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Date: February 2, 2024

Code: TECHNICAL LETTER
HR/Policy Admin. 2024-01

To: Conflict of Interest Filing Officers
Associate Vice Presidents, Human Resources
Associate Vice Presidents, Faculty Affairs

Reference HR 2018-02
HR 2015-02
HR 2015-04
HR 2015-05
HR 2010-01

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Subject: 2024 Conflict of Interest Annual Filing

Summary

This technical letter provides campuses with the 2024 Conflict of Interest (COI) annual filing requirements for employees in designated positions, including those identified through the interim disclosure process, and select consultants hired through the procurement process. Annual forms must be filed by **April 2, 2024**.

Systemwide Human Resources (SWHR) will host a webinar for COI Filing Officers on **February 6, 2024**, from 10:00 a.m. to 11:30 a.m. to discuss the annual filing process, the ethics-training requirement and answer campus questions. [Webinar registration](#) information was provided earlier this month via e-mail to each campus COI Filing Officer. The Chancellor's Office systemwide offices for Procurement and Sponsored Programs Administration has also shared this information to their respective groups.

Action Item(s):

Each campus COI Filing Officer and any campus designee responsible for COI annual filing must distribute Statement of Economic Interests (Form 700) to employees in designated positions, including those individuals identified through the interim disclosure process and to select consultants. Notices should be sent out as soon as possible and no later than March 1, 2024. This will allow employees to meet the **April 2, 2024** deadline and ensure timely completion of required training. COI Filing Officers will use DisclosureDocs, the electronic Form 700 filing system, to facilitate the annual filing process.

This technical letter should be reviewed in its entirety by the campus COI Filing Officer and any campus designee responsible for COI annual filing.

Affected Employees Groups(s)/Units:

All employees (including select consultants) in designated positions in the recently approved COI Code, effective January 7, 2024, and those individuals identified through the interim disclosure process.

Introduction

The Political Reform Act, Government Code Sections 81000, et seq., requires California State University (CSU), as a State Agency, to adopt and promulgate COI codes. The [CSU's COI Code](#) requires employees in designated positions, including those identified under the interim disclosure process, to file a Statement of Economic Interests (Form 700) on an annual basis. In addition, select consultants hired through the procurement process are also required to file a Statement of Economic Interests (Form 700) once a year (see [HR 2010-01](#)). This memorandum serves as a reminder that the Form 700 filers must complete their annual Form 700 filing by **April 2, 2024**.

COI Code

The Fair Political Practices Commission (FPPC) approved the [CSU's COI Code effective January 7, 2024](#). The COI Code consists of the list of [Disclosure Categories](#) and the list of [Designated Positions](#).

DisclosureDocs and eDisclosure – Form 700 Electronic Filing System

The CSU uses DisclosureDocs (FPPC approved electronic Form 700 filing system) and eDisclosure (FPPC approved electronic Form 700 filing web portal) to manage Form 700 notices and filings. The benefits of an electronic filing system include an automated filing notification process for Annual, Assuming and Leaving Office filings, as well as an enhanced filing experience for filers that ensures appropriate completion of Form 700.

Please note that electronic Form 700 filing via eDisclosure is only available for Annual, Assuming, and Leaving office filings. Form 700-U filings required by Principal Investigators must be completed in accordance with the guidance provided in the section titled “Principal Investigators” below.

Annual Filing Reminder

The campus COI Filing Officer should distribute the Statement of Economic Interests (Form 700) to employees in designated positions, as well as those identified through the interim disclosure process, as soon as possible, and no later than **March 1, 2024**, - 30 days before the filing is due. Please refer to [HR 2015-02](#) for additional requirements for Filing Officers. Designated employees must submit completed forms to the campus Filing Officer by **April 2, 2024**. As discussed above, COI Filing Officers will use DisclosureDocs, the electronic Form 700 filing system, to facilitate the annual filing process. Information and guidance on DisclosureDocs will be provided during the webcast on February 6, 2024.

The campus should determine if any consultants hired through the procurement process are required to file a Form 700 (See [HR 2010-01](#)). Campuses should also designate the individual responsible for distributing, collecting and retaining the Form 700 for these select consultants.

Individuals who filed a Form 700 during the last quarter of 2023 (October 1, 2023 through December 31, 2023), are not required to file during the 2024 annual filing period (January 1, 2024 through December 31, 2024). The next time they will be required to file will be during the 2025 annual filing period (January 1, 2025 through December 31, 2025).

Principal Investigators

There is no “annual” filing requirement for Principal Investigators (PIs); however, Title 2 regulations require PIs to file a Form 700-U (Statement of Economic Interests for Principal Investigators) before the final acceptance of a contract,

grant or gift for a research project from a non-governmental entity, and within 30 days of renewal of funding for such a contract or grant. For additional information regarding Pls filing requirements, refer to [HR 2015-05](#).

Principal Investigators must complete the ethics training within six (6) months of receiving the grant. Subsequent training is required at least once within each two-calendar year period that the grant is in place.

Interim Disclosure Requirement

In accordance with [HR 2015-04](#), campuses are required to submit to SWHR the interim disclosure list for their campus. The Interim Disclosure list tracks position titles that are not in the current list of FPPC approved designated positions until the positions are incorporated as part of CSU's FPPC-approved COI Code. Campuses should review the campus [designated position list](#) and provide a campus Interim Disclosure list to SWHR. The Interim Disclosure list of Designated Position must include the respective disclosure categories for each position listed.

