

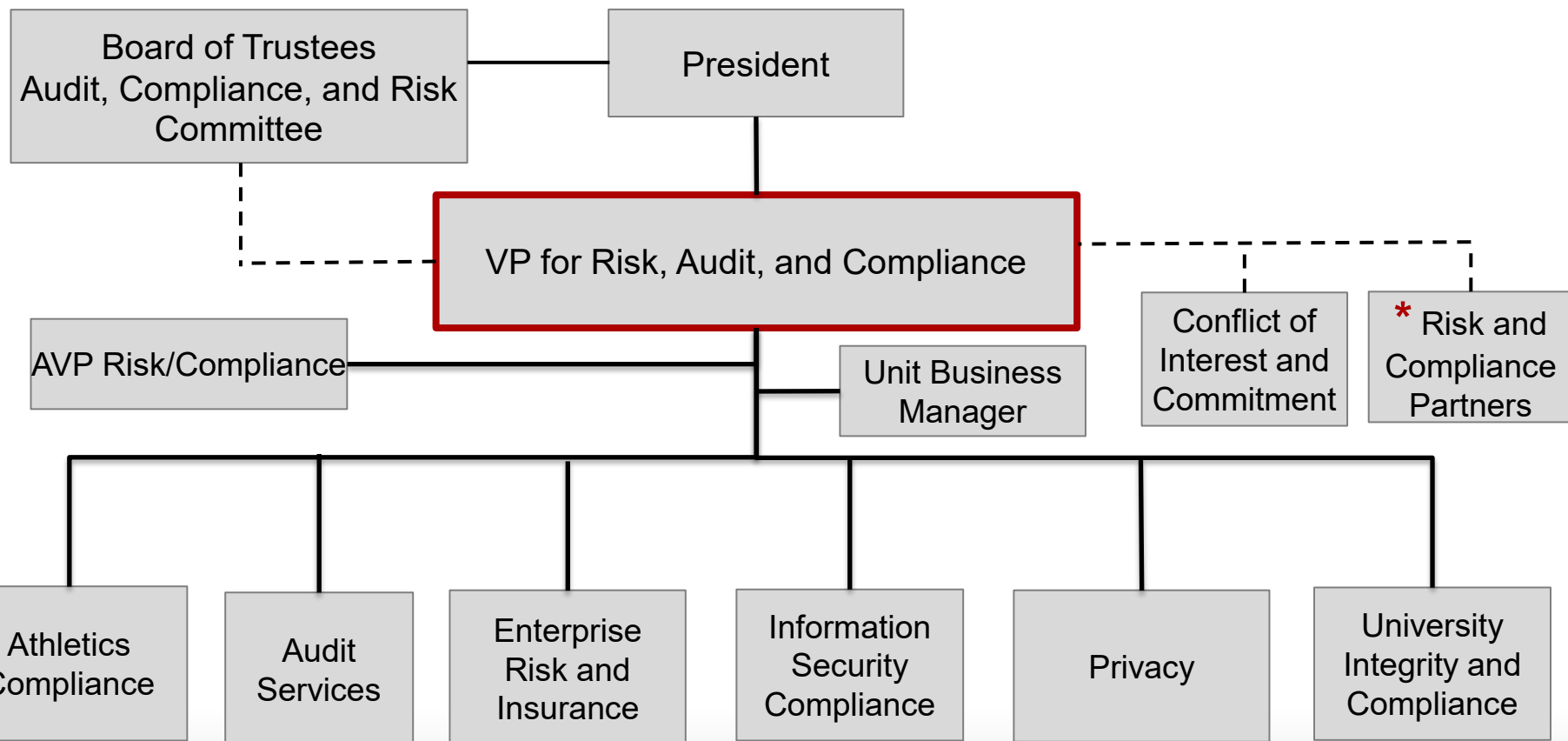
A wide-angle photograph of the University of Louisville campus. In the background, the iconic Old College building with its large dome and classical columns stands under a clear blue sky. Lush green trees frame the building. In the foreground, a large, circular stone seal is embedded in the pavement. The seal features a profile of a Native American man holding a bow and arrow, with the text "UNIVERSITY OF LOUISVILLE" and "1798" around the border. A low stone wall with the word "UNIVERSITY" in large letters is visible behind the seal.

