

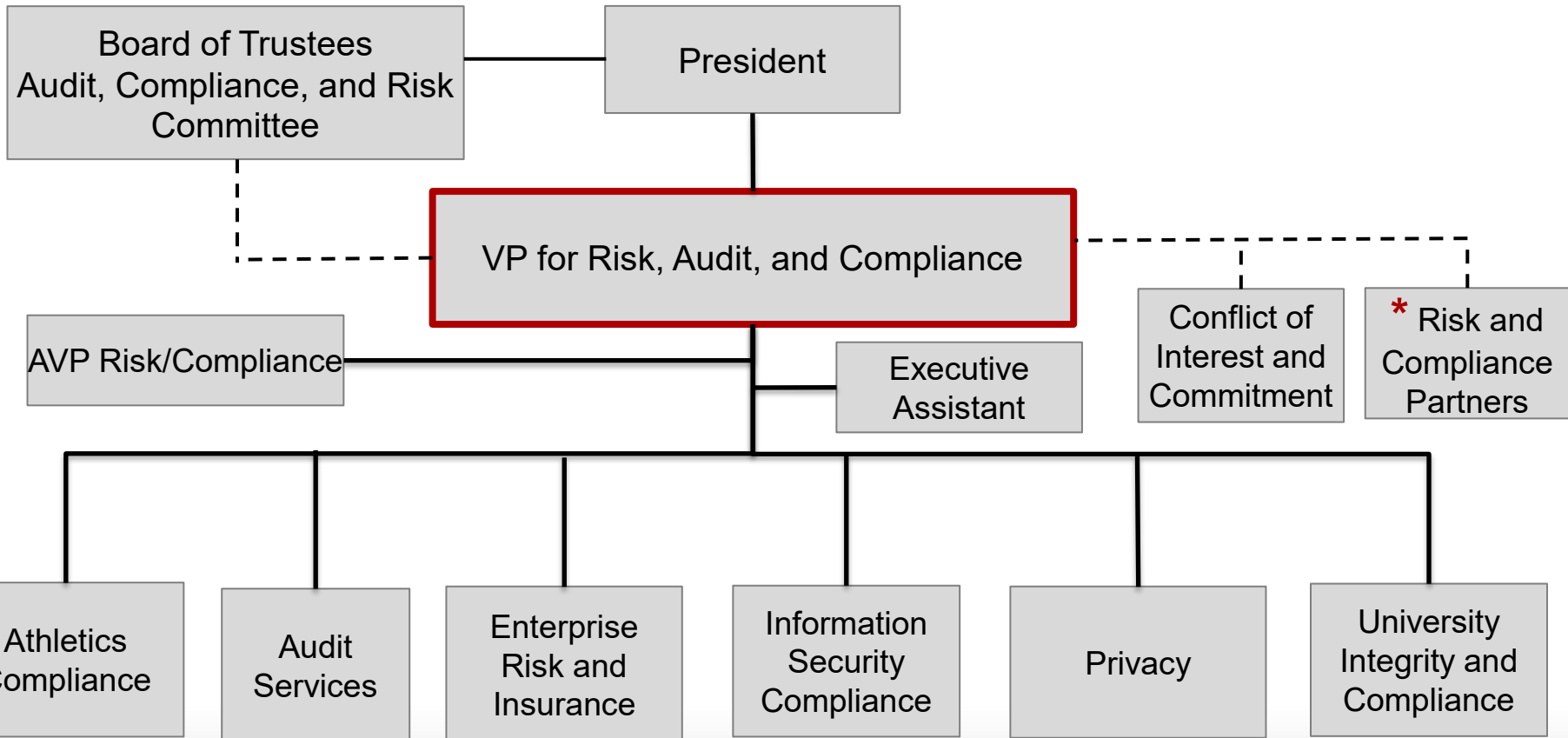
A photograph of the University of Louisville campus. In the background is a large, red-brick building with a prominent white portico and a dome. The foreground features a large, circular stone seal of the University of Louisville, which includes the text 'UNIVERSITY OF LOUISVILLE' and '1798'. A brick wall with the word 'UNIVERSITY' is visible in the middle ground. The sky is blue with light clouds.

UNIVERSITY OF
LOUISVILLE[®]

University Compliance Awareness

2024-2025

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:

- Assistant Vice President for Compliance
- Senior Compliance Specialist
- ADA Website Accessibility Compliance Coordinator

What We Do:

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

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
- Associate Athletic Director of Compliance
- Assistant Athletic Director of Compliance
- 3 Directors of Compliance (Recruiting, Eligibility, Financial Aid)
- Associate Director 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 II
- Conflict of Interest Specialist I

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

An external relationship or interest that influences Covered Person's professional judgment in University teaching, Research, outreach, or public service. The term also includes situation in which Covered Person engages in a Non-University Commitment that may interfere with fulfillment of obligations to University. Examples may include outside employment, pro bono or volunteer work, and obligations to share improperly information with, or to withhold information from, the University or a funding agency.

<https://louisville.edu/conflictinterest>

"Covered Person" includes all University faculty, administrators, staff, and any other individuals (full or part-time, paid or unpaid) participating in academic, business, clinical, and Research or scholarly activities for University.

