

# Instructions for Completing the Outside Employment Disclosure Form for Management Personnel Plan (MPP) Employees

## BACKGROUND

Any outside employment activities of an employee must not interfere with their ability to meet their CSU responsibilities or prevent them from acting in the best interest of the CSU. State law ([Title 5 California Code of Regulations § 42740](#)) and CSU policy ([HR 2016-06](#)) require MPP and Senior Management employees to disclose outside employment activities for which they are compensated.

The disclosure is then reviewed by the employee's immediate supervisor (referred to as "Administrator" or "Appropriate Administrator" in the disclosure form). If the employee's supervisor determines that the employee's outside employment poses a perceived or actual conflict of commitment or conflict of interest with the employee's CSU employment, the employee is expected to take actions to reduce or eliminate the conflict if the employee elects to continue the outside employment activity. If there is disagreement between the employee and their supervisor on whether a conflict exists or on the method to reduce or eliminate the conflict, the supervisor would note this disagreement on the disclosure form and consult with HR Policy & Audit Readiness ([hrpolicy@cpp.edu](mailto:hrpolicy@cpp.edu)) to ensure proper documentation and the appropriate review process by an independent review committee is followed. The independent review committee's determination will be the final decision on the matter.

## WHEN TO COMPLETE THE "OUTSIDE EMPLOYMENT DISCLOSURE FORM FOR MANAGEMENT PERSONNEL PLAN (MPP) EMPLOYEES"

Each MPP employee (full-time, part-time, or rehired annuitant) below the vice president rank must complete the "Outside Employment Disclosure Form for Management Personnel Plan (MPP) Employees":

- At the time of their MPP appointment;
- Annually;
- Within 30 days after they accept outside employment; **and**
- Within 10 days upon request by their immediate supervisor

## HOW TO COMPLETE THE FORM

### 1. Employee's CSU Position Section

- Provide your name, position title, campus name, and department name.

### 2. Type of Disclosure Section

- If you are filing the annual disclosure AND you were in your MPP position for the entire preceding calendar year, then check the "Annual" box and fill in the last two digits of the preceding calendar year. The preceding calendar year is the reporting period of your disclosure. In other words, report any part-time or full-time compensated outside employment activity that you undertook during the preceding calendar year. For example, suppose you are currently in June 2022, then fill out the form as follows:

### Outside Employment Disclosure Form For Management Personnel Plan (MPP) Employees<sup>1</sup>

*Requirements: This form is to be completed as appropriate by MPP employees<sup>1</sup> pursuant to Section 42740 of Title 5, California Code of Regulations, even if completed at an earlier date.*

Name: \_\_\_\_\_ Position/Title: \_\_\_\_\_

Campus: \_\_\_\_\_ Department: \_\_\_\_\_

**Type of Disclosure (Check at least one box):**

- Annual:** The period covered is January 1, 20 21, through December 31, 20 21.  
-OR- The period covered is \_\_\_\_/\_\_\_\_/20\_\_ (Time of hire or appointment) through December 31, 2021.
- Time of Hire or Appointment Date:** \_\_\_\_/\_\_\_\_/20\_\_
- Accepted outside employment:** Outside employment accepted date: \_\_\_\_/\_\_\_\_/20\_\_
- Administrator request:** The period covered is \_\_\_\_/\_\_\_\_/20\_\_ through \_\_\_\_/\_\_\_\_/20\_\_  
-OR - Current outside employment beginning \_\_\_\_/\_\_\_\_/20\_\_

- If you are filing the annual disclosure, BUT your MPP appointment began after January 1<sup>st</sup> of the preceding calendar year, then check the “Annual” box and provide the start date of your appointment. **You may conceivably file the disclosure twice within a year.** In the example below. You would have filed a disclosure on 12/15/2021, the date you entered your MPP appointment, and you would file the disclosure again in July 2022, when the annual disclosure is due. For example:

### Outside Employment Disclosure Form For Management Personnel Plan (MPP) Employees<sup>1</sup>

*Requirements: This form is to be completed as appropriate by MPP employees <sup>1</sup> pursuant to Section 42740 of Title 5, California Code of Regulations, even if completed at an earlier date.*

