August 2026

# RESPONSIBILITIES OF THE AGENCY ETHICS OFFICER

An overview of the legal obligations under the Public Officers Law and applicable regulations

New York State
Commission on Ethics and Lobbying in Government

540 Broadway
Albany, NY 12207

https://ethics.ny.gov

INTEGRITY • TRUST • TRANSPARENCY
NYS COMMISSION ON ETHICS AND LOBBYING IN GOVERNMENT

# Table of Contents

**Overview....3**

**Outside Activity Approvals ....5**

Actions Required by the agency Ethics Officer for Outside Activities....6

**Gifts and Widely Attended Events....7**

Actions Required by the agency Ethics Officer for Gifts and Widely Attended Events....10

**Honoraria Approvals and Official Expense Payments....12**

Actions Required by the agency Ethics Officer for Honoraria....13

**Official Activity Expense Payments ....14**

Actions Required by the agency Ethics Officer for Official Activity Expenses ....14

**Requirements for Financial Disclosure Statement Filers ....16**

**Options Available to Certain FDS Filers ....19**

Actions Required by the agency Ethics Officer for FDS Filers ....20

**Mandatory Ethics Training for NYS Employees ....21**

Training Deadlines ....22

Comprehensive Ethics Training Course ....23

Online Ethics Refresher Course ....25

Training Resources ....26

**Statewide Ethics Training Application ....30**

How to Report and Submit Monthly Training Information ....32

Actions Required by the Agency Ethics officer for Ethics Training....33

# *Ethics Officers...It's more than a title... it's a responsibility.*

## Overview

All New York State officers and employees are legally obligated to comply with the state's ethics laws and regulations. Agency Ethics Officers serve a critical function by assisting their agency's officials and employees in navigating these vital laws and rules. In addition to providing general guidance on compliance with the ethics laws and regulations, the Ethics Officer plays a central role in administering many of these requirements and is also responsible for assisting their agency's workforce with specific legal obligations related to the following subjects:

- Requirements for Financial Disclosure Statement ("FDS") Filers
- Mandatory Ethics Training
- Approvals for Outside Activities
- Approvals for Honoraria
- Approvals for Official Activity Expense and Service Payments
- Acceptance of Gifts (including Widely Attended Events)

## Resources

The Commission on Ethics and Lobbying in Government (the "Commission" or "COELIG") is available to assist Ethics Officers in carrying out their duties. Specific resources on the Commission's website include:

- Ethics Laws and Regulations
- Ethics Advisory Opinions
- Attorney of the Day Program
- Ethics at a Glance
- Topic-Based FAQs
- Ethics Spotlight Newsletter

In addition, the Commission maintains an Ethics Officer SharePoint site that features Comprehensive Ethics Training Course (CETC) training materials, including Spanish language materials, information on how to navigate the Statewide Ethics Training Application (SETA), and other valuable resources. To gain access to the Ethics Officer SharePoint site, email a request to COELIGEducation@ethics.ny.gov.

# Contact Us

Do not hesitate to contact Commission staff with questions or for guidance on any specific matter.

**For FDS Filing Questions**
Call the FDS Unit at 800-87-ETHICS (800-873-8442) and press "3" to speak to an FDS filing specialist, or email FDSHelpDesk@ethics.ny.gov.

**For Guidance on Ethics Issues**
Call 800-87-ETHICS (800-873-8442) and press "2" to speak to the Attorney of the Day, or email guidance@ethics.ny.gov.

**For Ethics Training Questions**
Call 518-474-1382 or email the Education Unit at COELIGEducation@ethics.ny.gov.

**To Report Misconduct**
Call the tip line at 800-87-ETHICS (800-873-8442) and press "4" to speak to a member of the investigative team or visit the Commission's website and fill out the online form.

NYS Commission on Ethics and Lobbying in Government
540 Broadway, Albany NY 12207
Telephone: (518) 408-3976

# Outside Activity Approvals

**Outside Activities**

Statewide elected officials, heads of state agencies, and all Policymakers, must follow the Commission's outside activity regulations at 19 NYCRR Part 932. The regulations require Policymakers (other than Policymakers who are unpaid or paid on a per diem basis) to obtain approval from their agency **and** from the Commission before engaging in certain outside activities. Agency heads and statewide elected officials must seek outside activity approval directly from the Commission. Generally, the Ethics Officer assists the agency head in preparing the application.

Most agencies designate the Ethics Officer to perform their agency's portion of the outside activity review and analysis that is required prior to approving the activity request under the regulations.

Policymakers are required to seek agency **and** Commission approval before engaging in any of the following outside activities:

1. Employment or a business venture that generates, or is expected to generate, more than $5,000 in compensation annually. (For agency heads and statewide elected officials, $1,000 is the minimum dollar threshold that triggers the need for Commission approval.)
2. Holding elected or appointed public office (regardless of compensation).
3. Serving as a director or officer of a for-profit entity (regardless of compensation).
4. Serving as a director or officer of a not-for-profit entity, where annual compensation is more than $5,000.

No outside activity approval is necessary when a Policymaker wishes to serve as a director or officer of a not-for-profit entity and receives up to $999 in annual compensation, but the Policymaker is obligated to provide written notice of their outside activity to their agency before commencing service, and annually thereafter. Serving as a director of a not-for-profit entity and receiving compensation between $1,000 and $5,000 requires the agency's approval but not the Commission's.

**Actions required by the Agency Ethics Officer for Outside Activities**

1. For Policymakers in your agency (other than those who are unpaid or paid on a per diem basis), the Ethics Officer must review and, if appropriate, approve any outside activity above $5,000 in annual compensation, in accordance with 19 NYCRR Part 932.
2. If a Policymaker, head of a state agency, or statewide elected official's outside activity requires the Commission's approval in addition to the agency's approval in accordance with 19 NYCRR Part 932, the Ethics Officer assists in completing the required approvals. The Outside Activity Approval Form is available on the Commission's website.
3. Educate all employees, regardless of their policymaking status, on avoiding potential conflicts of interest arising from outside activities.

## Additional Resources

Further information on Outside Activities can be found on the Commission's website, including:

- Relevant Outside Activity Advisory Opinions: 00-03, 99-12, 98-16, 97-28, 93-14, 92-23, 91-07,
- An Outside Activities FAQ document,
- The Outside Activities Approval Form, and
- Relevant Outside Activity Regulations: TITLE 19 NYCRR PART 932.

