Chapter highlights

- **Purpose**: This chapter sets forth background information and policy that should be followed by agencies and institutions. Adherence to this policy will ensure compliance with statutory regulations, protect the trust established between procurement officials and citizens of the Commonwealth, and establish fair and equal treatment of all suppliers who are interested in doing business with the Commonwealth.

- Key points:
  - VITA is committed to developing procurement policies and maintaining procurement processes which are fair, ethical, non-biased and in strict compliance with the laws of the Commonwealth.
  - Procurement professionals have the responsibility to ensure that all information and documentation relative to the development of a solicitation or contractual document for a proposed procurement or anticipated contractual award remains confidential until successful completion of the procurement process.

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5.0 Introduction

VITA's Supply Chain Management (SCM) Division is responsible for establishing statewide contracts to meet agencies' needs for IT goods and services and for delegating procurement authority back to agencies, where appropriate. SCM is also responsible for developing policies, standards and guidelines for the procurement of information technology. Since information technology procurement involves the expenditure of significant tax dollars, a trust is created between procurement officials, suppliers and the citizens of the Commonwealth.

This chapter provides VITA's policy regarding behavior of procurement professionals and

suppliers and other project team members involved in the procurement of information technology. Section 2.2-2006 of the *Code of Virginia* defines "information technology" (IT) as "communications, telecommunications, automated data processing, applications, databases, data networks, the Internet, management information systems, and related information, equipment, goods, and services."

The *Code of Virginia* dictates a higher standard of conduct for procurement officials than for other public employees due to the extraordinary trust and responsibility exercised by public officials conducting procurement transactions, and because of the expectation by the public that this trust and responsibility be exercised properly. Procurement professionals and suppliers, as well as IT project team members involved in any IT procurement, must be cognizant of these laws which include the Virginia Public Procurement Act, the State and Local Government Conflict of Interests Act, and the Governmental Frauds Act. All personnel having official responsibility for procurement transactions should be familiar with Article 6, *Code of Virginia*, § 2.2-4367 *et seq.*, entitled "Ethics in Public Contracting."

VITA expects all procurement professionals and project team members involved in any IT procurement to maintain the public trust by conducting themselves with integrity and in a manner above reproach, with complete impartiality and without preferential treatment. All procurement professionals should avoid acts which are improper, illegal, or give the appearance of impropriety and shall pursue a course of conduct that does not raise any appearance of impropriety or suspicion among the public or potential Commonwealth suppliers.

5.1 Responsibilities of Commonwealth procurement professionals and project team members involved in an IT procurement

5.1.1 Confidentiality

Procurement professionals involved in an IT procurement have a duty to maintain certain information as confidential before and during the course of a solicitation. Procurement professionals have the responsibility to ensure that all information and documentation relative to the development of a solicitation or contractual document for a proposed procurement remains confidential until successful completion of the procurement process. All information and documentation relative to the development of a specification or requirements document will be deemed confidential in nature until award of a contract. A confidentiality statement required for signature by all project procurement team members is available in Appendix A.

5.1.2 Ethics

All Commonwealth procurement professionals are subject to § 2.2-4367 *et seq.* of the *Code of Virginia*: Ethics in Public Contracting and State and Local Government Conflict of Interests Act (§ 2.2-3100 *et seq.*), the Virginia Governmental Frauds Act (§ 18.2-498.1 *et seq*.) and Articles 2 (§ 18.2-438 *et seq.*) and 3 (§ 18.2-446 *et seq.*) of Chapter 10 of Title 18.2.

In addition to the *Code of Virginia*, VITA's procurement professionals and those acting on behalf of any VITA-delegated agency procurement shall:

- Abide by the National Institute of Governmental Purchasing, Inc. (NIGP) Code of Ethics.
- Exhibit the highest ideals of honor and integrity in all public and personal relationships in

order to merit the respect and inspire the confidence of the Commonwealth's agencies and suppliers and the citizens being served.