Name: \_\_\_\_\_ Position/Title: \_\_\_\_\_

Campus: \_\_\_\_\_ Department: \_\_\_\_\_

**Type of Disclosure (Check at least one box):**

- Annual:** The period covered is January 1, 20\_\_\_\_, through December 31, 20\_\_\_\_.
- OR- The period covered is 12/15/2021 (Time of hire or appointment) through December 31, 2021.
- Time of Hire or Appointment Date:** \_\_\_\_/\_\_\_\_/20\_\_\_\_
- Accepted outside employment:** Outside employment accepted date: \_\_\_\_/\_\_\_\_/20\_\_\_\_
- Administrator request:** The period covered is \_\_\_\_/\_\_\_\_/20\_\_\_\_ through \_\_\_\_/\_\_\_\_/20\_\_\_\_

- If you are filing the disclosure because you have just assumed a MPP position, then check the “Time of Hire or Appointment Date” box and provide your date of appointment. For example:

### Outside Employment Disclosure Form For Management Personnel Plan (MPP) Employees<sup>1</sup>

*Requirements: This form is to be completed as appropriate by MPP employees <sup>1</sup> pursuant to Section 42740 of Title 5, California Code of Regulations, even if completed at an earlier date.*

Name: \_\_\_\_\_ Position/Title: \_\_\_\_\_

Campus: \_\_\_\_\_ Department: \_\_\_\_\_

**Type of Disclosure (Check at least one box):**

- Annual:** The period covered is January 1, 20\_\_\_\_, through December 31, 20\_\_\_\_.
- OR- The period covered is \_\_\_\_/\_\_\_\_/20\_\_\_\_ (Time of hire or appointment) through December 31, 2021.
- Time of Hire or Appointment Date:** 02/28/2022
- Accepted outside employment:** Outside employment accepted date: \_\_\_\_/\_\_\_\_/20\_\_\_\_
- Administrator request:** The period covered is \_\_\_\_/\_\_\_\_/20\_\_\_\_ through \_\_\_\_/\_\_\_\_/20\_\_\_\_
- OR- Current outside employment beginning \_\_\_\_/\_\_\_\_/20\_\_\_\_

- If, after your MPP appointment began (say 8/1/21) and before the annual disclosure is due (say, July 2022), you have taken on outside employment (say 9/30/21), you are required to complete the disclosure form within 30 days of accepting that outside employment. In that case, check the “Accepted outside employment” box and provide the date that you accepted your outside employment. For example:

**Outside Employment Disclosure Form  
For Management Personnel Plan (MPP) Employees<sup>1</sup>**

*Requirements: This form is to be completed as appropriate by MPP employees <sup>1</sup> pursuant to Section 42740 of Title 5, California Code of Regulations, even if completed at an earlier date.*

Name: \_\_\_\_\_ Position/Title: \_\_\_\_\_

Campus: \_\_\_\_\_ Department: \_\_\_\_\_

**Type of Disclosure (Check at least one box):**

- Annual:** The period covered is January 1, 20\_\_\_\_, through December 31, 20\_\_\_\_.
- OR- The period covered is \_\_\_\_/\_\_\_\_/20\_\_\_\_ (Time of hire or appointment) through December 31, 20\_\_\_\_.
- Time of Hire or Appointment Date:** \_\_\_\_/\_\_\_\_/20\_\_\_\_
- Accepted outside employment:** Outside employment accepted date: 09 / 30 / 20 21
- Administrator request:** The period covered is \_\_\_\_/\_\_\_\_/20\_\_\_\_ through \_\_\_\_/\_\_\_\_/20\_\_\_\_
- OR- Current outside employment beginning \_\_\_\_ / \_\_\_\_ / 20\_\_\_\_

- If you are asked by your supervisor to complete the form, then check the “Administrator Request” box and provide the dates of the reporting period that your supervisor specified OR the date of your acceptance of outside employment, whichever is applicable.

