



**President's**  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

### Contents:

- I. Introduction
- II. Roles and Responsibilities
- III. Definitions
- IV. Policy Statement
- V. Resolution Management Plan
- VI. Procedural Process
- VII. Related Resources
- VIII. Policy History
- IX. Policy Approval
- X. Appendix- Frequently Asked Questions

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## I. INTRODUCTION

- A. **Authority:** C.R.S. § 23-54-102, et seq. (2026) authorizes the Trustees of Metropolitan State University of Denver ("MSU Denver" or "University") to establish rules and regulations to govern and operate the University and its programs. The Trustees retain authority to approve, interpret, and administer policies pertaining to University governance. The Trustees authorize the President of MSU Denver to approve, administer, and interpret policies pertaining to University operations.
- B. **Purpose:** The Board of Trustees ("Board" or "Trustees") of Metropolitan State University of Denver is committed to MSU Denver operating in an ethical manner and in compliance with applicable legal requirements. Conflicts of Interest, including Conflicts of Commitment, or even the appearance of a Conflict, can erode public trust, undermine the reputation of the University, and may expose MSU Denver to liability. All employees of MSU Denver must endeavor to remain free of outside interests that would improperly influence their decisions and



President's  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
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# Employees' Conflicts of Interest and Commitment Policy

## Employment

actions taken on behalf of the University. The purpose of this policy is to define a Conflict of Interest and a Conflict of Commitment, to help prevent Conflicts from arising, and provide a means for MSU Denver to act if a Conflict of Interest or Conflict of Commitment arises.

- C. **Scope:** This policy applies to all MSU Denver administrators, staff, and non-student employees who are exempt from the State of Colorado personnel system in accordance with [C.R.S. § 24-50-135](#). This policy does not apply to affiliates of MSU Denver.

## II. ROLES AND RESPONSIBILITIES

- A. **Responsible Executive:** Vice President of Administration and Finance/CFO
- B. **Responsible Administrator:** Chief Human Resources Officer
- C. **Responsible Office:** Administration and Human Resources
- D. **Policy Contact:** Chief Human Resources Officer, 303-615-0999

## III. DEFINITIONS

- A. A **Conflict of Commitment** occurs when time dedicated to external professional (including outside employment or consulting) or other professional-level commitments (including volunteer positions) interferes with an employee's ability to fulfill their professional obligations to the University. Commitments that involve activities that occur exclusively during holidays, when the University is closed, while employees are on leave or have a scheduled day off, or outside normal work hours are excluded. All employees are expected to ensure that their outside commitments do not impair the performance of their University duties or create the perception that University resources are being misused.
  1. What are examples of activities and situations that ordinarily are permissible and are **not** a Conflict of Commitment?
    - a. Religious observances and participation in religious organizations.
    - b. Family obligations, including caregiving responsibilities and participation in student-parent organizations.



Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

- c. Personal medical and health-related appointments, activities, or situations.
  - d. Participation in neighborhood associations, youth sports, and other community organizations where service is primarily personal rather than professional in nature.
  - e. Participation in professional association activities, editorial boards, or scientific review panels.
  - f. Service on advisory committees or review panels for federal, state, or local government agencies.
  - g. Acceptance of honoraria for occasional lectures, commissioned papers, or presentations.
2. What are examples of activities that **do** appear to present a Conflict of Commitment?
- a. Situations in which the time or creative energy an employee devotes to activities, including those listed in the Definitions section that are not protected by US or Colorado Law, appears to be substantial enough to compromise the amount or quality of his/her/their participation in the instructional, scholarly, and administrative work of the University itself.
  - b. Activities that violate, or might reasonably be perceived to violate, any University policies or Colorado State Laws.
  - c. Relationships that could, or appear to, enable an employee to influence the University's dealings with outside organizations in ways leading to personal gain or to improper advantage for anyone.
  - d. Activities that violate, or might reasonably be perceived to violate, the principles or policies governing research that is supported by funds administered through the University.
  - e. Situations in which the individual assumes responsibilities for an outside organization that divert his/her/their attention from University duties.
  - f. Circumstances in which activities that could, and ordinarily would, be carried on within the University is conducted elsewhere to the disadvantage of the University and its legitimate interests.