- Provide and foster a procurement environment where all business concerns, large businesses or DSBSD certified small businesses and small businesses owned by women- minorities and service-disabled veterans (SWaM) businesses, or micro businesses certified small, women-owned, minority-owned, service-disabled veteran-owned businesses, or micro businesses are afforded an equal opportunity to compete for the Commonwealth's business.
- Avoid the intent and appearance of unethical or compromising practices in actions, relationships and communications, while also avoiding the appearance of impropriety or any action which might reasonably result in the perception of impropriety.
- Conduct all procurement activities on behalf of the Commonwealth in accordance with the laws of the Commonwealth, obeying all relevant laws and remaining alert to any and all legal ramifications of procurement decisions.
- Refrain from any private or professional activity that would create a conflict between personal interests and the interests of the Commonwealth as defined in § 2.2-3106 and § 2.2-4367 *et seq.* of the *Code of Virginia*, avoiding any appearance of a conflict and continually evaluating their outside interests which have the potential of being at variance with the best interests of the Commonwealth.
- Promote positive supplier relationships through professionalism, responsiveness, impartiality and objectivity in all phases of the procurement cycle.
- Enhance the proficiency and stature of the Commonwealth's purchasing community by adhering to the highest standards of ethical and professional behavior.
- Ensure all procurement project team members are aware of this policy and sign any required confidentiality and conflict of interest documents for the procurement file.

VITA procurement professionals and those acting on behalf of any VITA-delegated agency procurement shall not:

- Engage in outside business or employment by any outside company that might encroach upon their primary responsibilities as a procurement officer of the Commonwealth;
- Engage in any private or business relationship or activity that could result in a conflict of interest or could reasonably be perceived as a conflict of interest;
- Engage in business with, or employment by a company that is a supplier to the Commonwealth;
- Lend money to or borrow money from any Commonwealth supplier;
- Maintain a significant interest in a firm that does business with VITA;
- Provide inside information to prospective bidders;
- Accept trips, lodging, meals, or gifts from suppliers;
- Accept meals, beverages, tickets to entertainment and/or sporting events or any other item which could be construed as having more than nominal value. (An officer/employee could accept food/refreshments of relatively low value provided during the course of a meeting sponsored by a supplier.)

5.1.3 Collusion awareness

As procurement watchdogs and citizens of the Commonwealth, procurement professionals have a duty to prevent and report collusion between suppliers competing for the Commonwealth's business. The purpose of the antitrust laws is to promote the free market system in the economy of this Commonwealth by prohibiting restraints of trade and

monopolistic practices that decrease competition. The following could be construed as collusive activity or suspected antitrust violations:

- Any agreement or mutual understanding among competing firms that restrains the natural operation among market forces is suspect;
- Existence of an "industry price list" or "price agreement" to which suppliers refer in formulating their offers;
- Sudden change from competitive bidding to identical bidding;
- Simultaneous price increases or follow-the-leader pricing;
- Rotation of bids or proposals so that each offeror takes a turn as the low bidder;
- Division of the market so that certain competitors bid low only for contracts led by certain agencies or for contracts in certain areas or on certain products;
- Establishment by competitors of collusive price estimating systems;
- Incidents suggesting direct collusion. (Assertion by employees of a supplier, etc., that an agreement to restrain trade exists.);
- Identical bids that appear to be the result of collusion.

Practices that eliminate or restrict competition usually lead to excessive prices and may warrant criminal, civil, or administrative action by the Commonwealth against the supplier. Procurement personnel are an important source of investigating leads and recognizing possible antitrust or collusion violations. As a result, procurement personnel should therefore be sensitive to indications of unlawful behavior by suppliers, supplier's contractors, and other procurement, technical, or administrative personnel. Suspected antitrust or collusive activities shall be reported to the Office of the Attorney General, or to the agency's attorney advisor including any bids or proposals that show evidence or suspicion that an antitrust law violation has occurred. (See *Code of Virginia*, §§ 59.1-9.1 through 59.1-9.8 and §§ 59.1-68.6 through 59.1-68.8).

NON-COLLUSION REQUIREMENT: Neither supplier nor any member, representative or employee of the supplier's organization shall enter into any combination, collusion or agreement with any person relative to any price to be bid. They shall not prevent any person from bidding nor induce anyone to refrain from biding. Bids shall be made without reference to any other bid and without any agreement, understanding or combination that would serve to restrict competition.