**Outside Employment Disclosure Form  
For Management Personnel Plan (MPP) Employees<sup>1</sup>**

*Requirements: This form is to be completed as appropriate by MPP employees <sup>1</sup> pursuant to Section 42740 of Title 5, California Code of Regulations, even if completed at an earlier date.*

Name: \_\_\_\_\_ Position/Title: \_\_\_\_\_

Campus: \_\_\_\_\_ Department: \_\_\_\_\_

**Type of Disclosure (Check at least one box):**

- Annual:** The period covered is January 1, 20\_\_\_\_, through December 31, 20\_\_\_\_.
- OR- The period covered is \_\_\_\_/\_\_\_\_/20\_\_\_\_ (Time of hire or appointment) through December 31, 2021.
- Time of Hire or Appointment Date:** \_\_\_\_/\_\_\_\_/20\_\_\_\_
- Accepted outside employment:** Outside employment accepted date: \_\_\_\_/\_\_\_\_/20\_\_\_\_
- Administrator request:** The period covered is \_\_\_\_/\_\_\_\_/20\_\_\_\_ through \_\_\_\_/\_\_\_\_/20\_\_\_\_
- OR- Current outside employment beginning \_\_\_\_ / \_\_\_\_ / 20\_\_\_\_

### 3. Outside Employment Status Section

- Any compensated work that is not compensated through the CSU payroll must be disclosed. Employment by the CSU foundation or CSU auxiliary is considered reportable outside employment and must, therefore, be disclosed.
- Report any work that results in reportable income (for which a 1099 or W-2 is issued), no matter the amount of time commitment and even if you believe the work that is being performed does not conflict with your work for the CSU. For example, an outside employment engagement that takes one or two days on the weekend must still be disclosed.
- If you are not performing work, but instead are receiving passive income (e.g., royalty payments) for service(s) performed in the past, you do not need to disclose it.
- Unpaid volunteer work does not need to be disclosed, as it is not compensated work.
- Check the “I have outside employment to report” box if you have outside employment to report and provide the requested information. In the “Nature of Outside Employment Held” field, specify the role or category of employment services being performed (e.g., supervisor, president, manager, consultant, board member). For example:

**Type of Disclosure (Check at least one box):**

- Annual:** The period covered is January 1, 2021, through December 31, 2021.
- OR- The period covered is \_\_\_\_/\_\_\_\_/20\_\_ (Time of hire or appointment) through December 31, 2021.
- Time of Hire or Appointment Date:** \_\_\_\_/\_\_\_\_/20\_\_
- Accepted outside employment:** Outside employment accepted date: \_\_\_\_/\_\_\_\_/20\_\_
- Administrator request:** The period covered is \_\_\_\_/\_\_\_\_/20\_\_ through \_\_\_\_/\_\_\_\_/20\_\_
- OR- Current outside employment beginning \_\_\_\_/\_\_\_\_/20\_\_

**Outside Employment Status (Select one):**

- I have outside employment to report (complete table below).
- I have no outside employment to report.

	Nature of Outside Employment Held	Number of Hours for Reporting Period	Expected Duration From/To
1	Board member, ACE Company	30	1/1/21-12/31/21

- If you have no outside employment, check the “I have no outside employment to report” box. **NOTE: You are required to complete the form even if you have NO outside employment to report.**

**Type of Disclosure (Check at least one box):**

- Annual:** The period covered is January 1, 2021, through December 31, 2021.
- OR-** The period covered is \_\_\_/\_\_\_/20\_\_\_ (Time of hire or appointment) through December 31, 2021.
- Time of Hire or Appointment Date:** \_\_\_/\_\_\_/20\_\_\_
- Accepted outside employment:** Outside employment accepted date: \_\_\_/\_\_\_/20\_\_\_
- Administrator request:** The period covered is \_\_\_/\_\_\_/20\_\_\_ through \_\_\_/\_\_\_/20\_\_\_
- OR -** Current outside employment beginning \_\_\_/\_\_\_/20\_\_\_

**Outside Employment Status (Select one):**

- I have outside employment to report (complete table below).
- I have no outside employment to report.

**4. Affirmation Section**

- Check the box to affirm the accuracy of the information you provided. In signing and dating the form, you are acknowledging that it is your obligation to reduce or eliminate any identified conflict of commitment/interest. Moreover, you agree to submit the form with updated information whenever there is a significant change in the terms of your outside employment.

**Outside Employment Status (Select one):**

- I have outside employment to report (complete table below).
- I have no outside employment to report.

