

PROCEDURES

The College shall make this Conflict of Interest and Professional Ethics Policy readily available and shall communicate it at least annually to all employees. New employees are to be given a copy of this policy.

Upon receiving a Conflict of Interest Disclosure Form, the dean or Director of Human Resources shall render a decision on the matter after a full and fair investigation. The due process rights of all persons involved, including the right to a hearing, shall be respected at all times.

An employee affected by a resolution or decision of the Dean or Director of Human Resources may appeal to the appropriate Vice President by submitting a written statement explaining the disagreement. After a full and fair investigation, in which the same due process rights of all persons involved will be respected, the Vice President shall issue a final decision. An employee affected by a resolution or decision of the Vice President may appeal to the President by submitting a written statement explaining the disagreement. After a full and fair investigation, in which the same due process rights of all persons involved will be respected, the President shall issue a final decision.

Alternatively, the employee may also appeal to the state ethics commission.

In general, all Conflict of Interest Disclosure Forms are to be retained for four years. Where grants are involved, all related documents must be retained for at least three years beyond the termination of the grant and for at least three years beyond the resolution of any related action with the granting organization.

Possible conflicts of interest involving senior management are to be resolved by the President in consultation with SUNY legal counsel.

Possible conflicts of interest involving the President are to be resolved by the Chancellor.