5.2 Expectations of VITA's suppliers

VITA expects its IT suppliers to deal with public officials in a manner that upholds the expectations of the public and reassures their confidence in the public procurement process. To that end, VITA expects suppliers to:

- Avoid all situations where propriety or financial interests, or the opportunity for financial gain, could lead to favored treatment for any organization or individual;
- Avoid circumstances and conduct that might not constitute actual wrongdoing, or a conflict of interest, but might nevertheless create the appearance of impropriety, thus compromising the integrity of VITA and the Commonwealth;
- Avoid offering or providing any interest, financial or otherwise, direct or indirect, in the business of the supplier or professional activity in which the supplier is involved with the officer or employee;
- Avoid causing or influencing, or attempting to cause or influence any Commonwealth

officer or employee in his or her official capacity in any manner which might tend to impair the objectivity or independence of judgment of that officer or employee;

- Avoid offering any Commonwealth/VITA official or employee any gift, favor, service or other item of value under circumstances from which it might be reasonably inferred that such, gift, service or other item of value was given for the purpose of influencing the recipient in the discharge of his or her official duties;
- Accept responsibility for representations made on behalf of their company by employees or agents;
- Provide accurate and understandable pricing, schedules and terms and conditions;
- Treat competitors and employees of the Commonwealth with respect and professionalism, refraining from making any disparaging comments or accusations;
- Refrain from providing misleading information or unfavorable implications about a competitor's products or services.

5.3 Additional statutory prohibitions regarding contributions and gifts

Legislative actions from the 2015 General Assembly session resulted in additional statutory restrictions prescribed in the *Code of Virginia* that affect the procurement ethics and actions of public employees and private entities (suppliers) alike. In addition, the Appropriations Act contains language that directly addresses the solicitation and acceptance of gifts, grants and contracts by an agency at any time.

It is important to remember that § 2.2-3101 of the *Code of Virginia* defines "gift" very broadly:

"Gift" means any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value. It includes services as well as gifts of transportation, local travel, lodgings and meals, whether provided in-kind, by purchase of a ticket, payment in advance or reimbursement after the expense has been incurred.

"Gift" shall not include:

1. Any offer of a ticket or other admission or pass unless the ticket, admission, or pass is used.
2. Honorary degrees.
3. Any athletic, merit, or need-based scholarship or any other financial aid awarded by a public or private school, institution of higher education, or other educational program pursuant to such school, institution, or program's financial aid standards and procedures applicable to the general public.
4. A campaign contribution properly received and reported pursuant to Chapter 9.3 (§ 24.2-945 *et seq.*) of Title 24.2.
5. Any gift related to the private profession or occupation of an officer or employee or of a member of his immediate family.
6. Food or beverages consumed while attending an event at which the filer is performing official duties related to his public service.
7. Food and beverages received at or registration or attendance fees waived for any event at which the filer is a featured speaker, presenter, or lecturer.
8. Unsolicited awards of appreciation or recognition in the form of a plaque, trophy, wall memento, or similar item that is given in recognition of public, civic, charitable, or professional service.
9. A devise or inheritance.

10. Travel disclosed pursuant to the Campaign Finance Disclosure Act (§ 24.2-945 *et seq.*)
11. Travel paid for or provided by the government of the United States, any of its territories, or any state or any political subdivision of such state.
12. Travel provided to facilitate attendance by a legislator at a regular or special session of the General Assembly, a meeting of a legislative committee or commission, or a national conference where attendance is approved by the House or Senate Committee on Rules.
13. Travel related to an official meeting of the Commonwealth, its political subdivisions, or any board, commission, authority, or other entity, or any charitable organization established pursuant to § 501(c)(3) of the Internal Revenue Code affiliated with such entity, to which such person has been appointed or elected or is a member by virtue of his office or employment.
14. Presents from relatives. For the purpose of this definition, "relative" means the donee's spouse, child, uncle, aunt, niece, or nephew, or first cousin; a person to whom the donee is engaged to be married; the donee's or his spouse's parent, grandparent, grandchild, brother, or sister, *step-parent, step-grandparent, step-grandchild, step-brother, or step-sister*; or the donee's brother's or sister's spouse.

