Ethics and Conflicts of Interest

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Current as of: 11/15/2026

ANNOUNCEMENT: THE STATE ETHICS COMMISSION IS OFFERING MUNICIPAL SERVICES AS OF 09/28/2026

For assistance call 802-828-7187 or email ethicscommission@vermont.gov. For more information refer to the Vermont State Ethics Commission(opens in a new tab) website.

Act 171

Act 171 became law on June 10, 2024 and drastically changes the ethical regulatory landscape for municipalities. It removes municipal authority to enact conflict of interest prohibitions tailored to address the specific needs, concerns, size, and values of their municipalities and replaces that authority with a new, top-down, one size fits all, statewide Municipal Code of Ethics.

All provisions of Act 171 took effect on January 1, 2025, with two exceptions:

1. The repeal of existing municipal ethics statutes (24 V.S.A. §§ 1984 and 2291(20)) took effect upon passage June 10, 2024.
2. New ethics training requirements took effect on September 30, 2025

New Contact for Guidance and Advisory Opinions: Vermont State Ethics Commission

Since the legislature gave the State Ethics Commission the authority to provide guidance and advice (including advisory opinions) to municipalities, we are directing all municipal officers to contact the States Ethics Commission regarding any ethics questions they may have.

Guidance

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Municipal officers subject to the statewide Municipal Code of Ethics may request ethics guidance from the Executive Director as it relates to that person's duties. Guidance is non-binding and confidential unless the recipient chooses to disclose it. 3 V.S.A. § 1225(a). The State Ethics Commission can be reached at 802-828-7187 or ethicscommission@vermont.gov(opens in a new tab).

Advisory Opinions

Municipal officers subject to the statewide Code of Ethics may request an advisory opinion from the Executive Director regarding the requester's ongoing or prospective conduct.

Advisory opinions are in writing, do not contain any individual's personally identifying information, and are posted on the Commission's website within 30 days of issuance. In preparing an advisory opinion, the Executive Director may seek comment from parties interested in the subject under consideration. To request an advisory opinion, complete the request form on the State Ethics Commission's website (see upper left) and return it to ethicscommission@vermont.gov(opens in a new tab).

New Municipal Ethics Requirements

Please review the following new ethics requirements carefully and direct questions and comments to the Vermont State Ethics Commission.

Municipal Ethics Code Posting

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Municipalities must post the **Municipal Code of Ethics** on their websites or make such information available upon request if the municipality has no website. The posting must include the following:

1. A copy of the Municipal Code of Ethics. You can find Word and PDF versions of the Municipal Code of Ethics for download on the State of Vermont's Ethics Commission's Municipal Ethics (upper left)
2. Procedures adopted by the municipality for the investigation and enforcement of complaints that allege a municipal officer has violated the Municipal Code of Ethics
3. Any supplemental or additional ordinances, rules, and personnel policies regarding ethics adopted by a municipality.

Municipal Whistleblower Protection Required Posting

Every agency, department, and office of a municipality must post and display notices of protected employee whistleblower protection in a prominent and accessible location in the workplace. VLCT has developed a Whistleblower Protection Posting(opens in a new tab) (also posted below) that municipalities may use to comply with this requirement.

Staff & Officer Designees

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Required designees:

1. Each municipality's legislative body (e.g. selectboard, city council, village trustees, etc.) must designate either an employee or one of its own members to serve as its ethics liaison to the State Ethics Commission (within 30 days of January 1, 2025) and notify the Commission in writing within 30 days of any newly designated liaison.
2. Assign a municipal officer or body (i.e. "Designated Complaint Recipient") to receive complaints alleging violations of the Municipal Code of Ethics.

Training Requirements: Municipal Officers and Board Members

Initial ethics training requirement:

- Required specified officers* to complete State Ethics Commission approved ethics training on or before September 30, 2025.
- Requires new officers* to complete State Ethics Commission approved ethics training within 120 days of their election or appointment.
- The State Ethics Commission has posted an online training ethics video to satisfy the training requirement on its website: https://ethicscommission.vermont.gov/training.

Continuing ethics training requirements:

Requires all specified officers below to retake training **every three years** after

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their initial training.

List of Officers Required to Take Training:

- Chief Administrative Officers
- Town or City Managers
- Mayors
- Legislative bodies (all members)
- Quasi-judicial body members (Boards of Civil Authority, Boards of Abatement, Development Review Boards, etc.).

Records & Retention

Municipalities must:

- Record and retain complaints received, and the disposition of each complaint made against a municipal officer for the duration of their service (plus a minimum of five years after service has ended).
- Promptly provide the State Ethics Commission with a summary of complaints received and the outcome of each upon request, excluding any personally identifiable information (PII).
- Create and maintain records of municipal officers who have taken ethics training.

Sample Complaint and Training Tracking Forms

Municipalities may use the following resources as reference or templates for their own tracking forms.

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- State Ethics Commission sample complaint(opens in a new tab) and training tracking sheets(opens in a new tab) are available on the Ethics Commission website.
- VLCT Model Ethics Complaint created a form for use by municipalities to assist with processing and retaining complaints.

Create Investigation & Enforcement Process

Requires every municipality to create processes for investigation and enforcement of alleged violations by ordinance, personnel policy, or rule. VLCT MAC has developed a model ethics ordinance to assist municipalities in creating this process (below).

Additional Highlights of Act 171

Ethics Commission Authority & Whistleblower Protections

- Authorizes the Executive Director of the State Ethics Commission to provide advisory opinions and guidance, upon written request, to municipal officers related to governmental ethics.
- Requires the Executive Director of the State Ethics Commission to refer any ethics complaints received about municipal officers to the municipality's designated ethics liaison for investigation and enforcement by the municipality.
- Creates a new whistleblower protection for municipal employees that is nearly identical to that which protects state employees. See VLCT's sample

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Whistleblower Protection Posting.

Notes on Conflicts in Municipal Purchasing & Contracting

- Federal regulations require that real or apparent conflicts of interest which may arise in the context of municipal purchases and contracting are addressed.
- If the municipality does not already have a separate conflict of interest policy, it should be addressed in the body of a purchasing policy. See the VLCT Model Purchasing Policy (below).

Scroll down to see and access these and other VLCT resources. Links to other resources are also available in the upper left-hand corner of this page.

Disclaimer: This resource was created by Municipal Assistance Center attorneys but it is only intended to provide information and it does **NOT** constitute legal advice. Readers with specific legal questions are encouraged to contact an attorney. The use or downloading of this resource does **NOT** create an attorney-client relationship and will not be treated in a confidential manner.

If you have additional questions about this resource, please contact a MAC attorney by using the Ask a Question button to submit them.

Ask a Question(opens in a new tab)



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