	Nature of Outside Employment Held	Number of Hours for Reporting Period	Expected Duration From/To
1	Board member, ACE Company	30	1/1/21-12/31/21
2			

I affirm that the information on this form is accurate to the best of my knowledge, that I have read and understand my obligations under the CSU's policy on Outside Employment Disclosure, and that I will comply with the conditions and restrictions imposed by the CSU to manage, reduce, or eliminate conflicts of commitment/interest. I certify that my time commitment to the outside employer(s), if applicable, does not create a conflict of commitment/interest that would interfere with CSU work assignments and satisfactory performance. I also commit to providing an updated form to my immediate supervisor whenever a significant change occurs in the information I have provided. *(Complete and sign below)*

Employee Signature: Jane White Date: 6/20/2022

- After you have signed the form and entered your supervisor’s name and University email address, the form will be electronically routed to your supervisor for review and signature. ***Your supervisor’s signature is required even if you have NO outside employment to report.***

**5. Supervisor’s Review Section**

- The supervisor shall sign the form if:
  - The employee reported no outside employment; OR
  - The supervisor and the employee agree that the employee’s outside employment does not pose a conflict of commitment/interest; OR
  - The supervisor and the employee agree on the way to reduce/eliminate the conflict of commitment/interest posed by the employee’s outside employment. In this case, the supervisor shall note on the form that there is a perceived or actual conflict of commitment/interest and the way the employee will remedy the situation. (The employee shall follow through with the agreed upon action to remedy the identified conflict.)

Example of when the supervisor and employee agree the employee’s outside employment does not pose a conflict with their CSU employment:

I affirm that the information on this form is accurate to the best of my knowledge, that I have read and understand my obligations under the CSU’s policy on Outside Employment Disclosure, and that I will comply with the conditions and restrictions imposed by the CSU to manage, reduce, or eliminate conflicts of commitment/interest. I certify that my time commitment to the outside employer(s), if applicable, does not create a conflict of commitment/interest that would interfere with CSU work assignments and satisfactory performance. I also commit to providing an updated form to my immediate supervisor whenever a significant change occurs in the information I have provided. *(Complete and sign below)*

Employee Signature: Jane White John White | June 9, 2023 11:46 PM PT Date: 06/09/2023

**To be completed by the Employee’s Immediate Supervisor/Appropriate Administrator:**  
 I have reviewed this disclosure form and assessed whether the outside employment described above will create a conflict of commitment or interest between the employee and the CSU. I find that:

- the information submitted does not present a conflict of commitment or conflict of interest.
- the information submitted may present a conflict of commitment or a conflict of interest.

HRPA Rev. June 2023

---

*If an independent committee review is sought, the Administrator shall contact HR Policy & Audit Readiness (hrpolicy@cpp.edu) before signing the form for guidance on next steps.*

Administrator’s Name (Print): John Smith Title, Dept: Director, Academic Services

John Smith John Smith | June 9, 2023 06/09/2023

Example of when the supervisor and the employee agree on how the employee shall reduce/eliminate the identified conflict:

I affirm that the information on this form is accurate to the best of my knowledge, that I have read and understand my obligations under the CSU's policy on Outside Employment Disclosure, and that I will comply with the conditions and restrictions imposed by the CSU to manage, reduce, or eliminate conflicts of commitment/interest. I certify that my time commitment to the outside employer(s), if applicable, does not create a conflict of commitment/interest that would interfere with CSU work assignments and satisfactory performance. I also commit to providing an updated form to my immediate supervisor whenever a significant change occurs in the information I have provided. *(Complete and sign below)*

Employee Signature: Jane White  
Jane White (Jun 9, 2023 13:46 PDT)

Date: 06/09/2023

**To be completed by the Employee's Immediate Supervisor/Appropriate Administrator:**

I have reviewed this disclosure form and assessed whether the outside employment described above will create a conflict of commitment or interest between the employee and the CSU. I find that:

- the information submitted does not present a conflict of commitment or conflict of interest.  
 the information submitted may present a conflict of commitment or a conflict of interest.

Below, explain how the conflict will be mitigated or eliminated.

Jane will limit her review of the book manuscript to weekends and after work hours during the workweek.

HRPA Rev. June 2023

*If an independent committee review is sought, the Administrator shall contact HR Policy & Audit Readiness ([hrpolicy@cpp.edu](mailto:hrpolicy@cpp.edu)) before signing the form for guidance on next steps.*

Administrator's Name (Print): John Smith Title, Dept: Director, Academic Services

John Smith  
John Smith (Jun 9, 2023)

06/09/2023

- After the supervisor has signed the form, a copy will be provided to the employee, the supervisor and HR Policy & Audit Readiness (HRPA) ([hrpolicy@cpp.edu](mailto:hrpolicy@cpp.edu).) As the designated custodian of these forms, HRPA will retain them in accordance with the CSU Records Retention Schedule and produce them, if requested per the California Public Records Act.



