

VIRGINIA COMMONWEALTH UNIVERSITY
School of Medicine
Guidelines and Procedures for Disclosure, Approval and Reporting of
Outside Professional Activities

Purpose

The purpose of this document is to provide specific guidance to School of Medicine full-time faculty in understanding and complying with the University's policy regarding outside professional activities and employment, research and continuing education.

Department Responsibilities

Each Department is expected to develop, implement and monitor departmentally-based guidelines, procedures and processes that comply with the School of Medicine Guidelines and Procedures for Disclosure, Approval and Reporting of Outside Professional Activities described in this document. Departmentally-developed guidelines and procedures for disclosure, approval and reporting of outside professional activities must be in writing and approved by the Dean, School of Medicine. Departmental guidelines and procedures must describe how the department will implement and monitor the outside professional activities of its faculty. Each Department Chair is expected to ensure that the guidelines and procedures for outside professional activity disclosure, approval and reporting are followed.

Outside Professional Activity

According to University policy, outside professional activity is defined as *“any service rendered by a faculty member to persons or organizations external to the university, without university sponsorship, for the purpose of advancing, applying, or transferring knowledge in a field of endeavor related to the faculty member's employment at the university.”*

VCU requires School of Medicine faculty who accept a full-time faculty appointment to commit their principal professional effort to the university. However, the School of Medicine recognizes that the overall quality of teaching, research and patient care is enhanced when faculty members utilize their professional knowledge and skills externally through outside professional leadership and consulting activities.

The School of Medicine encourages its faculty to engage in professional activities outside of their regular University duties and responsibilities when: 1) the activities contribute to individual growth, extend knowledge, or advance the mission of the university; and, 2) the activities do not interfere with a faculty member's university duties and responsibilities. In addition, outside professional activities are typically conducted off-

campus and do not use University facilities and resources in ways that interfere with its programs of education, scholarly activity, and health care.

With appropriate approvals, it is acceptable for faculty members to receive extra compensation for work that is outside their regular university responsibilities.

The clinical practice of medicine is not considered an outside professional activity as defined under the University's policy. All clinical practice of medicine by faculty members must be conducted under approved university regulations in VCU Health System hospitals, clinics, and centers except as otherwise approved by the Department Chair, Dean and Vice President for Health Sciences.

Outside professional activities encompass a broad array of activities that may be occasional (short-term) or recurring (long-term). Examples of outside professional activities include, but are not limited to, the following:

- Consulting or providing professional advice to external entities.
- Serving on nonprofit and for profit entity boards
- Speaking on behalf of pharmaceutical and medical device companies
- Giving expert testimony
- Giving occasional lectures at other institutions
- Presenting papers at professional meetings
- Participating in or conducting continuing education short courses, seminars, workshops directed toward specific professional or other groups
- Serving in offices or on committees of academic or professional societies or professionally-related civic and nonprofit organizations
- Participating in accreditation visits to other institutions
- Serving on governmental advisory committees or study sections
- Holding national level office in an academic society or professional organization
- Editing a professional journal

The distinction between activities considered an integral part of a faculty member's university responsibilities and those considered as "outside professional activities" can be confusing. For example, attending an international, national or regional professional society conference is not an outside activity. However, presenting a paper at a professional meeting or being invited to give a lecture as a visiting professor at another institution is considered an outside professional activity. A distinguishing characteristic of outside professional activities is that the University does not provide travel and/or other financial support to a faculty member when undertaking the activity. (Exception: Departments often pay travel expenses for faculty to present papers at professional meetings.)

Faculty should always consult with their Department Chair to determine if an activity falls under the University's Outside Professional Activities policy.

Required Disclosure, Approval and Reporting

Outside Professional Activities fall into two broad categories:

1. **Outside Professional Leadership Activities, and**
2. **Outside Professional Consulting Activities**

The required reporting, approval and disclosure procedures and guidelines are described below.

1. Outside Professional Leadership Activities – School of Medicine faculty may engage in various types of professional leadership activities without seeking prior permission from the Department Chair and Dean. These activities include, but are not limited to, presenting papers at professional meetings, being a speaker at an approved continuing medical education (CME) conference, serving on governmental advisory committees or study sections, being invited as a visiting professor at other institutions, and serving as an officer in a professional society or professionally-related nonprofit organization. Faculty should consult with their department chair to ensure that the activity will not interfere with teaching assignments, research productivity, clinical activities or other departmental, school, and university duties. If the professional leadership activities will require a significant time commitment, the faculty member should ensure that the Department Chair approves the outside activity. **No formal approval process is required for professional leadership activities.** However, School of Medicine faculty are required to report annually on all outside professional leadership activities using the web-based School of Medicine Outside Professional Activity reporting system.

2. Outside Professional Consulting Activities - School of Medicine faculty may be asked to serve as consultants or part-time employees in for-profit and non-for-profit organizations outside the university. These outside consulting activities may be short-term or on a recurring basis, and the faculty member is usually compensated for providing professional consulting advice. Examples of outside professional consulting activities include, but are not limited to, providing expert testimony, speaking on behalf of a pharmaceutical company or medical device manufacturer where the activity is not part of an approved CME program, and serving on the board of a biotechnology company.

