

UNIVERSITY OF CONNECTICUT



CODE OF CONDUCT

individual responsibility
institutional success

This document serves to guide the daily operations of our University system including:

The Storrs campus;
Schools of Law and Social Work;
Regional campuses throughout the State;
University of Connecticut Health Center



Table of Contents

Letter from the President.....	4
Ethics Statement.....	6
Introduction.....	7
Campus-Wide Standards.....	7
Education Standards.....	10
Research Principles and Standards.....	11
Public Engagement and Outreach Standards.....	13
Patient Care Standards.....	15
Business, Fiscal and Legal Standards.....	16
External Relations and University Advancement.....	18
Resources, Additional Information, and Reporting.....	20

Letter from the President



Dear Colleagues:

The University of Connecticut is committed to assuring the highest standard of integrity in all aspects of University life and in all University and University-sponsored activities. While this goal is simply stated, its attainment requires concerted effort on the part of all members of the University community, particularly faculty, administrators and staff. Federal, state and local regulations which govern our activities are increasingly complex, and as the University's activities expand in size, scope and prominence, it is important that all of us understand relevant policies and know what is required in terms of compliance and reporting.

The University of Connecticut Board of Trustees is the body that is ultimately responsible for ensuring full compliance. At the Board's direction, the University has established a Compliance Program to help in our efforts to adhere to all federal, state and local regulatory requirements. A key ingredient of an effective Compliance Program is the establishment of a Code of Conduct. This Code of Conduct was developed with input from faculty, administrators and staff.

This Code serves to guide the conduct of University activities in support of the University's mission and is designed to serve three key purposes:

1. To set the basic standards of workplace behavior that the University expects of all faculty, administrators and staff.
2. To state publicly the University's long-term commitment to the highest standards of integrity in education, research, health care, public engagement and service.
3. To assure that faculty, administrators and staff understand their shared responsibility for keeping the University in full compliance with all applicable laws, regulations and policies.

Please read the Code carefully, and take all steps necessary to apply its standards. The University's Office of Audit, Compliance and Ethics is responsible for monitoring compliance and serving as a resource for questions and guidance on the Code, and on the University policies and procedures that spell out compliance requirements in greater detail.

A key element in assuring University-wide compliance is a system for reporting potential violations. In an institution this large and active, there may be areas of confusion; regrettably, there may also be instances in which individual behavior does not meet appropriate ethical expectations. Any University employee who observes a possible violation of law, regulation, policy or approved procedure has an obligation to report it. While a key element is reporting inappropriate activity, I want to emphasize that the most important element of any compliance or ethics program is working cooperatively to assure a positive climate of openness and integrity. Great universities function as true communities in which faculty, administrators, staff and students collaborate to achieve common goals. That holds true for instruction, research, public engagement, service and, at the most fundamental level, ethical compliance.

I want to thank you for understanding and adhering to these standards, and for your commitment to the highest level of ethical conduct in fulfillment of our institutional responsibilities.

Sincerely,



Susan Herbst

The University of Connecticut Ethics Statement

The standards contained in this Code of Conduct reflect the University of Connecticut's core values as they have been articulated over time by generations of faculty, staff, administrators, students and the State of Connecticut. These values are essential and enduring tenets of our organization. A statement of these values, while reiterating concepts already well understood, is helpful in outlining the context in which our Code will operate. Please be advised that violation of the standards in this Code of Conduct may result in appropriate disciplinary measures up to and including dismissal.

Knowledge:

Members of the University community value truth, the pursuit of truth, intellectual curiosity and academic freedom. Our faculty and students seek to create new knowledge and are committed to sharing ideas, research findings and the products of intellectual and creative pursuits with the broader community.

Honesty:

Members of the University community are truthful and sincere in their words and actions and do not intentionally mislead others or provide inaccurate information.

Integrity:

Institutional and individual behaviors at the University reflect fundamental moral and ethical values. Our actions are beyond reproach and avoid both the fact and the appearance of impropriety.

