

COLORADO STATE UNIVERSITY SYSTEM

Policy and Procedures Manual

SUBJECT: GOVERNANCE

Policy 108: CSUS Board Conflict of Interest Policy

Board Policy:

The Board has promulgated a Conflict of Interest Policy Statement in Article IX of the Board's ByLaws. This policy applies to all CSUS personnel, including employed students, faculty, staff, administration, and Board Members. The Policy imposes strict disclosure requirements on all persons subject to the Policy.

The CSUS Conflict of Interest Policy defines public employment and appointment as a public trust and identifies as a violation of that trust:

1. Any effort to realize personal gain through official action(s) – other than compensation and/or benefits that accrue under approved contracts;
2. Any disclosure of confidential information;
3. Any attempt to advance or promote interests that compete with, or adverse to, or conflict with the best interests of the CSUS.

The Board requires all CSUS Board Members, Board Officers, CSUS Officers, and CSUS employees to base all decisions or actions solely on the basis of a sincere and faithful effort to promote and foster the best interests of the CSUS and its constituent institutions and entities.

Procedures:

1. Disclosure of Conflicts of Interest: On or about April 30 of each year, each person included within one of the following named groups must file a disclosure statement attached hereto with the Chancellor and the General Counsel indicating all affiliations likely to cause an actual or apparent conflict of interest, and to notify the General Counsel promptly of any change in those affiliations. The General Counsel shall maintain the required disclosures on file for the following persons:
 - Board Members;
 - Board Officers;
 - CSUS Officers.
2. Any person covered by this Policy engaged in a transaction that creates an actual or potential conflict of interest – or an appearance of an actual or

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potential conflict of interest -- must, prior to discussing or taking any action for or against the transaction:

- a. Fully disclose the nature of the interest or involvement creating the actual or potential conflict of interest to the Board;
 - b. Refrain from any and all participation in the Board's consideration of or action on the matter, if CSUS General Counsel rules that a conflict of interest exists; and
 - c. Adhere to the management plan developed and approved to prevent a conflict from occurring.
3. This Policy does not prevent persons covered by it from engaging in business transactions with a CSUS campus or entity **IF** that person makes the required disclosures, refrains from involvement in any official decisions taken by the Board or other CSUS authority concerning those transactions, and adheres to the approved conflict of interest management plan. The person affected must note the disclosure and abstention in open session with the notation reflected in the minutes of the meeting. It is recommended that anyone concerned about a potential conflict of interest should consult with the CSUS General Counsel concerning voluntary actions to guard against legal consequences of potential conflicts of interest.

Institution Requirements:

- A. The Chancellor and institution Presidents insure that campuses maintain conflict of interest policies in compliance with this Policy, federal and state law.
- B. All system and campus policies must include all the required disclosure and mitigation procedures required by law.
- C. This Policy and all related system and campus policies require periodic review and approval by the Office of General Counsel to assure continued currency and relevance.

DISCLOSURE STATEMENT

TO: Board of Governors of the Colorado State University System

SUBJECT: Conflict of Interest Disclosure Statement

I have received and read Article IX of the Bylaws of the Board of Governors and the explanatory memorandum from the Office of General Counsel regarding relevant laws, standards and procedures concerning conflicts of interest. In compliance with the Board's policy and relevant laws, I am hereby providing full disclosure of all affiliations and other interests which may reasonably give rise to, or create an appearance of, a conflict of interest. **Such disclosure is attached and includes:**

1. A list of all affiliations for me, or members of my immediate family, which may give rise to a conflict of interest;
2. The position and/or specific interest which I, or a member of my immediate family, has in connection with each affiliation; and
3. The precise nature of the interest or involvement that I, or a member of my immediate family, has in each such organization or transaction and how it may give rise to or create an appearance of a conflict of interest.

If I have no affiliations or other interests which may reasonably give rise to or create an appearance of a conflict of interest, I have written "None" on the attached disclosure form.

I further recognize that it is my responsibility to update this disclosure as and when necessary or appropriate to provide a full and accurate disclosure as required by Board Bylaws and applicable laws.

Prior to being involved in any vote or discussion of a transaction or matter in which I may have, or appear to have, a conflict of interest, I understand that I must reiterate the applicable disclosure set forth herein and refrain from participating in consideration of the proposed transaction. Finally, if such disclosure involves a situation where I am participating in a transaction with the Board or one of its institutions, or taking other action that may result in a conflict of interest, I understand that I may choose to file a disclosure with the Secretary of State at least 72 hours prior to the time such action is taken.

Date _____

Name (Please type or print)

Signature

Position/Title

Please list all affiliations and other interests which may reasonably give rise to, or create an appearance of, a conflict of interest on the grid below.

If none, please write "none" on the grid. If you need more space to detail a disclosure, please add any continuation pages necessary and note that additional pages have been added.

If you have any questions concerning this disclosure form or the matters required herein, please contact the Office of General Counsel and/or the Chair of the Board.

Interest or Affiliation	Nature of the Interest/Affiliation	Indicate Self or Name of Immediate Family Member