- ***If the supervisor and the employee disagree on whether there is a conflict of commitment/interest AND/OR how that conflict is to be reduced/eliminated, then before signing, the supervisor shall contact HR Policy & Audit Readiness ([hrpolicy@cpp.edu](mailto:hrpolicy@cpp.edu)) for consultative guidance and to ensure that appropriate review by an independent review committee is followed.*** The independent review committee’s determination will be the final decision on the matter.

I affirm that the information on this form is accurate to the best of my knowledge, that I have read and understand my obligations under the CSU’s policy on Outside Employment Disclosure, and that I will comply with the conditions and restrictions imposed by the CSU to manage, reduce, or eliminate conflicts of commitment/interest. I certify that my time commitment to the outside employer(s), if applicable, does not create a conflict of commitment/interest that would interfere with CSU work assignments and satisfactory performance. I also commit to providing an updated form to my immediate supervisor whenever a significant change occurs in the information I have provided. *(Complete and sign below)*

Employee Signature: Jane White  
Jane White (Jun 9, 2023 13:46 PDT)

Date: 06/09/2023

***To be completed by the Employee’s Immediate Supervisor/Appropriate Administrator:***

I have reviewed this disclosure form and assessed whether the outside employment described above will create a conflict of commitment or interest between the employee and the CSU. I find that:

- the information submitted does not present a conflict of commitment or conflict of interest.
- the information submitted may present a conflict of commitment or a conflict of interest.

Below, explain how the conflict will be mitigated or eliminated.

\*

HRPA Rev. June 2023

*If an independent committee review is sought, the Administrator shall contact HR Policy & Audit Readiness ([hrpolicy@cpp.edu](mailto:hrpolicy@cpp.edu)) before signing the form for guidance on next steps.*

Administrator’s Name (Print): \*  Title, Dept: \*   
 \* Click here to sign  06/09/2023

**TERMINOLOGY**

**Appropriate Administrator:** The administrator to whom the MPP directly reports

**Conflict of Commitment:** Any outside work that creates a perceived or actual conflict with an employee’s ability to perform normal CSU work assignments, maintain satisfactory performance, and meet his/her responsibilities to the CSU.

The following is a partial list of possible conflicts of commitment that merit a case-by-case examination of the outside employment activity to determine whether the activity should be managed appropriately, reduced or eliminated. Conflict of commitment may be found if the outside employment

activity results in:

- A reduction of the employee's time and energy devoted to CSU activities
- The use of CSU property or other resources without authority (other than de minimis)
- An influence over the way the employee performs his/her CSU responsibilities
- The disclosure of confidential or proprietary information acquired through the performance of CSU duties
- Acting against the CSU's best interest or in conflict with the CSU's mission and goals
- The violation of CSU policies, procedures or practices

**Conflict of Interest:** The Political Reform Act prohibits an employee from making, participating in the making, or influencing a governmental decision in which the employee has a financial interest. A conflict of interest exists if the outside employment creates a financial interest on the part of the employee that precludes the employee from making decisions within the scope of the employee's duties.

**Outside Employment:** Outside employment is any employment not compensated through the CSU payroll. Employment by the CSU foundation or CSU auxiliary is considered reportable outside employment and must, therefore, be disclosed. This policy does not apply to unpaid volunteer work.

**Reportable Employment/Income:** Any work for which a W-2 or 1099 is issued. Reportable income can come from a number of sources, including but not limited to one-time speeches/presentations, paid work for profit or non-profit entities, and paid service on a board of directors. Passive income (e.g., payments for services performed in the past, including royalties for writing, copyrighted work, research, and patented materials) is not reportable.

## RESOURCES

- [HR 2016-06](#) - CSU Outside Employment Policy

## QUESTIONS

Contact: Ellen Bui  
HR Policy & Audit Readiness Analyst,  
Employee/Labor Relations & Compliance  
Tel: (909) 869-3938  
[hrpolicy@cpp.edu](mailto:hrpolicy@cpp.edu)