Respect:

The University honors and respects individuality and demonstrates tolerance for the personal beliefs and cultural differences of all individuals. As members of an academic community, we seek to foster a spirit of civility and collegiality through open and honest communication. We strive to protect the health, safety and well-being of all persons. We protect the private and confidential information that is provided by our patients and research participants, faculty, administrators, staff, students, volunteers and others. We value an environment that is free from harassment, intimidation, bullying, incivility, disrespect and violence.

Professionalism:

The University and its members expect that the professional standards and requirements that are applicable to the academic, research, clinical, engagement, administrative and other professions comprising our community will be followed. We are responsible and accountable for our actions and are expected to make reasonable efforts to comply with all applicable federal, state and local government laws and regulations. As individuals and as an institution, we also strive to follow ethical business practices and to act as good stewards of the resources made available to us.

Introduction to the University of Connecticut Code of Conduct

In all its endeavors, the University of Connecticut is dedicated to excellence that is demonstrated through national and international recognition. As Connecticut's public research, land-grant and sea-grant university, through freedom of academic inquiry and expression, we create and disseminate knowledge by means of scholarly and creative achievements, graduate and professional education, and public engagement and service. Through our focus on teaching and learning, the University helps every student grow intellectually and become a contributing member of the state, national and world communities. Through teaching, research, engagement and service, we embrace diversity and cultivate leadership, integrity and engage citizenship in our students, faculty, staff and alumni. As our state's flagship public land and sea grant institution, we promote the health and well being of Connecticut's citizens through enhancing the social, economic, cultural and natural environments of the state and beyond.

If you are faced with an ethical issue, you should consult this Code of Conduct as well as current University policies and procedures. You are responsible and accountable for addressing your ethical dilemmas. Consultation with your supervisor, manager, other appropriate colleagues, or the Office of Audit, Compliance and Ethics are avenues available to employees.

The Code of Conduct includes "Questions to Ask Yourself" after each set of Standards. These questions are intended to be thought provoking and assist employees by providing examples of matters that each of us may face during our employment with the University. For guidance regarding individual situations that relate to any of these or other questions, please feel free to contact the Office of Audit, Compliance and Ethics.

Campus-Wide Standards

The University of Connecticut values all members of its community and recognizes that each person contributes to the overall success of the institution. The University further recognizes that it is through the efforts of its faculty, administrators and staff that it achieves national and international prominence and delivers a world class education to its students. The culture of the University is one of respect, civility, trust, cooperation and collaboration among all its members. We believe all members of the University community are entitled to an environment that ensures collegiality and mutual respect.

Conduct of Faculty, Administrators and Staff

- Members of the University community shall perform their duties in a fair and ethical manner in accordance with established policies, procedures and regulations.

- Members of the University community shall carry out their duties with professionalism. The University supports the efforts of its faculty, administrators and staff to achieve and maintain professional standards.
- The University provides equal opportunity and access to its employment, programs, benefits and services.
- Supervisors have a particular responsibility to support the Code of Conduct and to demonstrate compliance within their units.
- Relationships of an inappropriate personal nature between supervisors and those they supervise are prohibited.

Civility

- The University values an environment that promotes a spirit of civility and collegiality, while fostering open and constructive intellectual debate.
- All members of the University community have a responsibility to treat each other with consideration and respect. Managers and supervisors have an elevated responsibility to demonstrate these behaviors and support their expression in the workplace.
- 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.

Non-Discrimination

- The University encourages and respects diversity within the university community and does not allow discrimination on the basis of age, race, national origin, religion, disability, sex, sexual orientation or any other characteristic protected by law in any activity or operation of the institution.

Harassment

- The University affirms its dedication to foster a community that condemns all forms of discrimination or acts of intolerance including sexual harassment, intimidation and retaliation.

