

# AMERICAN HISTORICAL ASSOCIATION

Organized 1884

Incorporated by the Congress 1889

December 10, 2014

The Honorable Terry McAuliffe  
Office of the Governor  
Patrick Henry Building, 3<sup>rd</sup> Floor  
1111 East Broad Street  
Richmond, VA 23219

Dear Governor McAuliffe,

The American Historical Association has learned that a policy recently adopted in Virginia requires certain scholars at public universities to complete and make public minutely detailed statements of economic interest, both personal and familial. While we recognize the imperative of transparency of interest among state employees who participate in procurement, auditing, and investment, we also note with alarm the inappropriate application of detailed financial disclosure requirements to individuals who control small budgets with little discretionary spending.

The principle of disclosure on the part of public servants serves the common good. But this new requirement imposes an undue and unnecessary burden on university employees who chair academic departments or direct programs. Individuals in such positions oversee a very limited amount of procurement, and that procurement is already bound by strict university- or college-wide rules about vendor choice, authority over which is nearly always lodged elsewhere in the institution. They have little discretion over the kinds of decisions that might generate practices that the new requirements are designed to prevent. The reporting policy initiated by the Commonwealth is an important tool to prevent corrupt influence on the part of those with independent budgetary and policy-making authority. But academic chairs and directors do not fall into that category. The new requirements are sufficiently intrusive and onerous that their main impact will be to discourage faculty from serving their institutions in administrative capacities.

In academic institutions across the country, faculty members are already required – and rightly – to advise our universities regarding conflicts of interest. In many instances we may use our own books in the classroom only after prior disclosure and official permission. Any interests we, or our family members, have in companies associated with our research must be disclosed annually. We undergo training and re-training in these matters and other ethical issues on a regular basis. All of this is as it should be. In their capacity as faculty members, chairs and directors of departments and programs are already, then, expected to disclose pertinent information about their scholarly activities and conflicts of interest. Hence there can be no legitimate reason to extend the disclosure required of a group who wield such limited financial power and authority, or to expose their private and family lives to public view.

We are not in any way questioning the principle of disclosure, but we respectfully submit that to extend an intrusive disclosure requirement to a group whose financial authority is wholly constrained by

university- or college-wide rules imposes an unnecessary burden on both the individuals who will spend hours filling out the forms and those who are responsible for reading them. We urge you to use your executive authority to reconsider the extension to this particular group of an otherwise important course of action to whom your policy cannot reasonably be said to apply.

Sincerely,



Jan E. Goldstein  
President



Philippa Levine  
Vice President, Professional Division