President's  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

## Employees' Conflicts of Interest and Commitment Policy

### Employment

- B. A **Conflict of Interest** arises when a University employee's personal, financial, or professional interests may compromise, or appear to compromise, their judgment, decisions, or actions in carrying out their institutional responsibilities. These interests can include relationships or financial investments that could improperly influence decisions related to research, sponsored projects, purchasing, hiring, admissions, or other academic or administrative matters. The existence of a Conflict of Interest does not necessarily imply wrongdoing, but it must be disclosed and appropriately managed or eliminated. Conflicts of Interest include potential conflicts such as:
1. Having a direct or indirect financial interest in a company that contracts with, seeks to contract with, or competes with the University;
  2. Using University funds, facilities, or resources for personal financial gain;
  3. Holding equity (e.g., stock, stock options) in companies that sponsor the employee's University research or projects, and/or,
  4. Apparent Conflicts, when it reasonably may appear to MSU Denver's administration or to the public, that the employee's private interest, relationship, or affiliation could improperly influence the performance of their duties.
- C. A **Conflict of Interest Disclosure Form** is to be completed by annually via Workday for staff and every semester for faculty, or at any time a Conflict of Interest arises.
- D. A **Conflict of Commitment Disclosure Form** is to be completed annually via Workday for staff and every semester for faculty, or any time a Conflict of Commitment arises.
- E. A **Management Plan** is a written understanding of the situation that gives rise to a Conflict of Commitment and/or Interest and the management mechanisms that will be implemented to mitigate or eliminate the Conflict. Management plans will occur on a "case-by-case" basis should a Conflict arise. Disclosures and Management Plans will be stored in Workday/Human Resources and will be revisited annually, or until the Conflict is resolved.



**President’s**  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees’ Conflicts of Interest and Commitment Policy

## Employment

### IV. POLICY STATEMENT

- A. This policy is intended to ensure that the professional judgment, decisions, and actions of MSU Denver employees in carrying out their University responsibilities are not improperly influenced by internal or outside Conflicts of Interest or Commitment.
- B. MSU Denver employees must disclose any Conflict of Interest or Commitment, or potential Conflict, as soon as they become aware of it. The employee’s direct supervisor must be notified with as much advance notice as reasonably possible so appropriate steps can be taken to address the matter.
- C. Conflicts of Interest may violate the law. All employees of MSU Denver shall abide by the applicable laws, which include:
  - 1. [\(C.R.S.\) § 24-50-117](#): “No employee shall engage in any employment or activity which creates a Conflict of Interest with their duties as a state employee.”
  - 2. [C.R.S. § 24-18-103](#): “The holding of public office or employment is a public trust, created by the confidence which the electorate reposes in the integrity of ... employees. A[n]... employee shall carry out [their] duties for the benefit of the people of the state.” As used in the statute, “employee” includes *every employee* of MSU Denver.
  - 3. [C.R.S. § 24-18-201](#): Prohibits an employee from being “interested in any contract made by them in their official capacity or by any body, agency, or board of which they are members or employees.” Being interested in a contract means having a pecuniary interest in a state contract unless the contract was awarded to the lowest competitive bidder.
  - 4. The [Code of Federal Regulations](#) (2 CFR 200.318, 42 CFR 50.601, 45 CFR 94.1) details the general procurement standards regarding Conflicts of Interest for employees engaged in the selection, award, and administration of contracts.
- D. Employees who believe they have a Conflict of Interest or Commitment must disclose it in writing to their supervisor and refrain from related activities until their supervisor determines whether a conflict exists.