# Gifts and Widely Attended Events

The regulations governing the acceptance of gifts by state officers and employees are set forth in 19 NYCRR Part 933. The regulations cover the receipt and acceptance of anything of value – such as money, meals, entertainment, travel, and lodging – and under what conditions the receipt of gifts is allowed or prohibited.

**Covered Person**

Gift rules apply to a "Covered Person," which includes:

- Statewide elected officials,
- Legislative members and employees,
- Officers and employees of New York State departments, boards, bureaus, divisions, commissions, councils, or other State agencies (other than unpaid and per diem officers of such entities), and
- Members, directors, and employees of New York State public authorities and public benefit corporations (other than unpaid and per diem members and directors of such entities).

Unpaid and per diem officers are excluded from Public Officers Law § 73; however, they are still bound by the conflict-of-interest rules found in Public Officers Law § 74.

**Gifts and Exceptions**

The Commission will generally consider something that has a fair market value of $15 or more to be a gift. A gift includes, but is not limited to, money, services, loans, travel, lodging, meals, refreshments, entertainment, forbearance (agreeing to change the terms for repayment of a debt), or a promise having a monetary value.

In addition, an impermissible gift cannot be redirected to a third party, including to a spouse, child, or charitable organization. Accepting multiple permissible gifts from the same source - even if each gift is worth less than $15 - could, depending on the circumstances, violate Public Officers Law § 74 by creating an actual or an apparent conflict of interest or an appearance of improper influence.

The regulations also contain a number of exceptions which are not considered gifts. The following items are not considered "gifts" under the regulations. These items or services may be accepted from anyone (including an "Interested source") as long as the acceptance does not create an actual or apparent conflict of interest or give the impression of improper influence.

There are several gift exceptions. Please refer to the box on the right for common gift exceptions.

**Step-by-Step Gift Analysis**

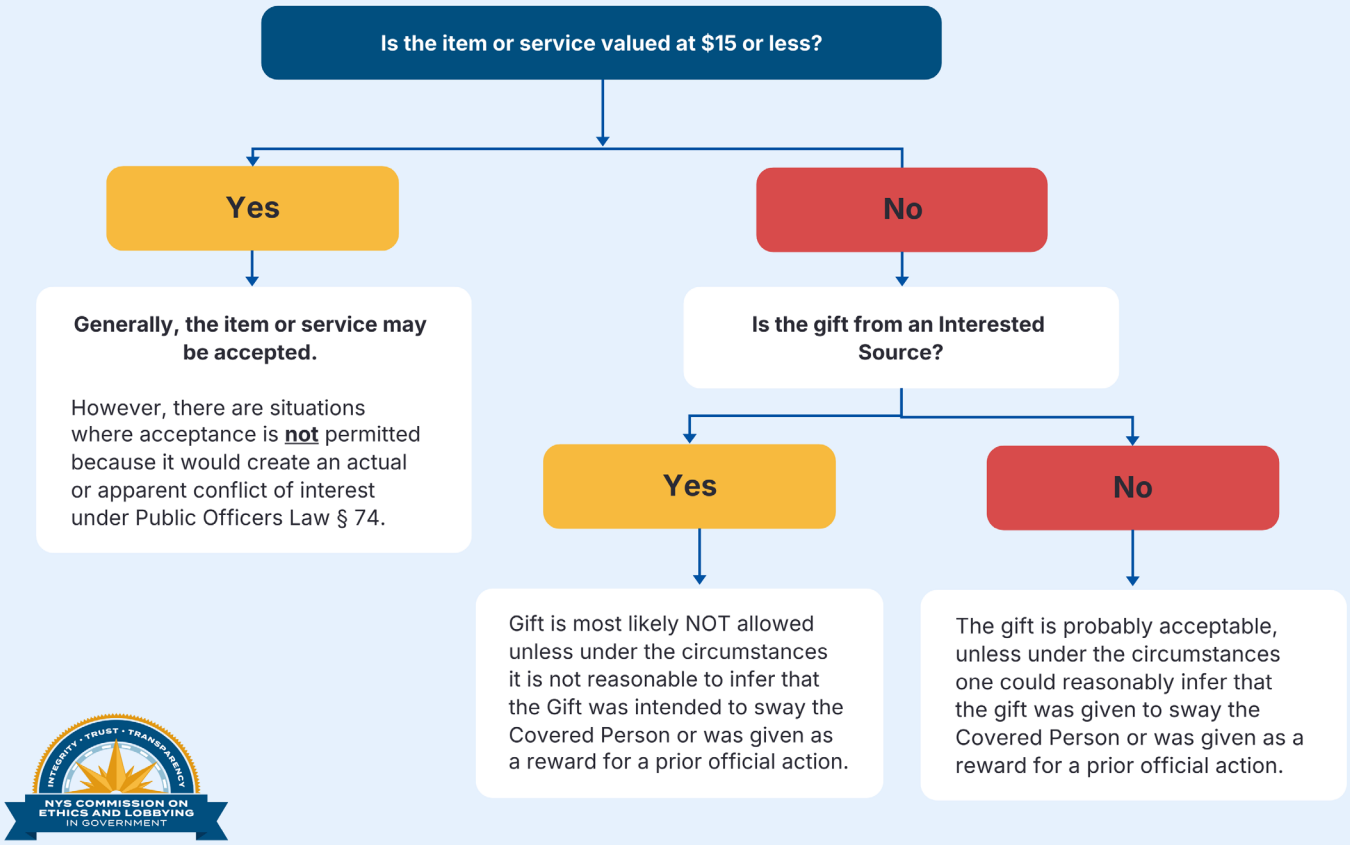
The Commission has developed the following analysis to assist you in determining if the acceptance of a gift is permissible. Generally, gifts from an "interested source" are prohibited. As defined above, an interested source is a person or entity that does business or wants to do business with your agency or is regulated by your agency. Generally, an interested source is any person or entity that may wish to influence a decision by you or your agency.

## Gift exceptions include:

- Awards or plaques in recognition of public service;
- Honorary degrees;
- Promotional items with no resale value;
- Discounts available to the general public, e.g., wireless providers offer discounts to all government employees;
- Gifts from family members and personal relationships where it is clear that the relationship is not being used as a pretext to give an otherwise impermissible gift;
- Contributions to political campaigns;
- Meals and beverages provided to participants at professional and educational programs;
- Local travel payments for tours related to one's official activity;
- Food or beverage valued at $15 or less per event; and,
- Complimentary attendance at certain events.

