



Operational Area:	Employment
Responsible Executive:	Chief Operating Officer
Responsible Office:	Human Resources Office
Effective:	July 1, 2019

Conflict of Interest in Outside Employment and Personal Activities and Relationships

Employment

Contents

- I. Introduction
- II. Roles and Responsibilities
- III. Definitions
- IV. Policy Statement
- V. Procedures
- VI. Related Information
- VII. Policy History

I. Introduction

- A. **Authority:** C.R.S. § 23-54-102, *et seq.* (2019) authorizes the Trustees of Metropolitan State University of Denver (MSU Denver) to establish rules and regulations to govern and operate the University and its programs. The Trustees retain authority to approve, to administer, and to interpret policies pertaining to University governance. The Trustees authorize the President of MSU Denver to approve, to administer, and to interpret policies pertaining to University operations.
- B. **Purpose:** This policy defines and prohibits conflicts of interest in outside employment and personal activities and relationships for University administrators and staff.
- C. **Scope:** This policy applies to University administrators and staff who are exempt from the State of Colorado personnel system in accordance with C.R.S. § 24-50-135.

II. Roles and Responsibilities

- A. **Responsible Executive:** Chief Operating Officer
- B. **Responsible Administrator:** Chief Human Resources Officer
- C. **Responsible Office:** Human Resources Office
- D. **Policy Contact:** Chief Human Resources Officer, 303-615-0999



Operational Area:	Employment
Responsible Executive:	Chief Operating Officer
Responsible Office:	Human Resources Office
Effective:	July 1, 2019

Conflict of Interest in Outside Employment and Personal Activities and Relationships

Employment

III. Definitions

- A. "Personal Activity" means any private practice, private consulting, teaching or research for another organization, or other similar services to third parties, whether compensated or uncompensated, which are not part of the employee's assigned duties for which the University has provided no compensation.
- B. "Personal Relationship" means any close relationship of a personal nature that can be considered to affect the professional objectivity of the employee, such as a family relationship, an amorous relationship, or a business or professional relationship arising from a personal activity.
- C. "Conflict of Interest" means:
 - 1. Any conflict between the personal activities of the employee and the public interests of the University, the Board of Trustees, or the State of Colorado, including conflicts of interest specified under Colorado Statutes;
 - 2. Any conflict between a personal activity and the full and effective performance of the employee's duties and obligations to the University; or
 - 3. Any conflict or appearance of conflict between a personal relationship and the exercise of unbiased professional judgment in performance of the employee's institutional responsibilities or obligations.

IV. Policy Statement

- A. Outside employment or business ownership will not interfere with the performance of contractual responsibilities.
- B. Employees should be aware of their obligations and responsibilities as public employees of the University. An employee is bound to observe, in all official acts, the highest standards of ethics



Table with 2 columns: Operational Area, Responsible Executive, Responsible Office, Effective. Values: Employment, Chief Operating Officer, Human Resources Office, July 1, 2019

Conflict of Interest in Outside Employment and Personal Activities and Relationships Employment

consistent with the code of ethics of the State of Colorado (Part 18, Article 24, Colorado Revised Statutes), the advisory opinions rendered with respect thereto, and University policies.

- C. Nothing in this policy is intended to discourage an employee from engaging in personal activity in order to increase the employee's professional reputation, service to the community, or income, subject to the conditions stated herein.
D. Disclosure. Conflicts of interest are prohibited. Employees are responsible for disclosing and resolving conflicts of interest, working with their supervisors and other University officials.
E. Use of University Resources. An employee engaging in any personal activity shall not use the facilities, equipment, or services of the University in connection with such outside activity without prior approval of the President or representative. Approval for the use of University facilities, equipment, or services may be conditioned upon reimbursement for the use thereof.
F. No University Affiliation. Any employee engaging in personal activity shall take reasonable precautions to ensure that the outside employer or other recipient of services understands that the employee is engaging in such outside activity as a private citizen and not as an employee, agent, or spokesperson of the University.

V. Procedures

- A. Written Report of Personal Activities
1. Any employee who proposes to engage in any compensated personal activity, or any other personal activity which the employee should reasonably conclude may create a conflict of interest, will report to the employee's supervisor, in writing, the details of such proposed activity prior to engaging therein.
2. The report will include, where applicable, the name of the employer or other recipient of services; the funding source; the location where the activity will be performed; the nature



Table with 2 columns: Operational Area, Responsible Executive, Responsible Office, Effective. Values: Employment, Chief Operating Officer, Human Resources Office, July 1, 2019

Conflict of Interest in Outside Employment and Personal Activities and Relationships Employment

and extent of the activity; and any intended use of University facilities, equipment, or services.

- 3. A new report will be submitted for personal activity previously reported at: a. The beginning of each semester for outside activity of a continuing nature; and b. Such time as there is a significant change in the outside activity (nature, extent, funding, etc.). 4. The reporting provisions of this section do not apply to activities performed wholly during a period in which the employee has no appointment with the University. 5. Upon receipt of the employee's report, the supervisor will consult with the appropriate vice president and the University attorney. If the supervisor is a vice president, the supervisor will consult with the President. If the vice president or President concludes that a conflict of interest exists, the employee will be directed to cease and desist the personal activity that created the conflict. Appropriate disciplinary action may also be initiated in accordance with University procedures.

VI. Related Information

The Conflict of Interest Form is available on the Human Resources webpage, msudenver.edu/hr/forms.

https://msudenver.sharepoint.com/w:/r/sites/HR/_layouts/15/Doc.aspx?sourcedoc=%7B8657A366-779C-4876-9ADC-683FF6962F2A%7D&file=PotentialConflictofInterestDisclosureForm07.28.18.docx&action=default&mbileredirect=true&wdLOR=c79B4961A-7066-CD44-883C-E78ACB9DA649



President's
Policy Statement
University Policy Library

Operational Area:	Employment
Responsible Executive:	Chief Operating Officer
Responsible Office:	Human Resources Office
Effective:	July 1, 2019

Conflict of Interest in Outside Employment and Personal Activities and Relationships

Employment

VII. Policy History

- A. **Effective:** July 1, 2019
- B. **Revised:** This policy supersedes Chapter IX of MSU Denver's *Handbook for Professional Personnel*, July 1, 2017.
- C. **Enacted:** February 2, 2005
- D. **Review:** This policy will be reviewed every three years or as deemed necessary by University leadership.

VIII. Policy Approval

Janine Davidson, Ph.D.
President, Metropolitan State University of Denver

Date

N/A

Chair, Board of Trustees, Metropolitan State University of Denver

Date