**President's**  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

## Employees' Conflicts of Interest and Commitment Policy

### Employment

- E. Any person may report a suspected Conflict of Interest or Conflict of Commitment to Human Resources or their supervisor.
- F. Supervisors will review each reported Conflict of Interest or Commitment, including interviews as needed, to determine if a conflict exists. Supervisors will have ten (10) calendar days to determine if a conflict exists. Supervisors may consult with Human Resources for Conflicts guidance.
- G. If a supervisor determines that a Conflict exists, the employee must either (1) recuse themselves from the conflicting activity or (2) comply with an approved Management Plan. If recusal is not possible without impairing the employee's work, the Conflict must be eliminated. Failure to disclose, resolve, or eliminate a Conflict may result in disciplinary action, up to and including termination.
- H. For sponsored programs, the US Department of Health and Human Services' (DHHS) Public Health Service (PHS) policy guidelines require the University to establish Conflict of Interest review procedures with the goal of promoting objectivity in funded research and projects. All covered individuals, regardless of the funding source, must complete a Conflict of Interest disclosure and complete Conflict of Interest [CITI Training Course](#).
  - 1. [The Conflict of Interest Disclosure](#) for sponsored programs/projects should be reviewed by the [MSU Denver Office of Sponsored Research & Programs \(OSRP\)](#) in addition to Human Resources. OSRP must determine whether an employee's/faculty's/staff's significant financial interest could affect the design, conduct, or reporting of the research/sponsored activities funded or proposed for such funding, and determine what conditions or restrictions, if any, should be imposed to manage such interests.
  - 2. All sponsored project personnel researchers must comply with federal policies and regulations regarding Conflicts of Interest in research/sponsored projects including, but not limited to, [Federal Regulations 42 CFR 50.601 et seq. and 45 CFR 94.1 et seq.](#)
    - a. [42 CFR 50.601:](#) This subpart promotes objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of research funded under Public Health Service (PHS) grants or cooperative agreements will be free from bias resulting from Investigator financial Conflicts of Interest.



**President's**  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

- b. [45 CFR 94.1](#): This subpart promotes objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, and reporting of research performed under PHS contracts will be free from bias resulting from Investigator financial Conflicts of Interest.
- c. Before applying for grants and contracts, all sponsored project personnel must take and pass the Responsible Conduct of Research module through the Collaborative Institutional Training Initiative (CITI) online training program, found on the CITI Training page of the [Office of Sponsored Research & Programs](#) website and follow MSU Denver Policy on Research Misconduct.
- d. Each sponsored project personnel must make a disclosure of a potential or a real Conflict of Interest at the time of proposal submission by answering the questions contained on the Conflicts Disclosure Form. Signatures on a completed Conflict Disclosure Form, which can be found on the [OSRP FCOI Disclosure Form](#) identifying no Conflict of Interest with the external organization shall suffice for negative disclosure.
- e. Disclosures must be indicated on the Conflict Disclosure Form and detailed by the respective investigator(s) in a separate statement that must be forwarded to the Office of Sponsored Research & Programs at the time of submission of the proposal for funding consideration.
- f. If there is a change in the Conflict of Interest status of the investigator(s) prior to the time of award or after a contract/award is issued, the investigator(s) must report change(s) to the executive director of the Office of Sponsored Research & Programs in writing immediately.
- g. Failure to comply with this or any other policy related to Conflicts of Interest may result in sanctions up to and including withdrawal of sponsored award.

## V. RESOLUTION MANAGEMENT PLAN

- A. Management Plans will occur "case-by-case" should a conflict arise. The Management Plan will be determined by the employee's direct supervisor and the employee working together. Disclosures and Management Plans will be stored in



**President's**  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

Workday/Human Resources and will be revisited annually, or when the Conflict is resolved.

- B. Employees with a Management Plan must continue to follow the plan until the underlying Conflict is eliminated and is no longer required.
- C. All employee Conflicts of Interest and Commitment that require a Management Plan shall be disclosed to the Board of Trustees.

