

## 2023 University Compliance and Ethics Training

### Transcript

#### INTRODUCTION

Hi, and thank you for starting this year's University Compliance and Ethics Training, which is brought to you by the [Office of University Compliance](#).

This training has been divided into 3 sections, all of which must be completed by **May 26, 2023**.

1. First, we will go over the University's Code of Conduct
2. We will then walk-through the University's Guide to the State Code of Ethics.
3. And then wrap up with an overview of important compliance reminders.

Note: This year's training provides participants with varied learning pathways, meaning that the amount of information you receive will depend on your understanding of covered concepts or on the responsibilities associated with your role. That said, learners should expect to complete all three sections of this training in approximately 50-60 minutes.

Before getting started, would you like to check out tips to help you navigate the training?

#### No

Thanks for letting us know! Just in case you change your mind, you can find this year's training navigation tips on the training resource page linked on the bottom left of your screen. Let's get started!

#### Yes

**Course Navigation** - As you probably noticed, each slide is being narrated. Once the voiceover ends, you will automatically advance to the next slide. For the most part, this will happen without the need to click on the "forward" button. However, if you are asked to respond to a question or prompt, you may need to select from the options on your screen to navigate to the next slide. Once a particular slide has been viewed in its entirety, the "seekbar" (which can be used to rewind or fast-word) will be unlocked.

This will allow you to revisit any content on the slides you previously viewed. If you are interested in revisiting a particular slide, use the "previous" button on the bottom right of your screen or navigate to the table of contents on the left side of your screen and click on the slide you would like to revisit.

**Closed Captions** – Please be aware, this training has been fully closed captioned. Click on the Closed Caption icon on the bottom of your screen to turn this feature on or off at anytime during this training.

**Knowledge Checks** – Throughout each section, you will also be provided with an opportunity to test your knowledge by responding to periodic questions or engaging in activities. Remember, you'll need to select a response to proceed to the next slide.

Did you know you can enlarge the text on your quiz slide? Simply click on the markers next to the text you would like to enlarge. Depending on the length, you may need to scroll down.

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**Training Resource Page** – We will be mentioning several policies and resources throughout this training, most of which will be linked on your screen at the time they are mentioned. That said, we recognize that there might be a need or interest in referring back to this year’s training materials. To assist with this, we have prepared a [training resource page](#) containing this year’s training content, as well as, links to any resources and contact information mentioned through-out this training. You can access the training resource page by clicking on the information icon on the bottom left of your screen.

**Training Evaluation** – Every year we ask training participants for feedback on their experience with this training and work hard to incorporate that feedback into future trainings. This year is no different! At the end of this training, you will receive a link to our training evaluation form. We would love to hear about your thoughts and feedback to continue to enhance the training.

**Technical Assistance** – While this training was prepared by University Compliance, the training platform is managed and administered by Human Resources. Therefore, if you experience any technical difficulties while taking the training, please email [learningatwork@uconn.edu](mailto:learningatwork@uconn.edu) if you are a UConn employee. If you are a UConn Health employee, please contact 860-679-7577 for assistance.

You can also visit the training resource page for additional tips on navigating common technical issues. Let’s get started!

### SECTION 1 – UNIVERSITY CODE OF CONDUCT

Slide #	
1.1 Section Intro	<p>Meet Kendall! They are a supervisor with responsibilities at UConn and UConn Health. In the evenings and weekends, you can find Kendall cycling throughout the state. Kendall is also well known for being a “compliance champion” and often uses part of their cycling time to reflect on their work and how they can contribute to a culture of compliance.</p> <p>Lately, Kendall has been thinking about discussing the University’s Code of Conduct with their team. This is important because supervisors have a particular responsibility to support the Code of Conduct and to ensure compliance within their units. Kendall has a series of topics in mind but would like your help with the content prior to discussing it with their team.</p> <p>Your task throughout this section is to help work through Kendall’s drafted presentation as if you were a member of Kendall’s team. As you work through the presentation, you will be asked to show your understanding of the covered topics. On occasion, you’ll be provided with chances to skip ahead if you are able to correctly show you understand the information. Let’s give it a try.</p>
1.2 – Purpose of	<p>Kendall wants to start the team discussion with a review of the purpose of the University’s Code of Conduct. Based on what you know about the code, which of the following best describes its purpose?</p>

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the Code of Conduct	<p>A) It sets the standards of workplace conduct</p> <p>B) It explains how employees document their work</p> <p>C) It informs us of our compliance responsibilities</p> <p>D) It outlines employee benefits options</p>
1.3 A – Correct	<p><b>A)</b> That’s right! There were actually 2 correct responses for this question. In addition to emphasizing the University’s commitment to the highest standards of integrity in all areas of its mission, the Code sets the basic standards of workplace behavior expected of all of us. Because the code also informs us of our shared responsibility for keeping the University in full compliance, option C is the other correct choice for this question. Let’s move forward.</p> <p><b>C)</b> That’s right! There were actually 2 correct responses for this question. In addition to emphasizing the University’s commitment to the highest standards of integrity in all areas of its mission, the Code informs us of our shared responsibility for keeping the University in full compliance. Because the code also sets the basic standards of workplace behavior expected of all of us, option A is the other correct choice for this question. Let’s move forward.</p>
1.3 B – Incorrect	<p>Hmmm. It seems like Kendall might need to provide some additional information here.</p> <p>The University is committed to the highest standards of integrity in all areas of its mission, including education, research, health care, public engagement, and service. While that’s a clear goal, the University’s ability to meet that goal requires a concerted effort on the part of all of us.</p> <p>That’s where the Code of Conduct comes in. By setting the basic standards of workplace behavior expected of all of us, the Code serves as the basis for which employees can make decisions that are in the best interest of the University and its community.</p> <p>Also, because we operate in a heavily regulated and ever-evolving environment, it is important that we know what is required of us in terms of compliance and reporting. The Code emphasizes this and informs all of us of our shared responsibility for keeping the University in full compliance with all applicable laws, regulations and policies.</p>
1.4 – Core Values	<p>The University has five core values which guide its daily operations. They include knowledge and professionalism, as well as:</p> <p>A) Honesty, Respect, Integrity</p> <p>B) Ethics, Leadership, Respect</p> <p>C) Leadership, Integrity, Honesty</p> <p>D) Respect, Ethics, Integrity</p> <p>E) Honesty, Leadership, Ethics</p>
1.5 A – Correct	<p>Nicely done! The University’s core values make up the foundation of the overall culture at UConn and UConn Health.</p>

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1.5 B - Incorrect	<p>Actually, the University’s five core values are: knowledge, honesty, respect, integrity, and professionalism. These core values guide the daily operations of the University. Regardless of your role at UConn or UConn Health, it is important to demonstrate a working understanding of these values and uphold them in all that you do.</p>
1.6 – University Standards	<p>As you read through the Code of Conduct, you will see it outlines standards for engaging in each of the following areas:</p> <ul style="list-style-type: none"> <li>▪ Education</li> <li>▪ Research</li> <li>▪ Public Engagement and Outreach</li> <li>▪ Patient Care</li> <li>▪ Business, Fiscal and Legal</li> <li>▪ External Relations and University Advancement</li> </ul> <p>In addition, it discusses University-wide standards for how we should all engage with each other to create a positive workplace environment, including standards related to the Conduct of Faculty, Administrators and Staff, Civility, Non-Discrimination, Harassment, confidentiality, the use of University Computers or Telecommunications, Regulatory Compliance, Health and Safety, and Conflicts of Interest.</p> <p>You’ll also notice reflection questions embedded throughout the code to help you apply the standards. Up next, you will be asked to review a scenario and think through the standards in the code to assess the matter.</p> <hr/> <p><i>PICK-ONE</i></p> <p>Managers and supervisors have a greater responsibility to show and support civility and collegiality in the workplace. As such, Kendall is planning on covering these topics with their team and would like your thoughts. Select one of the the following scenarios and compare notes with Kendall.</p>
1.7 – Scenario 1	<p>Mariana’s department is planning targeted outreach aimed at increasing the enrollment and success of first-generation college students in their programs.</p> <p>While Mariana agrees on the importance of this sort of outreach, she disagrees with the plan. Mariana respectfully shared her concerns with the team and provided alternative approaches to the parts of the plan she disagreed with. Is this an example of civility or incivility? Why do you feel that way? Type your response in the text field on the right of your screen and click on submit to proceed.</p>
1.8 – Scenario 1 Reflection	<p>This is an example of civility. The University values an environment that promotes civility and collegiality, encouraging open and productive scholarly debate. Mariana treated others with civility and respect while expressing her disagreement with the planned approach.</p> <p>Below are a few questions to ask yourself. Remember to <a href="#">visit the Code of Conduct for more</a>.</p> <ul style="list-style-type: none"> <li>• Have I treated others with kindness and respect, even when disagreeing?</li> </ul>

