




UNIVERSITY OF
LOUISVILLE®



Institutional Compliance Awareness



Updated 2/23/18



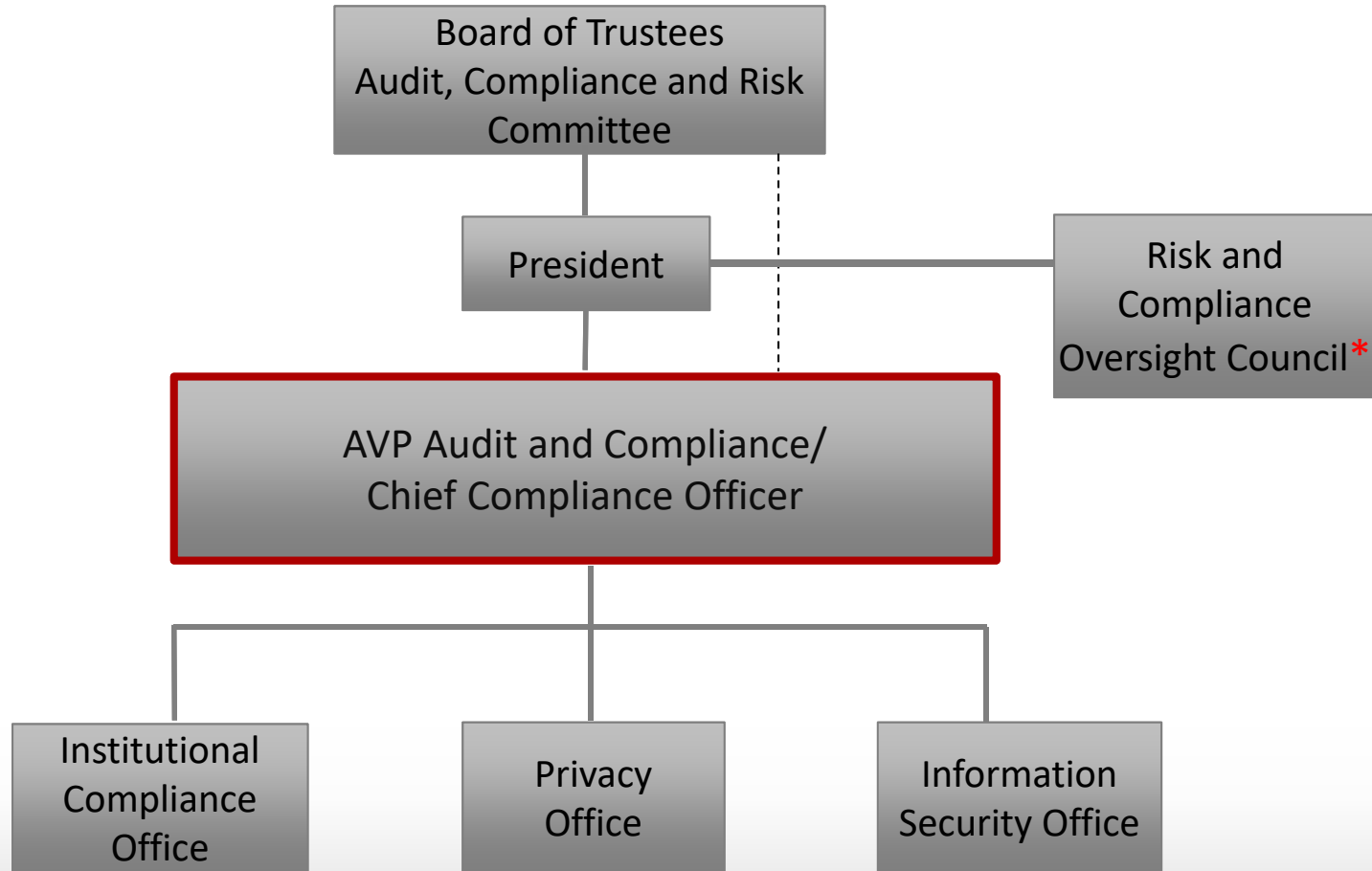
Institutional Compliance Plan

- Approved by the Board of Trustees
- Outlines key elements of the compliance structure:
 - Risk and Compliance Oversight Council
 - Membership is appointed by the President
 - Chaired by the Chief Compliance Officer
 - Oversees the university's risk and compliance programs
 - AVP for Audit and Compliance
 - Designated as the Chief Compliance Officer
 - Institutional Compliance Office

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



Institutional Compliance Structure



*The university is made up of many other compliance units that report to leadership serving on the RCOC.



