



State of New Jersey
STATE ETHICS COMMISSION

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THROUGH: Christina C. Fullam, Executive Director *CCF*
State Ethics Commission

FROM: Rachel L. Eger, Ethics Compliance Officer *RLE*
State Ethics Commission

DATE: July 11, 2025

SUBJECT: Ethics Compliance Review – Rutgers University

The State Ethics Commission (“SEC”) has completed its review of the ethics program at Rutgers University (“Rutgers”). The ethics review 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 reviews of State agencies in the Executive Branch, including State colleges and universities, for compliance with applicable ethical standards. On July 10, 2024, SEC Ethics Compliance Officer Rachel Eger met with you and Rutgers ELO Casey Woods (“ELO Woods”) to discuss the particulars of Rutgers’ ethics program. Prior to this meeting, SEC staff reviewed Rutgers’ completed Compliance Questionnaire and exemplars.

After the meeting, upon SEC staff’s request, ELO Woods submitted a supplement to the Compliance Questionnaire, which addressed requirements specific to State colleges and universities. SEC staff also engaged in extensive discussions with ELO Woods regarding Rutgers’ new ethics training module, which was in development at the time of the review meeting.

Based upon a review of the Compliance Questionnaire and accompanying documents, as well as subsequent meetings, the SEC concludes that Rutgers 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.

During the review process, two opportunities for improvement were identified:

1. Ethics Training – Pursuant to *N.J.S.A. 52:13D-21.1* and the SEC’s Ethics Training Plan, State officials must receive comprehensive ethics training within 60 days of commencement of their State employment or office and then every three years thereafter. In each calendar year in which the State employee or special State officer does not receive comprehensive training, he or she must complete an ethics briefing.

The review showed that Rutgers had not implemented a mandatory, system-wide ethics training program for several years. At the time of the review meeting, Rutgers was already in the process of developing an online training module for widespread dissemination to employees. SEC staff reviewed drafts of the training module and provided feedback to ELO Woods.

2. Post-Employment Restriction Letters – Pursuant to *N.J.S.A.* 52:13D-17 and -17.2, and Section VIII of the UEC, State officials are permanently barred from working on matters for subsequent employers on which they were substantially and directly involved on behalf of their State employer. Certain high-level State officials have additional limited duration restrictions when they leave State service, including restrictions relating to the casino and cannabis industries. The SEC requires that State agencies provide a notification to all separating employees to advise them of the applicable post-employment rules.

At the time of the review meeting, Rutgers was not providing post-employment restriction letters to separating employees. ELO Woods indicated that there have been ongoing discussions with Human Resources about adding post-employment letters to the already existing offboarding process. The post-employment rules are also addressed in the newly-developed training module.

The compliance review also revealed that Rutgers has successfully implemented many ethics requirements. In particular, the following areas have been handled extremely well:

- Rutgers effectively utilizes an online ethics disclosure reporting system, eCOI+, through which employees complete many requirements, including Scholarly Capacity Annual Disclosures and Request for Approval for Attendance at Events forms.
- Rutgers has established various procedures to detect nepotism-related conflicts, including the use of screening questions on employment applications and the Outside Activity Questionnaire.
- ELO Woods assists employees in identifying recusal obligations, and written recusals are regularly transmitted to the SEC for filing.

On behalf of the New Jersey State Ethics Commission, we would like to thank you for your assistance and cooperation with this review process. Under the guidance of ELO Woods, Rutgers' ethics program is in substantial compliance with the State's ethics requirements and thereby works to ensure the integrity of its operations.

Please feel free to contact the SEC if you have any questions or concerns regarding the findings in this report or if we can be of any assistance to Rutgers.

cc: Casey Woods, Ethics Liaison Officer, Rutgers (*via email only*)
Jessica Calella, Assistant Ethics Compliance Officer, SEC (*via email only*)