## VI. PROCEDURAL PROCESS

### A. Employee Disclosure

- 1. Employees complete the required COI/COC disclosure via Workday, annually for staff and every semester for faculty.
- 2. Disclosures must be updated throughout the year by the employee if circumstances change, and their direct supervisor must be notified.

### B. Initial Review

- 1. Workday routes each submitted disclosure to the employee's immediate supervisor for review.

### C. No Conflict Identified

- 1. If the supervisor determines no Conflict exists, no further action is required.
- 2. The disclosure is recorded and stored in Workday.

### D. Potential Conflict Identified

- 1. If a potential Conflict is disclosed, the supervisor will meet with the employee to review the situation, clarify details, and determine whether a Conflict exists.
- 2. Supervisors may seek guidance from:
  - a. Their own supervisor, and/or
  - b. Human Resources, for additional interpretation or support.



**President's**  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

### E. Development of a Management Plan (If Needed)

1. If a Conflict is confirmed and needs to be mitigated, a case-by-case Management Plan will be developed collaboratively between the supervisor and the employee.

### F. Documentation and Storage

1. All COI/COC disclosure forms and any approved Management Plans will be documented and stored in Workday.
2. Supervisors and employees must revisit and update Management Plans as needed when circumstances change.

### G. Closure

1. A Conflict is considered closed when the supervisor and employee verify that the Conflict no longer exists or that the Management Plan has been fully satisfied.
2. Closure is documented and stored in Workday.

## VII. RELATED RESOURCES

- A. Conflicts of Interest and Commitment Form (distributed via Workday)
- B. [OSRP Conflict of Interest Disclosure Form](#)
- C. [MSU Denver Staff Alternative Work Arrangements Policy](#)
- D. [Office of Sponsored Research and Programs](#)
- E. [U.S. Dept of Health and Human Services Conflict of Interest Policy](#)
- F. [Collaborative Institutional Training Initiative](#)
- G. [Colorado Office of the State Controller - Procurement Conflict of Interest Guidance](#)
- H. [Colorado Department of Education Conflict of Interest Policy](#)
- I. [Code of Ethics - State of Colorado \(Part 18, Article 24, Colorado Revised Statutes\)](#)
- J. [Code of Federal Regulations](#)
- K. [CITI Training](#)



President's  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

- L. [CITI Program Conflicts of Interest and Commitment \(Other Federal Sponsors\)](#)
- M. [Current Gift Ban Amount | Independent Ethics Commission](#)

### VIII. POLICY HISTORY

- A. **Effective:** April 1, 2026
- B. **Revised:** 2025 revisions include Conflicts of Commitment, added Resolution Management Plans, updated disclosure forms, clarified FCOI for OSRP. July 1, 2019; This policy supersedes Chapter IX of MSU Denver's Handbook for Professional Personnel, July 1, 2017
- C. **Original Enactment Date:** February 2, 2005
- D. **Review:** This policy will be reviewed every three years or as deemed necessary by University leadership.

### IX. POLICY APPROVAL

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

N/A  
Chair, Board of Trustees, Metropolitan State University of Denver



Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

### X. APPENDIX- FREQUENTLY ASKED QUESTIONS

The Appendix-FAQ section, though included following Presidential approval, are integral components of this policy and hold the same binding authority as the policy itself.

A. *Do all Conflicts mean I've done something wrong?*

1. No. Having a potential Conflict does not necessarily mean misconduct. The key is **prompt disclosure** so the University can evaluate, manage, or eliminate the Conflict.

B. *Does having any other job outside of MSU Denver mean there is a Conflict?*

1. No. This policy does not prohibit outside activities or employment. Discuss any potential Conflict with your supervisor to determine if there is a potential or actual Conflict, or not.

C. *What is a Conflict of Interest?*

1. A Conflict of Interest occurs when your financial, family, business, or personal interests may compromise—or appear to compromise—your independence of judgment in performing your MSU Denver professional duties. Examples include, but are not limited to:
  - a. Having a financial stake in a vendor the University uses,
  - b. Participating in hiring or purchasing decisions that benefit a family member, and/or,
  - c. Accepting gifts that could influence decision-making.