UNIVERSITY OF
LOUISVILLE[®]

University Compliance Awareness

May 30, 2023

Vice President for Risk, Audit, and Compliance Organizational Chart



*Risk and 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.



University Integrity and Compliance Office

The mission of the University Integrity and Compliance Office is to support and foster a culture of integrity, compliance, and accountability.

Who we are:

- Director, University Integrity and Compliance
- Senior Compliance Specialist
- ADA Website Accessibility Compliance Coordinator (Vacant)

What we do:

- Administer and promote the Compliance Hotline and other avenues to report concerns
- Evaluate/respond to complaints and conduct investigations
- Maintain and promote the university's policy and procedure library, including the university's employee code of conduct
- Oversee policy creation and approval process
- Provide compliance awareness/education to employees
- Conduct periodic compliance risk assessments
- Administer and oversee university sanction check screening policies and processes

University Employee Code of Conduct

The basic expectations that should guide each of us in our work at the University of Louisville as outlined at <https://louisville.edu/compliance/ico/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 and Protection from Retaliation

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.

- For reports involving patient information, please contact the Privacy Office or the Information Security Compliance Office

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.mycompliancereport.com/report?cid=UOL>

Option 3: Contact the **University Integrity and Compliance Office**.

<https://louisville.edu/compliance/ico/contact-ico> or email compliance@louisville.edu

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



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 employee leave policies, remote work arrangements, to operational procedures.

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

Submit questions via email to policies@louisville.edu



Athletics Compliance Office

Advance the NCAA principle of Institutional Control, and to provide our student-athletes, coaches, staff, and outside constituents exemplary customer service, sound guidance, visibility, and effective communication.

Who we are:

- Senior Associate Athletic Director of Compliance
- Assistant Athletic Director of Compliance
- 2 Directors of Compliance
- 3 Associate Directors of Compliance

What we do:

- Provide thorough rules education of NCAA, ACC, and University regulations
- Provide effective monitoring systems
- Promote a culture of compliance

For more information regarding Athletic Compliance or NCAA rules, please call (502) 852-7728 or e-mail athcomp@louisville.edu.

Ensure university transactions are conducted with integrity and free from unmanaged conflicts of interest and commitment.

Who we are:

- Director, Conflict of Interest and Commitment
- Conflict of Interest Specialist

What we do:

- Administer and manage Conflict of Interest and Commitment (COIC) operations
- Oversee COIC policy revision and implementation
- Maintain and distribute COIC educational guidance
- Develop and maintain annual disclosure process
- Conduct periodic monitoring assessments for COIC
- Respond to reports of noncompliance with COIC policy



What is a Conflict of Interest?

University of Louisville Definition

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.

<https://louisville.edu/conflictinterest>

"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

Employee Interest in a Contract

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, such as a Relative

Relative: Anyone related to a Covered Person in the following ways: parent, child or ward, sibling, uncle or aunt, first cousin, nephew or niece, spouse, domestic partner, or significant other. Includes adopted, step-, foster, grand-, half-, in-law, spouse of, or great.

Employee Interest in a Contract

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 COIC 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).