The Appropriations Act addresses the solicitation and acceptance of donations, gifts, grants and contracts by state agencies:

§ 4-2.01 (a) Nongeneral Fund Revenues of the Appropriations Act contains the following language:

§ 4-2.01 NONGENERAL FUND REVENUES

a. SOLICITATION AND ACCEPTANCE OF DONATIONS, GIFTS, GRANTS, AND CONTRACTS:

1. No state agency shall solicit or accept any donation, gift, grant, or contract without the written approval of the Governor except under written guidelines issued by the Governor which provide for the solicitation and acceptance of nongeneral funds, except that donations or gifts to the Virginia War Memorial Foundation that are small in size and number and valued at less than $5,000, such as library items or small display items, may be approved by the Executive Director of the Virginia War Memorial in consultation with the Secretary of Veterans Affairs and Homeland Security. All other gifts and donations to the Virginia War Memorial Foundation must receive written approval from the Secretary of Veterans Affairs and Homeland Security.

2. The Governor may issue policies in writing for procedures which allow state agencies to solicit and accept nonmonetary donations, gifts, grants, or contracts except that donations, gifts and grants of real property shall be subject to § 4-4.00 of this act and § 2.2-1149, *Code of Virginia*. This provision shall apply to donations, gifts and grants of real property to endowment funds of institutions of higher education, when such endowment funds are held by the institution in its own name and not by a separately incorporated foundation or corporation.

3. The preceding subdivisions shall not apply to property and equipment acquired and used by a state agency or institution through a lease purchase agreement and subsequently donated to the state agency or institution during or at the expiration of the lease purchase

agreement, provided that the lessor is the Virginia College Building Authority.

4. The use of endowment funds for property, plant or equipment for state-owned facilities is subject to § 4-2.03 Indirect Costs, § 4-4.01 Capital Projects-General and § 4-5.03 Services and Clients of this act.

5.3.1 Contributions and gifts prohibited during PPEA or PPTA approval process

This prohibited conduct affects all procurements, bids and proposals under the Virginia Public Procurement Act, Public-Private Transportation Act, or the Public-Private Education Facilities and Infrastructure Act. These are provided below by direct quote or summary.

"§ 2.2-3104.01. Prohibited conduct; bids or proposals under the Virginia Public Procurement Act, Public-Private Transportation Act, and Public-Private Education Facilities and Infrastructure Act.

A. Neither the Governor, his political action committee, or the Governor's Secretaries, if the Secretary is responsible to the Governor for an executive branch agency with jurisdiction over the matters at issue, shall knowingly solicit or accept a contribution, gift, or other item with a value greater than $50 from any bidder, offeror, or private entity, or from an officer or director of such bidder, offeror, or private entity, who has submitted a bid or proposal to an executive branch agency that is directly responsible to the Governor pursuant to the Virginia Public Procurement Act (§ 2.2-4300 et seq.), the Public-Private Transportation Act of 1995 (§ 33.2-1800 *et seq.*), or the Public-Private Education Facilities and Infrastructure Act of 2002 (§ 56-575.1 *et seq.*) (i) during the period between the submission of the bid and the award of the public contract under the Virginia Public Procurement Act or (ii) following the submission of a proposal under the Public-Private Transportation Act of 1995 or the Public-Private Education Facilities and Infrastructure Act of 2002 until the execution of a comprehensive agreement thereunder.

B. The provisions of this section shall apply only for public contracts, proposals, or comprehensive agreements where the stated or expected value of the contract is $5 million or more. The provisions of this section shall not apply to contracts awarded as the result of competitive sealed bidding as set forth in § 2.2-4302.1.

C. Any person who knowingly violates this section shall be subject to a civil penalty of $500 or up to two times the amount of the contribution or gift, whichever is greater, and the contribution, gift, or other item shall be returned to the donor. The attorney for the Commonwealth shall initiate civil proceedings to enforce the civil penalties. Any civil penalties collected shall be payable to the State Treasurer for deposit to the general fund and shall be used exclusively to fund the Council.

§ 56-575.17:1. Contributions and gifts; prohibition during approval process.