D. *What is a Conflict of Commitment?*

1. A Conflict of Commitment occurs when time dedicated to external professional (including outside employment or consulting) or other professional-level commitments (including volunteer positions) interferes with an employee's ability to fulfill their professional obligations to the University.

E. *In what ways can a family member create a Conflict of Interest for an MSU Denver employee?*



Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

1. A Conflict of Interest may arise when an employee's decisions or actions at the University could directly or indirectly benefit a family member. Examples include, but are not limited to:
  - a. **Employment/Supervision:** Hiring, supervising, evaluating, or making employment-related decisions about a family member.
  - b. **Financial Interests:** Awarding contracts, directing purchases, or approving expenditures that benefit a family member's business or employer.
  - c. **Academic/Research Decisions:** Influencing academic, research, or funding opportunities in ways that advantage a family member.
  - d. **Use of Influence:** Using one's University position to secure preferential treatment or opportunities for a family member.
2. **Family member** may include a spouse, domestic partner, child, parent, sibling, in-law, or any person living in the same household, or with whom the employee has a close personal relationship that could reasonably appear to influence their judgment.

*F. When should I disclose a Conflict?*

1. You must disclose as soon as you become aware of a potential or actual Conflict of Interest or Commitment. This includes:
  - a. During the annual/scheduled disclosure process via Workday,
  - b. Before entering into a business or financial transaction that may create a Conflict, and/or,
  - c. Before starting outside employment or a significant volunteer role, which could affect your ability to perform your University professional responsibilities.

*G. How do I disclose a Conflict?*

1. Complete the appropriate disclosure form:
  - a. Workday will routinely (annually for staff and each semester for faculty) send disclosures to be completed.
  - b. Submit forms to your direct supervisor, Human Resources, or the Office of Sponsored Research & Programs (OSRP).



Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

*H. What happens after I disclose a Conflict?*

1. Your direct supervisor or Human Resources will review the situation and determine whether a conflict exists. If a Conflict exists:
  1. You may be asked to recuse yourself from certain decisions,
  2. Eliminate the Conflict entirely, or
  3. Follow a Management Plan to address and monitor the Conflict.

*I. What is a Management Plan?*

1. Should a conflict arise, a Management Plan will be specific to the employee and the nature of the Conflict. The Management Plan will be determined by the employee's direct supervisor and the employee developing the plan. Disclosures and Management Plans will be stored in Workday/Human Resources and will be revisited annually.

*J. What are the consequences of not reporting a conflict?*

1. Failure to disclose or manage a Conflict can result in disciplinary action, up to and including termination of employment, loss of research funding, or other sanctions.

*K. What laws apply to Conflicts of Interest and Commitment?*

1. Relevant laws include:
  - a. Colorado Revised Statutes §§ 24-50-117, 24-18-103, 24-18-201
  - b. Federal regulations for research: 2 CFR 200.318, 42 CFR 50.601, 45 CFR 94.1
  - c. C.R.S. § 24-18-103: "The holding of public office or employment is a public trust, created by the confidence which the electorate reposes in the integrity of ... employees. A[n]... employee shall carry out [their] duties for the benefit of the people of the state." As used in the statute, "employee" includes *every non-student employee* of MSU Denver.
  - d. U.S. Dept. of Health & Human Services Conflict of Interest Policy

*L. Who can I contact with questions?*

1. Policy Contact: Chief Human Resource Officer, 303-605-7218



**President's**  
Policy Statement  
University Policy Library

Operational Area	Employment
Responsible Executive	Vice President for Finance and Administration/CFO
Responsible Office	Administration and Human Resources
Effective	April 1, 2026

# Employees' Conflicts of Interest and Commitment Policy

## Employment

2. For research-related conflicts: [Office of Sponsored Research and Programs](#)