

A large, red, classical-style building with a prominent dome and a portico with columns, surrounded by green trees under a blue sky with light clouds.

UNIVERSITY OF
LOUISVILLE®

A low stone wall with the word "UNIVERSITY" carved into it in large, spaced-out letters.

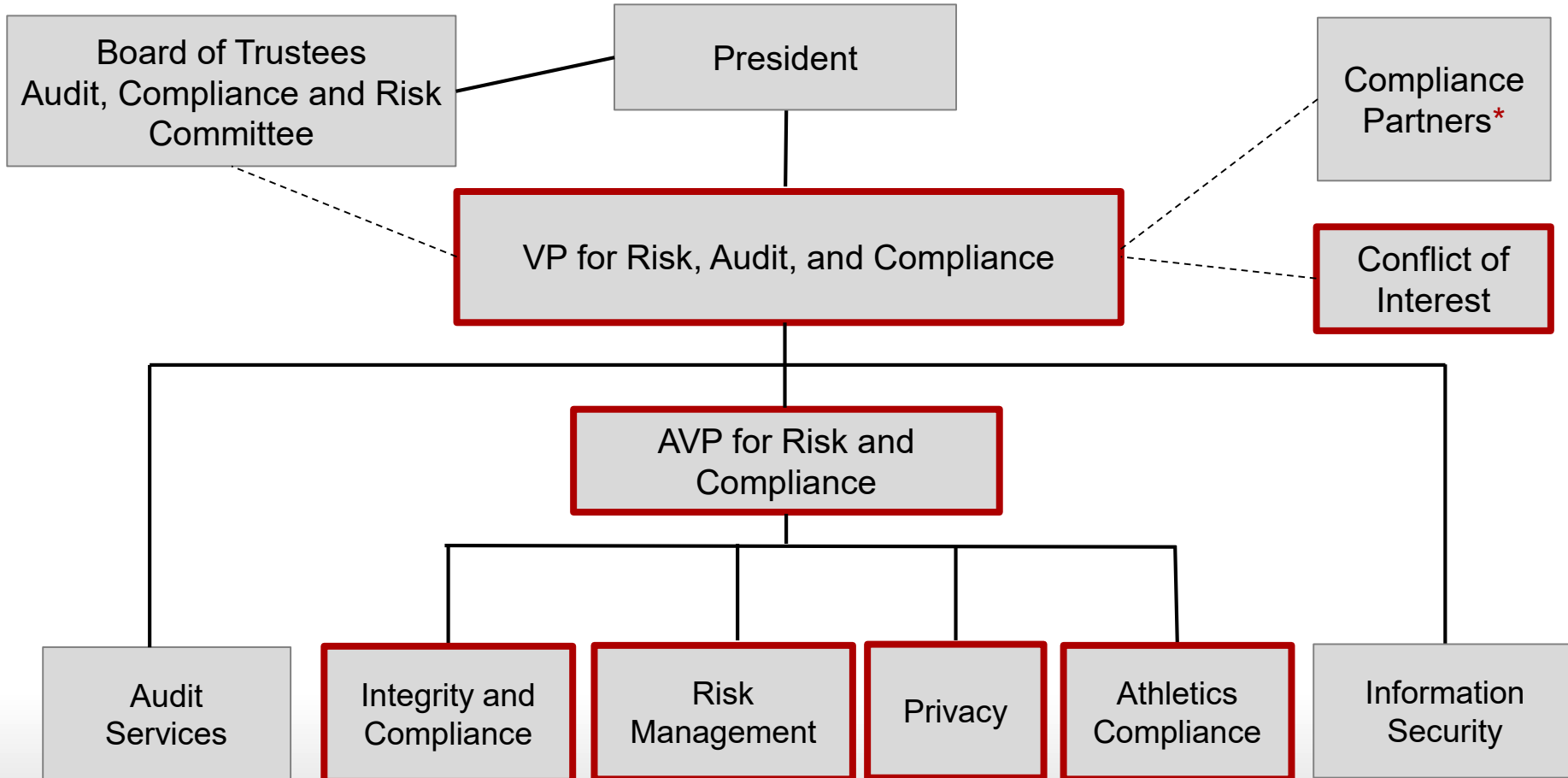
UNIVERSITY **VP for Risk, Audit, & Compliance**



Revised January 2020



Office of the VP for Risk, Audit, & Compliance



*Compliance partners oversee other university compliance units/programs and meet regularly with the VP for Risk, Audit, and Compliance, but do not report directly to the VP.

Youth Protection Program (formally Minors on Campus)

- UofL now has a Youth Protection Officer
- Youth Protection Officer is getting out in the UofL community to talk about our best practices and the upcoming changes.
- UofL best practices will now become policy and procedures.
- Youth Protection Officer will begin training (on-line and at campus locations)

Our Mission Statement:

To foster a culture of *integrity*, *compliance*, and *accountability*.

