



COMPLIANCE & ETHICS PROGRAM

Guiding Institutional Integrity



New Employee Orientation
2020

What is Compliance?

Knowing, respecting, and following the rules.

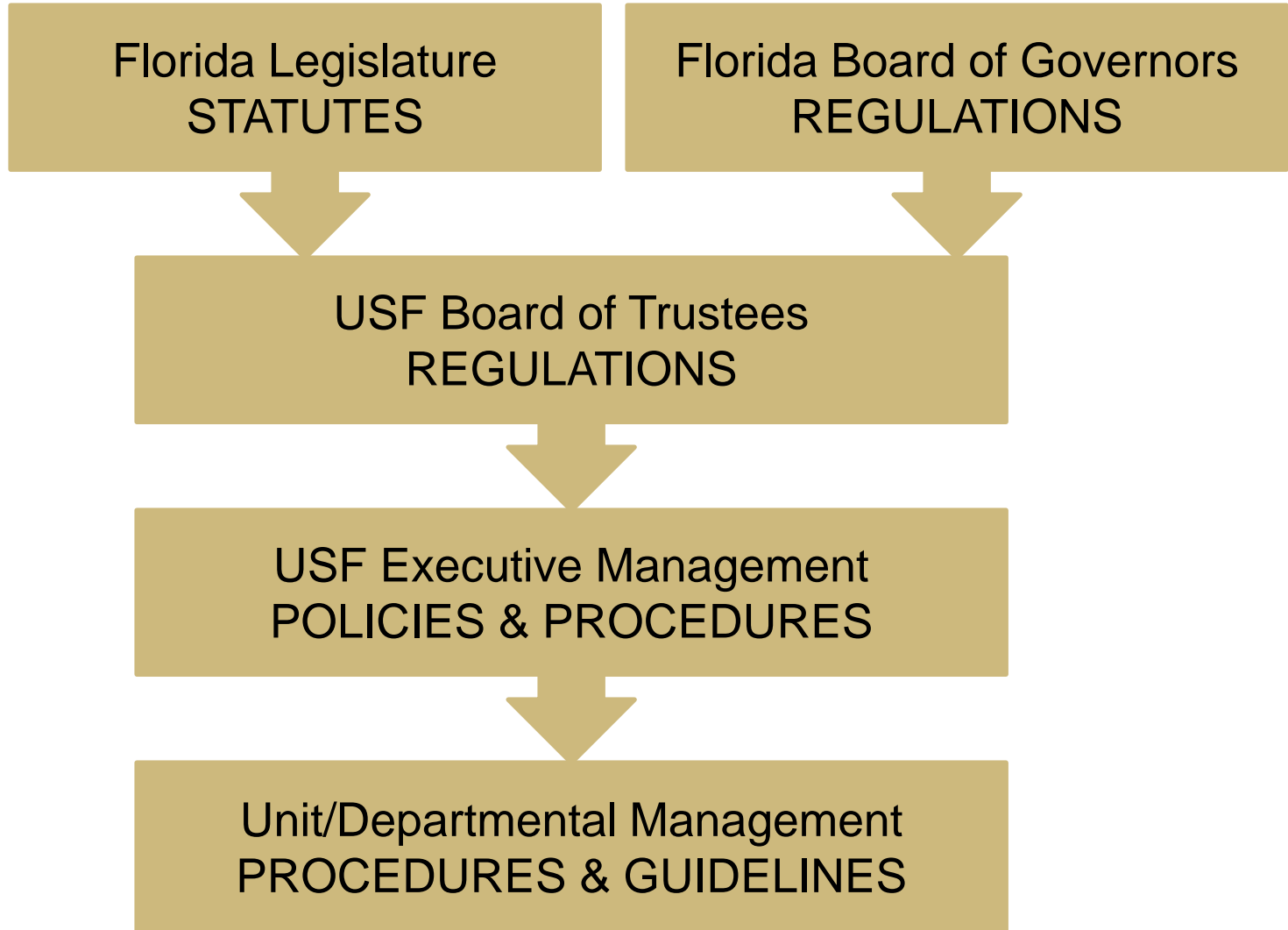


What is expected of you?