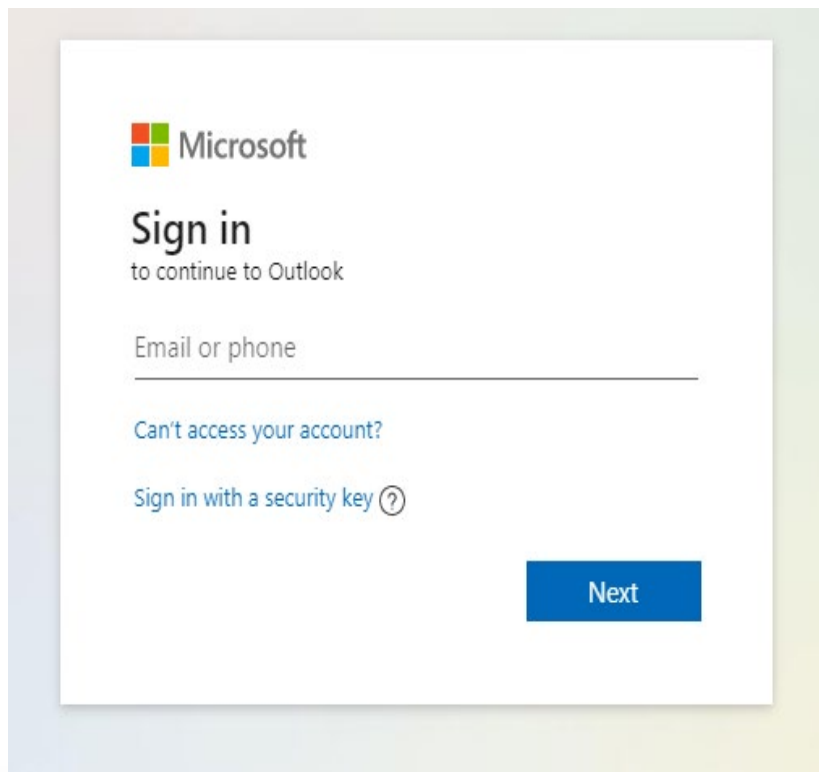
Attestation & Disclosure Form

Required for:

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

Contains:

- COIC Policy Information
- Disclosure Questions
- Code of Conduct Acknowledgement
- Information Security Awareness
- Human Resources/Employment Questions
- COIC 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.



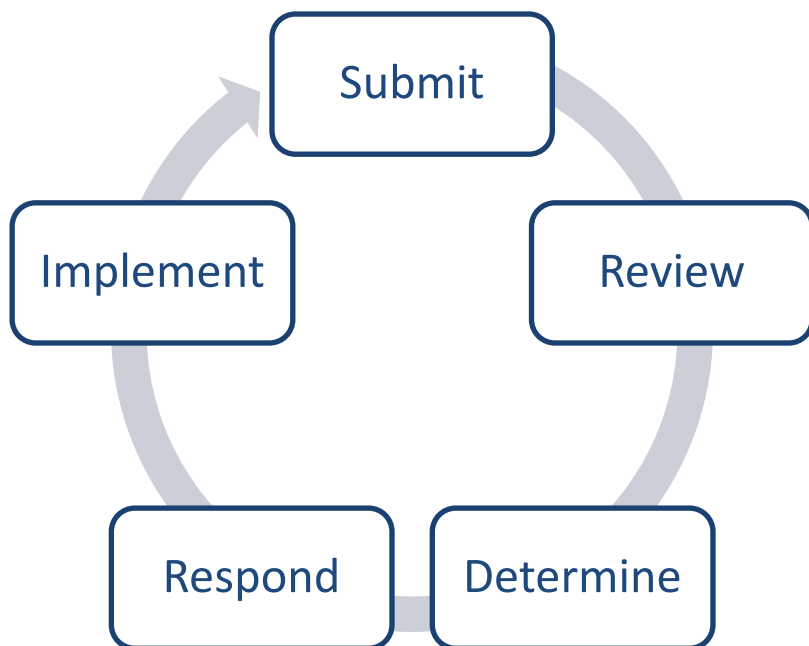
Remember!

Final Sign-Off:

You must select Signoff and Submit on this screen.