Confidentiality

- Confidentiality of faculty, staff, patient and student records is respected and maintained in accordance with University policies and procedures, federal laws and state regulations. We use such records for legitimate purposes only and in accordance with proper authorization.

Computer/Telecommunications Use

- The University's computer and telecommunication networks are University resources that are provided to employees, students and volunteers to allow them to carry out the functions of the institution. Those who use the computer and telecommunication networks are responsible for the appropriate use of these resources. We understand, support and abide by the policies concerning the ethical and responsible use of computers and electronic information at the University of Connecticut.

Regulatory Compliance

- The University of Connecticut Office of Audit, Compliance and Ethics strives to ensure that we meet the highest possible standards where relevant federal, state and local regulations, laws and guidelines are concerned. This office supports ethical conduct by all faculty, administrators and staff and requires ongoing monitoring of policies, procedures and practices. Education is a key component of this program.

Health and Safety

- We are responsible for complying with all workplace safety and health regulations and will report unsafe conditions, equipment or practices to appropriate University officials, as required by law.

Conflict of Interest

- We, as employees of the State of Connecticut, adhere to the guidelines set forth in the Connecticut Code of Ethics for Public Officials, as well as the University's Guide to the State Code of Ethics.
- We will not engage in outside activities which will create an actual conflict of interest and will strive to avoid the appearance of a conflict. If faced with a potential conflict of interest, members of the University community shall disclose the nature of the conflict to the appropriate parties.
- We do not accept gifts, including food and beverage, from vendors, lobbyists or any other person or entity that is doing business with or seeking to do business with the University unless permitted under the Connecticut Code of Ethics for Public Officials.
- We do not accept secondary employment that will impair our independence of judgment as to our official duties or which will require us to disclose confidential information.
- We will not use our state positions for personal financial gain beyond our official compensation, or for the financial benefit of our family members or domestic partners.
- We will not use state resources for personal use or for use unrelated to our University responsibilities.

Questions to Ask Yourself

- *Have I treated others as they wish to be treated?*
- *Do I make discriminatory and harassing statements?*
- *Have I used my position to intimidate or isolate others?*
- *As a faculty member or staff member, should I accept a gift from a student?*
- *Do I frequently use my University telephone for personal phone calls?*
- *Do I use my contacts at the University to help my outside business?*
- *Do my outside professional activities create an appearance of a conflict of interest?*
- *Do I maintain appropriate professional relationships with students, colleagues, patients, clients and customers?*

- *Have I used my position to gain employment for a family member?*
- *Even if I have access to certain records, do I have the authority to view them and/or distribute them to others?*
- *Do I know what to do if I think that a University record has been accessed inappropriately by someone inside or outside the University?*
- *Do I take shortcuts that create a safety hazard?*

Education Standards

The University of Connecticut recognizes education as one of its primary missions and strives to maintain a professional environment conducive to the development of its students. To that end, the University believes that the purposes of an educational institution are best served by attracting and developing scholars of proven professional and personal competence and integrity and by assuring those teachers and scholars freedom to expand human knowledge and understanding.

- We educate students from a wide range of backgrounds and respect differences in each individual's heritage and goals.
- We respect the individual choices that students make for career paths.
- We respect each student as a valuable individual regardless of age, race, color, nationality, ethnicity, ancestry, marital status, gender, disability, religion, sexual orientation or personal beliefs.
- We acknowledge and support students' rights to question faculty members, the administration and staff in good faith.
- We comply with all applicable statutes and regulations.

Student conduct is governed by the applicable codes of conduct and professional standards of conduct adopted by their schools. While this Code applies primarily to faculty, administrators and staff, its underlying principles are, however, common to codes and regulations governing students.

Athletics

The Division of Athletics operates a broad-based program of intercollegiate athletics and recreational and intramural opportunities that reflect the ethical philosophy of the University, the interest of the student body and the desires of the University's internal and external constituencies.

