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**Date:** May 18, 2004

**Code:** HR 2004-15

**To:** CSU Presidents

**From:** Jackie R. McClain  
Vice Chancellor  
Human Resources



**Subject:** Ethics Regulations and Conflict of Interest Code Training

Human Resources is pleased to announce a comprehensive ethics regulations and conflict of interest code training program, which will provide employee training on California State University (CSU) ethics statutes and regulations that govern CSU official conduct. The training program **must** be offered to all employees in designated positions who, as a result of the CSU Conflict of Interest (COI) code, are required to file a Form 700 Statement of Economic Interests in accordance with Article 3 of Chapter 7 (commencing with Section 87100) of Title 9 of the Government Code. Program completion is mandatory for employees in designated positions and training must be completed within six months of appointment in a designated position, and at least once during *each* consecutive period of two calendar years following the appointment in a designated position. The training program will be available to employees who are not required to file a Form 700, but participation is not mandatory. Highlights of the training program are provided below:

- The training will be delivered electronically to all campuses via Web browsers. Campuses are to facilitate computer access during normal working hours for all employees required to complete the training.
- Systemwide Professional Development will provide a document for campus program managers prior to the training rollout that will describe program administration.
- Each campus COI filing officer (or his or her designee) will serve as the campus online training program manager. The COI filing officer, or designee, will have password-protected Web access to the learning management system to track participation and progress of campus employees required to take the training. This “read only” access provides templates for several monitoring reports for the individual campus.

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**Distribution:**

Chancellor  
Executive Vice Chancellor & CFO  
Vice Presidents, Administration  
Associate Vice Presidents/Deans of Faculty Affairs

Conflict of Interest Filing Officers  
Human Resources Directors  
SOSS Director

- Employees required to attend the training may access the online training beginning June 7, 2004. The training completion time is approximately two hours. After the employee completes the training, the underlying learning management system will record training completion and generate a completion certificate. The employee will be required to submit the certificate to the filing officer within five days of training completion.
- The campus COI filing officer, or designee, is required to maintain training records, which identify attendees by name, job title, and date of completion. Records must be maintained for a period of 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). The learning management system will have an electronic storage component to maintain these records. Access to the records by any entity other than the vendor will be “read only.”

**Systemwide Professional Development will conduct an “invitation-only” demonstration of the new learning system for the COI filing officer/program managers (or designee) via a Web conference on May 26, 2004, from 10:00 a.m. – 11:00 a.m.** COI filing officers will receive an email invitation prior to the conference date that will include a Web link to the training site. To accommodate those who are unable to participate on May 26, the demonstration will be recorded on the Web for later viewing.

Detailed information is provided in the following referenced attachments to assist in training implementation and administration:

- Attachment A: Important Training Details
  - ✓ Campus COI Filing Officer Responsibilities
  - ✓ Training Schedule
  - ✓ Training Technical Requirements
  - ✓ Additional Technical Consideration
  - ✓ Accessing the Training
- Attachment B: Sample Letter to Employees Announcing the Mandatory Training
- Attachment C: Questions & Answers: Ethics Regulations and Conflict of Interest Training

Policy questions may be directed to Felice Bakre in Systemwide Human Resources at (562) 951-4411. Training questions may be directed to Lynne Hellmer at (562) 951-4403. This document is available on the Human Resources Administration’s Web site at: <http://www.calstate.edu/HRAdm/memos.shtml>.

JRMcC/fb

Attachments

ETHICS REGULATIONS AND CONFLICT OF INTEREST TRAINING  
IMPORTANT TRAINING DETAILS

Listed below are important training details:

➤ **Campus COI Filing Officer Responsibilities**

1. Designate the responsible program manager, preferably the COI filing officer, or his/her designee.
2. Notify filers of training requirement (see Attachment A - sample letter to employee).
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 reminders as appropriate.
6. Collect, sign, and maintain certificates of completion from filers.

➤ **Training Schedule**

Timing of training will be determined by the date an individual is appointed in a designated position.

1. For the initial training rollout (June 7, 2004), a filer who holds a designated position on January 1, 2004, *must complete the training no later than December 31, 2004*, and thereafter, at least once during *each* consecutive period of two calendar years commencing on January 1, 2006.
2. An individual appointed in a designated position between January 1, 2004 and June 30, 2004, *must complete the training no later than December 31, 2004*, and thereafter, at least once during *each* consecutive period of two calendar years commencing on January 1, 2006.
3. An individual appointed in a designated position *after* July 1, 2004, *must complete the training within six months of appointment in a designated position*, and at least once during *each* consecutive period of two calendar years following the appointment in a designated position.