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	<ul style="list-style-type: none"><li>• Have I made statements that could be discriminatory, harassing, or make others uncomfortable?</li><li>• Have I done anything that has intimidated or isolated others at work?</li></ul>
1.9 – Scenario 2	<p>Meet Toni and Carl. Carl is a new nurse at UConn Health and reports to Toni, a long-time nurse manager. Toni asked Carl to prepare a report, but did not fully explain the information needed to complete it. When Carl asked for clear instructions, Toni rolled their eyes and began shouting at Carl in front of their colleagues because according to Toni, they had already discussed what Carl needed to do the job. This embarrassed Carl, who became visibly upset. Is this an example of civility or incivility? Why do you feel that way? Type your response in the text field on the right of your screen and click on submit to proceed.</p>
1.10 – Scenario 2 Reflection	<p>This is NOT an example of civility. The University values an environment that promotes civility and collegiality, encouraging open and productive scholarly debate . Even if there is a disagreement on whether the requested information was already shared, rolling your eyes or shouting are examples of disrespectful and uncivil actions. Toni’s behavior was not considerate and respectful of Carl or others.</p> <p>Below are a few questions to ask yourself. Remember to <a href="#">visit the Code of Conduct for more</a>.</p> <ul style="list-style-type: none"><li>• Have I treated others with kindness and respect, even when disagreeing?</li><li>• Have I made statements that could be discriminatory, harassing, or make others uncomfortable?</li><li>• Have I done anything that has intimidated or isolated others at work?</li></ul>
1.11 – Scenario 3	<p>Meet Kylee and Ian. They both work in facilities. Kylee is tasked with training her co-workers (including Ian) on using a new piece of equipment. Ian struggled a bit with the training but did not share his concerns with Kylee. Instead, Ian made a comment in front of everyone including Kylee that he “highly dislikes Kylee’s voice and can’t understand her because of her accent”. He also said that, “the training is a complete waste of time.” Kylee is upset and leaves the training room in distress. Is this an example of civility or incivility? Why do you feel that way? Type your response in the text field on the right of your screen and click on submit to proceed.</p>

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<p>1.12 – Scenario 3 Reflection</p>	<p>This is NOT an example of civility. The University values an environment that promotes civility and collegiality, encouraging open and productive scholarly debate. Engaging in behaviors that harass, intimidate, bully, threaten or harm another member of the University community does not support a respectful and civil work environment. In this case, Ian did not use a respectful or constructive way to give feedback about the training. In addition, no one in the room confronted Ian about the incivility, which can be seen as agreeing with Ian or his approach.</p> <p>Below are a few questions to ask yourself. Remember to <a href="#">visit the Code of Conduct for more</a>.</p> <ul style="list-style-type: none"> <li>• Have I treated others with kindness and respect, even when disagreeing?</li> <li>• Have I made statements that could be discriminatory, harassing, or make others uncomfortable?</li> <li>• Have I done anything that has intimidated or isolated others at work?</li> </ul>
<p>1.13- Consult the Code of Conduct</p>	<p>Thank you for helping Kendall prepare for their staff meeting by testing out the scenarios. In addition to reviewing the Code of Conduct and other policies when you are unsure about a particular workplace situation, you can also consult with your supervisor and co-workers, or contact the Office of University Compliance for additional guidance. Doing so, will help ensure you do not inadvertently violate the Code of Conduct or University policies, which could result in disciplinary actions, including dismissal.</p>
<p>1.14 – Reporting Compliance Concerns</p>	<p>As part of their team discussion related to the University Code of Conduct, Kendall plans to go over how to report potential compliance concerns at UConn and UConn Health. This is important because we each have a responsibility to prevent, detect, and correct compliance concerns when they arise.</p>
<p>1.15 – Reporting Options</p>	<p>Upon reviewing Kendall’s proposed content, you notice that members of Kendall’s team are being encouraged to share their compliance concerns directly with Kendall. Kudos to Kendall for encouraging their staff to raise compliance concerns to them. Often times a compliance concern can be easily addressed and rectified by working collaboratively with your manager.</p> <p>That said, what are some other options for reporting compliance concerns that Kendall may want to mention in the staff meeting?</p> <ul style="list-style-type: none"> <li>A) That’s it. There are no other options</li> <li>B) Report it directly to the Office of University Compliance</li> <li>C) Visit <a href="http://policy.uconn.edu">policy.uconn.edu</a></li> <li>D) Use the University’s REPORTLINE</li> </ul>
<p>1.16A – Correct</p>	<p><b>B)</b> That’s right! B was one of the two correct responses listed for this question. In addition to reporting suspected compliance concerns to a manager, individuals have the option to report compliance concerns directly to the Office of University Compliance. Option D is also correct, as individuals can also use the University’s REPORTLINE to report compliance concerns. Individuals can also ask for guidance using these avenues.</p>

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	<p><b>D)</b> That’s right! D was one of the two correct responses listed for this question. In addition to reporting suspected compliance concerns to a manager, individuals have the option to report compliance concerns via the University’s REPORTLINE. Choice B is also correct, as individuals also have the option to report compliance concerns directly to the Office of University Compliance. Individuals can also ask for guidance using these avenues.</p>
1.16B – Incorrect	Let’s try that again. Here is a clue: When it comes to reporting compliance concerns at UConn or UConn Health, there are options.
1.17 – The University’s Reportline	<p>Those who report in good faith, will be provided anonymity to the extent possible under the law. Meaning that no personally identifiable information will connect the reporter to the report. The only option to truly report something anonymously is by using the University’s Reportline. There are three specific ways to utilize the Reportline.</p> <ol style="list-style-type: none"> <li>1. You can call 1-888-685-2637 and speak with a Call Specialist, who will ask you questions about your concern and will document the information in a report.</li> <li>2. You can submit a report using a web form via <a href="http://uconn.ethicspoint.com">uconn.ethicspoint.com</a>. The web form walks through what specific information is needed and is very similar to the questions that a Call Specialist would ask if you chose to submit your report verbally.</li> <li>3. You can also access an abbreviated web form by scanning the following QR code on a mobile device. Go ahead – try it!</li> </ol> <p>It’s important to note that while a reporter may opt to remain anonymous, sometimes the information shared can be identifiable in and of itself to others involved in the matter. If you are curious about the steps involved in submitting a report through the Reportline, refer to our video about the Reportline Web Form linked in this year’s training resource page.</p>
1.18 – Reportline Reminder	One important thing to keep in mind, is that anyone who submits a report via the Reportline will be asked to create a password and then be given a unique report key. Think of these two things as your inclusive access-pass! They will allow you to check on your report, receive communications from University Compliance, and provide additional information including uploading documents. If you lose this information or if it is misplaced, it cannot be regenerated. Therefore, it’s super important that you keep that information in a place for safe keeping.
1.19 – Quiz question on Reportline	<p>In addition to holding onto your password and unique report key to continue to share and receive communications regarding reported concerns, what are some other important considerations to keep in mind when reporting compliance concerns?</p> <ol style="list-style-type: none"> <li>A) Less is more. Do not give too many details</li> <li>B) Provide as many specific details as possible</li> <li>C) Contact 9-1-1 if you require emergency assistance or believe a crime is in progress.</li> </ol>
1.20 A - Correct	Good work! There are actually two correct responses for this question (option B and option C). In addition to holding onto your password and unique report key to continue to share and receive communications regarding reported concerns, other important