Before undertaking any outside consulting activity, School of Medicine faculty must consult with their department chair to ensure that the activity will not interfere with teaching assignments, research productivity, clinical activities or other departmental, school, and university duties.

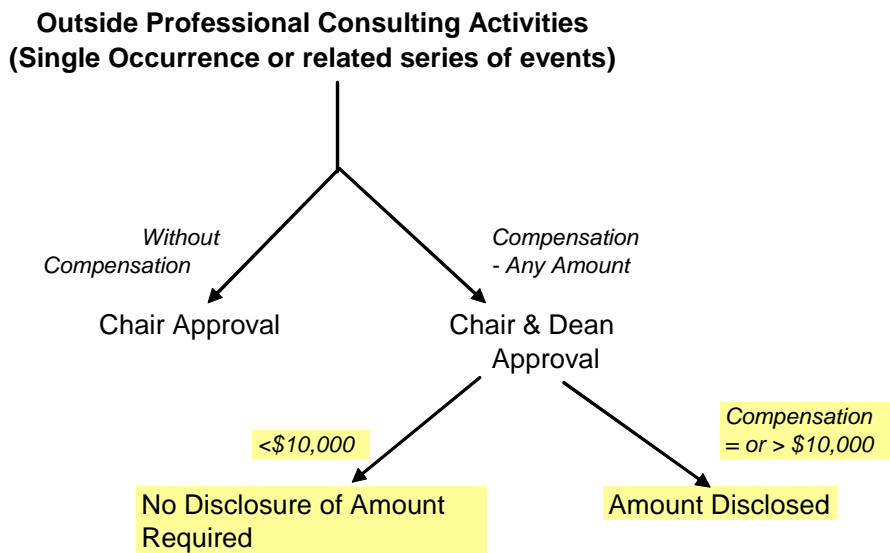
Faculty must also complete the School of Medicine Outside Professional Activity Request Form using the web-based reporting system prior to engaging in any outside consulting activity, one-time or recurring. Prior approval of all outside consulting activities is required regardless of whether the faculty member is to receive compensation for the activity. In all instances, the Department Chair or his/her designee must approve

the request prior to the faculty member undertaking an outside consulting activity. Consistent with University policy, faculty may also be required to complete a Conflict of Interest Form to disclose any potential conflict of interest and/or conflict of commitment.

If the faculty member receives no compensation for the outside activity, the faculty member must obtain written approval from the Department Chair prior to engaging in that activity. When the faculty member is compensated for an outside professional consulting activity, the faculty member must obtain written approval from the Department Chair and the Dean prior to engaging in the outside activity. When the amount of compensation is \$10,000 or greater for a single activity or a series of recurring activities, the faculty member must also disclose the amount of compensation to be received prior to engaging in the outside activity.

Compensation - Faculty may not always know the exact amount of compensation for an outside consulting activity prior to engaging in the activity. However, if a faculty member anticipates that the compensation will reach or exceed the \$10,000 threshold, the faculty member should provide a reasonable estimate. The exact amount of compensation must be disclosed in the faculty member's annual outside professional activities report.

The flowchart below describes the reporting and approval process for outside consulting activities.



Time Allowance for Outside Professional Activities - With appropriate approvals, a faculty member may commit no more than one day, on average, of his/her time per calendar (7-day) week to outside professional activities for which extra compensation is received. This time allowance applies to both outside professional leadership activities and outside professional consulting activities. Travel authorization forms are not required for outside professional activities, and travel authorization forms are not a substitute for reporting all outside professional activities.

Interpretation of Outside Professional Activities Guidelines and Procedures - The guidelines, procedures and definitions provided in this document cannot fully address every possible activity that might be considered an outside professional activity. Faculty should consult with their Department Chair on matters of guideline interpretation and application. Department Chairs should consult with the Dean's Office for additional guidance regarding the interpretation and application of the outside professional activities guidelines and procedures.

Liability and Risk Coverage - A faculty member assumes full liability for all outside professional activities which are not part of the faculty member's university teaching, research and service responsibilities. A faculty member will not be protected by the Commonwealth's liability insurance coverage administered through the State Division of Risk Management and may not use the services of the University's or VCU Health System's General Counsel. However, faculty engaging in outside professional activities are protected by the University's life insurance and health insurance coverage.

Required Annual Reporting of Outside Professional Activities – Full-time faculty are also required to report annually to the Department Chair and the Dean on all outside professional activities regardless of whether compensation is received. The annual report of outside professional activities should coincide with the contract period (July 1 – June 30). Annual reporting of Outside Professional Activities is facilitated through the School of Medicine web-based Outside Professional Activities reporting system. Faculty are required to disclose the amount of compensation received if the amount for a single occurrence or series of occurrences is \$10,000 or greater during the fiscal year.