A. No private entity that has submitted a bid or proposal to a public entity *that is an executive branch agency directly responsible to the Governor* and is seeking to develop or operate a qualifying project pursuant to this chapter, and no individual who is an officer or director of such a private entity, shall knowingly provide a contribution, gift, or other item with a value greater than $50 or make an express or implied promise to make such a

contribution or gift to the Governor, his political action committee, or the Governor's Secretaries, if the Secretary is responsible to the Governor for an *executive branch* agency with jurisdiction over the matters at issue, following the submission of a proposal under this chapter until the execution of a comprehensive agreement thereunder. The provisions of this section shall apply only for any proposal or an interim or comprehensive agreement where the stated or expected value of the contract is $5 million or more.

B. Any person who *knowingly* violates this section shall be subject to a civil penalty of $500 or up to two times the amount of the contribution or gift, whichever is greater. The attorney for the Commonwealth shall initiate civil proceedings to enforce the civil penalties. Any civil penalties collected shall be payable to the State Treasurer for deposit to the general fund."

§ 2.2-3103.1. Certain gifts prohibited.

A. For purposes of this section:

"Person, organization, or business" includes individuals who are officers, directors, or owners of or who have a controlling ownership interest in such organization or business. "Widely attended event" means an event at which at least 25 persons have been invited to attend or there is a reasonable expectation that at least 25 persons will attend the event and the event is open to individuals:

1. Who are members of a public, civic, charitable, or professional organization.
2. Who are from a particular industry or profession.
3. Who represent persons interested in a particular issue.

B. No officer or employee of a local governmental or advisory agency or candidate required to file the disclosure form prescribed in § 2.2-3117 or a member of his immediate family shall solicit, accept, or receive any single gift with a value in excess of $100 or any combination of gifts with an aggregate value in excess of $100 within any calendar year for himself or a member of his immediate family from any person that he or a member of his immediate family knows or has reason to know is:

1. A lobbyist registered pursuant to Article 3 (§ 2.2-418 *et seq.*) of Chapter 4
2. A lobbyist's principal as defined in § 2.2-419
3. A person, organization, or business who is or is seeking to become a party to a contract with the local agency of which he is an officer or an employee.

Gifts with a value of less than $20 are not subject to aggregation for purposes of this prohibition.

C. No officer or employee of a state governmental or advisory agency or candidate required to file the disclosure form prescribed in § 2.2-3117 or a member of his immediate family shall solicit, accept, or receive any single gift with a value in excess of $100 or any combination of gifts with an aggregate value in excess of $100 within any calendar year for himself or a member of his immediate family from any person that he or a member of his immediate family knows or has reason to know is:

1. a lobbyist registered pursuant to Article 3 (§ 2.2-418 et seq.) of Chapter 4
2. a lobbyist's principal as defined in § 2.2-419

3. a person, organization, or business who is or is seeking to become a party to a contract with the state governmental or advisory agency of which he is an officer or an employee or over which he has the authority to direct such agency's activities.

Gifts with a value of less than $20 are not subject to aggregation for purposes of this prohibition.

D. Notwithstanding the provisions of subsections B and C, such officer, employee, or candidate or a member of his immediate family may accept or receive a gift of food and beverages, entertainment, or the cost of admission with a value in excess of $100 when such gift is accepted or received while in attendance at a widely attended event and is associated with the event. Such gifts shall be reported on the disclosure form prescribed in § 2.2-3117.

E. Notwithstanding the provisions of subsections B and C, such officer or employee or a member of his immediate family may accept or receive a gift from a foreign dignitary with a value exceeding $100 for which the fair market value or a gift of greater or equal value has not been provided or exchanged. Such gift shall be accepted on behalf of the Commonwealth or a locality and archived in accordance with guidelines established by the Library of Virginia. Such gift shall be disclosed as having been accepted on behalf of the Commonwealth or a locality, but the value of such gift shall not be required to be disclosed.

F. Notwithstanding the provisions of subsections B and C, such officer, employee, or candidate or a member of his immediate family may accept or receive certain gifts with a value in excess of $100 from a person listed in subsection B or C if such gift was provided to such officer, employee, or candidate or a member of his immediate family on the basis of a personal friendship. Notwithstanding any other provision of law, a person listed in subsection B or C may be a personal friend of such officer, employee, or candidate or his immediate family for purposes of this subsection. In determining whether a person listed in subsection B or C is a personal friend, the following factors shall be considered:

1. The circumstances under which the gift was offered
2. The history of the relationship between the person and the donor, including the nature and length of the friendship and any previous exchange of gifts between them
3. To the extent known to the person, whether the donor personally paid for the gift or sought a tax deduction or business reimbursement for the gift.
4. Whether the donor has given the same or similar gifts to other persons required to file the disclosure form prescribed in § 2.2-3117 or 30-111.