Institutional Compliance

What is **Compliance** and what does it have to do with you?

- **Compliance** means following the *laws, regulations, and policies* with integrity and ethics.
- **Be aware!** There are *tools available to YOU* that help ensure integrity.
- **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.
- **Be accurate!** Know the different reporting **OPTIONS** available to **YOU**.
 - You may report to the **Compliance Hotline** - a toll free confidential reporting line at **1-877-852-1167** or online via **ULink**.
 - You may report to your direct supervisor or appropriate authority.
 - You may report to a compliance unit that your concern is about or directly to the Institutional Compliance Office. See the **Directory** for contact information.
- **Be assured!** **Protection for Employees** who report non-compliance is available through UofL's **Duty to Report and Non-Retaliation Policy**.

University of Louisville Institutional Compliance

<http://louisville.edu/compliance>

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



What is the 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 and links to university policies and procedures on the following topics:

- 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



University Policy and 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



Conflict of Interest Program

What is the role of the Conflict of Interest Program?

- Respond to inquiries and issues relating to the application of the COI Policy.
- Oversee COI requirements for researchers (as required by Federal regulations and COI policies of funding agencies).
- Monitor compliance of the disclosure requirements.
- Serve as support to the Conflict Review Board, including the creation and facilitation of individual Management Plans.



What is a Conflict of Interest?

A Conflict of Interest is
**ANY situation that compromises
or appears to compromise**

a Covered Individual's *professional judgment* in carrying out University responsibilities because of an external interest. This interest can be held by a Covered Individual, the Covered Individual's spouse and / or dependent child(ren).

"Covered Individual" includes all university employees and all individuals participating in research under the auspices of UofL.

"Interest" is defined as - direct (ownership) or indirect (direct financial) gain, benefit, monetary value, right, claim or share.

Managing Possible Conflicts of Interests

If you have disclosed a possible conflict of interest that is determined to require management, then you will be contacted if further information is needed and an approved management plan will be developed for the COI. You will have to agree and sign off on the management plan and your Appropriate Authority will be copied on the plan. Unique COI situations are brought before the Conflict Review Board for a determination on the management, reduction, or elimination of a conflict of interest.



Attestation & Disclosure Form (ADF)

- The annual Attestation and Disclosure Form (ADF) is means for ***all university employees*** and ***other Covered Individuals*** at UofL to disclose any external financial interest related to their institutional duties/activities.
 - *Only external interests that are **related** to a covered individual's institutional role (and activities) must be reported on the Attestation and Disclosure Form.*
 - *A new form is required to be completed at least annually, regardless of changes to the previous form.*



Who is required to complete the ADF?

The annual Attestation and Disclosure Form must be completed by:

- **All** University of Louisville Employees
- All individuals **participating in research** under the auspices of UofL, regardless of compensation. *This includes all individuals with a research appointment.*

The ADF is available in the iRIS system at <https://iris.louisville.edu/>. You will need your UofL UserID and Password to enter the system.

Instructions are available at <http://louisville.edu/conflictinterest>.



Conflict of Interest Policy

The Individual Conflict of Interest Policy and Procedures, (also referred to as the COI Policy) provides guidance to ***all university employees*** and ***other Covered Individuals*** regarding:

1. Prohibited Activities,
2. Activities & Interests required to be disclosed,
3. Guidelines for Activities & Interests, and
4. Activities & Interests exempt from disclosure.

The full COI Policy and tip sheets are available for your reference on the Conflict of Interest Program website located at <http://louisville.edu/conflictinterest>.



Privacy Office

What is the role of the Privacy Office?

- Oversee privacy compliance related to HIPAA covered health information, especially in clinical, research, and Human Resources benefits settings
- Provide formal training, as well as individualized assistance, to ensure that HIPAA's requirements are understood and met
- Coordinate HIPAA breach investigations and notifications

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



Information Security Office

What is the role of the Information Security Office?

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



Information Security Office

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)
 - To send securely include **[SEND SECURE]** in the email subject line



Information Security Office

Your responsibilities continued...

- Never share or store 'sensitive' data with external parties without appropriate agreements (i.e., cloud storage, calendaring). 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

Institutional Compliance Office

425 West Lee Street, Louisville, KY 40208

Jennifer Mudd (502) 852-5709 / Fax (502) 852-0665

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

Conflict of Interest Program

Jouett Hall Room LL05, 2301 South Third Street, Louisville, KY 40292

Adrienne Dumke (502) 852-7612 / Fax (502) 852-2403

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

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Cheri Jones (502) 852-4494 / Fax (502) 852-0665

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