



Regional Council COIA Policy

PURPOSE:

The purpose of this guidance is to assist Regional Council's wishing to adopt a policy in relation to the Conflict of Interest Act (COIA). Currently, Regional Council members are only subject to the online training required by the COIA Council and not subject to the State and Local Statement of Economic Interests filing. One goal of the Regional Councils is to encourage collaboration among localities, the education sector, and the private sector. With projects being brought forth at the regional level, along with Council representation at the regional level, there will be times when individuals may need to recuse themselves from reviewing or voting on a project to be submitted to the state Board. The proposed policy below outlines when such recusal would be appropriate.

MODEL POLICY:

The Conflict of Interest Act is set out to prevent situations in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity. Therefore, abstention from project reviews and approvals may only be appropriate if the member of the Regional Council was to derive a direct personal benefit, i.e. a Regional Council member's company is a partner in a project that would increase the company's revenue. However, local government representatives whose localities are partners would not need to recuse themselves since they would have no personal benefit from the project and are already subject to COIA in their official roles.

STATEMENT OF ECONOMIC INTERESTS:

Since it is not required by the COIA Council for Regional Council members to file the State and Local Statement of Economic Interests, the Department of Housing and Community Development (DHCD) does not advise that the Regions create their own statement of economic interest form. However, if a Regional Council feels strongly otherwise, DHCD would recommend it model its form based on the COIA Council's State and Local Statement of Economic Interests.

ONLINE TRAININGS

All members of the regional councils are required to take an approved COIA training at least one every two consecutive years they serve on the regional council. The first training should be within two months of their appointment to the regional council. Online training modules offered by the State Ethics Council can be found online here: <http://ethics.dls.virginia.gov/> by clicking on "State Employee and Officer Training Module".

Support organizations are responsible for ensuring that their regional council members stay in compliance with COIA trainings, and an up-to-date list of those that have taken the COIA training online can be requested from ethics@dls.virginia.gov.