



State of New Jersey
STATE ETHICS COMMISSION

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December 10, 2018

TO: Dawood Farahi, Ph.D., Office of the President
Kean University

FROM: Mark T. Holmes, Esq. *M.T.H.*
Acting Executive Director, State Ethics Commission

Regan A. Barbetti, Esq. *RB*
Ethics Compliance Officer, State Ethics Commission

SUBJECT: Ethics Compliance Audit – Kean University

The State Ethics Commission (“SEC”) recently conducted an audit of the ethics program at Kean University (“Kean”). The ethics audit was undertaken pursuant to *N.J.S.A. 52:13D-21(e)(3)* and as part of the SEC’s compliance plan which requires systematic audits of State agencies in the Executive Branch for compliance with applicable ethical standards. On December 5, 2018 SEC Ethics Compliance Officer Regan A. Barbetti met with Ethics Liaison Officer Kelly Schlusselfeld (“Schlusselfeld”) to discuss the status of the Kean’s ethics program. A detailed Compliance Questionnaire was completed during the meeting, and ELO Schlusselfeld provided the requested documentation to complete the audit.

Based upon a review of the Compliance Questionnaire and accompanying documents, the Commission concludes that Kean is in substantial compliance with reporting, documentation and other requirements of the New Jersey Conflicts of Interest Law, regulations issued thereunder, and applicable Executive Orders. The audit revealed that Kean has effectively implemented ethics procedures. In particular, the following areas have been handled extremely well by ELO Schlusselfeld:

1. Processing Attendance at Events forms and submitting speaker exception forms to the SEC for review;
2. Coordinating and communicating with Human Resources to ensure employees receive the required ethics documents at new hire orientation as well as receiving their post-employment restriction letters;
3. Maintaining and providing the SEC with updated Financial Disclosure filer lists; and

4. Reminding employees quarterly to update their Outside Activity Questionnaire forms, above and beyond what is required.

On behalf of the New Jersey State Ethics Commission, we would like to thank ELO Schlusselfeld for her assistance with this audit and we look forward to working with you to continue to bring the highest ethical standards to Kean University.

Please feel free to contact the SEC if you have any questions or concerns regarding the findings in this report.

Cc: Ms. Kelly Schlusselfeld, Ethics Liaison Officer *(via email only)*