- *Integrity* – Are we doing the right thing?
- *Compliance* – Are we following the law/rules and our policies and procedures?
- *Accountability* – Are we holding people responsible for their actions?

Core functions of the Integrity and Compliance Office:

- Oversee the university's compliance and ethics program
 - Maintain and promote **university code of conduct**
 - Work closely with university compliance partners
 - Provide compliance awareness education to university community
 - Administer and promote the **compliance hotline and other avenues to report concerns**
 - Evaluate and respond to allegations of misconduct and conduct investigations
 - Administer and oversee university sanction check screening process
 - Conduct periodic compliance risk assessments

- Oversee the university's policy creation and approval process
 - Maintain and promote **online policy library**
 - Educate university community on policy creation and approval process
 - Assist departments with creating new and updating existing policies

<http://louisville.edu/compliance/ico>



University Code of Conduct

The basic expectations that should guide each of us in our work at the University of Louisville as outlined at <http://louisville.edu/compliance/code>

Provides guidance on the following standards of conduct:

- Act Ethically and with Integrity
- Be Fair and Respectful to Others
- Manage Responsibly
- Protect and Preserve University Resources
- Promote a Culture of Compliance
- Preserve Academic Freedom and Meet Academic Responsibilities
- Ethically Conduct Teaching and Research
- Avoid Conflicts of Interest and Commitment.
- Carefully Manage Public, Private, and Confidential Information
- Promote Health and Safety in the Workplace



The Cardinal Principles

At the University of Louisville we share the following values, known as the Cardinal Principles:

- C** – Community of Care
- A** – Accountability to the Team
- R** – Respect
- D** – Diversity and Inclusion
- I** – Integrity and Transparency
- N** – Noble Purpose
- A** – Agility
- L** – Leadership

To learn more, see <https://louisville.edu/about>

Duty to Report Concerns

Be advised! University employees have a **duty to report** knowledge of or suspicion of misconduct, violations of law, regulation and/or policy, or other wrongdoing, including but not limited to:

- Employee Behavior/Conduct matters (bullying, verbal abuse)
- Items of discriminatory/harassment nature
- Potential or Perceived Conflicts of Interest or Commitment
- Environmental Health and Safety concerns (lab safety)
- Fiscal Misconduct or Fraudulent Activity
- Security or Privacy matter (HIPAA, FERPA)
- NCAA compliance matters

Be assured! Protection for Employees who report non compliance is available through UofL's [Duty to Report and Non-Retaliation Policy](#).

Options to Report Concerns

- **Option 1:** Talk to your **supervisor**, other **appropriate management**, or a **university compliance partner**.

- **Option 2:** Report using the **Compliance Hotline**.
 - Call the toll free confidential and anonymous reporting line at **1-877-852-1167**
 - Write or submit your own report
<https://app.mycompliance.com/report.aspx?cid=uol>

- **Option 3 (specific to Athletics compliance):** Submit an **anonymous form** via the Athletics Compliance website.
 - Submit anonymous form available at https://gocards.com/sb_output.aspx?form=10

University Integrity and Compliance Office <http://louisville.edu/compliance>

“When in doubt, point it out. Help us maintain our ethical excellence.”



University Policy & Procedure Library

Visit the online library to search for a specific university-wide administrative policy or procedure.

The library features more than 300 university-wide policies and procedures on topics ranging from annual leave to workstation and computing devices.

University Policy and Procedure Library: <http://louisville.edu/policies>

Submit questions via email to policies@louisville.edu



What is a Conflict of Interest?

University of Louisville Definition

<http://louisville.edu/conflictinterest>

A conflict of interest is any situation that **may compromise or appear to compromise** a covered individual's (employee's) professional judgment in carrying out their institutional activities because of an external relationship/interest of the employee or their immediate family.

"Covered Individual" also includes nonemployees participating in research under the auspices of UofL.
"Interest" is the direct (ownership) or indirect (direct financial) gain, benefit, monetary value, right, claim or share.



Conflict of Interests

Application

- Employee interest in a contract
- Gifts and other benefits
- Use of university resources
- Disclosure of external interests/activities

KRS 164.821(7):

Prohibits university employees from having an interest in a contract to provide goods or services to the University of Louisville or its associated organizations.

- Exception: compensation to the employee.
- Includes direct or indirect interest

Keep in Mind:

This currently includes spouse, dependents, and other individuals for which the employee is legally responsible (but may be broadened)

Example

Coach John Smith's wife, Jane, owns a flower company.

The Biology Department needs to purchase flowers for their event.

Can the Biology Department purchase flowers from Jane's company?

NO.

They cannot purchase from Jane because John Smith, a UofL employee has an indirect interest in the contract.

