State Code of Ethics Enforcement Update

The Office of State Ethics recently announced a former state employee agreed to pay $5,500 to settle allegations that he violated the State Code of Ethics by accessing state resources for personal financial gain. According to the Office of State Ethics press release, the alleged violations include:

- Using his access to state gasoline to obtain gasoline for his personal use
- Using a state vehicle for his personal use
- Directing subordinates on two occasions to assist in gathering scrap metal belonging to the state
- Selling copper and other scrap metal from structures belonging to the state for financial gain
- Using wood from state property for his personal use
- Directing subordinates to use state vehicles to transport the wood to his house for personal use

The State Code of Ethics prohibits employees from using their state position to obtain financial gain for themselves. The Code also provides that no state employee shall intentionally counsel, authorize or otherwise sanction action that violates any provision of the Code of Ethics. All employees of the University are expected to be familiar with the Code and to comply with all of its provisions. In an effort to assist employees in determining what conduct is prohibited so that it may be avoided, the University also maintains a Guide to the State Code of Ethics at http://policy.uconn.edu/?p=387.

New HIPAA Website

The Office of Audit, Compliance and Ethics recently created a resource webpage dedicated to the Health Insurance Portability and Accountability Act (HIPAA). Hipaa.uconn.edu contains policies, procedures, forms and online training for faculty, students, patients and other members of the UConn community. Please note that the resources on this page apply to HIPAA practices on the Storrs and Regional Campuses only.

Please contact Rachel Krinsky Rudnick, Assistant Director of Compliance and University Privacy Officer with questions or comments. Rachel may be reached by e-mail at Rachel.Krinsky@uconn.edu or by phone at (860)-486-5256.

The "Compliance Courier" is a quarterly newsletter issued by the Office of Audit, Compliance & Ethics. Each newsletter will provide updates on important compliance issues. For questions or concerns or to suggest future articles, please contact Kimberly Fearney at (860) 486-6195 or Kim.Fearney@uconn.edu.
Thank you for completing the 2015 annual compliance training. Our training provides an opportunity for UConn faculty and staff to learn about new or revised policies, what offices and resources are available for workplace questions, concerns or needs and what compliance areas may require special attention. Your attendance demonstrates our commitment to UConn’s core values: knowledge, honesty, integrity, respect and professionalism. Together we achieved a 100% completion rate!

Policies, Procedures and Guidelines

Please take a moment to review the following updates related to University policies, procedures, and/or guidelines. The Office of Audit, Compliance & Ethics is available for questions at 860-486-2530.

- The E-mail Communication Policy was recently updated. The purpose of this policy is to describe the permitted and appropriate use of University e-mail.

- The Familial Relationships and Teaching Policy was adopted to issue clear direction for circumstances when a faculty member or instructor finds themselves in a position where they could have a family member in one of their courses.

- Newly adopted Faculty Medical Leave Guidelines are intended to clarify the By-Laws and provide better guidance and general parameters to University administrators in evaluating requests for medical leave.

- Revisions to the Travel & Entertainment Policy were effective July 1, 2015. More information, including a summary of the more significant changes is available at http://travel.uconn.edu/2015/06/26/1update/.

Internal Controls:

Policies and Procedures

An evaluation of the effectiveness of a department’s internal controls is one of the key areas of focus during the audit process and is used to identify specific audit risks. The lack of written departmental policies and procedures is the most common “red flag” indicating weak internal controls encountered by the audit staff. Written policies and procedures illustrate that managers are aware of a department’s mission and goals and knowledgeable about the department’s financial operations. Written procedures should include:

- A brief description of the flow of major transactions that are processed, from their beginning to their recording in the accounts.

- Staff responsibility for initiating transactions and controlling the movements of assets.

- The identification of “control points” (i.e., the safeguard functions that staff perform to minimize risk of error, theft, or loss).

Departments might use a detailed description or flowchart to describe the operation of the internal control system, identify the control procedures in place and the staff that perform relevant tasks.