**Disclosure Initiative: Frequently Asked Questions**

Q: Why do we have this procedure?

A: An internal review revealed the need for a procedure to notify employees to disclose required and essential information and for the College to respond to these disclosures. In this connection, certain disclosures are required by law or College policies. Public employees are legally required to avoid conflicts of interest (see, for example, Public Act 317 of 1968) and College Policies, including the Standards of Conduct Policy, require employees to avoid situations that may cause a question as to their actions, integrity, or motives.

 Specifically, conflicts of interest could arise due to outside employers offering services similar to those offered by the College, or the outside employer or its employees may interact with the College in business or employment relationships. Criminal charges or convictions may affect the public perception regarding one’s performance given one’s position, or it may affect LCC’s public image. The loss or suspension of a work-related credential may impact one’s ability to hold a specific position or teach a specific course or type of course. Other disclosures are essential for the maintenance of an environment conducive to academic and operational excellence.

Q: Have there been cases in which conflicts of interest arising from outside employment have been found?

A: Yes, actual cases of conflicts of interest arising from outside employment have included:

1. A College employee running a personal business on College time, using College resources and employing Students to perform work for the business during class lab hours.
2. A College employee being employed by a business that provided training and government certifications to students identical to College training and certifications, and soliciting students to select the external training.
3. A College employee running a personal business similar to a College-provided lab and promoting the outside business during lab hours.
4. A full-time College employee who was unavailable during assigned working hours due to work obligations for an outside employer.
5. A College employee using College equipment to operate a personal business (outside of regular College work hours).

Q: What are some examples of potential conflicts of interest related to outside employment creating a potential conflict of interest?

A: Some examples of potential employment related conflicts of interest are:

1. A purchasing employee working for a company that provides any kind of goods or services to the College.
2. An accounting employee working for a company that provides auditing services to the College.
3. An employee providing paid consulting services (even on his or her personal time) to a vendor or supplier of goods or services to the College.
4. An employee working for a business providing training classes that are identical to or that compete with training provided by the College.
5. An employee involved in selecting textbooks for classes that also works for a textbook publishing company.

Q: Is it necessary to report old, historical criminal convictions and charges, including those for which there is no ongoing oversight or compliance?

A: All criminal offenses since the date of hire should be reported at this time. Therefore, employees are not burdened with the responsibility of determining if a conviction or charge is currently relevant.

Q: What if a criminal offense or charge is unrelated to the employee’s LCC assignment?

A: For each reported charge or conviction, the College will, if necessary, communicate with the employee to determine whether any significant relationship exists between the charge the position(s) held by the employee. If it is determined that the charge is unrelated to the position(s) held and there are no concerns regarding the impact on the College public image, it is likely that no action will be taken.

Q: Who will be privy to information that is disclosed?

A: All disclosures will be treated as confidential information and, except as otherwise required by law, will be shared only with those with a legitimate need to know.

This Q&A is provided to answer anticipated frequently asked questions. It is not possible to proactively respond to each particular circumstance. If, after review of this document, you have additional questions or concerns, please contact a member of our Labor Relations and Organizational Development Staff:

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