- We offer student-athletes the opportunity to excel in academic achievement and athletic accomplishments.
- We foster among our students a sense of citizenship, leadership and social responsibility and encourage adherence to the highest standards of integrity and ethics. We promote principles of good sportsmanship, honesty and fiscal responsibility in compliance with University, state, National Collegiate Athletic Association (NCAA) and conference regulations.

- We promote and support the University's comprehensive commitment to diversity and equity, providing equitable opportunity for all students and staff, including women and members of minority groups.

Questions to Ask Yourself

- *Do I foster an environment that is conducive to learning?*
- *Am I providing each student an equal opportunity to learn?*
- *Do I react negatively when students challenge or critique my interpretation of source material?*
- *Do I protect the privacy of each student's academic record and personal information?*
- *Are my grading practices fair and understood by all of my students?*
- *Do I regularly update my teaching materials?*
- *Am I a role model for my students regarding professional values?*
- *Do I acknowledge and support providing student athletes equitable and appropriate opportunities to excel in academic achievement?*

Research Principles and Standards

The University of Connecticut is committed to the highest standards of professional conduct and integrity in research. These standards include honesty, trustworthiness, objectivity, accountability, openness, respect and fairness when dealing with other people, a sense of responsibility towards others and loyalty to the ethical principles espoused by our institution.

The University expects these standards to be maintained by all academic, research and relevant support staff, students and their supervisors and other individuals conducting research or involved in the peer review process within or on behalf of the University. Prompt reporting to the appropriate institutional administrative committees of violations of human subjects' protection, laboratory safety, or humane treatment of animals is expected.

We understand that academic freedom is essential to creating an atmosphere in which scholarship flourishes. Promotion of intellectual freedom is consistent with assuring a climate of integrity and the University has the right and the obligation to inquire into all instances of alleged or apparent misconduct in scholarly activities.

Scholarly Integrity

- We properly collect, record and maintain research data.
- We take responsibility for all publications and presentations of which we are author or co-author.
- We appropriately acknowledge, in publications and presentations, those who have contributed to our research.
- We grant access to our research data to co-investigators involved in generating the data.

- We grant reasonable access to our research equipment and resources to other University investigators involved in research.
- We, the University and its faculty, administrators and staff, do not interfere with the research conducted by students or faculty.
- We do not tolerate plagiarism, falsification, or fabrication of research data, or other scientific misconduct.

Human Research

- We abide by all federal and state laws and regulations, in addition to the University's policies and procedures, when performing studies involving human subjects.
- We respect human research participants and are committed to their safety.
- We protect human subjects by securing institutional review and approval for any research.
- We adhere to approved protocols and obtain prospective institutional approval of any changes in those protocols.
- We engage all human subjects, or their appropriate representatives, before initiating a research protocol, in a meaningful informed consent process including explanations of possible risks and benefits.
- We allow potential or current participants to withdraw from a study at any time without prejudice.
- We notify human subjects in a timely fashion of any serious adverse events associated with a human subjects study.
- We conduct appropriate education and training before initiating a human subjects study.

Animal Research

- We abide by all federal and state laws and regulations, in addition to the University's policies and procedures, regarding the care, transport, maintenance and use of animals.
- We are committed to the humane treatment of animals in research.
- We protect research animals by securing appropriate institutional review and approval for any research.
- We adhere to approved protocols and obtain prospective institutional approval of any changes in those protocols.
- We conduct appropriate education and training before initiating animal research.

Laboratory Safety

- We abide by all federal and state laws and regulations, in addition to the University's policies and procedures, concerning laboratory safety.
- We seek prior approval of appropriate University committees when research involves hazardous chemical substances, bio-hazardous materials or radioactive materials.
- We properly document, store, handle, transport and dispose of radioactive, bio-hazardous and hazardous chemical materials, pharmaceuticals and investigative drugs.

- We participate in appropriate education and training before initiating studies involving such materials.
- We comply with all workplace safety and health regulations and will report unsafe conditions, equipment or practices to our supervisors or other appropriate University officials.
- We attend required instructional and training sessions when dictated by funding or oversight agencies.