# Gift Analysis: Can I accept or should I decline?

**Disclaimer:** Do not substitute the below flow chart for legal advice. Always consult your agency Ethics Officer or COELIG for guidance BEFORE accepting a gift.




NYS COMMISSION ON ETHICS AND LOBBYING IN GOVERNMENT

**More information is available on the Gifts section of the COELIG website.**

# ATTORNEY OF THE DAY

+1 800-87-ETHICS

Guidance@ethics.ny.gov

**When in doubt whether a gift is permissible or not, contact COELIG's Attorney of the Day.**

**Complimentary Attendance at a Widely Attended Event**

The following conditions must be satisfied for a state employee to make use of the Widely Attended Event exception:

1. Complimentary admission must be offered by the sponsor of the event; and
2. Twenty-five individuals – who are not from your agency – must attend or in good faith be invited to attend; and
3. Either
    (a) The event is related to the individual's official duties or responsibilities (this can be satisfied if there is a speaker at the event who addresses an issue of public interest or concern) or
    (b) The event allows the individual to perform a ceremonial function appropriate to their position; and
4. The Ethics Officer must be informed in writing of the Widely Attended Event before the event takes place.

Since the conditions for participating in a Widely Attended Event include an examination of the employee's specific job duties, a separate analysis must be conducted for each employee considering participation in the event.

Food and beverages can be accepted at a Widely Attended Event only if it is offered to all participants.

The Widely Attended Event exemption does not permit attendance at entertainment, recreational, or sporting activity unless the presentation addressing the public interest or concern is delivered during the entertainment, recreational, or sporting activity.

**Actions required by the Ethics Officer for Gifts and Widely Attended Events**

1. Educate all agency employees on the requirements and prohibitions in the gift regulations.
2. Make employees aware of the requirement set forth in Part 933.4(a)(7)(ii) that employees must provide the Ethics Officer with prior written notification of their intent to accept a complimentary invitation to a Widely Attended Event, as defined in Part 933.4(a)(7)(i).
3. Advise agency employees on questions and issues that may arise on the applicability of the gift regulations to specific scenarios.

## Additional Resources

Further information on Gifts and Widely Attended Events can be found on the Commission's website, including:

- Relevant Gifts Advisory Opinions: 20-02
- Gifts FAQs Document
- Relevant Gifts Regulations: TITLE 19 NYCRR PART 933

# Honoraria Approvals and Official Activity Expense Payments

## Honoraria

An honorarium is a payment for a service that is unrelated to one's state duties such as delivering a speech, publishing an article, and attending a conference. An honorarium may also include expenses incurred for travel, lodging, and meals related to the service performed.

Statewide elected officials, heads of state agencies, and all state officers and employees, are subject to the Commission's honoraria regulations at 19 NYCRR Part 930. Statewide elected officials and agency heads apply directly to the Commission for approval to accept an honorarium. Generally, the Ethics Officer assists the agency head with the application. Statewide elected officials and heads of agencies are prohibited from accepting an honorarium specifically for delivering a speech, although other activities are permissible.

There are exemptions from the honoraria approval process for SUNY/CUNY academic filers who serve in specific titles.

All other requests for approval to accept an honorarium are handled at the agency level. Generally, the Ethics Officer reviews and approves an employee's request to accept an honorarium in accordance with 19 NYCRR Part 930.

Some restrictions on honoraria include:

- State personnel, equipment, and time cannot be used in preparing the service for which an honorarium is offered.
- State funds cannot be used to pay the covered person's attendance, registration, travel, lodging, or meal expenses.
- If the service is to be performed during the covered person's official workday, he or she must charge accrued leave (other than sick leave) to perform such service.
- If the honorarium is offered by or on behalf of an interested source, it may only be accepted if it is unreasonable to infer that the honorarium was intended or expected to influence the covered person or was intended as a reward.
- The Ethics Officer/approving authority must determine that the offeror is not being used to conceal that the honorarium is actually offered or paid by an interested source.
- Acceptance of an honorarium must not create even the appearance of a conflict of interest – in violation of Public Officers Law § 74 (the Code of Ethics).

An agency's honoraria approvals are not required to be sent to the Commission. Instead, agencies must keep records of all honoraria approvals for three years, provide a copy to the employee, and make the record available to the Commission upon request.

**Actions required by the Agency Ethics Officer for Honoraria**

1. Review and render a determination on employee requests for honoraria approvals in accordance with the regulations.
2. Ensure that the agency amends the internal records retention policy to require honoraria approvals to be retained for three years in accordance with the regulations.
3. Prepare any application to the Commission by a statewide elected official or agency head for approval to accept an honorarium.
4. Educate agency personnel on the requirements and restrictions contained in the honoraria regulations.

## Additional Resources

Further information on honoraria can be found on the Commission's website, including:

- Relevant Post-Employment Advisory Opinions: Advisory Opinion 96-28, Advisory Opinion 91-20, Advisory Opinion 90-09
- Honoraria FAQs
- Public Officers Law § 73
- Honorarium Approval Request Form
- 19 NYCRR Part 930 – Honoraria Regulations

# Official Activity Expense Payments

Official Activity Expense Payments are also commonly referred to as "travel payments" or "travel reimbursements." The regulations governing official activity expense payments are set forth in 19 NYCRR Part 931.

Statewide elected officials and agency heads apply directly to the Commission for approval to accept an Official Activity Expense Payment. The Ethics Officer usually assists the agency head in preparing the application.

All other requests for approval to accept an Official Activity Expense Payment are handled at the agency level, usually by the agency Ethics Officer.

Official Activity Expense Payment approvals for employees are not required to be sent to the Commission. However, the agencies must keep all approvals for three years, provide a copy to the employee, and make the record available to the Commission upon request.

**Restrictions on acceptance**

- Mode of travel and related expenses must be in accordance with your agency's travel policy.
- Payment or reimbursement from an "interested source" is ordinarily impermissible.
- Must report travel reimbursement on FDS if over $1,000.
- The agency/approving authority is required to maintain an Official Activity Approval for each approved request, and it must contain the information specified in Part 931.

