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To: CSU Presidents

From: Jackie R. McClain
Vice Chancellor
Human Resources



Subject: Conflict of Interest Update – Requirement for Newly Approved Designated Positions

The Fair Political Practices Commission (FPPC) has approved California State University's (CSU's) Conflict of Interest (COI) Code amendment adopted by the Trustees at the July 2006 Board meeting. Changes to the designated position list that were submitted in response to last year's filing notice (HR 2006-07) have been incorporated into the CSU's COI Code and are reflected in each campus' designated position list. Based on FPPC recommendation, changes were made to several positions and disclosure categories at three campuses. The campuses affected have been notified of the update.

As required by law, employees in these newly approved designated positions must file an "Initial Statement" of Form 700 (Statement of Economic Interests) within 30 days after the effective date of the code or amendment. The CSU Code will become effective March 10, 2007. Campus Conflict of Interest Filing Officers must notify employees in these newly designated positions of the filing requirement. For these employees, the filing deadline for the initial statement is April 9, 2007. Attached is a revised Form 700 that campuses may use to distribute to designated employees.

Attachment A provides updated lists of campus-specific designated positions. The positions added to the newly designated positions list have been underlined. The disclosure categories for these newly added designated positions have been underlined as well. All individuals employed in a newly designated position must file an "Initial Statement" of Form 700 by April 9, 2007. Positions appearing on the list with a "strikethrough," along with an underlined position title represent a job title change of a "current filer." These positions are already in the CSU Code. Consequently, employees in these positions do not need to file an initial statement. Designated employees with an annual filing requirement will be addressed in a separate correspondence.

Attachment B provides the CSU disclosure categories under which the newly designated positions must file.

To assist individuals required to file a Statement of Economic Interests, the FPPC created a new reference pamphlet to supplement the instructions provided in Form 700. A copy is provided and it is recommended that your campus have copies available for employee use, if requested.

Distribution:

With Attachments:

Conflict of Interest Filing Officers

Without Attachments:

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

AVPs/Deans, Faculty Affairs
Business Managers
Human Resources Directors
General Counsel

Principal Investigators

Title 2 regulations require Principal Investigators to report financial interests on a Form 700-U (Statement of Economic Interests for Principal Investigators) for new (initial) and renewed funding. As a reminder, pursuant to CSU policy, Principal Investigators also are required to file a project completion statement within 90 days after project completion. The Form 700-U has been modified to reflect this CSU requirement and a copy is attached for campus use.

Ethics Training Requirement

With the approval of these newly designated positions to the CSU's Conflict of Interest Code, employees in these positions must be identified for purposes of meeting the CSU's ethics training requirement. These employees must complete the Ethics Training within six months of appointment in a designated position. In the case of these newly approved designated positions, individuals must complete the training requirement by September 10, 2007. Please note that the Web-based CSU ethics training course is currently being updated and is not available for employee access. Campuses will be notified with updated instructions for ethics training in a forthcoming Technical Letter.

Please note that the 2007 annual Conflict of Interest filing process will be addressed in a separate Technical Letter.

Questions regarding the COI filing process should be directed to Pamela Chapin at (562) 951-4414. This document also is available on the Human Resources Administration's Web page at: <http://www.calstate.edu/HRAdm/memos.shtml>.

JRMcc/pc

Attachments