Reporting violations of the Conflict of Interest and Commitment Disclosure and Management policy to the appropriate dean/vice provost/vice president or president and initiating appropriate disciplinary actions.

Examples of outside activities requiring disclosure in advance

- Professional leadership activities requiring a significant or long-term commitment, such as holding national-level office in a professional organization, serving on a board of directors, editing a professional journal, running for public office, service to an external advisory group that is ongoing, etc.
- Professional employment outside VCU in a field of endeavor related to the individual's university duties, including non-VCU teaching and/or research appointments. Teaching and/or research at other academic institutions is discouraged and is generally only approved under rare circumstances.
- Compensated or uncompensated private consulting or independent practice/business, both short-term and recurring.
- Giving expert testimony in a court proceeding.
- Any other outside activity that could present a conflict of interest or commitment, per the terms of the Conflict of Interest and Commitment Disclosure and Management policy.

Examples of outside activities that generally do not require disclosure

- Scholarly or creative writing and other individual creative endeavors.
- Occasional uncompensated workshops or lectures in the faculty member's area of specialization.
- Outside employment, including self-employment, in fields of endeavor unrelated to the individual's university duties. Any such activity must occur only in time that is clearly off-duty from the university and must not in any way infringe on the faculty member's university responsibilities and duties.
- Short term service on an external advisory board that has no business relationship with VCU.
- Short term service on a peer review panel or participating in an accreditation visit at another university.

Clinical practice of medicine and dentistry

The clinical practice of medicine and dentistry by faculty members is typically only conducted under approved regulations in VCU hospitals, clinics, and centers. Income from such activity becomes part of the faculty member's annual compensation, in accordance with approved compensation plans for clinical faculty through MCV Associated Physicians and VCU Dental Care. Any outside practice of medicine is permitted only in rare circumstances and must be clearly stipulated in a faculty member's MCVP contract. The outside practice of dentistry may also be considered in rare circumstances and must be approved in writing by the Dean of the School of Dentistry.

Procedures for disclosure and approval

1. Faculty member discloses outside activity via [VCU's conflict of interest and commitment reporting tool](#).

2. Department chair or direct supervisor reviews the request, assessing the extent to which the outside activity complements or interferes with faculty development, performance, or obligations to the university and determines whether a potential conflict of interest is present. Most requests can be approved at the chair or supervisor level; however, some requests may be elevated for dean/unit head review depending upon the nature of the activity. (Refer to instructions and materials provided by the Integrity and Compliance Office, linked below) All requests must be fully approved before the service/work has commenced.
3. If the request involves use of university facilities, services, or other university personnel, additional approval is required by the Provost and Senior Vice President for Academic Affairs or the Senior Vice President for Health Sciences (for academic units) or the President (for administrative units) in consultation with the Senior Vice President for Finance. Review by the Senior Vice President for Finance is required in order to evaluate the impact of the private use of facilities that are supported by tax exempt funds.
4. If permission for a faculty member to engage in outside professional activity is denied, the faculty member may appeal the decision in writing with the administrative officer to whom the department chair or direct supervisor reports. An appeal must be made within 10 business days. The decision of the next level administrative officer will be final.

FAQ's

1. Are there instructions for using the reporting tool?

Yes - instructions and resources are located on [this webpage](#).

2. When should I disclose outside professional activity?

Disclosures should be submitted as soon as you are aware of the potential activity, and prior to commencing any work or service. Disclosures can be submitted at any time of the year. Additionally, all disclosures must be reported on an annual basis, even those that are continuing.

3. Do I need to disclose outside activity occurring during a period of time that is outside of my contractual obligation to the university?

The requirement to disclose outside professional activities typically applies to the contractual period of employment only (including the period of any secondary assignment contracts, such as summer teaching for 9/10-month faculty). However, if the activity may pose a conflict of interest to the university (i.e. 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), you must disclose at any time of the year, regardless of contract status.

4. Am I required to provide a final report of my activities at the end of the year?

Faculty are no longer required to submit a final activity report (previously entered on the "CP-2" form). However, it is expected that all approved outside activities will take place in accordance with the original disclosure and that activities will be adjusted as needed and submitted for reapproval if any modifications to the scope or duration of the outside activity occurs.

5. Do I need approval to hold a compensated part-time position outside VCU that is unrelated to my VCU work?

No. However, it is every employee's responsibility to ensure that other part-time work occurs only during time that is clearly off-duty from the university and it must be carefully limited so that it is compatible with the individual's professional status, creates no conflict of interest with the university, does not conflict with scheduled university duties, and does not in any way infringe on the full-time professional effort committed to the university.

6. What if I'm not sure whether a particular outside activity needs to be reported and approved?

Please consult with your department chair or direct supervisor for guidance. Chairs and supervisors may consult with their respective Senior VP's Office or the Office of Integrity and Compliance.