## Actions Required by the Ethics Officer for Official Activity Expenses

1. Review and render a determination on employee requests to accept an Official Activity Expense Payment in accordance with the regulations.
2. Ensure the agency amends the internal records retention policy to require Official Activity Expense Payment approvals be retained for three years in accordance with the regulations.
3. Prepare any application to the Commission by a statewide elected official or agency head for approval to accept an Official Activity Expense Payment.
4. Educate agency personnel on the requirements and restrictions contained in the Official Activity Expense Payment regulations.

Additional Resources

Further information on Official Activity Expense Payments can be found on the Commission's website:

- Advisory Opinion 99-11, Advisory Opinion 91-08
- Official Duty Expense Payment Request Form
- Public Officers Law § 73
- 19 NYCRR Part 931 – Official Activity Expense Payments

# Requirements for Financial Disclosure Statement Filers

**What is an annual Financial Disclosure Statement?**
An annual Financial Disclosure Statement (FDS) is a record containing financial and professional information about an FDS Filer and their spouse or domestic partner. The FDS program is intended to prevent conflicts of interest between a person's duties in the public interest and their private financial interests and affiliations.

A filer's FDS is available to the public upon request. However, the document does not contain Social Security numbers, account numbers, or residential addresses. Sensitive information, such as names of minor children, is redacted before the document is released.

**Who is required to file an FDS?**
There are two groups of state officers and employees who are required to file an FDS. The first are individuals who are designated by their agency as "policymakers." The second are "threshold filers" - individuals whose annual state salary exceeds CSEA Salary Grade 24 (regardless of any union membership).

**Who is a Policymaker?**
A policymaker is an officer or employee who, as a regular and significant part of their official duties, are involved in formulating or implementing the goals and policies of the state or of their state agency, regardless of their annual compensation or collective bargaining status.

**Policymaker [*pol·i·cy·mak·er*] noun**

1. Those officers and employees who, as a regular and significant part of their official duties, are involved in formulating or implementing the goals and policies of the State or a State agency may be Policymakers, regardless of their annual compensation or collective bargaining status.

In determining whether an individual is a policymaker, the agency should consider whether such individual:

1) acts in the capacity of:
    a. the head of a state agency (e.g., commissioner, president, executive director, chair, or equivalent position);
    b. general counsel, chief counsel or equivalent position;
    c. member of a board, commission, or the equivalent highest governing body for a state agency;
    d. member, director, or equivalent position of a public authority, other than a multi-state authority; or
    e. member of a board, commission, task force, or equivalent body empowered to issue binding recommendations to the legislature, governor, or a state agency.

2) is the head or deputy head of a field, branch, regional, or other office;

3) is the chair, dean, director, or otherwise head of an academic department, school, college, institute, or center, and exercises authority or discretion as set forth in #7 below;

4) has been designated as managerial pursuant to § 201(7) of the Civil Service Law because the individual formulates policy;

5) is in the non-competitive class pursuant to § 2.2 of the Rules for the Classified Service of the Department of Civil Service and, under Appendix 2 of the Rules and Regulations of the Department of Civil Service, holds a position designated by the symbol φ on the basis that it requires the performance of functions influencing policy;

6) has the authority to make final decisions affecting the individual's state agency, another state agency or entity, or the public; or

7) exercises authority or discretion, other than authority or discretion that is ministerial in nature, in helping to formulate or implement the goals and policies of the state or a state agency, including, but not limited to:
    a. researching, analyzing, developing, implementing, identifying the need for, and making recommendations as to policies, regulations, rules, practices, procedures, programs, guidance, manuals, initiatives, budget proposals, or legislative proposals;
    b. developing plans or strategies to achieve the goals and policies of the state or a state agency;

c. determining appropriations and expenditures and making budget decisions; or determining appropriations and expenditures and making budget decisions; or
d. negotiating, authorizing, or approving contracts, permits, licenses, significant purchases, or obtaining grants of money or loans with or from non-governmental entities.

Agencies are responsible for determining which of their employees should be designated as policymakers, using these guidelines. If you have additional questions on these guidelines, please email the Attorney of the Day at Guidance@ethics.ny.gov.

**Special Cases**

A non-policymaker whose full-time salary exceeds the threshold rate, but who voluntarily works less than full-time (such as by taking extensive leave), and therefore receives actual compensation below the filing rate, is still considered a Threshold Filer and must file an FDS.

However, a non-policymaker with a full-time salary over the filing rate but who is hired on a permanent part-time basis and therefore receives annual compensation below the filing rate, is not required to file an FDS.

**FDS Filing Due Dates for Existing Filers**

- May 15th is the filing deadline for Statewide elected officials, State officers, political party chairs, and State employees designated as Policymakers and Threshold Filers.
- November 15th is the filing deadline for academic employees at SUNY and CUNY who meet the filing requirements.

# Options Available to Certain FDS Filers

## FDS Extensions

An FDS filer may request an extension of time to file an FDS in one of two ways: by submitting an extension request from the filer's dashboard by way of the FDS Online Filing System; or by downloading and printing the FDS Extension Request Form available on the Commission's website. **The deadline to apply for an extension is the same as the filing deadline.**

More information on how to request an extension is available in the regulation at 19 NYCRR Part 936.

## FDS Exemptions

Only Threshold Filers can seek an exemption from the FDS filing requirement. Policymakers are not eligible for an exemption.

There are two ways to apply for an exemption:

1. An individual can apply directly to the Commission for an FDS exemption via the filer's dashboard in the FDS Online Filing System, or by downloading and printing the FDS Exemption Request Form available on the Commission's website.

2. An Ethics Officer, on behalf of the agency, may apply for an FDS exemption for a group of Threshold Filers who serve in the same job title or classification by using the FDS Agency/Union Exemption Request Form available on the Commission's website. A union may also request an exemption on behalf of all filers in a specific job title or classification.

An exemption may be granted where, in the discretion of the Commission, the public interest does not require disclosure and the applicant's duties do not involve the negotiation, authorization, or approval of:

i. contracts, leases, franchises, revocable consents, concessions, variances, special permits, or licenses as such terms are defined in section 73 of the Public Officers Law;
ii. the purchase, sale, rental or lease of real property, goods or services, or a contract; or
iii. the obtaining of grants of money or loans; or
iv. the adoption or repeal of any rule or regulation having the force and effect of law.

**The deadline to request an FDS exemption is the same as the filing deadline.**

## Previously Granted Exemptions

An exemption, once granted, remains valid as long as the filer:

- remains in the same title or performs the same job duties under the exempted title;
- is employed by the same agency at which the exemption was originally granted; and
- has not been subsequently designated as a Policymaker.