Research Support

- We use research funds only for their designated purposes.
- We accurately account for time and effort related to research funding.
- We disclose financial conflicts of interest to University administrators and, as appropriate, manage such conflicts in accordance with existing policies and procedures.
- We properly acknowledge sponsorship of research in our publications and presentations.
- We disclose inventions produced from our research to the University so that consideration is given to the protection of intellectual property.

Questions to Ask Yourself

- *Do I work safely in the lab?*
- *Have I received training and approval to use research materials?*
- *Have I collected data and documented my research accurately?*
- *Did I face a conflict of interest today? Does it bias my research?*
- *Do I protect the safety and well-being of my human or animal subjects?*
- *Did I obtain proper consent from my human subjects?*
- *Do I respect the privacy of research participants? Do I appropriately protect the confidentiality of their research data?*

Public Engagement and Outreach Standards

The primary purpose of public engagement is to serve external constituents in a manner that leads to enhanced teaching and research. Public engagement efforts impact on the reputation of the University. Engaged scholarship, as a component of public engagement, results from public engagement and outreach. It focuses on those activities that promote advanced understanding and creative works in a mutually beneficial manner. Public engagement, which includes outreach and public service, consists of all activities where the University offers its resources, both human and physical, to external constituencies in such a manner where there is a partnership or that engaged scholarship results. These efforts are on behalf of the public good and not for private gain. The term University resource refers to those activities and entities that the University makes available to its various constituencies which may involve a cost to access.

As a land and sea grant university, the University of Connecticut is committed to our mission that includes public engagement as measured by the impact of teaching and research on the world outside of the institution. In the spirit of true partnership, we seek to expand our interactions with groups beyond our campuses in areas of mutual concern and enhance their access to the resources available at the University. In addition to collaborations in the arts and humanities, we encourage constructive partnerships in new areas of interdisciplinary excellence, such as Health and Human Behavior, the Environment, and Human Rights. Through broadened access and reciprocal interaction, we realize synergistic outcomes that further strengthen the University and benefit the people of Connecticut as well as those beyond the state borders.

- We believe the reputation of the University is tied to its responsiveness to the needs of the citizens and communities of the State.
- We reach out to and engage communities in reciprocal partnerships.
- We are respectful of our community members, demonstrate cultural competence in their interactions, and comply with University policies while engaged in and with communities, just as we would on campus.
- We strive for responsible engaged scholarship and community-based programs to the benefit of communities by involving our partners in the planning, execution and dissemination of the knowledge gained by such programs.
- We translate and disseminate research results to real world applications to address problems. We recognize and respect the knowledge and behaviors of our partners as we work in a collaborative environment.
- We effectively communicate these standards and values with the organization.
- We actively engage students in community experiences as part of our service learning priority.

Questions to Ask Yourself

- *Have I ensured that the public engagement effort is consistent with the University's mission and vision?*
- *How do I solicit input regarding community needs when designing, planning, and conducting my engaged scholarship or community-based project?*
- *How can I work with community members as equal and collaborative partners in all phases of the project, from planning to dissemination of findings, and avoid the perception of using the group for my gain?*
- *How do I handle the findings of my work to ensure confidentiality when appropriate?*
- *Am I culturally sensitive to the diverse needs of community members and partners, starting with the selection and training of my University team members?*
- *How can I prioritize considerations of diversity when designing, planning and conducting my community-based research or program, identify any barriers to participation and work to ameliorate or eliminate such barriers?*
- *How will my actions reflect how the University is viewed in the community?*

- *How do I manage, use and share resources of the University in a manner that is respectful to partners?*
- *How do I teach and engage my students in the work of the community as they apply classroom learning to real world situations?*

Patient Care Standards

Clinicians associated with the Health Center, Storrs and regional campuses and other University health care facilities provide compassionate primary and specialty health care in an academic environment. We focus on delivering quality patient care and fostering continuous improvement through scientific knowledge that is shared with patients, colleagues and the public.

- We, each faculty and staff member involved in patient-related activities, are expected to understand and support the applicable Patient's Bill of Rights and Responsibilities.
- We strive to deliver health care that is based on contemporary scientific knowledge and technology.
- We provide educational resources and opportunity for consultations with other health care programs to assist our patients in the planning of their treatment.
- We strive to consider the physical, emotional and spiritual needs of our patients in making our treatment recommendations.
- We do not extend or receive payments or benefits in exchange for referrals. Our health care and referrals are based on the well-being of and best treatment for our patients.
- Patients have a right to ask members of their health care team about the role of students and residents in their care and to receive complete and accurate information. We explain to our patients the importance of the educational mission at the University as it relates to their treatment.
- We provide our patients with information necessary to make informed health care decisions. This includes reviewing medical findings with each patient, as well as discussing alternative treatment options and the associated risks and benefits.
- We prepare clear, honest and accurate patient medical documentation in a timely manner. We maintain the confidentiality of this information in accordance with existing University policies and procedures, federal laws and state regulations, including but not limited to the Health Information Portability and Accountability Act (HIPAA).
- We provide clinical facilities and laboratories to support quality care for our patients. We adhere to appropriate policies and procedures to ensure that we retain certification in all aspects of program function as required by institutional, state and federal regulatory agencies.

Questions to Ask Yourself

- *Do I demonstrate respect and compassion for my patients and their families?*
- *Was the care that I provided today in the best interest of my patients?*
- *Did I answer my patients' questions to the best of my ability or assist them in obtaining the information they requested?*
- *Do I offer all of the needed resources and services to my patients or assist them in making a referral to obtain those services?*
- *Do I respect the privacy of my patients and protect the confidentiality of their health information?*
- *Did I document my patient care thoroughly and accurately today?*

Business, Fiscal and Legal Standards

The University of Connecticut adheres to established business standards in its conduct as an institution of higher education and as a health care provider. We comply with all applicable federal, state and local government laws and regulations and strive to follow ethical business practice standards. We endeavor to conduct all University business with honesty, integrity, accuracy and fairness.

Contracts

- We strive to make all purchasing decisions based on the best interests of and value to the University. The University follows fair business practices in its contracting.
- We recognize the value of obtaining competitive bids when appropriate, maintaining independence, ascertaining the financial and legal status of vendors and obtaining clear written agreements for services or goods to be purchased.
- We comply with all state guidelines regarding procurement activities. We comply with all laws relating to pricing, competition and business arrangements.

Proprietary information

- In the course of doing business, the University creates and receives information that could directly affect the success of its business ventures or those of its current or prospective business partners. If used inappropriately, this information could unduly benefit individuals who have access to such information. The University depends on the ethical business practices and personal integrity of its employees to protect this information from premature or improper use and disclosure.

Physical property and intellectual property, including data

- The University's physical property includes property that is owned by the University but entrusted to individuals or organizational units within the University. Examples include office and departmental equipment and supplies, vehicles, facilities, cash, reports and records, including clinical and billing records in department offices, computer software, electronic files and data, patents, trademarks and service marks.

- We utilize such resources properly and protect property against loss, theft, misuse and waste.
- Research materials, inventions or devices developed through the use of University resources are the property of the University. Rights to such property may be transferred to other parties (such as commercial sponsors) only with express written authorization. Materials subject to copyright are generally not the property of the University.
- Research data are considered the property of the principal investigator or the joint property of collaborating individuals when research data are generated by a principal investigator working in collaboration with one or more faculty colleagues.
- Research data generated by postdoctoral fellows, graduate students, research trainees or others who have had significant intellectual input, shall be considered the joint property of the collaborating individuals.
- The use of any form of intellectual property covered by copyright and license agreements and used for face-to-face, distance teaching purposes or a combination of the two, will comply with copyright law and the terms of the license agreement under which it was obtained. Examples include books, journal articles, newspapers, images, audio, and video in physical or electronic form owned or borrowed by the University or the instructor.

Financial Records and Funding Sources

- We understand that the federal and state governments constitute major funding sources for the University in student financial aid, research and other areas. As such, we acknowledge responsibility for the stewardship of such funds, understanding and complying with federal and state laws and regulations.
- We maintain accurate and timely financial records in accordance with the University's policies and Generally Accepted Accounting Principles. We use appropriate internal financial controls to safeguard assets and to ensure compliance with all internal and external accounting rules and regulations. We cooperate fully with internal and external auditors and regulatory agencies during examinations of all books and records and do not alter or destroy any documents in anticipation of such reviews.
- We, as employees of the University, accurately account for our time and properly document when seeking reimbursement for work-related expenses.
- We charge and bill for patient care services in accordance with third party regulations and applicable state and federal laws. We bill for medically appropriate services that are clearly and accurately documented in the medical record. We submit claims for services in a timely manner. We maintain accurate patient accounts and promptly correct billing errors.
- We acknowledge that clinical care providers, coding personnel and billing staff have a collective responsibility to understand the third party regulations and federal and state laws governing the services they are providing.

Questions to Ask Yourself

- *Did I document my work clearly, honestly and accurately?*
- *When I sign a document, do I understand what I am signing?*
- *Do I understand when the competitive bidding process must be used?*
- *Have I signed a contract without obtaining proper authorization?*
- *Am I wasteful of University supplies?*
- *Was I honest with my coding of patient visits today?*
- *Do I share my computer password with others?*

External Relations and University Advancement

Government relations and political activity

- We depend, as a public institution, upon the support and trust of federal and state officials.
- We will not make representations on behalf of the University without official authorization.
- We do not engage in partisan political activities while on state time nor will we use University resources for the purposes of influencing a political election.
- We adhere to federal and state laws which provide guidance for the political activities of the University employees.

Public access to University information

- We facilitate accurate, ethical and timely news coverage of significant programs and the achievements of faculty, administrators, staff, students and alumni.
- We comply with all federal and state laws and regulations as well as all University policies regarding the release of information about activities of the University, or its employees, students, volunteers, patients or research subjects, carefully balancing privacy rights with the public's interest.

University Advancement

- We recognize that the process of raising charitable funds requires ethical and sensitive interactions with prospective and current donors. Although we may release general information about alumni or other supporters, we respect an individual donor's intent and honor all requests for anonymity.
- We recognize that the primary responsibility for development of prospective donors lies with the University of Connecticut Foundation. The Foundation works in cooperation with offices and departments across the University but is organizationally independent of the University itself.

Media Relations

- We acknowledge that University Communications is the University's primary and official liaison to the news media – international, national, regional, state and local – and that this department is responsible for initiating, developing and maintaining effective, productive and beneficial relations with the news media in communicating University news and in responding to media requests.
- We respect the individual freedom of faculty, staff and administrators to express their personal opinions on University actions and policies, while also recognizing that University Communications is responsible for coordinating official University comment on all matters regarding the institution.
- We understand that the University encourages its faculty, staff and administrators to serve as members of community panels, boards, civic organizations, professional associations and other similar voluntary associations. An employee assuming such a role is not acting as a spokesperson of the University.

Graphic Standards

- We recognize that University Communications is responsible for establishing and maintaining the University's graphic standards and that specific standards apply to the use of the University's logos and seals.
- We understand that the University has legal rights regarding the use of its name, logos and seals and protected trademarks.

