

THE CALIFORNIA STATE UNIVERSITY
Office of the Chancellor
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Date: February 23, 2005

Code: HR 2005-09

To: CSU Presidents

From: Jackie R. McClain
Vice Chancellor
Human Resources



Subject: 2005 Conflict of Interest Annual Filing

The Political Reform Act, Government Code Sections 81000, et seq., requires California State University (CSU), as an agency, to adopt and promulgate conflict of interest (COI) codes. The CSU's COI code requires employees in designated positions to file a Statement of Economic Interests (Form 700) on an annual basis. This memorandum serves as a reminder that employees in designated positions on your campus must file Statements by April 1, 2005.

I. Code Update

The Fair Political Practices Commission (FPPC) approved the CSU's COI Code amendment adopted by the Trustees at the July 2004 Board meeting. As discussed in HR 2005-08, individuals in newly designated positions must file an "initial" statement within 30 days after approval (March 25, 2005).

II. Annual Filing Reminder

Conflict of Interest filing is a campus responsibility. Your campus Conflict of Interest Filing Officer should distribute Form 700 ("Statement of Economic Interests") to employees in designated positions as soon as possible. These employees must submit completed forms to the campus Filing Officer by April 1, 2005. Please note: employees in newly designated positions who completed an initial filing statement pursuant to HR 2005-08 are not required to complete an annual form until next year. *As a reminder, the Chancellor's Office does not need to be notified when the filing process is completed.*

The following information is included with your campus' Conflict of Interest Filing Officer's copy of this memo to assist in the annual filing process:

Distribution:

With Attachments: Conflict of Interest Filing Officers

Without Attachments:

Vice Presidents, Academic Affairs
Vice Presidents, Administration
Vice Presidents, Information Systems
Vice Presidents/Deans of Students
Associate Vice Presidents/Deans, Faculty Affairs

Business Managers
Human Resources Directors
Payroll Managers
General Counsel
Director, SOSS

1. **CSU Disclosure Category Listing (Attachment A)** - Identifies the seventeen (17) disclosure categories and highlights each category's potentially applicable Form 700 schedule(s) in bold print.
2. **Campus Designated Position List (Attachment B)**. Updated with changes submitted during the 2004 filing process. This list incorporates the last campus update. Please note, in consultation with the Office of General Counsel, the decision was made to add disclosure category 8 for all campus Presidents.
3. **Handbook for State Agency Filing Officers and Filing Officials - Statement of Economic Interests** (revised November 1997).
4. **2004-2005 Form 700 Statement of Economic Interests**. Form 700 (schedules and instructions). Filing Officers are required to review completed statements of economic interests ensuring that a completed individual disclosure statement is received, and that the date is indicated in the official date stamp box located in the upper right hand corner of Form 700. (Please refer to the Handbook for further reviewing guidelines.) Copies of Form 700 can be reproduced locally for appropriate employees at your campus. Form 700 also can be accessed electronically via the Internet at: <http://www.fppc.ca.gov>.
5. **Principal Investigator's Statement of Economic Interests Form 700-U and Instructions for Statement of Economic Interests for Principle Investigators**. Form 700-U should be made available to employees "with principal responsibility for a research project funded or supported, in whole or in part, by the contract or grant (or other funds earmarked by the donor for a specific research project, or for a specific researcher) from a non-governmental entity."
6. **Limitations and Other Restrictions on Gifts, Honoraria, Travel and Loans Fact Sheet**. This Fact Sheet summarizes the major provisions concerning gifts, honoraria, travel and loans. **Please note, effective January 1, 2005, the aggregate limitation on gifts, which is biennially indexed for inflation, is \$360 in a calendar year.**

III. Principal Investigators

There is no "annual" filing requirement for Principal Investigators; however, they must file Form 700-U disclosure statements (a) before final acceptance of a contract, grant or gift; (b) when funding for such a contract or grant is renewed; and (c) within 90 days after the expiration of the grant/contract, or after the funds have been completely expended in the case of a gift.

Principal Investigators must complete the ethics training within 6 months of receiving the grant. Subsequent training is required at least once during each consecutive period of two calendar years that the grant is in place.

IV. Campus Designated Position List Update Process

In addition to the annual filing process, campuses are to review carefully their designated position list to determine if changes are required. *Campuses are asked to remove from any designated position disclosure categories 10, 11, 12, 13, and 15 as these categories are reserved for Chancellor's Office purposes.*

During last year's filing, Human Resources Administration introduced the new Access database electronic data submittal process (the Designated Position Update Process (DPUP)) for campuses to report changes to its designated position lists. We are pleased to report successful implementation, which resulted in a more simplified submittal and reporting process. For this year's filing, the 2004 position list changes have been incorporated and a campus-specific Access database disk is attached for campus reporting. Attachment C provides instructions for reporting designated position list changes using the DPUP process. **Please submit designated position list changes no later than Friday, April 29, 2005, to the Chancellor's Office, attention Pamela Chapin.**

V. Teleconference

Human Resources Administration will host a teleconference for COI Filing Officers on March 8, 2005, from 10:00 a.m. – 11:00 a.m. to discuss the Access database filing system, the 2005 filing process and answer campus questions. To register campus participants, please email Rachel Caracoza at rcaracoza@calstate.edu. Upon receipt of email registration requests, participants will receive the teleconference dial-in telephone number and participant code.

Systemwide Human Resources will continue to operate in an advisory capacity and serve as liaison between the Fair Political Practices Commission and the campuses. Questions should be directed to Pamela Chapin at (562) 951-4414. This document is also available on the Human Resources Administration's web page at: <http://www.calstate.edu/HRAdm/memos.shtml>.

JRMcC/fb

Attachments – COI Officers only