

Conflict of Interest Standards Policy – All Employees

Employees – Human Resources

CWU Policy 301-26

Effective: February 20, 2019

Policy Review Date: YEAR

Policy Executive: Senior Vice President – Finance and Administration

Responsible Office/Unit: Human Resources

Policy Statement:

Applicability:

Content:

Policy

Appendix A - Conflict of Interest Standards Procedures – All Employees

(1) The following standards apply to all employees of Central Washington University.

(2) Fiduciary Responsibilities.

- A. Employees serve the public trust and are obliged to fulfill their responsibilities in a manner consistent with this fact. All decisions are to be made solely on the basis of a desire to promote the best interests of Central Washington University and the public good. The university's integrity must be considered and advanced at all times.
- B. Employees are often involved in the affairs of other institutions, businesses, and organizations. An effective employee may not always consist of individuals entirely free from perceived, potential, or real conflicts of interest. Although most such conflicts are and will be deemed to be inconsequential, it is every employees' responsibility to make staff, or designee, of the university, aware of situations at CWU that may involve the employee's personal or business relationships.

(3) Affirmation and Disclosure. The university requires all employees annually to affirm adherence to the following standards:

- A. Disclosure of personal or business interests and relationships. All employees will disclose to the University any personal or business relationship or interest that reasonably could give rise to a perceived, potential, or real conflict of interest.
 - 1. Laws. State agencies (including colleges and universities) are subject to different conflict of interest laws in RCW 42.52 relating to financial interests and receipt of gifts. Unlike the local government conflict of interest laws, there are no minimum thresholds or exemptions. Any

direct or indirect financial benefit could be assessed as a potential violation.

B. Disclosure of potential or real conflict of interest. In the event there comes before the university a matter for consideration or decision that raises a potential or real conflict of interest for any employee, the employee shall disclose to staff, or designee, of the university, the existence of a potential, perceived, or real conflict of interest as soon as possible.

(4) Situations that Constitute Conflicts of Interest. While it is difficult to list all circumstances that may create a conflict of interest for individual employees, the university defines certain situations as prohibited actions. (See Appendix A)

History:

*Responsibility: Business and Financial Affairs; Authority: Cabinet/UPAC; Reviewed/Endorsed by: Cabinet/UPAC; Review/Effective Date: 02/20/2019; Approved by: James L. Gaudino, President
Reformatted and Assigned new Policy Number - Previous Policy CWUP 2-40-065, June 2025
Attached Procedure CWUR 3-45-090 as Appendix A, June 2025*

Appendix A - Conflict of Interest Standards Procedures – All Employees

(1) Situations that Constitute Conflicts of Interest.

- A. While it is difficult to list all circumstances that may create a conflict of interest for individual employees, the university defines the following situations as prohibited actions.

(2) General Principles of Ethical Conduct

- A. All employees of the university:
1. Shall not hold financial interests that are in conflict with the conscientious performance of their official duties and responsibilities;
 2. Shall not engage in any financial transaction in order to further any private interest using nonpublic information of the university;
 3. Shall put forth honest effort in the performance of their duties;
 4. Shall make no unauthorized commitments or promises of any kind purporting to bind the university;
 5. Shall not use their public offices for private gain;
 6. Shall act impartially and not give preferential treatment to any private or public organization or individual;
 7. Shall protect and conserve public property and shall not use it for other than authorized activities;
 8. Shall not engage in outside employment or activities, including seeding or negotiating for employment, that conflicts with official duties and responsibilities;
 9. Shall promptly disclose to staff, or designee, of the university, waste, fraud, abuse, or corruption in accordance with applicable law and policy;
 10. Shall endeavor to avoid any actions that would create the appearance that they are violating the law or the ethical standards of the university;
 11. Shall disclose potential conflicts of interest to staff, or designee, of the university, and avoid conflicts of interest, potential conflicts of interest, and circumstances giving rise to the appearance of a conflict of interest.

(3) Conflict of Interest

- A. A conflict of interest occurs when a person's private interests compete with his or her professional obligations to the board-governed entity to a degree that an independent observer might reasonably question whether the person's professional actions or decisions are materially affected by personal considerations, including but not limited to personal gain, financial or otherwise.

(4) Considerations of Transactions

- A. In the event that a person subject to this policy shall be called upon to consider a transaction involving a Board-governed entity and a person, entity, party, or organization with which the person is affiliated, as defined below, such person, as soon as he or she has knowledge of the transaction, shall:
1. disclose fully to staff, or designee, of the University, the precise nature of his or her interest or involvement in the transaction and/or such organization, and
 2. refrain from participating in the university's consideration of the proposed transaction.
- B. Each person subject to this policy shall disclose to staff, or designee, of the university, all relationships and business affiliations that reasonably could give rise to a conflict of interest because of the employee's duties and responsibilities. This disclosure obligation is ongoing, and each employee has a duty to supplement or amend his or her disclosure when the employee knows that the disclosure was incorrect in a material respect when made or the disclosure, though correct when made, has become inaccurate in a material respect.
- C. For the purposes of this policy, an employee is "affiliated" with an organization if the person, a member of the person's immediate family (i.e., spouse, parents, children, brothers, and sisters), or a person residing in the employee's household or a legal dependent of the employee:
1. is an officer, director, trustee, partner, employee, or agent of such organization;
 2. is either the actual or beneficial owner of more than one percent (1%) of the voting stock of or a controlling interest in such organization;
 3. has any other direct or indirect dealings with such organization from which the employee is materially benefited. It shall be presumed that an employee is "materially benefited" if he or she receives, either directly or indirectly, money, services, or other property in excess of one thousand dollars (\$1000) in any year in the aggregate.
- D. All disclosures required to be made hereunder must be directed, in writing, to staff, or designee, of the university.