Gifts

The following guidelines apply

In the context of your UofL position/affiliation:

- Cash or other monetary equivalents of any amount may NEVER be accepted.
- The value of any single promotional benefit accepted should not exceed \$25.00 (pens, note pads or other items with corporate imprints).
- Employees, directly or indirectly, MAY NOT receive tickets/offers of entertainment events.



Gifts

The following guidelines apply

If an employee is offered a gift or meal, the employee should politely refuse the offer.

If an incentive is being provided to influence an institutional decision, the item should be refused and the COI Office should be notified.

Use of University Resources

Using any University address or communication method (including email, telephone, fax) for **personal gain**



Using University personnel, equipment, or services for **personal gain**



Examples:

Using a UofL email address to communicate on behalf of a non-UofL entity.

Providing a UofL business address as the legal address for an external company.

Having a staff member do work for an external company while on university time (without a university approved agreement in place to recuperate payment for time).

Attestation & Disclosure Form

Log In

Welcome to



iRIS
integrated
Research
Information System

UserID:

Password:

Log In

[System/Browser Requirements](#)

LOGIN Issues? go to <https://iris.support.louisville.edu/jira/servicedesk/customer/portal/6>

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Required for:

- All University of Louisville Employees
- Non-employees who engage in research under the auspices of U of L, regardless of compensation
- This includes all individuals with a research appointment.

Contains:

- COI Policy Information
- Disclosure Questions
- Code of Conduct Acknowledgement
- Human Resources/Employment Questions
- COI Training Requirement for Research



External Interest vs. Conflict of Interest

How to appropriately disclose related interests/activities

External Interest

- **Disclosed by Individual**
- External to university role(s) or activities

Conflict of Interest

- **Determined by Institution**
- Based on interest level and role(s) and activities at the university

The disclosure of an external interest/activity is not automatically considered a conflict of interest.



Attestation & Disclosure Form

Complete your annual form at
<https://iris.louisville.edu/>.

Log In

Welcome to



iRIS

integrated

Research

Information System

UserID:

Password:

Log In

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Instructions for completing the form are available [HERE](#)



Submit

- Individual submits annual Attestation & Disclosure Form

Review

- Disclosed items are flagged for review
- ADFs with no disclosures are closed and filed

Determine

- Determination of review is either:
 - No additional or formal management needed or
 - Management Plan required

Respond

- Communication sent to the individual regarding:
 - No potential conflict found
 - Awareness of potential COI
 - A Management plan for the COI

Implement

- Management Plan effective after 10 business days
- Monitoring for compliance through the lifecycle of plan

What is the role of the Privacy Office?

- Oversee compliance for areas of the university that handle protected health information
- Provide formal training and individualized assistance to ensure that HIPAA requirements are understood and met
- Conduct HIPAA breach investigations and provide notification of privacy incidents
- Ensure that University of Louisville contracts include privacy provisions
- Oversee compliance with UofL's obligations regarding nondiscrimination for participants in health programs

For HIPAA guidance, see <http://louisville.edu/privacy>

What is the role of the Information Security Office?

- Assist users in protecting university information (electronic and hardcopy) ensuring confidentiality, integrity, and availability (CIA) and in complying with university policy and regulations.
- Develop and implement policies and procedures pertaining to information security requirements.
- Provide guidance and training on information security regulations, compliance and safeguards.
- Coordinate information security incident investigations and responses.
- Assist other university areas of compliance (HIPAA, PCI, FERPA, Export Controls, HB5, etc.).

What are your responsibilities?

- Information Security is the responsibility of EVERY user.
 - Familiarize yourself with the university Information Security policies at <http://louisville.edu/security/policies/>.
- Never share or post your password.
- Encryption – devices or messages containing ‘sensitive’ data MUST BE encrypted
 - Mobile devices (laptops, flash drives, tablets, PHONES)
 - All university devices must follow UofL encryption requirements.
- Email – encrypt ‘sensitive’ data when sending outside of the university’s system (@louisville.edu)



Information Security Office

Your responsibilities continued...

- Never share or store 'sensitive' data with external parties (i.e., cloud storage, calendaring) without appropriate agreements and security review. HIPAA may require a formal Business Associate Agreement (BAA).
- Regularly update all computing devices with approved anti-virus software and patches.
- Know your data, its classifications, and any regulations – handle accordingly.
- Immediately notify your supervisor or the Information Security Office if you suspect an incident.

<http://louisville.edu/security/>



Compliance Contacts

Vice President for Risk, Audit, and Compliance

Sandy Russell (502) 852-4652

Integrity and Compliance Office

Jennifer Mudd (502) 852-5709

icouofl@louisville.edu or <http://louisville.edu/compliance>

Conflict of Interest Office

Adrienne Lindsay (502) 852-7612

coioff@louisville.edu or <http://louisville.edu/conflictinterest>

Privacy Office

Stacie McCutcheon (502) 852-4062

privacy@louisville.edu or <http://louisville.edu/privacy>

Information Security Office

Kim Adams (502) 852-6692

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