



University of Colorado

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System Human Resources

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TO: System Administration Hiring Authorities

FROM: Lisa Landis, Director, System Administration Human Resources

SUBJECT: Procedures for Implementing Regent Policies on Conflict of Interest and Nepotism in Personnel Matters

DATE: February 16, 2009

The procedures for identifying potential conflicts of interest in personnel matters are outlined in the University of Colorado Administrative Policy Statement titled Procedures for Implementing Regent Policies on Conflict of Interest and Nepotism [Policy](#).

Procedures for implementing the Policy in System Administration are as follows:

- A. Annually, hiring authorities are required to submit a written statement to Human Resources (HR) regardless of whether relatives are employed within the same unit. A template of this can be found [here](#). This report should contain the following:
 1. The names, relationships, titles and supervisor's names of relatives who work in the same department, are paid from the same account, and/or otherwise hold appointments where potential or actual conflicts of interest in employment relationships exist. This list must include all regular full-time, part-time, temporary and student employees.

The policy defines immediate family as: spouses, children, parents, grandparents, grandchildren, brothers, sisters, nieces, nephews, uncles, aunts, first cousins, fathers-in-law, mothers-in-law, sisters-in-law, brothers-in-law, sons-in-law, and daughters-in-law.
 2. Where a potential conflict of interest exists because of the employment relationship or other factors, a written statement must be made to change the reporting relationship or to delegate authority for personnel decisions regarding the affected employee to another supervisor. A copy of this statement shall be included in the departmental personnel file for each affected employee, with copies forwarded to HR. Disclosure of the change in reporting relationship should be made to employees in the respective unit.
- B. HR will review all reports and discuss with the hiring authority alternatives for resolving difficult situations of actual or potential conflict of interest as needed.
- C. The annual Conflict of Interest and Nepotism in Employment report will be compiled by HR and sent to the President. It will contain a summary of information received and recommended solutions for actual or potential conflict of interest.

In summary, please send the completed template described in item A to 035 UCA or Shannon.Gillette@cu.edu by April 30, 2009. For additional information, you may call Shannon Gillette at 303-860-5645.