➤ **Training Technical Requirements**

Training can be accessed on any computer with the following minimum requirements:

1. Computer running a current Windows or Mac operating system with a minimum of 333 mHz speed.
2. High speed internet connection (300k) to run streaming video. Most office computers will have the appropriate connection.
3. Sound card with speakers or earphones. Earphones are recommended in open work environments.
4. Windows Media Player (which can be downloaded for Windows and Mac at:

- http://www.microsoft.com/windows/windowsmedia/download/default.asp.).
5. Security setting set to a medium low level.
  6. Cookies should be enabled.

➤ **Additional Technical Considerations**

Firewall configurations, buffering, and bandwidth issues are covered in the Questions and Answers document in Attachment B. In preparation for the training launch, campuses with specific technical questions can contact Carla Lane, Executive Director, TEC Learning, (949)-369-3867, [CarlaLane@aol.com](mailto:CarlaLane@aol.com) or Steve Russak, eLearning Media, (805)-493-4402, [srussak@elearningtv.com](mailto:srussak@elearningtv.com). Individual users can obtain technical information and support from the hosting vendor while engaged in the training.

➤ **Accessing the Training**

1. The web site address to access the online training is: [www.TheSource.calstate.edu](http://www.TheSource.calstate.edu) >Ethics and Conflict of Interest Training. The site will be available June 7, 2004.
2. Individuals self-register for the training and assign their own username and password.
3. The training is open to all employees, whether in designated positions or not.

May XX, 2004

Dear CSU Employee:

The California State University (CSU) is pleased to announce a comprehensive ethics and conflict of interest code training program, which will provide employee training on CSU ethics statutes and regulations that govern CSU official conduct. The training will be provided to all employees in designated positions who, as a result of the CSU Conflict of Interest (COI), are required to file a Form 700 Statement of Economic Interests in accordance with Article 3 of Chapter 7 (commencing with Section 87100) of Title 9 of the Government Code. All Form 700 filers must complete the training.

**<Note: campuses need to select the training option appropriate to the date the employee's position became designated.>**

- ❑ *As an employee in a designated position on January 1, 2004, you are required to complete the training no later than December 31, 2004, and periodically thereafter.*  
OR
- ❑ *As an employee appointed in a designated position between January 1, 2004 and June 30, 2004, you are required to complete the training no later than December 31, 2004, and periodically thereafter.*  
OR
- ❑ *As an employee appointed in a designated position on or after July 1, 2004, you are required to complete the training within six months of appointment in a designated position, and periodically thereafter.*

The training, which takes approximately two hours to complete, will be delivered electronically via Web browsers. Once you have completed the online training, the learning management system will record your training completion and generate a completion verification certificate. You are required to print and submit the completion certificate to your campus COI filing officer within five days of completing the training. **You may access the training beginning June 7, 2004, at the following website:**

<http://www.TheSource.calstate.edu> >Ethics and Conflict of Interest Training

The training can be completed on any computer that meets the requirements. (If you do not have a computer, please contact the COI filing officer to arrange computer access.) Please review the attached Questions & Answers sheet for more information. If you have additional questions, please contact me at \_\_\_\_\_.

Sincerely,

Name  
Conflict of Interest Filing Officer

Attachment

## Questions and Answers

### Ethics Regulations and Conflict of Interest Code Training

Perhaps you have heard that California State University employees will be required to complete ethics training. Not every employee will be required to complete the training, but if you are one of the many who will need to complete the training, you probably have a few questions.

#### **Does this training apply to me?**

If you are required to file an annual Statement of Economic Interests (Form 700), you also are required to complete the training. The training, however, will be available to all employees though the content is most relevant to those who make decisions that require Form 700 filing.

#### **Is the training mandatory?**

The training is mandatory, but only for designated employees who file a Form 700. Managers may opt to include a wider range of employees in the training, however.

#### **Is this “ethics” training or Conflict of Interest training?**

The training focuses both on understanding of how Conflict of Interest regulations apply to employees who are required to file Form 700 and also how ethics statutes and regulations guide CSU official conduct.

#### **What will be covered in the required training?**

The training covers the following subjects as they apply to CSU Form 700 filers: terminology as it applies to the Conflict of Interest regulations; the Political Reform Act; identifying economic interests; analyzing and determining conflicts; gifts and honoraria; contractual conflicts; and incompatible acts. You will be referred to other training and informational resources for an optional in-depth treatment of regulations beyond the basics for CSU employees.