- Be a role model
- Stay informed
- Raise questions
- Report concerns

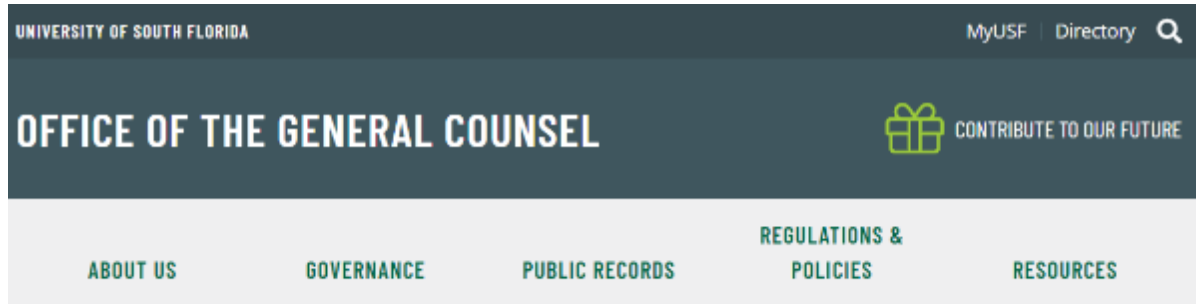
Compliance Framework





USF Polices & Regulations

<https://www.usf.edu/general-counsel/regulations-policies/index.aspx>



Regulations and Policies

Office of the General Counsel / Regulations and Policies / Index of Current Regulations and Policies

OVERVIEW

INDEX OF CURRENT
REGULATIONS AND POLICIES

NEW AND PROPOSED
REGULATIONS AND POLICIES

ARCHIVE OF ADOPTED OR
REPEALED REGULATIONS AND
POLICIES

REGULATION AND POLICY
DEVELOPMENT AND REPEAL

INDEX OF CURRENT

The following documents are in PDF
the documents.

FRAUD

Title

Abandoned Vehicles-Policy 6-035

Academic Curricular Offerings-Regul.

Academic Freedom and Responsibility



UNIVERSITY OF
SOUTH FLORIDA

REGULATION

Number:
Title:

USF5.001
Waste, Fraud, or Financial Mismanagement
Prevention and Detection
Office of Internal Audit

Responsible Office:

Date of Origin: 3-9-17

Date Last Amended: 6-24-20 (technical)

Date Last Reviewed: 6-24-20

*Regulation 5.001 formerly known as USF Policy 0-024: Fraud Prevention and Detection

I. PURPOSE AND INTENT

This Regulation addresses the responsibility of all University of South Florida (USF) and related entity employees for detecting and reporting known or suspected waste, fraud or financial mismanagement. This responsibility also extends to business entities conducting business with USF.

Online Business Processes



Online Business Processes

Business Processes Search

Explore our Business

Welcome to the USF Online Business Processes. This system allows you to search for university system processes. You can find the process you need correctly.

[How to search for an OBP document](#)

Search Online Business Processes

Search...



USF UNIVERSITY OF SOUTH FLORIDA

Welcome to MyUSF

EMAIL	LEARNING & TEACHING TOOLS	BUSINESS SYSTEMS	MY RESOURCES
Employee Announcements		Employee Features	OASIS
A test of USF's Emergency Notification System will be conducted on Thursday, October 1 at 11:00 am at the Tampa and St. Pete campuses. Learn more.			My Funding
USF World is proud to announce the Global Achievement Awards! Do you know someone who should be recognized for his or her outstanding global contributions to USF? Nominations are due October 16.			Campus Resources
Please note that FAST will be unavailable due to maintenance between 5:00 PM Fri, 10/2 and Sun, 10/4/15. A MyUSF announcement will be posted when the maintenance is complete.			Parking Permits
Nominations/Applications are being accepted for Outstanding Undergraduate Teaching & Advising Awards and Outstanding Community-Engaged Teaching Award. Deadline is no later than Oct. 2. Learn more.			Campus Safety
			Business Processes
			IT Tampa HelpDesk
			Directory
			Academic Calendar
			Faculty Staff Campaign
			Orbitz For Business
			Student Organizations

YOU ARE INVITED

2015 Family & Friends Weekend

October 23-25

Employee Leave Balance

Annual Leave

Hours Balance (as of 9/10/2015)

Hours Adjusted

Hours Requested

What is Ethics?

- Honesty
- Integrity
- Putting the public interest first



Florida Code of Ethics (FCOE) for Public Officers and Employees

- Prohibits or restricts us from private gain
- Sets standards of conduct for all employees

Conflicts of Interest:

- Gifts or benefits
- Misuse of Public Position or Non-Public Information
- Business, Contractual, & Employment Relationships
- Nepotism

Why adhere to the FCOE?

Penalties can include:

- Reprimand, suspension, demotion, salary reduction, dismissal, restitution
- Forfeiture of 1/3 salary per month for up to 12 months
- Civil penalty of up to \$10,000



Do the Right Thing

No *Quid Pro Quo* Gifts

Do not solicit or accept anything of value based on any understanding that your official actions or judgment will be influenced thereby.



What is “anything of value”?

Includes:

Gift



Loan



Reward



Promise of
future
employment



Favor or
Service

No Solicited Gifts

Do not solicit any gift from a Vendor or Lobbyist for the personal benefit of yourself or any other person.



No Gifts to Influence

Do not accept anything of value when you know, or should know, it was given to influence your official actions.



