

THE CALIFORNIA STATE UNIVERSITY
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Supplement #1

To: CSU Presidents

From: Jackie R. McClain 
Vice Chancellor
Human Resources

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

HR 2004-15 announced the California State University's (CSU) Ethics Regulations and Conflict of Interest (COI) Code Training policy. The training program is designed to provide employees with information regarding ethics statutes and regulations that govern CSU official conduct and is delivered electronically to all campuses via Web browsers. As stated, completion of the training is mandatory and must be offered to all employees who are appointed in a designated position in the CSU Conflict of Interest Code. The training requirement also applies to Principal Investigators who are required to file Form 700-U. The CSU COI Code defines a Principal Investigator as an employee who has principal responsibility for a research project that is supported (in whole or in part) by a contract or grant (or other funds earmarked by the donor for a specific research project, or for a specific researcher) from a nongovernmental entity.

This supplement is issued to inform campuses that, in addition to being systemwide policy, the requirement that employees in designated positions complete the CSU Ethics Regulations and Conflict of Interest Code Training *is now a legal requirement, codified by state statute, Assembly Bill (AB) 1969 (referred to as "Courses in Employee Ethics")*. The bill adds Section 89500.7 to the Education Code and becomes effective on January 1, 2005. CSU policy requires designated employees to complete the training by December 31, 2004, and this training will satisfy the legal requirement. *Designated employees who complete the training by the December 31, 2004 deadline will not be required to retake it until 2007, which is consistent with the statute. Employees appointed after July 1, 2004, have six months to complete the training and subsequent training will track with the statute.*

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

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

To assist campuses in communicating the training requirement to Principal Investigators who are required to file Form 700-U, the following documents are attached:

- ✓ Attachment A: Sample training announcement letter.
- ✓ Attachment B: Questions and Answers: Ethics Regulations and Conflict of Interest Training.

Campuses are required to periodically monitor training completion and provide reminders as appropriate. For additional information, please refer to HR 2004-15.

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

<Date>

Dear Principal Investigator:

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 CSU Ethics and Conflict of Interest Code Training is required under CSU policy and state statute and must be completed by all Principal Investigators, as defined in the CSU Conflict of Interest (COI) Code in accordance with Article 3 of Chapter 7 (commencing with Section 87100) of Title 9 of the Government Code), who are required to complete Form 700-U.

<Note: campuses need to select the training option appropriate to the date the employee became a Principal Investigator.>

- ❑ *As an employee who became a Principal Investigator before or on January 1, 2004, you are required to complete the training no later than December 31, 2004, and periodically thereafter.*

OR

- ❑ *As an employee who became a Principal Investigator 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 who became a Principal Investigator 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 immediately, 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?

This training is required for all employees who are appointed into a designated position as part of the CSU Conflict of Interest (COI) Code and required to complete a Statement of Economic Interests (Form 700, or Form 700-U).

Is the training mandatory?

Yes, as part of CSU policy, and statutory regulations, the training is mandatory for all employees who are appointed into a designated position as part of the CSU Conflict of Interest Code.

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

The training focuses both on understanding how Conflict of Interest 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.

What will be covered in the required training?

The training covers the following subjects as they apply to CSU Form 700 and Form 700-U 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 > 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 or Form 700-U, 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/html/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 or Dr. Carla Lane, TEC Learning, (949) 369-3867, 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.