

3. What has been the process for developing the draft policies?

The summary below lists the most significant procedural steps undertaken to date. Additional discussions, not reflected below, took place with the Faculty Executive Committee, Academic Affairs leadership, Cabinet, the College's legal counsel, and others.

4-23-10: IPPC approved charge to the Working Group.

Group originally included Professors Roy Rotheim and Denise Smith, Michael Thomas, Bill Tomlinson, and Barbara Krause (coordinator). Professor Sylvia Franke McDevitt replaced Denise Smith January 2012.

11-24-10: Draft forwarded to Cabinet (Acting President Susan Kress), FEC (Chair Reg Lilly), and SGA Executive Committee (SGA President Alexandra Stark) for consultation.

Spring 2011: Further policy development by Working Group.

3-29-11: Acting VPAA Muriel Poston distributed draft policy to Academic Staff and invited comment.

4-8-11: IPPC discussed draft policy – no substantive comments; suggestion to vet with Academic Staff.

5-6-11: Academic Staff discussed draft policy. Significant concerns raised.

5-25-11: CAFR letter expressing concerns regarding policy.

Academic year 11-12: Working Group met regularly to address concerns and revise policy.

Spring 2012: Informal consultations with CAFR Chair.

3-30-12: Draft dated 3-30-12 forwarded to President Glotzbach and Denise Smith as chair and vice chair of IPPC. Also sought advice on what student input would be appropriate.

4-9-12: Presentation of draft policy and related documents (drafts dated 3-30-12) to Cabinet; Cabinet supported presentation of draft documents to IPPC.

4-20-12: IPPC discussion. Comments focused on \$5,000 threshold for reporting salary or consulting fees (Conflict of Interest Policy and disclosure form).

Expected Fall 2012:

Working Group will submit final draft to IPPC.

Academic Affairs leadership and FEC to determine appropriate role for faculty.

Other steps to be determined by IPPC and Cabinet.

4. What are the various parts of the draft Standards of Business Conduct Policy?

The draft document consists of four parts:

- The Standards of Business Conduct Policy itself
- Attachment A: Conflicts of Interest Policy
- Attachment B: Conflicts of Commitment Policy
- Attachment C: Whistleblower Policy (NOTE: in light of external regulatory expectations, Cabinet approved the Whistleblower Policy on August 20, 2012; IPPC expressed its support for this action on September 7, 2012. The policy will be implemented as soon as the services of the external reporting service are in place.)

Once approved, each of the four policies will stand on its own, although the Standards of Business Conduct Policy will continue to include the other three as attachments.

5. Faculty members, in a presentation to Academic Staff in Spring 2011 and in correspondence from CAFR dated May 25, 2011, raised significant concerns about the draft policies. How have those concerns been addressed?

- a. **Faculty members required to sign an annual disclosure form:** The current draft significantly limits the number of faculty members who will be required to complete an annual disclosure form. The 4-27-11 draft required all faculty to complete an annual form; the current draft requires annual disclosure only by certain faculty who serve in administrative positions (including department chairs and program directors) and faculty members (and non-faculty personnel) who have a defined role with externally funded research.
- b. **Definition of**

