



## KENTUCKY STATE UNIVERSITY

### Policies and Regulations

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#### **POLICY TITLE:**

**Conflict of Interest and Commitment Policy**

#### **APPLIES TO:**

**Faculty  
Staff**

#### **ADMINISTRATIVE AUTHORITY:**

**Office of Human Resources**

#### **APPROVED BY:**

**Kentucky State University Board of Regents**

#### **EFFECTIVE DATE:**

**August 8, 2025**

#### **NEXT REVIEW DATE:**

**August 8, 2028**

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#### **POLICY STATEMENT:**

Kentucky State University (KSU) requires all employees and members of its Board of Regents to uphold the highest standards of ethical conduct in their interactions with vendors, colleagues, professional organizations, and other external entities. This policy establishes guidelines to ensure employees and Regents avoid activities or relationships that conflict with KSU's interest or harm its reputation, including conflicts of interest and commitment.

#### **DEFINITIONS:**

##### **Conflict of Commitment**

A situation in which an employee's or Regent's personal interests, or those of their immediate family, could impair their impartiality, objectivity, or effectiveness in performing KSU duties.

### **Conflict of Interest**

A situation in which an employee's or Regent's external activities interfere with their primary obligations to KSU, including time, energy, and loyalty devoted to teaching, research, service, or administrative duties.

### **Immediate Family**

For the purposes of this policy, immediate family members include an employee's or Regent's spouse, parents, children, or siblings, and any other close relatives who live in the employee's or Regent's household.

## **PROCESS:**

### **Prohibited Activities, Generally**

Employees and members of the Board of Regents must avoid:

- Accepting and soliciting gifts, favors, or services intended to influence decision-making or professional conduct
- Soliciting or accepting benefits (e.g., money, tangible/intangible items) in exchange for favorable job-related actions
- Engaging in external employment or activities requiring disclosure of KSU's confidential information
- Accepting compensation that impairs independent judgment in official duties
- Making personal investments contrary to KSU's interests
- Pursuing outside activities that detract from primary KSU responsibilities

### **Permitted Investments**

Employees and members of the Board of Regents should avoid investments in the business of KSU's customers, suppliers, or vendors that could cause divided loyalty or the appearance of divided loyalty.

- Employees with such investments, or who plan to make such investments, must file a conflict-of-interest disclosure form (or other written notice) with their department head and the Office of Human Resources (HR).
- Members of the Board of Regents with such investments, or who plan to make such investments, must file a conflict-of-interest disclosure form with the Board Chair and the Office of General Counsel.
- Investments in publicly traded securities on recognized exchanges are generally permissible if purchased on equal terms with the public.

### **Disclosure Upon Employment or Transaction**

- Employees must notify their department head in writing as soon as they become aware of a KSU transaction (or proposed transaction) involving an external party that creates an actual or apparent conflict. Members of the Board of Regents must provide such notification to the Board Chair and the Office of General Counsel.
- The disclosure must include any remuneration, investments, ownership interests, positions held, or any other relationships that the employee or Regent, or their immediate family member, has with the external party that could pose a conflict.

- Department heads are charged with promptly reviewing employee disclosures to determine if a conflict exists and if it can be resolved. The Board Chair and General Counsel are charged with reviewing disclosures from Regents.
- Employees purchasing goods or services on behalf of the University must submit an annual conflict of interest disclosure form to HR.

### **Confidentiality of Disclosures**

Disclosures are handled confidentially, with access limited to a need-to-know basis.

### **Withdrawal From Decision-Making**

- Employees and members of the Board of Regents must not influence or decide on matters involving an organization or transaction in which they or an immediate family member have a personal interest.
- Employees shall notify their department heads of any such personal interests as soon as practicable. Members of the Board of Regents shall notify the Board Chair and the Office of General Counsel.
- An individual with a personal interest in an organization or transaction shall recuse themselves from any discussions or decisions on the matter unless and until their department head (for employees) or the Board Chair (for Regents) determines otherwise.

### **Misuse of Information**

Employees and members of the Board of Regents may not use non-public KSU information for personal gain or others' benefit. They must not exploit business opportunities known to be of interest to KSU without prior written consent from KSU.

### **Gifts and Favors**

- Employees and members of the Board of Regents may not solicit or accept gifts, loans, rewards, or items of value that could influence their judgment or conduct in KSU business.
- Unsolicited courtesy gifts (e.g., business lunches, event tickets) under \$100 in market value which do not influence or appear to influence judgment are allowed.
- Supervisors (for employees) or the Board Chair (for Regents) may grant written exemptions for gifts in excess of \$100, but such exemptions must include sufficient justification and apply only to a specific gift or favor.

### **Professional Organizations and Associations**

Work with external professional groups is permissible if it supports the individual's legitimate professional development, does not interfere with KSU duties, and does not violate laws or compete with KSU's interests.

### **Conflicts of Commitment**

- **Administrators and Faculty:** Faculty and professional administrators must dedicate their primary professional effort, time, and focus to KSU's teaching, research, and service missions. External employment in their field is allowed, provided it does not conflict with KSU interests or commitments.

- **Staff:** Staff may engage in outside employment if it does not conflict with KSU interests, overlap with scheduled work hours, or impair job performance. Staff must notify their supervisors and HR of external employment.
- **Board of Regents:** Members of the Board of Regents have a primary fiduciary duty to the University. They must avoid external commitments that would interfere with their ability to provide impartial oversight and governance.

### **Reporting Suspected Violations**

Employees should confidentially report alleged violations in writing to their supervisor, HR, or the Office of General Counsel. Good-faith reporters are protected from retaliation. Members of the Board of Regents should report alleged violations to the Board Chair and the Office of General Counsel.

### **Disciplinary Actions**

Engaging in prohibited activities or failing to disclose conflicts may lead to immediate discipline.

- For employees, this may include disciplinary action up to and including termination of employment.
- For members of the Board of Regents, violations may result in censure or be referred for removal from office in accordance with the Board's bylaws and applicable state law.

## **REFERENCES AND RELATED MATERIALS:**

- Ethical Standards Policy
- Conflict of Interest Disclosure Form

## **CONTACTS:**

Subject	Office	Telephone	E-mail
Reports	Human Resources	(502) 597-6667	<a href="mailto:Human.Resources@kysu.edu">Human.Resources@kysu.edu</a>
Policy questions	General Counsel	(502) 597-6414	<a href="mailto:General.Counsel@kysu.edu">General.Counsel@kysu.edu</a>

## **HISTORY:**

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