



GovState Ethics & Compliance Regulations: *An Introduction*

Therese King Nohos
Vice President, General Counsel
August 28, 2025



What's New?

On October 21, 2024, the Board of Trustees passed a new regulation—Regulation VII—dedicated entirely to Ethics & Compliance.



Does the new Regulation apply to me?

The new regulation applies to
all GovState employees.

Where can I find the Regulation?

It's available online via the Board's Public Website:

<https://www.govst.edu/bot-bylaws/>





Why should I read the Regulation?

The Regulation guides employee conduct on day-to-day issues. It's important to stay compliant with the law and with GovState policies.



Overview

Following is a snapshot of topics covered. Every employee is encouraged to read the Regulation itself.

Who to contact for help

- Consult GovState's Ethics Officer (Kaitlyn Wild) whenever you're unsure of how to act in an ethical manner or to report a potential ethics violation
- Consult GovState's General Counsel (Therese King Nohos) when seeking an opinion on what is legal and/or compliant

General Guidelines

- Public service is a public trust, not to be exploited for personal gain.
- Public service requires honest and impartial performance.
- Public servants serve as stewards of taxpayer resources.
- Public servants are good citizens.
- Public service must be an equal opportunity for all.

Personal Reporting Obligations

Whenever an employee learns that another individual subject to this Code has committed a violation of the Code, the employee has a duty to report such suspected violation to the Ethics Officer promptly.

Specific Guidelines

GovState Does Not Discriminate

Discrimination based on a person's protected characteristic, such as gender, race, religion, disability, etc. is strictly prohibited.

GovState Does Not Retaliate

Retaliating against someone who brings a good faith complaint or participates in an investigation is strictly prohibited.

Timekeeping

Employees are required to truthfully and accurately record in writing their time spent on University business on a daily basis.

Reimbursements

Any expense for which reimbursement is sought must be actual, reasonable, and adequately documented. Pre-approval may be required.

Gift Ban

With very few exceptions, do not take gifts from people seeking to do business with the University. Gifts include anything of monetary value, including entertainment (e.g., concert tickets) and food (e.g., lunches and dinners).

Prohibited Political Activities

While on University property or during work time or while using University resources, do not:

- Participate in political events (e.g., rallies)
- Solicit political/campaign contributions, including selling tickets for fundraisers
- Survey voters
- Assist at polls

Prohibited Political Activities

Cont'd

- Solicit votes on behalf of a candidate or for/against a referendum
- Circulate, review, or file a petition on behalf of a candidate or for/against a referendum
- Make campaign contributions
- Campaign for any office or for/against a referendum
- Manage or work on a campaign for any office or for/against any referendum
- Serve as a delegate (or proxy) to a political party convention
- Participate in a recount or challenge to the outcome of any election

Nepotism, Conflicts of Interest, Conflicts of Commitment

Avoid and/or Disclose

- Avoid conflicts of interest (e.g., teaching a class where your child is enrolled)
 - Report unavoidable conflicts of interest so the University may mitigate (e.g., requiring recusal from a hiring committee where applicant includes a Relative)

Common Pitfalls

- Do not Influence the Decision to Hire or Promote a Relative
- Do not Serve as a Decisionmaker when your Relative may benefit (e.g., the award of a scholarship)
- Intimate Personal Relationships are Prohibited between Supervisor/Employee and Instructor/Student
 - Seek Approval of Outside Employment

“Revolving Door” Prohibition

- Do Not Participate in Contract Negotiations with a Vendor Who Has Hired You or is Negotiating Employment with You
- If you were materially involved with deciding to contract with a particular vendor, you cannot work for that vendor for at least 12 months after you leave GovState.

Other Prohibited Conduct Issues

- Insubordination
- Disruptive Conduct
- Breach of Confidentiality (Including FERPA)
- Stealing
- Misuse/Abuse of State Property
- Improper Destruction of University Records



Other Conduct Issues Cont'd

- Conduct Unbecoming of a Supervisor
- Threatening Words, Actions, Violence
- False Statement
- Health & Safety Violations
- Official Misconduct
- Failure to Complete Mandatory Trainings



Please see:

Therese King Nohos, General
Counsel, tnohos@govst.edu

Kaitlyn Anne Wild, Compliance
Director, kwild@govst.edu

Questions?