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	<p>considerations to keep in mind when reporting compliance concerns are to provide as many specific details as possible, and to contact 9-1-1 if you require emergency assistance or believe a crime is in progress.</p> <p>Let's keep going.</p>
1.20 B - Incorrect	<p>There are two additional important reminders to keep in mind when reporting compliance concerns.</p> <ul style="list-style-type: none"><li>• First, be sure to provide as many specific details as you can, such as names, locations, dates, office or unit names, as well as any potential witnesses. This information will allow the University to conduct a complete and thorough review of the matter.</li><li>• Last, while the REPORTLINE is intended to report activities or conduct that you believe may violate a law or policy, it is <b>NOT</b> meant to report emergencies. If you require emergency assistance or believe a crime is in progress, please call or text 9-1-1.</li></ul>
1.21 – Non-Retaliation Policy	<p>When reporting a concern, the highest level of privacy will be maintained. While anonymity and privacy cannot always be guaranteed, it is important to be aware of the <u>University's Non-Retaliation Policy</u>.</p> <p>This policy strictly prohibits any adverse action attempted, taken, or threatened against someone because they submitted a report in good-faith, they participated in a compliance investigation, or they assisted others in making such a report.</p> <p>Interested in testing your knowledge around this policy?</p> <p>Select A for Yes. Select B for No.</p>
1.22 – Non-Retaliation Scenario 1	<p>Let's walkthrough a few scenarios to determine whether they may constitute retaliation.</p> <p>Meet Daisy an employee who has responsibilities at both UConn and UConn Health. Daisy recently reported to her manager that she believed their office was not in compliance with an IT Security policy, specifically that personal mobile devices did not include the required anti-virus software. Daisy provided her supervisor with a copy of the policy as well as documentation of her concerns in writing, which included employee names that Daisy believed were intentionally violating the policy.</p> <p>Daisy's reported concern to her manager would be considered a protected activity under the Non-Retaliation Policy, and her manager as the person who received the report is aware of the protected activity.</p> <p>A week after reporting the concern to her manager, Daisy was pulled into a meeting with her manager and Human Resources to discuss Daisy's attendance at work. Her manager issued her a letter of warning for three unexcused absences in the last</p>

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	<p>quarter. In addition, her manager indicated any further unexcused absences could lead to further discipline including dismissal from her position.</p> <p>Daisy receiving a letter of warning and notice of potential further discipline could be considered an adverse action. So, we have Daisy engaged in protected activity which followed an adverse action from her manager a week after. Do you think this is retaliation?</p> <p>In looking at Daisy’s past attendance, it appears that Daisy has three unexcused absences within the last quarter, one of which occurred two days after she reported her concerns. So, while the timing of the adverse action may cause concern for retaliatory animus, it appears there are non-retaliatory reasons that prompted the letter of warning to Daisy. Therefore, a causal relationship between Daisy making the report, and Daisy getting a letter of warning, would not be substantiated.</p>
<b>1.23 – Non-Retaliation Scenario 2</b>	<p>Meet Clarke – A graduate student in biomedical engineering. Clarke works in a lab with faculty from both UConn and UConn Health as a research assistant. One of the faculty members, Dr. Shaffer, is also Clarke’s faculty advisor, overseeing Clarke’s research project and progress toward obtaining a Ph.D. Clarke recently reported a concern, using UConn’s Reportline. Clarke’s concerns were related to the use of research funds and whether or not Dr. Shaffer was using funds in a permissible way.</p> <p>Prior to reporting the concern, Clarke was generally well liked and regarded by the research faculty he worked with. He was receiving only positive feedback related to his lab responsibilities and was successfully progressing with his research for his dissertation. Clarke was often invited to Dr. Shaffer’s house for dinner and to talk about their research.</p> <p>After submitting the report, Dr. Shaffer emailed Clarke to indicate he no longer wished to serve as Clarke’s research advisor and that Clarke had until the end of the semester to find another advisor. When Clarke asked Dr. Shaffer why he was dropping Clarke as his advisee, Dr. Shaffer stated he could no longer “trust” Clarke and had no interest in working with students who disrespected his authority or “submitted false accusations” about him. Clarke also later found out that Dr. Shaffer emailed all other faculty in the department discouraging them from working with Clarke because Clarke had reported Dr. Shaffer and “slandered” his name.</p> <p>Let’s look this a bit closer to see if the University’s Non-Retaliation Policy might be implicated using the four factors we previously discussed. Clarke reported a concern regarding appropriate use of research funds, which would be considered protected activity under the policy.</p> <p>The person that Clarke reported, Dr. Shaffer, resigned from being Clarke’s faculty advisor. It is required for Clarke to have a faculty advisor to persist in obtaining his Ph.D., so this could impact Clarke’s academic progress. Additionally, Dr. Shaffer actively discouraged other faculty from working with Clarke in an effort to further impact Clarke’s chances at future research progress. While it is not entirely clear whether or</p>

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	<p>not Dr. Shaffer is aware of Clarke’s report to the Reportline, given the email communication to Clarke, a reasonable person would conclude that Dr. Shaffer was aware and therefore knew about the protected activity. Additionally, given the statements from Dr. Shaffer via email to Clarke and other faculty in the department, his resignation from being Clarke’s advisor was in response to Clarke’s reported concern, indicating a causal relationship between the protected activity and the adverse action. This circumstance would therefore demonstrate that Dr. Shaffer retaliated against Clarke so long as Clarke original report was made in good faith.</p>
<p>1.24 – Section conclusion</p>	<p>Thanks for participating in this section regarding the University’s Code of Conduct and the importance of individual behavior. Navigate back to the learning@work site to launch section 2 and continue this training.</p>

### Section 2 – University Guide to the State Code of Ethics

<p>2.1 – Section Intro</p>	<p>Each year, the University’s Compliance and Ethics Training covers important topics that are required by laws and policies. For example, in this section, we will be going over requirements in the State Code of Ethics for public officials. Such requirements apply to all state employees, including UConn and UConn Health employees.</p> <p>Depending on your experience with the Code, you might already have an advanced understanding of some of the concepts that will be covered in this section. Like in the first section of this training , we have provided you with chances to demonstrate what you already know about some of the content in order to skip ahead.</p>
<p>2.2 – Purpose of the Code of Ethics</p>	<p>Here is your first opportunity to do so! Tell us what you know about the State Code of Ethics.</p> <p>The Connecticut State Code of Ethics is a:</p> <ul style="list-style-type: none"> <li>A. Conflict of interest law</li> <li>B. Set of moral principles relating to work ethic</li> <li>C. Philosophical approach to workplace relations</li> <li>D. Series of best practices for working with vendors and contractors</li> </ul>
<p>2.3A Correct</p>	<p>Correct: That’s right! It is a conflict of interest law that aims to prevent state employees and public officials from using their position or authority for personal financial benefit. As you may know, UConn is required to have its own policy. The University Guide to the State Code of Ethics is the policy for UConn and UConn Health and is linked here and in your accompanying resource.</p>
<p>2.3B Incorrect</p>	<p>Not quite... The Connecticut State Code of Ethics for Public Officials was developed in the 1970’s as a conflict of interest law with the intent to prevent state employees and public officials from using their position or authority for personal financial benefit. The Connecticut Office of State Ethics is the state agency tasked with the administration and enforcement of the State Code of Ethics.</p>

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	<p>Per the Code, UConn is required to have its own institutional policy addressing provisions of the State Code of Ethics. UConn’s policy (which is linked here and referenced in your accompanying resource) is called the University Guide to the State Code of Ethics. As a UConn or UConn Health employee, it is your responsibility to regularly review the University Guide to the State Code of Ethics and ensure your actions comply with its outlined requirements.</p>
<p>2.4 Guidance on the Code of Ethics</p>	<p>1) If you have questions or need guidance on the Code of Ethics, UConn and UConn Health employees should contact:</p> <ul style="list-style-type: none"> <li>A. Human Resources</li> <li>B. UConn’s Ethics Liaison</li> <li>C. Research Compliance Services</li> <li>D. Office of the General Counsel</li> </ul>
<p>2.5A - Correct</p>	<p>Correct: Excellent! Yes, the Ethics Liaison for UConn and UConn Health is our Associate Vice President and Chief Compliance Officer Kimberly Fearney. She works to provide employees with guidance on the Code, answers questions, and works directly with the Office of State Ethics for clarification or formal guidance when appropriate. Remember, you are individually responsible for following the State Code of Ethics. This means you can be required to pay fines for violating the Code up to \$10,000 per violation.</p>
<p>2.5B - Incorrect</p>	<p>Incorrect: That’s a great resource, but maybe for a different question. You will want to contact the Ethics Liaison for UConn and UConn Health for guidance on the Code of Ethics. UConn is required by law to have a dedicated person to serve as a liaison between UConn employees and the Office of State Ethics. The Ethics Liaison provides UConn employees with guidance on the Code, answers questions, and works directly with the Office of State Ethics for clarification or formal guidance when appropriate. UConn’s Ethics Liaison is our Associate Vice President and Chief Compliance Officer, Kimberly Fearney.</p> <p>An important thing to note is that as a UConn or UConn Health employee, you are also a Connecticut state employee. With that, you are individually responsible for following the State Code of Ethics and can be required to pay fines for violations of the Code up to \$10,000 per violation. As employees, it is important that we keep this in mind and always act in the best interest of the University and the State of Connecticut.</p>
<p>2.6 Conflicts of Interest</p>	<p>Now that we are clear on the purpose of the Code of Ethics, let’s try to connect it to the work that we do. Regardless of your role at UConn and UConn Health, the work that you do helps to contribute to its overall success. That’s why it’s important to be mindful to avoid situations when there is some personal financial gain that could compromise or have the appearance of compromising your work or professional judgement. The Code of Ethics refers to these situations as conflicts of interest, and</p>

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	<p>they may come up in different ways, including: giving or receiving gifts, accepting payments or appearance fees, other monetary benefits, engaging with or negotiating contracts with the state, and engaging in outside employment.</p> <p>We will discuss each of these in more detail, but remember, the goal is to help you identify when you may need to reach out for help or seek guidance from the Office of University Compliance. You are not expected to become an expert in the Code of Ethics. That said, let's take a moment to test your expertise related to the gift rules.</p>
2.7 Gift Rules	<p>It looks like you have 3 unread messages. Each contains a scenario related to the gift rules. Before reviewing and responding to your messages, remember: A gift is anything of value received directly and personally and where you do not pay for it. A gift can be a discount, gratuity, tickets to an event, it can be a meal, a giveaway from vendors, or even reimbursement or payment for attendance at an event.</p> <p>Okay, let's open your messages.</p> <hr/> <hr/> <p><i>Select from the messages on the right of your screen to view and respond to the chat.</i></p>
2.8 Message 1 - Mariana	<p>Meet Mariana, an administrative program assistant for HR Services at UConn Health. A few weeks ago, Mariana attended a conference sponsored by a UConn Health vendor and was entered into a prize drawing. Earlier today, Mariana was notified that she won a \$75 gift card to a gourmet coffee shop.</p> <p>She reaches out to you see if it would be acceptable to accept the gift card. What would you respond?</p> <p>A) No, it would not be permissible for you to personally accept a gift from a current or prospective vendor.</p> <p>B) Yes, that is fine because it is under \$100.</p> <p><i>Select your choice and drag it to the chat to submit your response.</i></p>
2.9A Correct	<p>Great work! In this circumstance, it would not be permissible for Mariana to accept the gift. Mainly because the gift is being offered by a restricted donor, which includes: current vendors or those seeking to contract with the University, registered lobbyists in the State of Connecticut, or Contractors who are Pre-Qualified by the Department of Administrative Services. That said, there may be circumstances in which this may be acceptable if it falls under an <u>exceptions to the gift rules</u>. We will come back to this when we talk about the gift exceptions later in this section.</p>
2.9B Incorrect	<p>In this circumstance, it would not be permissible for Marianna to accept the gift. Mainly because the gift is being offered by a restricted donor, which includes: vendors who currently contract with the University or who are seeking to do so,</p>

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	<p>registered lobbyists in the State of Connecticut, or Contractors who are Pre-Qualified by the Department of Administrative Services. That said, there may be circumstances in which this may be acceptable if it falls under an <u>exceptions to the gift rules</u>. We will come back to this when we talk about the gift exceptions later in this section.</p>
2.10 Message 2 - Garret	<p>Meet Garret! They are being offered a gift. The gift is being offered to Garret from a former student because Garret helped the student throughout their time at UConn. Garret doesn't think they can accept the gift, and has reached out to you to confirm. What would you say?</p> <p>A) That's correct. You cannot accept it because it is being given to you due to your UConn position.</p> <p>B) Actually, you can accept up to \$100 in gifts from a non-restricted donor, which would include a previous student, in a calendar year.</p> <p><i>Select your choice and drag it to the chat to submit your response.</i></p>
2.11A Correct	<p>You're pretty good at this! When offered a gift from a non-restricted donor because of your UConn or UConn Health position, the total value of gifts received from that individual cannot exceed \$100 per calendar year. So long as the gift does not exceed \$100, and you haven't received gifts prior that would put you over that limit, it would be permissible!</p>
2.11B Incorrect	<p>Not quite... If a non-restricted donor, like a student, is giving you a gift because of your position at the University, you should be aware that the total value of gifts received from that individual cannot exceed \$100 per calendar year. Therefore, the key to determining if a gift is permissible in this circumstance is first asking yourself whether the gift is being offered because of your University position, and whether or not all gifts you have received from this person are under the threshold of \$100 during the calendar year.</p>
2.12 Message 3 - Ruby	<p>Meet, Ruby. She wants to get her supervisor a birthday gift. Her friend, Garret told her about the guidance you provided, and she is wondering whether there are similar monetary limits for gifts between employees and supervisors because like students, they would be a non-restricted donor.</p> <p>Ruby asked, would it be ok to get my supervisor a gift? If so, are there restrictions as to the value of the gift? What would you respond?</p> <p>A) Yes, you can. You will the need to make sure the gift does not exceed a \$100.00 limit (per gift).</p> <p>B) Yes, you can. There are no monetary limits for gifts between employees and supervisors.</p> <p><i>Select your choice and drag it to the chat to submit your response.</i></p>

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2.13A Correct	Nicely done! Gifts between supervisors and their employees must be valued at no more than \$100. This is a per-gift, not per-year limit, regardless of whether it is a group gift or individual gift.
2.13B Incorrect	That is partially correct. While it is true that the code allows for supervisors to accept gifts from their employees (and vice versa), the State Code of Ethics provides that when there is a supervisory relationship between the gift givers, and gift receiver, a limit to the amount the gift is worth needs to be appropriate. What does that mean? It means that gifts between supervisors and their employees must be valued at no more than \$100. This is a per-gift, not per-year limit, regardless of whether it is a group gift or individual gift.
2.14 Gift Exceptions	<p>Ok, we've covered most of the basics related to the gift rules, but before moving forward, it's important to note that there are 19 exceptions to the gift rules, including:</p> <ul style="list-style-type: none"> <li>• Token items. These are items that are less than \$10, provided the annual total of such items from a single source is \$50 or less. For example, a water bottle or mug provided at a conference, so long as the value of that item is not above \$10.00.</li> <li>• Food and Beverage. Up to \$50 in food/beverage annually from a single source, provided the donor or donor's representative is present when it is consumed. This would include food/beverage from a restricted donor.</li> <li>• Training being provided by a vendor for a product purchased by UConn, as long as the training is offered to all customers of that vendor and the training facilitates UConn business.</li> <li>• Ceremonial awards, including a certificate, plaque or other ceremonial award valued less than \$100.</li> <li>• A gift valued under \$1,000.00 given to celebrate a "major life event": a child's birth or adoption, wedding, funeral, ceremony commemorating induction into religious adulthood, and retirement from state service. The \$1000.00 limit is per gift, regardless of whether it is given by one person or multiple people.</li> <li>• The acceptance of some goods or services given to UConn, provided that the gifts meet certain requirements and help facilitate University business.</li> </ul> <p>With this in mind, let's revisit our earlier scenario where a vendor wanted to give Mariana a gift card to a gourmet coffee shop.</p>

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2.15 Gift Exceptions and Mariana	<p>A gift card (valued at more than \$10), while not acceptable if given to one person alone, may be accepted on behalf of an entire agency or division if the per person cost will be reduced to less than \$10. This makes the gift fall within the gift exception for “token items” of \$10 or less per person.</p> <p>Do you think this would also fall under the "food and beverage" exception? If you're thinking no, you're right! In this case, the "food and beverage" exception does not apply because the vendor would not be present while Mariana grabbed coffee and because the value is above the \$50.00 annual limit.</p> <p>Given the various gift rules and exceptions, please contact UConn's Ethics Liaison, Kimberly Fearney or refer to the University Guide to the State Code of Ethics for guidance. Let's move forward.</p>
2.16 Outside Employment	<p>Remember Kendall? Here are a few of their colleagues and members of their team. Each team member is encountering an ethics matter.</p> <p>The first, involves Rania, who is thinking about picking up a second job as an online afterschool tutor. Rania knows that the Code of Ethics allows state employees to have another job, however, there are several rules that need to be followed. Which of the following is an example of a potential violation of the outside employment rules?</p> <ul style="list-style-type: none"><li>A) Rania makes sure that her job at UConn takes precedence and her tutoring job does not create a conflict of interest.</li><li>B) Rania does not use confidential information learned through her UConn job for her tutoring job.</li><li>C) Rania hosts a few tutoring sessions on Friday afternoons, about an hour before the end of her workday at UConn.</li></ul>
2.17A Correct	<p>Spot on! Rania must also follow the State Code of Ethics, which prohibits using state resources, including time, for outside employment. We will talk more about expectations regarding the use of University resources (including time) momentarily.</p>
2.17B Incorrect	<p>So, from the listed options, the one where Rania provides tutoring during time she is supposed to be working at UConn, is an example of a violation of the outside employment rules. We will talk more about expectations regarding the use of University resources (including time) momentarily.</p> <p>Additionally, while the code allows us to have other jobs, we cannot accept outside employment that will impact our independence of judgment with our UConn or UConn Health duties or encourage us to disclose confidential information learned throughout our UConn or UConn Health jobs.</p>
2.18 Faculty Consulting 1	<p>Are you a member of the faculty bargaining unit, AAUP or work frequently with members of the faculty bargaining unit?</p>

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	A) Yes or B) No
2.19 Faculty Consulting 2 (Choice A)	Thanks for letting us know. Here is some additional information to be aware of. In 2007, the Office of State Ethics created a “carve out rule” for outside employment that allows for faculty consulting activities. As such, it is important that members of the faculty bargaining unit are complying with the established guidelines and policies governing such activities, including getting pre-approval. For more information on faculty consulting requirements and activities, please go to consulting.uconn.edu.
2.20 Appearance Fees	Meet Tom. Tom is a financial analyst at UConn and is great at what he does. Tom recently got invited to speak at a national conference. While the details still need to be ironed out, Tom anticipates being offered some sort of payment or honorarium for speaking at the conference. Let’s help Tom run through a few questions related to the acceptance of appearance fees. Click let’s go to begin.  <hr/> <hr/> Each question is worth 5 points. Review and answer each question, then click next to proceed. Are you ready?
2.21 Appearance Fees Q1	True or False: The Code of Ethics is silent on whether state employees can personally accept payment (or honorariums). A. True B. False
2.22A Q1 - Correct	B is Correct: Nicely done! You get five points! Let’s keep going.
2.22B Q1 - Incorrect	<b>Incorrect – This would be false:</b> The Code of Ethics is clear that state employees cannot personally accept payment (or honorariums) for certain work done.
2.23 Appearance Fees Q2	Can Tom accept an appearance fee if he was asked to speak because of his position as a UConn financial analyst? A. Yes B. No
2.24A Q2 - Correct	Correct: Way to go! Five points coming your way! Try the next question.
2.24B Q2 - Incorrect	<b>Incorrect:</b> It would not be permissible for Tom to personally accept payment if he was asked to speak at the conference because of his position as a financial analyst at UConn.
2.25 Appearance Fees Q3	What if Tom was not asked to present because of his UConn position, but will be speaking about the financial analysis program he built for UConn? Would it be permissible for him to accept the appearance fee? A. That would be ok B. <b>Still not permissible</b>
2.26A Q3 - Correct	B is Correct: Correct! You’re doing great.
2.26B Q3 - Incorrect	<b>A is Incorrect:</b> It would NOT be permissible. If Tom is representing UConn during the speaking engagement, he cannot personally accept a payment or honorarium.

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<b>2.27 Appearance Fees Q4</b>	Tom mentioned he is not speaking due to his UConn role or representing UConn during the speech, and will be presenting during his own personal time. Would it be okay for him to accept payment? <b>A. Yes</b> B. No
<b>2.28A Q4 - Correct</b>	A is Correct: Well done! That’s correct! Let’s check out your final score!
<b>2.28B Q4 - Incorrect</b>	<b>B is Incorrect:</b> It would be permissible. If Tom is presenting on his own time, not representing the University, or not speaking in his UConn capacity, he CAN personally accept a payment for the speaking engagement as that would be seen as outside employment.
<b>2.29 Necessary Expenses / Gifts to the State</b>	<p>Alright!</p> <p>After the details were ironed out, it looks like Tom was asked to speak at the conference as a financial analyst at UConn. While he may not accept payment for his presentation, he may accept payment or reimbursement of things like travel costs, lodging and meals under the “necessary expenses” or “gifts to the state” rules.</p> <p>Because Tom is actively participating in the conference as a speaker, reimbursement for such costs would fall under “necessary expenses” as they are necessary costs associated with the event in consideration for one's service or expertise. “Active participation” requires involvement in an official activity that is essential to the event such as giving a speech, participation on or moderating a panel, or presenting or receiving an award.</p> <p>What if Tom was not speaking at the conference, but was just attending the event? In such case, Tom may still be able to accept payment or reimbursement of reasonable expenses for attending the event in his official UConn capacity as a “gift to the state” so long as:</p> <ol style="list-style-type: none"> <li>1) The event is educational in nature and relevant to his UConn duties (i.e., the event must facilitate state action or function); AND</li> <li>2) Tom attended the event to acquire knowledge or a certain expertise. Like with Necessary Expenses, payment or reimbursement of “gifts to the state” may be made by either a restricted or non-restricted person or entity, however, unlike Necessary Expenses, Gifts to the State are not limited to the sponsors of the event.</li> </ol> <p>It's also important to note that a gift to the state or a necessary expense is only for reasonable expenses the University would otherwise pay for. For instance, coach class travel, lodging in a standard room (the nights before, of and after event), meals, and conference or seminar registration fees. Therefore, “Necessary Expenses” and “Gifts to the State” do not include payment for recreation or entertainment costs, or for lavish travel expenses such as first-class airfare</p>
<b>2.30 Reporting Requirements for YOU:</b>	If you receive payment or reimbursement of necessary expenses or a gift to the state for lodging and/or out of state travel, you must report it to the Office of State Ethics <b>within 30 days using the online reporting form</b> . Reporting is not required if these

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	<p>expenses were paid by the State of Connecticut, the federal government or another state government.</p> <p>If you ever find yourself receiving reimbursement or payment to attend an event in your UConn capacity, you can use the Necessary Expenses and Gifts to the State flowchart to determine if it would need to be reported to the Office of State Ethics or you can always contact University Compliance for guidance.</p>
<b>2.31 Checking-in</b>	<p>How are you doing? We are nearing the end of this section. Before moving forward, let's test your knowledge on some of the remaining topics – if you get the correct answer, you can move forward in the training to another topic. Good luck!</p>
<b>2.32 Substantial and Potential COI's</b>	<p>As UConn employees, we must pay attention to and avoid situations that may present substantial or potential conflicts of interest. This includes situations in which your official action directly affects your financial interests, or those of a relative, or business with which you are associated.</p> <p>For example, if you were to hire a family member to supervise and work alongside you, that action could personally benefit you, as well as your relative. Such conflicts often result in complaints about favoritism and unfair treatment. Additionally, hiring and supervising a relative may violate the State Code of Ethics as well as the University Policy on Employment and Contracting for Service of Relatives.</p> <p><b>What do you need to do if you are presented with an actual or potential conflict of interest?</b></p> <ul style="list-style-type: none"><li>A. Ignore it. It's probably nothing.</li><li>B. Disclose the matter and the nature of the potential or actual conflict</li><li>C. Document it in your personal notes, but don't tell anyone else as it is confidential</li><li>D. Provide a copy of your disclosure to your immediate supervisor</li><li>E. None of the above</li></ul>
<b>2.33A Correct</b>	<p>Correct: Good work! There are two correct responses here. Options B and C. If presented with a conflict, the Code requires employees to prepare a written statement describing the matter and the nature of the potential or actual conflict and provide a copy to their immediate supervisor. This can be done by completing the Conflict of Interest (COI) Disclosure form linked here and in your accompanying resource..</p> <p>Supervisors who receive a disclosure of a conflict of interest are required to assess and manage the conflict in a way that is in the best interest of the University. Sometimes responsibilities for budget allocation or supervision are delegated to another University employee in order to eliminate any potential conflict.</p>

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<b>2.33B Incorrect</b>	<p>It's important not to overlook or mismanage a potential conflict of interest. If presented with a conflict, the Code requires employees to prepare a written statement describing the matter and the nature of the potential or actual conflict, and provide a copy to their immediate supervisor. This can be done by completing the Conflict of Interest (COI) Disclosure form linked here and in your accompanying resource.</p> <p>Supervisors who receive a disclosure of a conflict of interest are required to assess and manage the conflict in a way that is in the best interest of the University. Sometimes responsibilities for budget allocation or supervision are delegated to another University employee in order to eliminate any potential conflict.</p>
<b>2.34 Financial Benefits (Use of Office)</b>	<p>Becca, a program coordinator at UConn Waterbury has an extensive network in the greater New Haven area. In her personal time, she has been planning a fundraising event to support one of her friends in a local political election. Becca would like to design and print marketing materials for the event using her UConn computer and printer. Would that be ok?</p> <p>A. Yes, but Becca would just need to complete a conflict-of-interest disclosure form.</p> <p>B. No, Becca cannot use University resources for personal reasons.</p> <p>C. Maybe. But, only if there is extra paper and ink.</p>
<b>2.35A Correct</b>	<p>Good work! Any UConn resources, including printers and paper, are designated for university business.</p> <p>In addition, it would also be important for Becca to know that as a state employee, she is not allowed to use state materials, equipment, or her position to influence a political election of any sort.</p>
<b>2.35B Incorrect</b>	<p>While it may seem like a convenient idea, as a UConn employee Becca would not be allowed to use University resources for any non-UConn reason. This includes using work time for personal tasks or using University equipment such as computers, network access, paper, etc. for personal reasons. This applies to the use of staff members or students for your own personal benefit. For example, having a staff member in your office pick up your dry cleaning, or run to the grocery store for you would be an inappropriate use of University resources.</p> <p>In addition, it would also be important for Becca to know that as a state employee, she is not allowed to use state materials, equipment, or her position to influence a political election of any sort.</p>
<b>2.36 Contract w/ the State</b>	<p>Here is Javi! He works at UConn Health in Avon, Farmington and Southington. Javi's oldest child, Mel, is an established photographer and social media content creator. Mel's company has gained recognition on social media for its breathtaking aerial photos. Mel was recently contacted by the UConn Hartford Campus with interest in having Mel provide professional photography services to capture a series of upcoming campus events and assist with the creation of digital content.</p> <p>What are some things here that could complicate the situation?</p>

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	<ul style="list-style-type: none"> <li>• Well, because Javi is a state employee, there are rules around when an immediate family member would be permitted to contract with the state.</li> <li>• Any contract with a state employee, their immediate family member, or affiliated business valued above \$100 would need to go through a public and transparent process. To clarify, an immediate family member would be a spouse, child or dependent relative who resides in the same household.</li> <li>• If Mel’s company contracts with the UConn Hartford Campus and the contract is above the \$100 threshold, both Javi as the state employee, and Mel as the contracted business, could be held responsible for violating the State Code of Ethics.</li> </ul>
<p><b>2.37 Post-State Employment</b></p>	<p>Before wrapping up this section, let’s go over the Ethics Code’s revolving-door provisions. These are requirements that apply to UConn and UConn Health employees after leaving state service.</p> <p>In particular, there are 4 rules to keep in mind.</p> <ol style="list-style-type: none"> <li>1) The first has to do with confidential information and what you do with it. As a state employee, you may never share or use confidential information learned while you worked at UConn for the financial benefit of anyone. That’s a lifetime ban.</li> <li>2) Another lifetime ban to be aware of has to do with preventing “side-switching”. Per the Code of Ethics, you may never represent anyone (other than the state) concerning a matter in which you substantially participated while in state service and the state has a substantial interest. Substantial participation means participation that was direct, extensive and substantive, not peripheral or clerical.</li> <li>3) For one year after leaving UConn, you are not allowed to work with UConn for compensation on behalf of another company or entity. The purpose of this rule is to establish “a ‘cooling off’ period to inhibit the use of influence with your former colleagues for improper financial gain.</li> </ol> <p>Lastly, if you substantially participated in or supervised the negotiation of a state contract valued at \$50,000 or more, you may not accept employment with a party to that contract within one year after the contract was signed.</p>
<p><b>2.38 Section 2 conclusion</b></p>	<p><i>You did it! You completed the second section of this year’s training. You have one section left. Remember, you will need to navigate back to the learning@work site to launch section 3 and finalize your participation.</i></p>

### Section 3 – Key Compliance Requirements

<p><b>3.1 – Section Intro</b></p>	<p>In this last section, we will learn about a few important compliance topics including the responsible use of University funds and Clery Compliance. Additionally, if you are currently working in, or planning to work in, research at UConn or UConn Health you will be directed to compliance reminders related to such activities. Let’s move forward.</p>
<p><b>3.2 – Scenario 1</b></p>	<p>Meet Tate! Tate is a Digital Media and Design Specialist at the Stamford campus, and is one of the top experts in their field. Tate is well-regarded by their peers at</p>

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	<p>UConn and beyond. Tate is dedicated, has a strong work ethic, and often takes on projects outside of their day-to-day assignments. These are the qualities about Tate most visible to others, but a lesser-known fact about Tate is that they are a decent guitarist, and really enjoy attending a good blues concert.</p> <p>Today happens to be Tate’s birthday. In recognition of their big day, Tate’s supervisor, Flora, is thinking about getting Tate concert tickets to an upcoming blues show in the area. Given that Tate reports to her at UConn, Flora is wondering if it would be permissible to use departmental funds to purchase the tickets. What do you think?</p>
<p><b>3.3 – Scenario 1 Reflection</b></p>	<p>As you reflect on this, here are a few things to keep in mind.</p> <ul style="list-style-type: none"> <li>• As a public institution and agency of the State of Connecticut, our funding comes from a wide range of sources including students, patients, taxpayers, and benefactors. As such, there are a few “strings” attached to our University funds. These include restrictions on how we use those funds. Why is it important to pay attention to the “strings” attached to University funds?</li> <li>• Well, UConn and UConn Health have a responsibility to use funds wisely and manage them responsibly. Therefore, any use of University funds must be directly related to, and in the best interests of, UConn and UConn Health business.</li> <li>• That’s why, when deciding to use University funds, we must first ask ourselves whether such a decision is: A) justified with a business purpose, and B) supported by a clearly identifiable benefit to the University.</li> </ul> <p><b>Did you identify either of these in the scenario involving Tate and Flora?</b></p> <ol style="list-style-type: none"> <li>a. Yes, both of them.</li> <li>b. Yes, the benefit to the University is that Tate will continue to be a satisfied employee and remain on Flora’s team.</li> <li>c. No, neither were present in this scenario.</li> </ol>
<p><b>3.4 A – Correct</b></p>	<p>C is Correct – You assessed that correctly. We know that University funds cannot be used for personal / non-University business related purposes, such as things like purchasing gifts for employees or their families in recognition of personal events, including birthdays (or even holidays, the birth or adoption of a child, marriages, or bereavement). Again, when utilizing University funds, there must be a business purpose and benefit to the University. Flora may use her own personal funds to get Tate a birthday gift, but it cannot exceed the \$100 per-gift threshold we learned about in the previous section. You’re doing great!</p>
<p><b>3.4 B – Incorrect</b></p>	<p>A and B are Incorrect – This would <i>not</i> be an example of an allowable use of University funds. As a reminder, University funds cannot be used for personal / non-University business related purposes, such as things like purchasing gifts for employees or their families in recognition of personal events, including birthdays (or even holidays, the birth or adoption of a child, marriages, or bereavement). Again,</p>

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	<p>when utilizing University funds, there must be a business purpose and benefit to the University. In this case, neither were present. Flora may use her own personal funds to get Tate a birthday gift, but it cannot exceed the \$100 per-gift threshold we learned about in the previous section.</p>
<b>3.5 – Scenario 2</b>	<p>Does this topic only apply to using University funds for gifts?</p> <p>Actually, no. Our responsibility to be wise and thoughtful when using University funds extends to any financial decision we make as UConn and UConn Health employees.</p> <p>For example, let’s say Tate had their eyes on an expensive set of oil paintings and lavish décor for their new workspace. Tate saw the items featured on a popular docuseries and thinks the items may be good conversation pieces. Given what we just learned, do you think purchasing those items using University funds would be the best use of such resources? Does it appear to be justified with a business purpose? Would those expenses help the University achieve its mission? If you are thinking no, you are right!</p> <p>Based on the information at hand, Tate’s potential purchase does not directly relate to University business, nor is it in the best interest of the University. These are the sort of questions to reflect on when looking to make sound financial decisions using University funds. Tate is certainly welcome to decorate with these items using his own personal funds.</p> <p>For questions or additional guidance on this topic contact the Office of the Controller at UConn if you are a UConn employee or the Office of the Controller at UConn Health if you are a UConn Health employee.</p>
<b>3.6 – Clery Intro</b>	<p>UConn and UConn Health campuses are all across the state, providing members of our communities with opportunities to learn, work, heal, engage and so much more. That is why the safety and security of our students, employees, patients, and others in our campus community is of the utmost importance. To that end, the Division of University Safety would like to remind you of your obligations related to the Clery Act.</p> <p>In case you’re wondering, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (or the Clery Act) is a federal law requiring all institutions of higher education who receive federal funding to disclose information about crime on their campuses and in the surrounding communities. As an institution that receives federal funding, we too must comply with the Clery Act.</p> <p>Because the Clery Act is driven by the location of where a crime was committed, it focuses on university owned or leased property. This means our University counts crime that has occurred on any of our campuses, within the residence halls, on any of the public property that is within one of our campuses.</p>

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	<p>The Clery Act is enforced by the U.S. Department of Education. Failure to comply with the Clery Act could impact or jeopardize campus safety as well as result in large fines levied against UConn. It could also result in the suspension or total loss of federal funding. Therefore, as a UConn or UConn Health employee, it is important for each of us to be aware of the Clery Act and do our part to ensure compliance.</p>
<p><b>3.7 - Clery Act Requirements</b></p>	<p>So, what does the Clery Act require? Well, the act mandates that we:</p> <ul style="list-style-type: none"> <li>• Collect, classify, and count crime reports and statistics related to Clery crimes.</li> <li>• Issue timely warnings and campus alerts for Clery crimes that present an ongoing threat to the safety of students or employees, or emergency notifications upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees.</li> <li>• Publish an Annual Security Report containing safety and security-related policy statements and crime statistics and distribute it to all current students and employees. We must also inform prospective students and employees about the availability of the report.</li> <li>• Submit crime statistics to the U.S. Department of Education each fall</li> <li>• Maintain a daily crime log of alleged criminal incidents, which is open to public inspection.</li> <li>• Disclose missing student notification procedures that pertain to students residing in on-campus student housing facilities.</li> <li>• Disclose fire safety information related to on-campus student housing facilities. This includes a fire log that is open to public inspection and includes policy statements, as well as fire statistics associated with each on-campus housing facility within the Annual Safety Report (ASR).</li> </ul>
<p><b>3.8 - Campus Security Authority's</b></p>	<p><i>Is there anything else you should be aware of related to the Clery Act?</i></p> <p>Yes! Another important requirement to keep in mind is that the Clery Act designates many individuals throughout the University as Campus Security Authority's(CSA). These are individuals who are likely to receive reports of criminal violations on campus. Who does that include?</p> <p>Beyond Police and Security Officers. A CSA is an</p> <ol style="list-style-type: none"> <li>a. Individual with campus security responsibilities</li> <li>b. Individuals designated by the campus</li> </ol>

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	<p>c. Official with significant responsibility for student and campus activities who are likely to receive complaints from a victim of crime.</p> <p>Examples of a CSA include, but are not limited to:</p> <ul style="list-style-type: none"><li>• Staff in Student Affairs such as:<ul style="list-style-type: none"><li>○ The Dean of Students Office,</li><li>○ Residence life and housing</li></ul></li><li>• Student Activities</li><li>• Student Health and Wellness</li><li>• Community Standards; and</li><li>• Center for Fraternity and Sorority Development</li></ul> <p>Staff in offices such as:</p> <ul style="list-style-type: none"><li>• The Provost’s Office</li><li>• Orientation Services</li><li>• Department Heads and Directors as well as Deans</li><li>• Faculty advisors and those who advise student groups</li><li>• Supervisors of student workers</li></ul> <p><b>CSA Exclusions:</b> A licensed mental health counselor or a pastoral counselor (employed by a religious organization to provide confidential counseling) is not considered a Campus Security Authority when working within the scope of their license or religious assignment.</p>
<b>3.9 – CSA Reporting</b>	<p>UConn’s CSA Report form (linked here and in your accompanying resource) is available for CSA’s to report Clery crimes to the Division of University Safety for inclusion in the University’s annual Clery crime statistics. Be aware, this form is NOT a method of notifying police of an emergency, dangerous situation or other hazard. In such situations, immediately contact 911.</p> <p>In addition to the CSA Report Form, you can contact the Assistant Clery Compliance Coordinator at 860-486-4801 (at UConn) or 860-679-2121 (at UConn Health) for non-emergent situations.</p> <p>Interested in learning more about Clery? Want to keep learning about CSA’s? Would you like to check out the Annual Fire and Security Report? Click on the link on your screen or finding in your accompanying training resource.</p>
<b>3.10 – Research Intro</b>	<p>Before we proceed, are you planning to, or currently working, in research at UConn or UConn Health?</p> <p>A) Yes B) No</p>

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#### No

No – Thank you for letting us know, and for participating in this year’s Compliance and Ethics Training. Please take a moment to review and submit the following training acknowledgement form to complete your participation.

#### Yes

– If you are planning to, or are currently participating in, research with UConn or UConn Health, there are a few guidelines to be aware of to ensure your research projects remain in compliance. The Department of Research Integrity and Compliance, within the Office of the Vice President for Research, works to help researchers at UConn and UConn Health balance academic freedom and inquiry, with laws and policies that implement restrictions. One example of specific regulations you could encounter include the restrictions involving export-controlled items or information.

Next, we will review helpful information regarding export-control restrictions that researchers at UConn and UConn Health need to know.

#### 3.12 – Importance of Research

In a university environment, research in an academic setting, academic publications by faculty and students, and the sharing of knowledge, are expected and encouraged. At the same time, UConn works with multiple companies and sponsors, including both U.S. government and private entities, on research and development. Each sponsor has a unique process for safeguarding export-controlled technology, data, information, and tangible materials. As such, there is a delicate balance between ensuring the freedom to pursue research and scientific inquiries, and complying with all applicable U.S. Export Regulations.

The International Traffic in Arms Regulations (ITAR) [\*pronounced I-TAR\*] administered by the Department of State, is a U.S. regulatory system to restrict and control the export of defense and military-related technologies to safeguard U.S. national security and further U.S. foreign policy objectives.

The Export Administration Regulations (EAR) [\*pronounced E-A-R\*] administered by the Department of Commerce, regulates export and export restrictions, including whether a person may export something from the U.S.; re-export something from a foreign country; or transfer something from one person to another in a foreign country. EAR restrictions may apply to physical objects - sometimes referred to as "commodities" - as well as intellectual property, such as technology and software. The Office of Foreign Assets Control (OFAC) [\*pronounced O-FAC\*] administers and enforces economic and trade sanctions in support of U.S. national security and foreign policy objectives.

The ITAR, EAR and OFAC regulations work together to implement and enforce the U.S. sanctions and export control regime. Failure to comply with these regulations can result in significant civil and criminal penalties. For individual researchers, this could include monetary damages that can exceed \$1 million dollars, and criminal

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	<p>penalties including jail time (up to 10 years). For individual institutions, failing to comply with sanctions and export control regulations can mean the loss of federal funding that could impact future research initiatives.</p>
<b>3.13 – Actual Export &amp; Deemed Export</b>	<p>When thinking about the term ‘export’, folks can think to themselves, “While I may conduct sponsored research and some of it may be considered ‘sensitive,’ I don’t ever travel outside of the U.S. Therefore, I have nothing to worry about, right?” The answer is, it depends. Learning more about ‘export’ and ‘deemed export’ should help clarify these questions.</p> <p>‘Export’ is defined as the actual shipment, or transmission of, items subject to the EAR or ITAR out of the United States. The EAR is similar to the ITAR in that, it covers intangible exports of “technology,” including source code, as well as the physical export of items. If an item is classified as ‘export controlled’, the shipment of this item, or transfer of certain information, software, and technology related to this item outside the US, <b>may be prohibited</b> for foreign policy or national security reasons. For example, a UConn professor physically carrying her export-controlled microscope when she travels from the United States to China.</p> <p>‘Deemed export’ is the release of technology to a foreign national in the United States; this is <i>deemed</i> to be an export, per the regulations, even though the release took place within the United States. Deemed exports may occur through such means as a demonstration, trade show, conference, oral discussion, or plant visit, as well as the electronic transmission of non-public data.</p> <p>In the export control regulations, a foreign national is identified as an individual who is present in the U.S. on a temporary immigration visa [e.g. <b>F1</b> (student), <b>H1B</b> (Specialty Occupations) or <b>J</b> (exchange visitor)]. In contrast, a U.S. person is identified as any of the following: U.S. citizen; lawful permanent resident (green card holder); or protected person (political asylum holder).</p> <p>As you can imagine, the risk of deemed export at a university can be relatively high because our community is comprised of domestic and international students, researchers, visiting scholars, and more.</p> <p>Deemed exports can occur when export-controlled information and technology are shared with a foreign national who maintain any of the following statuses: student, postdoc, faculty, visiting scientist, or training fellow. For example, sharing export-controlled information with a foreign national on campus during a conversation in the student union, within a research presentation, or while visiting a UConn lab, would be classified as deemed export.</p> <p>If you have any questions regarding EAR, ITAR, OFAC or any other export control issues, please do not hesitate to contact OVPR Export Control at <a href="mailto:exportcontrol@uconn.edu">exportcontrol@uconn.edu</a>.</p>

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<b>3.14 – Q1</b>	Let's do a quick check-in. Which of the following is likely <i>not</i> considered a 'deemed export'? <ul style="list-style-type: none"><li>A. A foreign national visitor attending a technical meeting where blueprints for a rare type of satellite are on display.</li><li>B. A history professor giving a foreign national undergraduate student a book on the military history of Iran, a comprehensively sanctioned country.</li><li>C. A foreign national graduate student joining a research project concerning proprietary jet engine technology.</li><li>D. An Engineering professor sharing unpublished data of his hypersonic projectile research with a foreign national PhD student.</li></ul>
<b>3.15A – Q1 – Guidance: Correct</b>	B. That's correct! Published non-proprietary works available for public access and dissemination are <i>not</i> considered export controlled. In addition, STEM-related research is more likely to be export controlled compared to research done in humanities and social sciences.
<b>3.16B – Q1 Guidance: Incorrect</b>	Actually, the correct answer is B. Published non-proprietary works available for public access and dissemination are <i>not</i> considered export controlled. In addition, STEM-related research is more likely to be export controlled compared to research done in humanities and social sciences.
<b>3.17 – Research and Travel</b>	<p>Research and travel are integral at any university. Researchers and students planning overseas trips for academic or research purposes should be mindful that there are sanctions and export control requirements for certain embargoed countries. Researchers with sensitive sponsored research must always check with OVPR Export Control or OVPR Facilities Security Officer before an overseas trip.</p> <p>OFAC regulations restrict travel to embargoed, or comprehensively sanctioned, countries such as Cuba, Iran, Syria, North Korea, and the Crimea, Donetsk, and Luhansk regions of Russia/Ukraine, <b>even for academic/research purposes.</b></p> <p>ALL faculty, students, and staff <b>MUST</b> obtain written approval from UConn's OVPR Export Control Office <b>BEFORE</b> organizing any travel to these countries.</p> <p>The export of university-owned equipment may require a license to take it outside of the US; this includes research equipment, laptops, cellphones, telescopes, and chemicals among other items. This requirement may also apply to technology and technical data residing on laptops and other devices individuals intend to take with them overseas. To be sure, check with OVPR Export Control beforehand.</p> <p>Last but not least, laboratory samples, substances, biological, genetic, and other similar materials that need to be shipped overseas for research collaboration purposes, will require a Material Transfer Agreement (MTA) to be completed and reviewed by OVPR Export Control, before they can be sent off.</p>

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	Once again, do not hesitate to contact OVPR Export Control at <a href="mailto:exportcontrol@uconn.edu">exportcontrol@uconn.edu</a> if you have any questions. The office is always eager and ready to assist!
<b>3.18 – Q2</b>	<p>Here is one final question to wrap up this section.</p> <p>True or false. You read on the U.S. Treasury website that Americans can now go to Cuba. As long as you follow the instructions on the Treasury’s website, you can travel to do research in Cuba.</p> <ul style="list-style-type: none"><li>A. True</li><li>B. False</li></ul>
<b>3.19A – Q2</b> <b>Guidance:</b> <b>Correct</b>	<p>B. That’s correct! While the U.S. Treasury may permit it, you still need to consult with OVPR Export Control. Cuba remains an embargoed/comprehensively sanctioned country. While there are exceptions in various OFAC General Licenses that may permit certain activities by U.S. Persons in Cuba, they are narrowly defined.</p> <p>UConn or UConn Health students and staff would run the risk of violating OFAC sanctions and other export control laws by unilaterally deciding to travel to Cuba without first consulting with OVPR Export Control. Once again, do not hesitate to contact OVPR Export Control at <a href="mailto:exportcontrol@uconn.edu">exportcontrol@uconn.edu</a> if you have any questions.</p>
<b>3.19B – Q2</b> <b>Guidance:</b> <b>Incorrect</b>	<p>Actually, that is not correct. DO NOT travel to Cuba without first consulting with OVPR Export Control. Cuba remains an embargoed/comprehensively sanctioned country. While there are exceptions in various OFAC General Licenses that may permit certain activities by U.S. Persons in Cuba, they are narrowly defined.</p> <p>UConn or UConn Health students and staff would run the risk of violating OFAC sanctions and other export control laws by unilaterally deciding to travel to Cuba without first consulting with OVPR Export Control. Once again, do not hesitate to contact OVPR Export Control at <a href="mailto:exportcontrol@uconn.edu">exportcontrol@uconn.edu</a> if you have any questions.</p>

Thank you for participating in this year’s Compliance and Ethics Training. Please take a moment to review and submit the following training acknowledgement form to complete your participation.

### Training Attestation

To finalize your participation in this training, please select the checkbox on the bottom of your screen and click the "submit" button to confirm your agreement with the following statement:

By doing so, you are acknowledging that you have received annual compliance training, which included an overview of the University of Connecticut’s Code of Conduct, and the University Guide to the State Code of Ethics.

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You have been informed on how to ask questions, or report, concerns to the Office of University Compliance.

You understand that University policy prohibits retaliation against any individual asking questions or reporting concerns to the appropriate authority.

And, you understand that violations of the Code of Conduct or the University Guide to the State Code of Ethics may result in disciplinary measures or sanctions by the University as appropriate.

### **Exit Course**

Please click the exit button below to conclude this course.