A screenshot of a web-based form titled 'Form has been Completed!'. The form is displayed in a light blue box. On the left side, there is a sidebar with a list of sections: INTRODUCTION, Background Information, Disclosure Questions, Supplemental Disclosures, Attestations and Declarations, Training, and Acknowledgements. The 'Section view of the Form' tab is selected. At the top right of the form, there are two buttons: 'Print Friendly' and 'Signoff and Submit'. The main content area of the form contains the text 'Instruction of Form has Been Completed Screen' and 'To complete submission of the ADF, you must click Signoff and Submit below.' At the bottom of the form, there are two buttons: 'Exit Form' (with a red X icon) and 'Signoff and Submit' (with a pencil icon).

COIC Process



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 COIC
 - A Management plan for the COIC

Implement

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

Advance the mission of the Institute through informed risk taking. Foster a culture of risk awareness that promotes intelligent, informed decisions consistent with the University's values of excellence and integrity, and within the decentralized, collaborative and entrepreneurial spirit of the University.

Who we are:

- Director Enterprise Risk and Insurance
- Risk Management Coordinator (Vacant)
- Risk Management Program Assistant

What we do:

- Administer ERM and commercial insurance program
- Develop and implement overall Risk Management strategies
- Review contracts/leases for insurance requirements and risk
- Administer university claims and litigation
- Oversight of the Youth Protection Program



Information Security Compliance Office

Provide guidance and foster a culture of compliance and accountability in protecting the confidentiality, integrity, and availability of university information assets.

Who we are:

- Chief Information Security Compliance Officer
- Information Security Compliance Analyst (Vacant)

What we do:

- Provide guidance on information security compliance
- Coordinate information security incident and breach response – lead the response team (ISIRT)
- Oversee information security policy and standard creation
- Provide information security compliance awareness education
- Conduct information security compliance risk assessments
- Partner with ITS regarding security operations compliance

What is the role of the Information Security Compliance Office?

- Assist users in understanding information security compliance regulations and requirements.
- Assist users in protecting university information (electronic and hardcopy) privacy, confidentiality, integrity, and availability.
- Develop and implement policies and procedures pertaining to information security requirements and regulations.
- Provide guidance and training on information security compliance.
- Coordinate information security incident investigation and breach responses.
- Assist other university areas of compliance (HIPAA, PCI, FERPA, Export Controls, KRS 61.931-934, etc.).

What are your responsibilities?

- Information Security is the responsibility of **EVERY** user.
 - Familiarize yourself with the university Information Security policies at <https://louisville.edu/security/policies/>.
- Never share or post your password.
- Encryption – devices or messages containing sensitive data **MUST BE** encrypted:
 - **Mobile devices** (i.e., 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) using the university's encryption option.



Information Security Compliance Office

Your responsibilities continued...

- Never share or store sensitive data with external parties (i.e., cloud storage, calendaring) without appropriate agreements. 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 applicable regulations – handle accordingly and only store or collect data that is necessary.
- Immediately notify your supervisor or the Information Security Compliance Office if you suspect an incident.

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

isopol@louisville.edu



Privacy Office

Provides guidance and assistance to the UofL community regarding regulations which may impact the privacy of our students, our employees, our patients, and our campus visitors.

Who we are:

- Privacy Officer

What we do:

- Oversee the University's compliance with HIPAA regulations
- Provide training and individualized assistance to ensure that HIPAA requirements are understood and met
- Conduct investigations of inappropriate uses and disclosures of information and provide notification of breaches to individuals and U.S. Department of Health & Human Services
- 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 <https://louisville.edu/privacy>



Compliance Contacts

Vice President for Risk, Audit, and Compliance

Sandy Russell (502) 852-4652

Athletics Compliance Office

John Carns (502) 852-7728

athletic.compliance@louisville.edu

Conflict of Interest and Commitment Office

Allison Ratterman

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

Enterprise Risk and Insurance

Melissa Renn Brown (502) 852-0210

Information Security Compliance Office

Kim Adams (502) 852-6692

isopol@louisville.edu or <https://louisville.edu/security>

Privacy Office

Stacie McCutcheon (502) 852-4062

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

University Integrity and Compliance Office

Jennifer Mudd (502) 852-5709

compliance@louisville.edu or <https://louisville.edu/compliance>