Please submit your campus Interim Disclosure list by **April 2, 2024**. Individuals who filed interim disclosures during the last quarter of 2023 (October 1, 2023 through December 31, 2023) are not required to file during the 2024 annual filing period; however, these positions should be indicated on the list.

Assuming and Leaving Office Form 700 Filings

Employees required to complete assuming and leaving office Form 700 statements in 2023 should use the disclosure categories identified in the [CSU Disclosure Category Listing](#).

Annual Filing Resources

The following information is included to assist in the annual filing process:

1. [CSU Disclosure Category Listing](#) – This updated list contains seven (7) disclosure categories.
2. [Campus Designated Position List](#) – Identifies the designated positions submitted during the remapping process and approved by the FPPC, effective January 7, 2024.
3. [2023-2024 Statement of Economic Interests Form 700](#) - Form 700 (schedules and instructions). Filing Officers are required to review completed statements of economic interests ensuring that a completed individual disclosure statement is received, and that the date is indicated in the official date stamp box located in the upper right-hand corner of Form 700. Copies of Form 700 can be reproduced locally for appropriate employees at your campus. Form 700 also can be accessed electronically via the internet at: <http://www.fppc.ca.gov>. Refer to [HR 2015-02](#) for additional information.
4. [Frequently Asked Questions: Form 700 Disclosure \(Rev. 10/2023\)](#) – Provides a list of frequently asked questions that are often asked to FPPC by employees completing Form 700. Frequently asked questions regarding gift disclosure are also included.
5. [2023-2024 Form 700 Statement of Economic Interests Reference Pamphlet](#) - Provides information to assist employees in designated positions on how to complete their Form 700.

6. [Limitations and Restrictions on Gifts, Honoraria, Travel and Loans Fact Sheet \(Rev. 10/2023\)](#) - This fact sheet summarizes the major provisions concerning gifts, honoraria, travel and loans. The aggregate limitation on gifts, which is indexed for inflation every two years, is \$590 (2023-2024 limit) from a single source in a calendar year.
7. [2023-2024 Principal Investigator's Statement of Economic Interests Form 700-U and Instructions for Statement of Economic Interests for Principal Investigator](#) Form 700-U should be made available to employees "with principal responsibility for a research project funded or supported, in whole or in part, by the contract or grant (or other funds earmarked by the donor for a specific research project, or for a specific researcher) from a non-governmental entity."
8. [Conflict of Interest Handbook](#) - This handbook prepared by the Office of General Counsel provides information on conflict statutes.
9. [Form 700 Tutorial for Hard Copy Filers](#) – Systemwide Learning and Development in SWHR and the Office of General Counsel have developed a brief tutorial to assist designated employees in completing their Form 700 statements. This Form 700 tutorial is available to campuses through CSU Learn. Tutorials for the electronic Form 700 are available within the eDisclosure web portal.

Ethics Training

All employees in designated positions, including those that fall under the interim disclosure requirement and select principal investigators and consultants, are required to complete ethics training. A systemwide training titled "Avoiding Conflicts of Interest" is available through the CSU's learning management system (LMS) and is delivered in an interactive format. This training must be completed within six months of appointment to a designated position, and at least once during each consecutive period of two calendar years following the appointment in a designated position. Completion time is approximately 25 minutes, with quizzes embedded throughout the content. A unique course link will be sent to each designated employee by our learning management system (LMS).

Employees will be able to access the training by invitation. The invitations will be prompted from the list of filers submitted by each campus and will be communicated electronically to individual e-mail accounts. COI Filing Officers are able to monitor completions through the learning management system. Reminders will be emailed weekly for 3 months from the learning management system unless designated by the campus administrator to extend them.

It is the responsibility of campus COI Filing Officers to complete the following tasks in regards to the ethics training:

- Provide your campus LMS administrator with the names of the individuals that are required to take the training, so that online training can be assigned; and
- Inform designated employees, including those identified through the interim disclosure process and select consultants, of their ethics training obligations under the COI Code. Alert these designated employees of forthcoming e-mail communications from the learning management system about when this training is due.

Refer to [HR 2018-02](#) for additional filing officer responsibilities with regards to ethics training requirements.

Questions regarding ethics training should be directed to Systemwide Learning and Development at L&D@calstate.edu.

Enforcement Considerations

Employees may be subject to a \$10 per day fine up to a maximum of \$100 for the late filing of a Statement of Economic Interests Form 700 (Government Code Section 91013). In addition, the President/Chancellor may be notified of the late filers.

Employees who fail to file a Form 700, or who fail to disclose material interests may be subject to a personal penalty. Penalties include disciplinary action against the employee, as well as potential civil and criminal penalties. Violations of the Conflict of Interest Code are addressed in the [Conflict of Interest Handbook](#), prepared by Office of General Counsel.

Campuses should work with their campus counsel to address any issues pertaining to code violations.

Annual Webcast

SWHR will host a webcast for COI Filing Officers on **Tuesday, February 6, 2024**, from 10:00 a.m. to 11:30 a.m. to discuss the annual filing process, the ethics training requirement, and answer campus questions. Information regarding registration for this meeting has been forwarded to each COI Filing Officer via e-mail, but you may also register [here](#).

General Information

SWHR will continue to operate in an advisory capacity and serve as a liaison between the Fair Political Practices Commission and the campuses. Questions should be directed to Form700@calstate.edu.

This technical letter is also available on the CSYou Human Resources Management's Web page at: <https://csyou.calstate.edu/Policies/HRPolicies/Forms/Default.aspx>.

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c: Vice Chancellor, Human Resources