


Date: February 25, 2015

To: CSU Presidents

From: Lori Lamb 
Vice Chancellor
Human Resources

Subject: **Conflict of Interest –Annual Filing and Policy Updates**

Colleagues:

I am pleased to forward you information regarding the 2015 Conflict of Interest (COI) annual filing requirements and multiple policy updates pertaining to Conflict of Interest.

I encourage campuses to review the attached policies listed below:

- **[HR 2015-02: Revisions to the COI Filing Officers' Requirements](#)**
Updates the duties of the COI Filing Officers to bring the requirements from Executive Order 295 current.
- **[HR 2015-03: Ethics Regulations and COI Code Training](#)**
Updates the Ethics Training requirements and provides campuses with information needed to ensure compliance with ethics training requirements.
- **[HR 2015-04: New Requirement to Submit an Interim Designated Position List](#)**
Provides a new interim COI requirement to submit the 2014 Conflict of Interest Interim Designated Position List to Systemwide Human Resources by April 1, 2015.
- **[HR 2015-05: Principal Investigators – Nongovernmental](#)**
Provides revisions to the CSU COI Policy for Principal Investigators (PI), a designated position in the CSU COI Code. Human Resources and Business and Finance/Sponsored Programs Administration collaborated on this policy.
- **[HR 2015-06: 2015 COI Annual Filing](#)**
Details the 2015 COI annual filing requirements for employees (including select consultants) in designated positions, as well as those identified through the interim disclosure process. Annual forms must be filed by April 1, 2015.

Please let me know if you have any questions or concerns.

Warm regards,

Lori

Distribution: With Attachments:
Conflict of Interest Filing Officers (all)
Directors, Research and Sponsored Programs (HR 2015-05)

Without Attachment:
CSU Chancellor
All Campus Vice Presidents
AVPs/Deans of Faculty
Human Resources Officers

Procurement Officers
General Counsel
Trustees' Secretariat

CSU policy does not permit exceptions for individuals who may have completed ethics training, or similar training through another employer or agency.

As part of CSU policy, COI training is also available to employees who are not required to file a Form 700, but participation is voluntary, not mandatory. Content is most relevant to those who make decisions that require Form 700 filing.

- **Roles and Responsibilities**

- **Chancellor's Office (CO) Systemwide Human Resources (HR), Systemwide Professional Development (SPD)**

- SPD is responsible for developing training content, program training requirements and delivery systems, and establishing, communicating and maintaining training system deliverables and documentation requirements on a systemwide basis.

- **Campus COI Officers**

- Campus COI Filing Officers, or designees, are responsible for monitoring and ensuring compliance of COI training requirements.

- **Records/Documentation Requirement**

- Training completion records are public information and must be retained at the campus for at least five years from the time the employee completes the training. These records are public records and are subject to inspection and copying in accordance with the Public Records Act (Chapter 3.5 of Division 7 of Title 1 of the Government Code).

- **Non-compliance and Non-completion of Training Considerations**

- Employees must complete training with 100% accuracy. Campus filing officers are responsible for ensuring timely completion by specified due date(s), and escalating through the prescribed protocol (e.g. the campus President or Chancellor for CO employees), as appropriate, until compliance is attained.

Additional information pertaining to training scope and guidelines are provided in Attachment A.

Questions regarding this policy letter should be directed to systemwide Human Resources at (562) 951-4411. Ethics training questions may be directed to Robin Innes at (562) 951-4499. This HR memorandum is also available on the Human Resources Management's Web site at: <http://www.calstate.edu/HRAdm/memos.shtml>.

LL/lb

Attachment

Ethics Regulations and Conflict of Interest Training Scope and Guidelines

Scope

The CSU Ethics Regulations and COI Training focuses on understanding how COI regulations apply to employees who are required to complete a Statement of Economic Interests (Form 700 or Form 700-U) and also how ethics statutes and regulations guide CSU official conduct.

The training covers the following subjects as they apply to CSU Form 700 and Form 700-U filers: terminology as it applies to COI regulations; the Political Reform Act; identifying economic interests; analyzing and determining conflicts; gifts and honoraria; contractual conflicts; and incompatible acts.

Guidelines

Roles and Responsibilities

❖ CO Systemwide HR SPD

SPD is responsible for monitoring systemwide participation, and provides information to CO and campus leadership on compliance training matters. With regard to training system deliverables, SPD is responsible for ensuring that:

1. The learning management system is hosted and maintained by an external vendor.
2. The learning management system has an electronic storage component to maintain records.
3. Access to employee's records by the campus or the Chancellor's Office is "read only".

Training Deliverables

1. Training is delivered electronically to all campuses via a web-based learning management system found at <https://ds.calstate.edu/?svc=skillsoft>.
2. The training system is an on-line course, and training is available 7 days a week, 24 hours a day, however, campuses are to facilitate computer access during normal working hours for all employees required to complete the training.
3. The training completion time is approximately 45 minutes. After the employee completes the training, the learning management system will record training completion. Each campus may require a training completion certificate available online upon completion.
4. Training can be accessed on any computer (Windows or Mac operating system) with internet access. To determine if the computer is appropriately configured, test it at: <http://support.skillsoft.com/browser-test.asp>. The computer may need speakers and/or earphones. Earphones are recommended in open work environments.

5. For technical questions about computer performance during the training, access the HELP link or users may also access LIVE HELP at <http://skillssoft.com>. Contact Systemwide Professional Development at 562-951-4403 or SPD@calstate.edu for further assistance.
6. For questions about the training design, contact Robin Innes, Senior Manager, Systemwide Professional Development at (562) 951-4499 or rinnes@calstate.edu.

❖ **Campus COI Filing Officers**

Campus COI Filing Officers are responsible for monitoring and ensuring compliance of COI training requirements. The campus COI Filing Officer serves as the campus COI training program manager, and has password-protected access to the learning management system. Their primary responsibility is to track participation and monitor the timely progress of campus employees required to take the training. COI Filing Officers' responsibilities also include:

1. Notify Form 700 and Form 700-U filers of training requirement.
2. Maintain training records, which identify attendees by name, job title, and date of completion. Campuses are responsible for assigning the course to Form 700 and 700-U filers.
3. Ensure that all employees required to complete the training have access to a computer during normal work hours.
4. Monitor training progress/completion of campus filers.
5. Issue and escalate reminders as appropriate, to ensure compliance.
6. Collect, sign, and maintain certificates of completion from filers if required at the campus.