The Commission may review existing exemptions and determine the exemption is no longer appropriate under the rules outlined in Part 935.

Please see 19 NYCRR Part 935 for more information regarding the exemption process.

### Actions required by the agency Ethics Officer for FDS Filers

1. Submit a filer certification each year before the end of February, containing the name, job title, home address, and email address of each individual designated an FDS Filer. The filer certification is submitted via the FDS Online Filing System. Instructions on how to navigate the FDS Filing System for both FDS Filers and Ethics Officers are available on the Commission's website.
2. For SUNY/CUNY only: Submit a filer certification on or before September 30 of every year containing the name, job title, home address, and email address of each individual designated as an Academic FDS Filer. The filer certification is submitted via the FDS Online Filing System.
3. Submit an amended certification through the FDS Filing System within 30 days from the date: (i) an individual becomes either a Policymaker or a Threshold Filer, or (ii) an FDS Filer leaves state service or has a change in job that results in the individual no longer being either a Policymaker or a Threshold Filer.
4. Notify FDS Filers of their legal obligation to file an FDS. Please notify individuals of their requirement to file prior to creating a profile.

# Mandatory Ethics Training for NYS Employees

The Ethics Commission Reform Act of 2022 (ECRA) mandates that all executive branch state officers and employees – approximately 330,000 individuals – receive ethics training every year by attending live comprehensive ethics training every two years and taking online refresher training in the intervening years. Prior to July 8, 2022, the Public Integrity Reform Act of 2011 (PIRA) mandated live ethics training for a significantly smaller population of approximately 30,000 Financial Disclosure Statement filers every three years. New York is the first state in the nation to administer a program of mandated live ethics training for its entire State workforce.

## Definitions

- **CETC** refers to the live Comprehensive Ethics Training Course that every state employee must complete every other year.
- **Ethics Refresher** refers to the recorded online ethics course employees must complete every year when they are not due for the CETC.
- **On-Demand Ethics Training** refers to a version of the Ethics Refresher in MP4 format, which satisfies the Ethics Refresher requirement. More information in the On-Demand Ethics Training is available here on the Commission's website.
- **OSC Payroll File** refers to those employees who receive paychecks from the Office of State Comptroller ('OSC') and whose data is automatically included and refreshed in SETA.
- **Outlier agency** refers to any agency that is not part of the OSC Payroll File and whose employee information is not automatically refreshed in SETA.
- **SETA** is the Statewide Ethics Training Application. This is the system of record where employee training data is recorded for the entire state workforce. Agencies with their own learning management system are still required to provide employee and training data in SETA.
- **SLMS** refers to the Statewide Learning Management System that is available to most Executive Branch agencies.
- **State Agency** refers to any state department, or division, boards, commissions, or bureau of any state department, any public benefit corporation, public authorities, or commissions with at least one member who is appointment by the governor or the state university of New York or the city university of New York, except community colleges of the state university of New York.

- **New Hires** refers to employees that are new to state service and are required to attend live CETC training within 90 days of their state employment. Agencies whose employee data is provided by the OSC Payroll file are automatically assigned a 90-day due date in SETA. Outlier agencies must provide COELIG with the new hire date so they can be assigned a 90-day due date in SETA.

## Overview

Executive Law § 94(8) requires that all state employees complete yearly ethics training. State employees are mandated to attend an approved ethics training course and have their training completion recorded in the ethics training system of record (SETA).

### General Actions Required by Ethics Officers (or their designee) for Ethics Training:

1. Facilitate the live Comprehensive Ethics Training Course (CETC)
2. Track the ethics training requirements for all agency staff
3. Record the completion of ethics training in SETA for all agency staff

**Employees Required to Complete Yearly Ethics Training**
Ethics Training is required for all state employees (approximately 330,000 individuals) – this includes individuals who serve full-time and part-time, are paid a salary, those who serve on an unpaid or per diem basis, seasonal state workers, and paid student interns.

**Part 939 Waiver and Extension Requests (Effective August 18, 2025)**
These regulations set forth a procedure and criteria for submitting and determining requests for an extension or waiver modifying the statewide ethics training requirements. Part 939 regulation in its entirety is available on the Commission's website.

## Training Deadlines

Ethics training is a yearly requirement. To provide agencies with the greatest flexibility in administering their own internal ethics training programs, the Commission provides a blanket due date of December 31st to all existing state employees. All state employees (other than new hires) are required to complete ethics training on or before December 31st each year. New hires, or employees new to state service, are required to attend live Comprehensive Ethics Training within 90 days of beginning their state job.

The table below helps summarize the required ethics training. As a reminder, many agencies elect to deliver live CETC training to their agency employees every year.

**State Employee and Officers' Ethics Training Requirements and Deadlines**

| Employee Status | 2026 Requirement | 2027 Requirement |
|---|---|---|
| New Hire Employees | Complete the Live CETC within 90 days of appointment to your state job. | Complete Online On-Demand Ethics Refresher Training on or before December 31, 2027. |
| Existing Employees who have completed an online Ethics Refresher (OER) in 2025 via SLMS or your agencies own learning management system | Complete the Live CETC on or before December 31, 2026. | Complete Online On-Demand Ethics Refresher Training on or before December 31, 2027. |
| Existing Employees who completed the Live CETC Training in 2025 | Complete Ethics Refresher Training on or before December 31, 2026. | Complete the Live CETC on or before December 31, 2027. |

**Required Ethics Training Courses**

Executive Law § 94 outlines the live Comprehensive Ethics Training Course (CETC) and the Ethics Refresher Course as the two courses that can be applied to fulfill the ethics training mandate.

## Comprehensive Ethics Training Course ("CETC")

The CETC is a live, instructor-led training that can be conducted in a traditional classroom setting or remotely using videoconferencing tools, such as Webex or Microsoft Teams. The CETC must be presented by an instructor in real time and cannot be pre-recorded, participants must have the ability to ask and get answers to ethics questions during the course.

All newly hired State employees are required to complete the CETC within 90 days from the date of hire and every other year thereafter.

The Agency Ethics Officer, Training Department or other designated internal agency staff should regularly conduct CETC sessions at their agency for both existing and new employees. The Ethics Officer should be present during live training sessions (traditional classroom or remote) and be available to provide clarification on any agency-specific policies that may be stricter than those outlined in the CETC.

