

## COIA QUICK GUIDE

The State and Local Government Conflict of Interests Act (“Act”), Virginia Code §2.2-3100, *et seq.*, is applicable to you as a University employee. The Act governs 1) contracts 2) transactions and 3) general prohibitions. The following is intended as general guidance. You need to be aware of potential conflicts and seek an exception, applicable to contracts and transactions only, **before** engaging in any prohibited conduct.

**Contracts and Transactions** Virginia Code §2.2-3105, *et seq.*, and §2.2-3111, *et. seq.*

Prohibited conduct for Contracts and Transactions generally requires that **you** have a **personal interest** in the contract or transaction (transaction is normally a vote you cast in a committee). **YOU** means you personally, your spouse, and dependents. **PERSONAL INTEREST** means salary or other compensation (or any legal consideration) exceeding \$10,000 per year, or ownership in a business exceeding 3% of its total equity.

You cannot have any contract with the University, **except for your contract of employment**, in which you have a personal interest unless a statutory exception applies. You cannot participate in any transaction with the University in which you have a personal interest without statutory public disclosures.

**General Prohibitions** Virginia Code §2.2-3103.

These prohibitions do not require a personal interest, and there are no exceptions. You **are prohibited** from accepting or soliciting money or anything of value, regardless of the amount, **for**:

- 1) Performing your official duties (salary and remuneration for actual expenses excepted).
- 2) Obtaining employment, appointment or promotion for any person with the University.
- 3) Obtaining a contract for any person or business.
- 4) Using confidential information.
- 5) Accepting any money, loan, gift favor, service or business or professional opportunity reasonably tending to influence you in the performance of your duties.
- 6) Accepting gifts from any person whose interests may be substantially affected by you, or from accepting gifts on such a frequent basis as to create an appearance of private gain.

**Statement of Economic Interests** Virginia Code §2.2-3117.

Some employees are required to annually file a Statement of Economic Interests with the Secretary of the Commonwealth. This is a public document. While the form is not a model of clarity, the general guidance is that when in doubt, disclose.

**WARNING: The Act has criminal and civil sanctions.** Virginia Code §2.2-3120, *et seq.*