#### **How will the training be presented?**

The training is a combination of television show, dramatic playhouse, quiz show, and resource library. The learning design continually loops back to reinforce new information and keep you alert. There is no detailed on-screen reading required or content to memorize.

#### **How often is the training offered and how long will it take?**

Since this is an on-line course, it is available 7 days a week, 24 hours a day. You decide how much to do in one session. We estimate about two hours for completion depending upon interruptions and the accuracy of your responses.

### **What are the expectations for my successful completion of the training?**

You'll need to complete the training with 100% accuracy. You will be tested throughout the training and will not be able to move to the next content area until you have answered all questions correctly. It may be necessary to go backwards and review content but you won't be able to jump ahead. When you have completed the entire training session, you will then be able to move freely within the learning environment.

### **How do I access the training?**

The link for the training can be found on the opening page of [www.TheSource.calstate.edu](http://www.TheSource.calstate.edu) > Ethics and Conflict of Interest Training. When you begin your training, you will register with your name, job title, department, campus, and e-mail address. You also will be asked whether this training is **required** for you. (If you file the Form 700, then it *is* required.) You will provide your own user name as well as a password. Be sure to remember your username and password because your campus will **not** be able to provide it for you if you forget.

### **What are the technical requirements to access the training?**

- ❑ A computer running Windows or Mac OS with a minimum 333mHz speed.
- ❑ High speed internet connection (300k) to run streaming video. Most office computers will have the appropriate connection.
- ❑ Sound card with speakers or earphones. Earphones are recommended in open work environments.
- ❑ Windows Media Player. Download Windows Media Player appropriate for your system (Windows and Mac) at:  
<http://www.microsoft.com/windows/windowsmedia/download/default.asp>
- ❑ Security setting should be set to a medium low level.
- ❑ Cookies should be enabled.
- ❑ Firewall Considerations: If you have problems streaming information past or receiving information through your firewall, your network administrator can open different ports on your firewall to allow streaming traffic to pass through. To get the most updated firewall configuration:  
[http://support.microsoft.com/default.aspx?scid=/support/mediaplayer/wmp7help/h tm/player\\_overview\\_network.asp](http://support.microsoft.com/default.aspx?scid=/support/mediaplayer/wmp7help/h tm/player_overview_network.asp)
- ❑ Buffering: As the content plays, you may experience pauses. The media player may experience network congestion. This means that there is not enough available bandwidth to stream the selected file. Once the buffered data is gone, the player pauses, replenishes the buffer, and then resumes playing, using the new buffer to supplement the playback stream bandwidth. This cycle continues until network conditions improve.

### **What if my computer doesn't meet these technical requirements?**

You can take the training on **any** computer that meets the requirements. It need not be **your** computer. You may want to "borrow" some time on someone else's computer or

arrange to complete your training in a computer lab on your campus. Since your training access is linked to your username and password, you can be anywhere.

**What if I do not have a computer?**

Please contact the Conflict of Interest filing officer to make arrangements for computer access.

**What do I do if I'm having technical questions about the computer requirements or performance during training?**

You have several options. The first is to send an e-mail message to the vendor who is administering the technical components of this online training. Contact Steve Russak, eLearning Media, (805) 493-4402, [srussak@elearningtv.com](mailto:srussak@elearningtv.com) or Dr. Carla Lane, TEC Learning, (949) 369-3867, [CarlaLane@aol.com](mailto:CarlaLane@aol.com). The other option is to contact your campus IT department.

**How private is my participation in the training? Who can see my records?**

Completion records are public information and must be retained for at least 5 years on your campus. Your personal access to the training is protected by your username and password. The date of your initial log-on, how far you've progressed in the training, and your final completion date are accessible by your campus filing officer (or designee). You may be contacted by your filing officer if you have not made timely progress towards completion by a specified deadline date.

The Chancellor's Office Systemwide Human Resources office will monitor Systemwide participation. Access to your records by the campus or the Chancellor's Office is "read only." Your actual answers and the number of times you have answered incorrectly are not collected within the learning management system. The entire learning management system is hosted and maintained by an external vendor.

**Who can I contact regarding the training design or content?**

The training was designed by Systemwide Professional Development, Office of the Chancellor. The contact person is Lynne Hellmer, Senior Director, (562) 951-4403, [lhellmer@calstate.edu](mailto:lhellmer@calstate.edu).