The COELIG Training unit has Train-the-Trainer materials available on our Education SharePoint site. Materials include the PowerPoint slide deck, trainer notes, and Ethics Handbook.

**Requests to modify the CETC**

Agencies may submit a request to modify the existing CETC materials. These requests should be sent to the COELIG Education Unit at COELIGeducation@ethics.ny.gov.

General guidelines for CETC modification:

Agencies **may**:

- discuss stricter policies, i.e. zero gift policy,' than those outlined in Public Officers Law and the CETC Training.
- include their own unique polling questions or ethics checks that are more relatable to their agency employees.

Agencies **may not:**

- record the CETC as a substitute for live delivery.
- print and distribute a copy of the CETC slide deck and provide an attestation to employees as an alternate for live or refresher training.
- Remove any sections of the training except for the section on Financial Disclosure Statements which can be removed ONLY if presenting to a group where no FDS filers are present.

**Providing live CETC as part of your employee onboarding orientation procedure**

As part of your employee onboarding process, all new hires should receive live CETC training. This ensures your new employees can safely avoid potential conflicts of interest that diminish the public's trust in our state workforce. Providing live ethics training is especially important for those employees who are employed on a seasonal

and/or temporary basis where access to computers and reliable Wi-Fi/internet may not always be available.

**Tracking CETC attendance**

Any employee who completes the live CETC with their ethics officer (or their ethics officer designee) must have their training completion date recorded in SETA. Refer to the 'Statewide Ethics Training Application' section of this guide for further detail.

**Tracking engagement and participation when utilizing remote platforms**

When conducting live CETC sessions agencies are encouraged to check participation understanding using engagement tools such as live polling or questions and answer opportunities. Conducting live sessions at your agencies allows ethics officers to engage their staff using examples that are agency specific and relatable.

## Online Ethics Refresher Course

After completing the CETC, all employees are required to complete ethics refresher training in the following year. The Online Ethics Refresher Course is a self-directed training course that reviews key concepts in public ethics and guides employees through statutory changes in ethics laws.

As an alternative to an online ethics refresher course, agencies can adopt their own policy to conduct live CETC training every year. Agencies who elect to mandate yearly live ethics training must formally request an adjustment to the tracking of their employee records in SETA. This request must be submitted to the COELIG Education Unit at COELIGeducation@ethics.ny.gov.

**Employees who complete an online ethics refresher are ineligible to complete an online ethics refresher the following year.**

The On-Demand Ethics Training available in the Statewide Ethics Training Application (SETA) is just one of the many options available to agencies to deliver online ethics training to their employees. Beginning early 2026, agencies with their own learning management system can request a SCORM or HTML compatible online ethics training they can disseminate to their employees. Agencies electing to utilize the SCORM/HTML compatible zip files are still required to upload completion information into the system of record for tracking ethics training (SETA).

## Training Resources

### COELIG Education Unit

Whether you're new to the statewide ethics training initiative or a seasoned agency Ethics Officer, the COELIG Education unit is here to assist you. The Education unit would like to help you meet your agency's ethics training compliance goals.

**Education Unit Services**

1. COELIG hosted Comprehensive Ethics Training Courses
2. Agency Specific Training
3. Compliance Monitoring
4. Agency Direct Outreach
5. Employee Direct Outreach
6. Education Unit SharePoint

### COELIG-hosted Comprehensive Ethics Training Courses

The Education unit facilitates weekly deliveries of the live Comprehensive Ethics Training Course via Webex. These deliveries are available on Tuesdays, Wednesdays, and Thursdays throughout the year and are meant to supplement the efforts of the ethics officer in ensuring that every member of the state workforce remains compliant with their ethics training requirement.

Following each COELIG-hosted session, COELIG trainers award training credit using a combination of the Webex attendance report to track the duration of time an employee was logged in along with the number of poll responses they answered. Employees must be logged in from the beginning of the conflicts-of-interest section through the end of the session. The COELIG Training Team provides three (3) polling questions that are multiple-choice and fill-in responses. The polls are not graded; however, they are mandatory as they are used to track an individual engagement throughout the live presentation.

Employees who attend a COELIG-hosted CETC and have employee training records in our Statewide Ethics Training Application (SETA) are automatically marked as completed once their attendance has been verified.

## Agency-Specific Trainings

Ethics Officers (or their designees) may request support from the COELIG Education unit in the form of a COELIG-hosted Agency-Specific training. These training courses offer an opportunity to train a large group of your agency's employees remotely, utilizing Webex or your preferred video conferencing platform.

A minimum enrollment of 100 participants is required for agency-specific training. For agencies looking to train a smaller number of employees, you are encouraged to direct your employees to one of the COELIG-hosted open CETC sessions that are available weekly.

To request an 'Agency-Specific' training, please send an email to: **COELIGEducation@ethics.ny.gov** with up to three (3) preferred dates and times. The COELIG Education unit has availability on Mondays. Requested sessions are not guaranteed until a confirmation email is sent from the COELIG Training Team.

## Compliance Monitoring

The Education Unit provides ongoing support and monitoring of your agency's compliance with the ethics training mandate through available reporting found in SETA along with direct communication efforts.

## Agency-Direct Outreach

The Education unit is available for targeted outreach meetings to assist you in understanding your agency's obligations with regards to delivering ethics training and navigating the Statewide Ethics Training Application.

## Employee-Direct Outreach

The Education unit provides employee-direct outreach to assist in notifying employees directly when they are out of compliance with their ethics training mandate or when their training deadlines are coming due.

