

OTERO COLLEGE PROCEDURE

Conflict of Interests- Students

Otero College Procedure (OCP) 3-70d

EFFECTIVE: January 2, 2025

APPROVED: January 2, 2025

REFERENCE(S): Colorado Community College Board Policy (SP) 3-70b Conflicts of Interests and Colorado Community College Board Policy (SP) 3-70c Conflicts of Interest – Financial Transactions

APPROVED BY: Otero College Cabinet

APPLICATION

This procedure applies to Otero College

BASIS

It is an Otero requirement that employees whose immediate family members are enrolled in classes require disclosure to Human Resources. These circumstances must be disclosed, and the conflict of interest or perceived conflict of interest must be appropriately addressed in accordance with this procedure.

DEFINITIONS

“Immediate Family”: An employee’s spouse including, but not limited to, domestic and civil union partners; children, stepchildren, and their spouses; siblings and siblings-in-law; parents and parents-in-law; grandparents and grandparents-in-law; and grandchildren and their spouses.

PROCEDURE

Enrollment of Immediate Family

Otero College is committed to fostering an employment and educational climate characterized by professional and ethical behavior, free of discrimination and conflict of interest. Immediate family members of an employee who enroll in classes with the institution must be disclosed to Human Resources at the earliest opportunity. Human Resources will work with the relevant individuals through the disclosure process as outlined in this procedure and the appendix.

The primary responsibility to disclose the relationship rests with the employee.

Even if an immediate family member of an employee attending classes does not create a conflict of interest requiring disclosure, the relationships between employee and student may create a perception that the student is favored by the employee or other employees and may be afforded undue access and advantage above others.

Employees may not act in a financial transaction approval capacity in relation to the immediate family member. Human Resources, the employee's department, and the employee will work together to create a process for checks and balances if an employee cannot be removed from a financial approval or a process that involves their immediate family member.

A college official is deemed to have a legitimate educational interest regarding accessing student records if the official needs to review the educational record to fulfill his or her professional responsibility for the College. Otherwise, employees who can access their children, stepchildren, and/or spouse's records such as grades or enrollment must refrain from doing so, unless the student has filled out a release of record form and submitted to Student Affairs. For other family members who are enrolled, employees should exercise discretion or contact Human Resources for guidance.

Record Retention Requirements

This form is maintained in the employees' personnel file.

This form must be updated when there is a change in position or line of supervision that affects current Disclosure or Directives.

Appendix A

Disclosure and Approval

Enrollment of immediate family within CCCS must comply with the disclosure and approval requirements outlined in this procedure. This form shall be used to document the disclosure and approval requirements. Employees should work with the Human Resources department to complete the approval process.

Employee Name:

Position held:

Immediate Family Member's Name:

Familial relationship to the student:

Attendance start date:

Anticipated attendance end date:

Additional educational programs the student may participate in:

Details of all steps taken (or that need to be taken) and alternative arrangements to resolve any potential or actual conflict of interest:

Date Release of Records completed with Student Affairs:

Approval:

For enrollment of **immediate family members of employees in the institution:**

Human Resources Representative:

Human Resources Representative signature:

Date of approval: