



CITY OF NEW YORK CONFLICTS OF INTEREST BOARD

2 Lafayette Street, Suite 1010

New York, New York 10007

(212) 442-1400

Fax: (212) 442-1407 TDD: (212) 442-1443

A Practical Approach to Establishing and Maintaining A Values-Based Conflicts of Interest Compliance System

Prof. Mark Davies, Executive Director

Introduction

I. Context, Purpose, Principles, History, and Basis of Conflicts of Interest Systems

- A. Context of Conflicts of Interest Systems [see written materials]
- B. Purpose of Conflicts of Interest Systems
To promote both the reality and the perception of integrity in government by preventing conflicts of interest before they occur.
- C. Principles of Conflicts of Interest Systems
- D. The Antiquity of Conflicts of Interest Systems [see written materials]
- E. Values-Based and Compliance-Based Conflicts of Interest Systems
- F. Cautions

II. Structure of an Effective Conflicts of Interest System: The Three Pillars

- A. First Pillar: Code of Ethics and Conflicts of Interest Code
- B. Second Pillar: Disclosure
 - 1. Transactional Disclosure
 - 2. Applicant Disclosure
 - 3. Annual Disclosure
- C. Third Pillar: Administration
 - 1. Nature of Administrating Agency: Board or Office
 - 2. First Function of the Board/Office: Conflicts of Interest Advice
 - 3. Second Function of the Board/Office: Training and Education
 - 4. Third Function of the Board/Office: Regulation of Disclosure
 - 5. Fourth Function of the Board/Office: Enforcement

III. A Step-by-Step Approach to Establishing a Conflicts of Interest System [see written materials]

IV. Possible Model Conflicts of Interest System and Annual Disclosure Form [see written materials]

Conclusion