

**CALIFORNIA STATE UNIVERSITY, NORTHRIDGE  
ASSOCIATED STUDENTS, CSUN, INC.  
Conflict of Interest Procedure**

**Section A. Board of Directors**

*The Conflict of Interest policy will be distributed to all voting and non-voting members of the Associated Students (AS) Board of Directors, along with other documents describing their legal responsibilities related to their membership on the AS Board of Directors. These documents will be reviewed with all incoming board members during the first meeting of each session of the Board, or immediately after the first meeting attended by any Board member who is not present or who is not yet a member at that first meeting. All members of the Board will indicate their understanding and compliance with the policy by signing a memorandum to that effect and submitting it to the Government Secretary.*

1. The Government Secretary or Student Leadership Coordinator will prepare a packet for each member of the Board. The packet will include the Conflict of Interest policy, other Board responsibility guidelines (see immediately below), an as-yet unsigned memorandum of agreement to comply with these regulations, and a summary cover memorandum, explaining the process. The other regulations include:
  - The Romero Open Meeting Law
  - Use of Public Documents
  - Board of Directors Liability
  - Use of Non-Public Information
  - Use of Funds for Political Activities
2. These documents will be made available to the members of the Board of Directors at least three working days prior to the first meeting of each session of the Board.
3. Overview of this packet will be included as an information item on the agenda of the first meeting of each session. The General Manager or her/his designee will review each of the regulations in that item.
4. Since membership on the Board can change after the session has begun, a special outreach will be made to members of the Board not yet elected or appointed to the Board by the first meeting of each session. That special outreach will entail the following steps
  - The General Manager or designee will meet with each new member of the Board within three days of the member's appointment to the Board.
  - The General Manager or designee will review each of the regulations and policies in the Packet
  - Each new member will be given a packet at or before that meeting.
5. The cover memorandum will set as a response deadline six calendar days from the date of the receipt of the memorandum or the date and time of the convening of the next meeting of the Board, whichever is sooner. Board members may participate in Board meetings only after they have submitted the signed response.

6. The cover memorandum will direct each person to sign the packet's signature page. It will state that their signature attests that the signer has read and understood the expectations and will comply with them.
7. The memo will direct each recipient to return only the signature page to the Government Secretary or designee who will file the original set of signature pages in the Compliance Audit files.

## **Section B. Designated Employees Who Are Required to File Statements of Economic Interest**

*The Associated Students (AS) will annually identify any employees who occupy positions in which they make or participate in decisions which could lead to a conflict of interest through the exercise of their official responsibilities. Employees designated in this way will disclose any and all interests through an annual statement of economic interests. Such statements will be filed with the Government Secretary and made available to any appropriate requestor.*

1. The Classification Specification for positions established through the AS normal procedure shall indicate whether the position is one in which duties are performed that could lead to a conflict of interest as defined by the AS Conflict of Interest Policy. Incumbents in such position shall annually submit a statement of economic interest.
2. Consistent with requirements for university consultation, on or before February 1 of every year, the General Manager or designee will submit a memorandum to the California State University, Northridge (CSUN) Vice President for Administration and Finance or designee. The memorandum will contain the names, position titles, and general duties of management employees of the AS whose responsibilities include decision-making related to the economic interests of the Associated Students, which could result in a conflict of interest. The memorandum will indicate the criteria used in establishing potentiality for conflict of interest. Finally, the memorandum will indicate which form the AS will use to disclose economic interests.
3. Any AS employee occupying a designated position shall complete a statement by the end of March every year in which he or she discloses economic interests. The statement shall be on a form provided by the AS.
4. The original signed copy of the statement will be filed with the Government Secretary.
5. At a subsequent meeting of the AS Personnel Board, the General Manager will report who has filed such statements, as an information item on the Personnel Board's agenda.

Established August 13, 2010