"Interest" A Covered Person's direct (ownership) or indirect (receipt by Covered Person of 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 members of the teaching and administrative staff 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 and includes those within these categories who are referred to as adopted, step-, foster, grand-, half-, in-law, spouse of, or great-: parent, child or ward, sibling, uncle or aunt, first cousin, nephew or niece, spouse, or domestic partner.

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**.



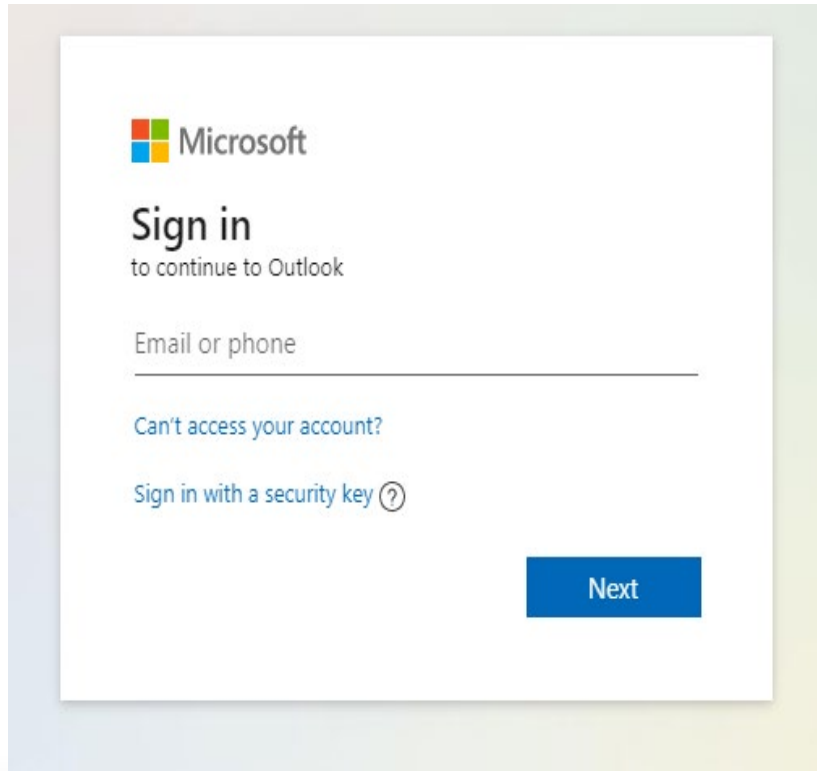
Examples:

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
- 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

Print Friendly Signoff and Submit

Section view of the Form Entire view of the Form

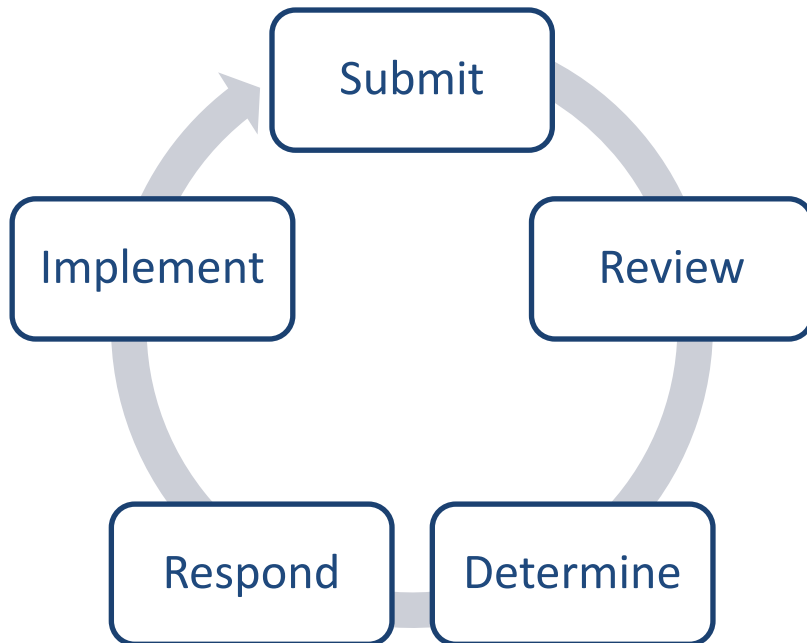
INTRODUCTION
Background Information
Disclosure Questions
Supplemental Disclosures
Attestations and Declarations
Training
Acknowledgements

Form has been Completed!
Instruction of Form has Been Completed Screen

To complete submission of the ADF, you must click Signoff and Submit below.

Exit Form Signoff and Submit

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 Specialist
- 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:

- Information Security Compliance Officer

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.

For more information, visit <https://louisville.edu/security>, or contact the Information Security Compliance Office at isopol@louisville.edu.



Privacy Office

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

Who We Are:

- Privacy Officer

What We Do:

- Oversee the University's compliance with international, federal, and state privacy regulations.
- Provide training, oversight, 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 the U.S. Department of Health & Human Services.
- Identify threats to the privacy of the University's proprietary and sensitive information.
- Draft/review Business Associate Agreements and ensure that University contracts include privacy provisions.
- Oversee compliance with the University's obligations regarding nondiscrimination for participants in health programs.

For HIPAA guidance, visit <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

<https://louisville.edu/riskmanagement/RM>

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>