

STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION

December 13, 2023

TOPIC: Board Policy 3-70, Ethics

PRESENTED BY:

Angela Gramse, General Counsel

RELATIONSHIP TO THE STRATEGIC PLAN:

Transform our own workforce experience; Redefine our value proposition through accessibility, affordability, quality, accountability, resource development, and operational excellence

EXPLANATION:

The System has reviewed Board Policy (BP) 3-70 as part of its five-year review cycle. General Counsel, along with the CHRO, are recommending the Board approve structural changes to the entire 3-70 policy and procedure series, encompassing deletion of duplicative content and general reorganization to make the documents more concise, user friendly, and grouped by subject matter.

The proposal creates a single Board Policy that contains a code of ethics and other restrictions and requirements related to conflicts of interest. The corresponding System Procedures would apply to Board members as well as employees, and are broken out by topic:

- SP 3-70a, Ethics Disclosures – Establishes the process for annual and ongoing disclosures for Board members, System Office executive staff, College Presidents and senior staff, and System audit staff. The content was previously part of the BP. Applicable forms are attached as Appendices.
- SP 3-70b, Conflicts of Interest – Relationships – Establishes and streamlines the process for disclosure and approval of: 1) employment of immediate family; 2) academic evaluation of immediate family; and 3) amorous relationships between employees and employees/students. Applicable forms are attached as Appendices.
- SP 3-70c, Conflicts of Interest – Financial Transactions – Establishes the process for disclosure and approval of financial transactions that involve a potential or actual conflict of interest. Board Approval form is attached as Appendix.

Additionally, the proposed BP 3-70 contains a “Code of Conduct” that applies to all Board members and employees. Previously, the BP bounced back and forth as to application to Board members, employees, or both. The revision makes clear Board members are being held to the same standard of conduct as employees.

Further, General Counsel recommends the policy be retitled to “Ethics” (from “Colorado Community College System Code of Ethics”).

The attached BP 3-70 reflects the substantive as well as non-substantive, editorial, or conforming changes. A redline version showing the details of all revisions is available upon request.

RECOMMENDATION:

General Counsel recommends the Board approve the revisions to BP 3-70.

ATTACHMENT(S):

BP 3-70 FINAL 12.13.23