Questions to Ask Yourself

- *Have I referred media requests to University Communications?*
- *Should I talk "off the record" to a reporter?*
- *When is it appropriate to talk to the media about my research or to comment on the research of others?*
- *Should I speak on behalf of the University to government officials regarding University matters?*
- *Can I be identified as a University employee in my political or charitable activities?*
- *Do I maintain clear boundaries between my professional role and my personal activities that are unrelated to the University?*

Resources, Additional Information and Reporting

The University has established the Office of Audit, Compliance and Ethics to oversee its internal audit and compliance programs and to ensure compliance with applicable laws, regulations, policies and procedures.

Obtaining Additional Information, Reporting Compliance Concerns and Non-Retaliation Policy

- For additional information please refer to the appropriate website or contact the office at the phone numbers or email addresses noted below. If you wish to report suspected violations of laws, regulations, rules, policies, procedures, ethics or any other information you feel uncomfortable reporting to your supervisor or faculty administrator, you may also contact the Office of Audit, Compliance and Ethics directly using the phone numbers or email addresses listed below.

Storrs and Regional Campuses:

9 Walter's Avenue, Unit 5084

Storrs, CT 06269-5084

Website: www.audit.uconn.edu

Phone: (860) 486-4526

Fax: (860) 679-1608

Email: reportline@uconn.edu

Health Center:

263 Farmington Avenue

Farmington, CT 06030

Website: www.uchc.edu/compliance/index.html

Phone: (860) 679-4180

Fax: (860) 486-4527

Email: compliance.officer@uchc.edu

- If you wish to report a concern or a suspected violation anonymously you may contact the University's **REPORTLINE** using the contact information below. The **REPORTLINE** is operated by a private (non-University) company. No effort is made to identify the person reporting and no trace of the call is performed. Information received is given to the Compliance Officer for appropriate action. This service is available 24 hours a day, 7 days a week and is staffed by independent specialists trained to obtain complete and accurate information in a confidential manner. If you wish, you may obtain information about the Compliance Office response to your call by following up with the **REPORTLINE** at a later date. To contact the **REPORTLINE**:

Storrs and Regional Campuses

Phone: 1-888-685-2637

Web reporting address: <https://www.compliance-helpline.com/uconncares.jsp>

Health Center

Phone: 1-888-685-2637

Other Reporting Options

- **State Auditors of Public Accounts**

The Whistle Blower Act, **Section 4-61dd** of the Connecticut General Statutes, authorizes the Auditors of Public Accounts to receive information concerning matters involving corruption, unethical practices, violation of State laws or regulations, mismanagement, gross waste of funds, abuse of authority or danger to the public safety occurring in any State department or agency. Upon receiving such information the Auditors are required to review such matters and report their findings and any recommendations to the Attorney General. The Auditors shall not, after receipt of any information from a person under the provisions of this section, disclose the identity of such person without his/her consent unless the Auditors determine that such disclosure is unavoidable during the course of the review. You can file a complaint with the Auditors of Public Accounts by calling (860) 566-1435 or toll free at (800) 797-1702. Website: www.state.ct.us/apa/

- **Federal False Claims Act (31 U.S.C. § 3729-3733)**

This act permits a person with knowledge of fraud against the federal government to file a lawsuit on behalf of the government against those that committed the fraud. The person filing the lawsuit is also known as the “whistleblower” or “qui tam” plaintiff. The “qui tam” plaintiff must notify the United States Department of Justice (DOJ) of all information regarding the fraud. If the DOJ takes the case and fraud is proven the “qui tam” plaintiff is entitled to a portion of the money recovered by the federal government. Under the False Claims Act the “qui tam” plaintiff is protected from retaliation that may result from his or her involvement in the case. This is known as Whistleblower Protection.

Non-Retaliation

- University policy prohibits retaliation if you report in good faith a compliance concern to any supervisor, faculty, administrator, the Compliance Office, the **REPORTLINE** or any appropriate agency outside of the University. If you feel that you have been subject to retaliation, you should contact the Compliance Office immediately. The Compliance Office will respond to all reports in a timely manner in order to resolve any non-compliance and to educate regarding compliance concerns.





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