G. Notwithstanding the provisions of subsections B and C, such officer, employee, or candidate or a member of his immediate family may accept or receive gifts of travel, including travel-related transportation, lodging, hospitality, food or beverages, or other thing of value, with a value in excess of $100 that is paid for or provided by a person listed in subsection B or C when the officer, employee, or candidate has submitted a request for approval of such travel to the Council and has received the approval of the Council pursuant to § 30-356.1. Such gifts shall be reported on the disclosure form prescribed in § 2.2-3117.

H. During the pendency of a civil action in any state or federal court to which the

Commonwealth is a party, the Governor or the Attorney General or any employee of the Governor or the Attorney General who is subject to the provisions of this chapter shall not solicit, accept, or receive any gift from any person that he knows or has reason to know is a person, organization, or business that is a party to such civil action. A person, organization, or business that is a party to such civil action shall not knowingly give any gift to the Governor or the Attorney General or any of their employees who are subject to the provisions of this chapter.

I. The $100 limitation imposed in accordance with this section shall be adjusted by the Council every five years, as of January 1 of that year, in an amount equal to the annual increases for that five-year period in the United States Average Consumer Price Index for all items, all urban consumers (CPI-U), as published by the Bureau of Labor Statistics of the U.S. Department of Labor, rounded to the nearest whole dollar.

J. The provisions of this section shall not apply to any justice of the Supreme Court of Virginia, judge of the Court of Appeals of Virginia, judge of any circuit court, or judge or substitute judge of any district court. However, nothing in this subsection shall be construed to authorize the acceptance of any gift if such acceptance would constitute a violation of the Canons of Judicial Conduct for the State of Virginia.

5.3.2 Return of gifts during procurement process

§ 2.2-3103.2 of the *Code of Virginia* states:

"No person shall be in violation of any provision of this chapter prohibiting the acceptance of a gift if:

1. The gift is not used by such person and the gift or its equivalent in money is returned to the donor or delivered to a charitable organization within a reasonable period of time upon the discovery of the value of the gift and is not claimed as a charitable contribution for federal income tax purposes.
2. Consideration is given by the donee to the donor for the value of the gift within a reasonable period of time upon the discovery of the value of the gift provided that such consideration reduces the value of the gift to an amount not in excess of $100 as provided in subsection B or C of § 2.2-3103.1."

5.3.3 Contributions and gifts prohibited during procurement process

§ 2.2-4376.1. of the *Code of Virginia* states:

A. "No bidder or offeror who has submitted a bid or proposal to an executive branch agency that is directly responsible to the Governor for the award of a public contract pursuant to this chapter, and no individual who is an officer or director of such a bidder or offeror, shall knowingly provide a contribution, gift, or other item with a value greater than $50 or make an express or implied promise to make such a contribution or gift to the Governor, his political action committee, or the Governor's Secretaries, if the Secretary is responsible to the Governor for an executive branch agency with jurisdiction over the matters at issue, during the period between the submission of the bid and the award of the public contract under this chapter. The provisions of this section shall apply only for public contracts where the stated or expected value of the contract is $5 million or more. The provisions of this section shall not apply to contracts awarded as the result of competitive sealed bidding."

Any supplier or person who knowingly violates this requirement is subject to a civil penalty of $500 or up to two times the amount of the contribution or gift, whichever is greater. Civil proceedings for any violation will be initiated by the Commonwealth's attorney. A person who willfully violates this and is convicted will be guilty of a Class 1 misdemeanor. A convicted public employee will have to forfeit his or her employment with the Commonwealth and is subject to other fines or penalties provided by law.

Appendix A
Procurement Project/Evaluation Team Confidentiality and Conflict of Interest Statement

A current version of this form may be located under the Forms section of this VITA SCM website: https://vita.virginia.gov/supply-chain/scm-policies-forms/