## SharePoint

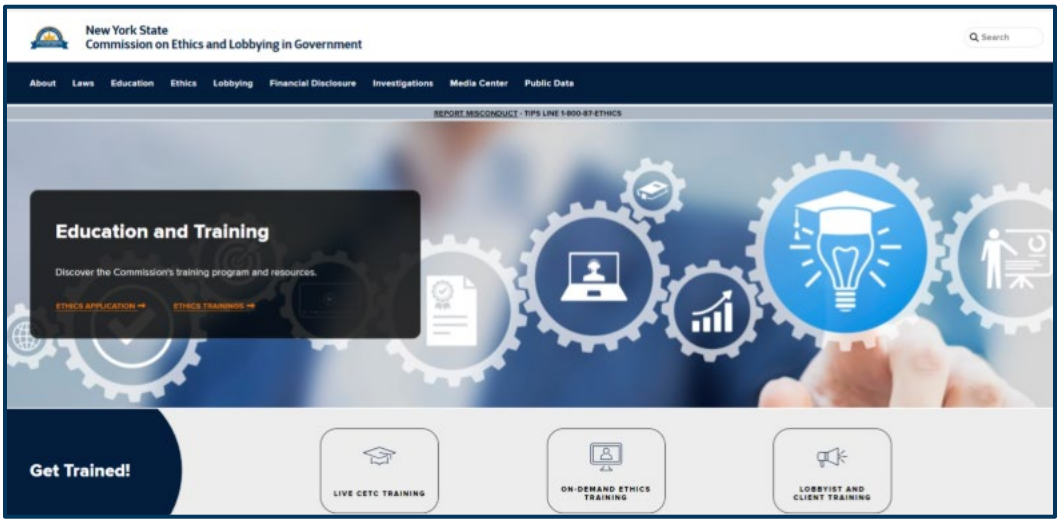
The [COELIG Education Resource Center SharePoint site] facilitates communication and knowledge sharing for Ethics Officers and training staff statewide. The COELIG Education unit continues to update the SharePoint site with new content and provides agencies with view access to our Google calendar and the ability to reserve agency-specific training for their employees.

The SharePoint site provides the following resources:

- CETC Training Materials
- Spanish Language Translations
- SCORM/HTML zip files for agencies with their own LMS
- SETA Tips and Tricks
- Recorded Ethics Forums and Presentations

## Website

- The Education main menu of the Commission website is an excellent resource for agency Ethics Officers and the state employee workforce.
- Course Offerings – agency Ethics Officers should regularly direct their employees to the Commission's course offerings page.
- Comprehensive Ethics Training Course (CETC) Openings – provides more information on the live ethics training requirement and access to the Commission's CETC class registration self-enrollment portal.
- On-Demand Ethics Training – provides more information on the online ethics training and access to the Commission's On-Demand Online Certification.
- Info for Ethics Officers – provides an array of information to help new and seasoned Ethics Officers navigate the ethics training requirement and resources to distribute to the state workforce.
- Info for NYS Employees – a great resource that contains plain language materials on many topical areas of the state ethics laws. Employees can also access our 'Find My Ethics Officer' searchable table to instantly connect with their agency's Ethics Officer to receive guidance on agency-specific policies.



## Statewide Ethics Training Application (SETA)

All training and tracking of the yearly ethics training requirement is mandated to be reported in the Statewide Ethics Training Application (SETA). This applies across all agencies, even those who use their own learning management system or the Statewide Learning Management System (SLMS).

Every agency is required to assign at least one Ethics Officer and designate alternate staff as needed in SETA. Your NY.gov ID is required to access SETA. At this time, individual employees cannot access SETA and are unable to view their training status.

**Ethics Officer (or designee) Required Actions in the Statewide Ethics Training Application (SETA)**

1. Designation of an assigned Ethics Officer and Agency Users
2. Recording Training Completion Dates
3. Maintaining/Updating Employee Profiles
4. Monthly Reporting
5. Designation of an assigned Agency Ethics Officer and Agency Users

Agencies must have an Ethics Officer listed in their agency profile within SETA. Agency Ethics Officers listed in the Commission's training application are used to populate the '**Find My Ethics Officer**' searchable table on the Commission website. Additional agency users including agency contacts or training compliance officers should also be added to SETA. Each role in SETA has the same application permissions assigned, meaning that an Ethics Officer of agency contact can view, update and correct employee training records as needed. The roles in SETA have been established to provide more targeted communications related to ethics training or guidance.

### Recording Training Dates

Ethics Officers (or their designee) are required to update and maintain training completion dates for individual employee records. This is required for both Office of the State Comptroller payroll and outlier agencies monthly or as needed.

## Maintaining/Updating Employee Profiles

Ethics officers (or their designee) are responsible for ensuring that every agency employee has a profile in SETA and that those profiles are updated with accurate information.

The process of managing employee HR records depends on your agency's OSC status.

- ***OSC payroll file agencies*** – the OSC payroll file is refreshed the first week of each month by ITS staff. Employees who have left state service or are on medical leave are automatically marked inactive. New hires are also automatically added to their assigned agency and are given a 90-day due date based on the date the OSC payroll file is refreshed in SETA. The 90-day due date in SETA does not reflect an employee's actual hire date. Please note that hourly employees can remain indefinitely on the OSC payroll file. It is the responsibility of the agency to notify OSC to remove hourly employees from the payroll file to avoid this subset of individuals from inaccurately being identified in SETA as requiring to take ethics training.

- ***Outlier*** – outlier agencies are required to update employee records manually, adding new hires into SETA and marking those who have left state service as inactive in SETA. SETA is capable of mass uploading employee records, please email COELIGEducation@ethics.ny.gov for a custom Excel CSV template that can be uploaded into SETA.

Email addresses are required to be provided for any employee who is provided with a state issued email address. Agency Ethics Officers (or their designee) are required to update the email addresses for all agency employees – this includes agencies whose employee data is provided by the OSC payroll file as well as outlier agencies. The OSC payroll file does NOT include email addresses. The Education Unit relies on our partner agencies to update employee emails monthly or as needed. A customized email template is available for those agencies who would like to mass upload email addresses into SETA for existing employees. Email us at COELIGEducation@ethics.ny.gov for assistance.

