


**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

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**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

**Date:** February 25, 2015

**Code:** HR 2015-04

**Reference:** HR 2010-01

**To:** CSU Presidents

**Subject:** **Conflict of Interest Update – New Requirement to Submit an Interim Designated Position List**

**Summary**

This policy updates [HR 2010-01](#) and provides a new interim requirement for the California State University (CSU) Conflict of Interest (COI) Filing Officers to submit an Interim Designated Position List with respective disclosure categories for each interim designated position. This requirement will remain in effect until the Fair Political Practices Commission (FPPC) approves the new CSU COI Code.

**Action Item(s):**

COI Filing Officers are required to submit a list of designated positions filing under interim disclosure until the positions are incorporated as part of CSU's FPPC-approved COI Code. We are requesting that your list be submitted to Systemwide Human Resources by **April 1, 2015**.

This HR letter should be reviewed in its entirety by the COI Filing Officers and/or the campus designee responsible for COI Form 700 filing.

**Affected Employees Groups(s)/Units:**

Employees and consultants in designated positions filing under interim disclosure.

**Background**

The requirements for designated positions filing under interim disclosure, as discussed under HR 2010-01 and HR 2010-16, was intended to be short-term. The interim disclosure process will remain in effect until designated positions filing under interim disclosure are incorporated into the CSU COI Code (Code) and the Code receives FPPC approval.

Efforts to obtain FPPC approval of our Code remain in progress and as part of that process, the FPPC requested that the CSU provide current listings of designated positions filing under the interim disclosure process. Additionally, an Office of Audit and Advisory Services (OAAS) audit recommendation noted that documentation requirements need to be better tracked with regard to when new or modified positions are reviewed and added to interim designated position lists.

**Details**

As a result of FPPC's request and the OAAS audit recommendation, Systemwide HR requests that campuses provide their list of designated positions filed under the interim disclosure process. This list should encompass interim designated positions (including assuming and leaving office positions) that were effective in calendar year 2014. In addition to the designated position, campuses need to indicate the disclosure categories assigned to that position. Interim designated positions are separate from designated positions filed under the current COI Code.

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CSU Chancellor  
All Campus Vice Presidents  
AVPs/Deans of Faculty  
Human Resources Officers  
General Counsel

Designated positions filed under the current COI Code include those which may have had a job title change (e.g. as a result of changed duties, reassignments, etc.) but did not warrant a change in disclosure category. COI Filing Officers will need to submit to Systemwide HR the 2014 Interim Disclosure List until the new code is approved by FPPC. **We are requesting this list be submitted by April 1, 2015.**

Again, this interim requirement will remain in effect until a new Code is approved by the FPPC. Changes cannot be made to the 2006 Code until approved by FPPC. In addition, this interim requirement will benefit the CSU in our efforts to finalize the new CSU COI Code with the FPPC. Our goal is to have CSU's COI Code approved in 2015, in time for the 2016 COI Filing period. When that occurs, maintenance of the interim designated positions list will no longer be applicable.

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

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