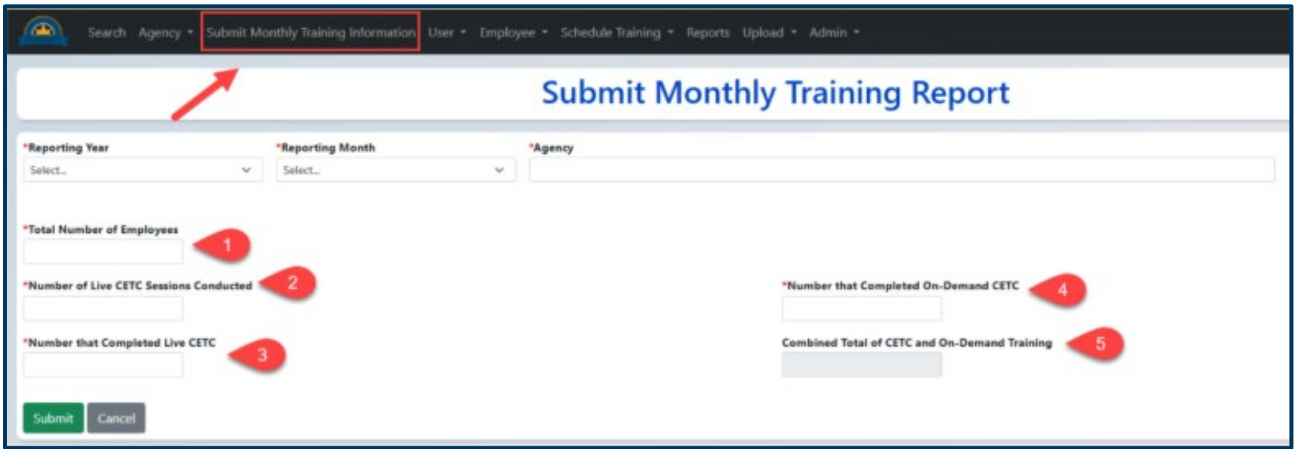
## Monthly Reporting

The submission of monthly aggregate Statistics is due by the 15th of the month and must be submitted in SETA for the prior reporting period. Agencies are required to submit training statistics **even if no training was conducted for the applicable reporting period.**

## How to Report and Submit Monthly Training Information

Log in to your account in SETA. From the black menu bar click – 'Submit Monthly Training Information'. Below are some helpful instructions on what to enter in each field.

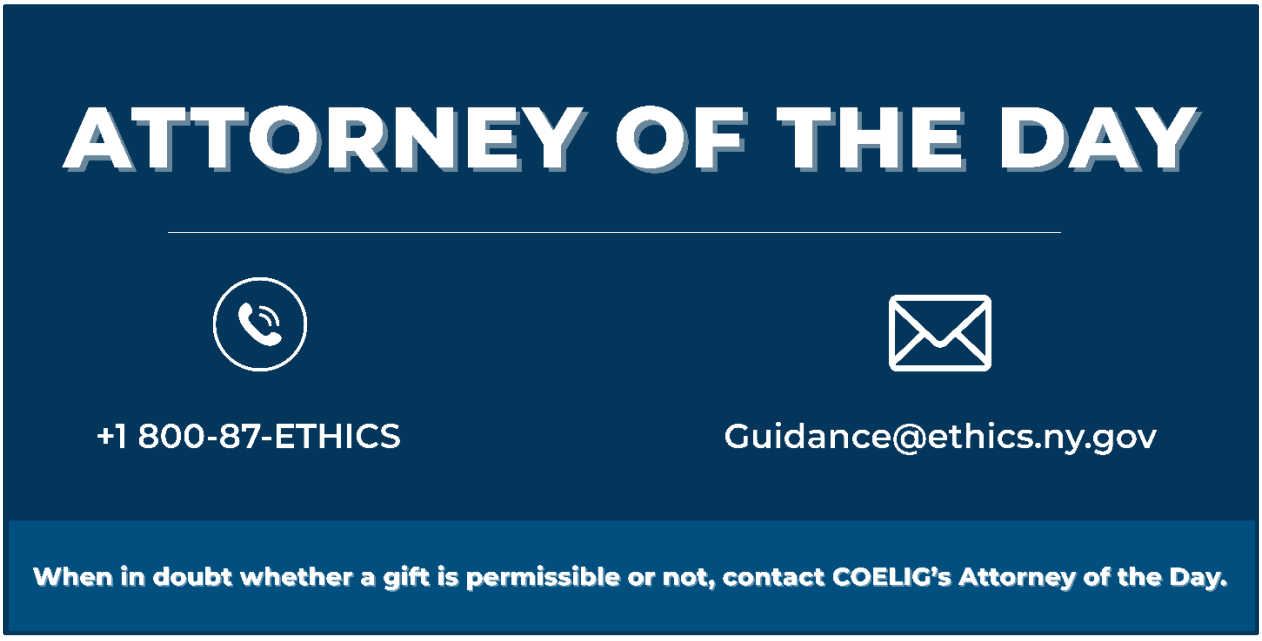
1. **Total Number of Employees:** Include the number of employees listed in your agency profile.
    - If your employee data hasn't been uploaded or is missing in SETA, enter the total number of active employees who are on your agency profile. Your **next required** action item is to email COELIGEducation@ethics.ny.gov for instructions on how to provide us with your employee HR information.
    - If you are identified as a parent agency in SETA, include the total number of employees for your parent agency and all subsidiaries.
2. **Number of Live CETC Sessions Conducted:** Include the number of live CETC sessions conducted at **your** agency
3. **Number that Completed Live CETC:** Include the number of employees who completed live training (in-person or remotely) at your agency and/or attended a live CETC hosted by COELIG.
4. **Number that Completed On-Demand:** Include the number of employees who completed the COELIG on-demand ethics training directly in SETA via the self-enrollment portal, the Statewide Learning Management System (SLMS), or your own learning management system.
5. **Combined Total of CETC and On-Demand Training:** This field auto-populates, you do not need to enter a number here.



## Actions Required by the agency Ethics Officer for Ethics Training

1. Provide live CETC training to all new hires as part of your onboarding process.
2. Notify all employees at the start of each new training cycle (January 1) of the requirement to complete mandatory ethics trainings.
3. **On a monthly basis:**
   - Submit your monthly aggregate statistics in SETA.
   - Review your current list of Agency Users in SETA and add or remove agency users as needed.
   - **OSC payroll agencies** review the number of new hires identified and assigned a 90 day live due date and enroll them in a live CETC training at COELIG or at your agency.
     - Monitor the training compliance status of all existing employees in your agency and proactively notify them of ethics training deadlines.
     - Update your individual employee records and record training completion dates in SETA.

   - **Outlier agencies** add individual employee records as needed, update email addresses and mark any employees that have left state service inactive in SETA.
4. Deliver the CETC to your staff or assign a designee to provide ethics trainings at regular intervals or as needed.
5. Regularly inform your employees who their agency ethics officer is and what their roles and responsibilities are with regards to advice and guidance, outside activities, financial disclosure, applicable ethics laws, and agency policies.

## Conclusion

This publication is meant to serve as a starting point resource for Ethics Officers. When in doubt, please contact COELIG's attorney of the day or COELIG Training Staff with any questions and they will gladly assist you.