Rule of Thumb: The larger the gift, the more you "should know".

No Gifts > \$100

Do not accept a gift from a Lobbyist or Vendor that you know or reasonably believe has a value greater than \$100, if you are a procurement employee.



And a Procurement Employee is?

Any employee participating in procurement through:

- Decision, Approval, Disapproval, or Recommendation
- Preparing Purchase Requests
- Influencing Specifications or Standards
- Investigations or Auditing
- Any other advisory capacity



But there's more...

Organizational units and departments may have more restrictive gift guidelines.

e.g. USF Health, Purchasing



Misuse of Public Position

Do not secure special privileges, benefits, or exemptions for yourself or others by misusing, or attempting to misuse, your...

- Position
- Property within your trust
- Resources within your trust



Misuse of Non-Public Information

Do not disclose or use non-public information for personal gain or benefit of yourself or any other person or business entity.

e.g. student education information, certain medical records, social security numbers

This applies to current & former employees.



Conflicting Business, Employment, or Contractual Relationships



No Selling to the USF

Unless a statutory exemption applies...

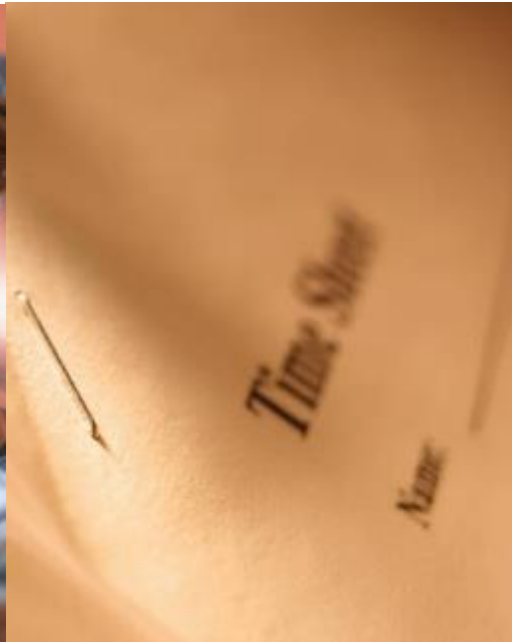
Do not rent, lease, or sell any realty, goods, or services to USF, while acting in a private capacity.



No Vendor Employment/Contracts

Unless a statutory exemption applies...

Do not be employed by or have a contractual relationship with a business doing business with USF.



Buying for USF

Unless a statutory exemption applies...



Do not purchase, rent, or lease any realty, goods, or services for USF from a business entity in which you, your spouse, or your child is an Officer, Partner, Director, or Proprietor; or has a material interest.



Ownership of > 5% of the total assets or capital stock.



Statutory Exemptions

Some examples...

- Contract prior to USF employment
- Total aggregated transactions < \$500/calendar year
- Emergency/Sole Source
- Competitive Bid filed with Commission on Ethics
- Sponsored Research Exemption

Contractual Services

If you participate in the procurement of contractual services, do not become or be the employee of a person or business entity contracting with USF.

“Contractual service” means the rendering by a contractor of its time and effort rather than the furnishing of specific commodities.



Look & Sound Familiar?

Any employee participating in procurement through:

- Decision, Approval, Disapproval, or Recommendation
- Preparing Purchase Requests
- Influencing Specifications or Standards
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- Any other advisory capacity




Nepotism



"...and what makes you the best member of my family for this job?"

Nepotism

Do not employ related persons in a single organizational unit or a work-related unit unless approved by the Senior Manager responsible for the unit.



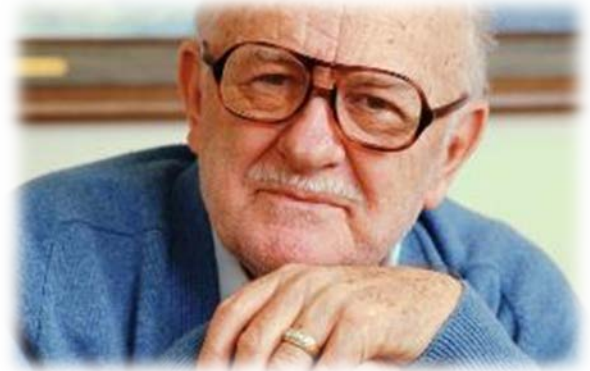
Approved only when one related person can not affect the other's:

- **Appointment**
- **Retention**
- **Work Assignments**
- **Evaluation**
- **Promotion**
- **Demotion**
- **Salary**



Related Persons

- Husband or wife
- Parent or child
- Brother or sister
- Grandparent
- Grandchild
- Aunt or uncle
- First cousin, niece, or nephew
- Spouse of a child, brother, sister, or parent
- Parent, child, brother or sister of spouse
- Fiancé or Fiancée
- Persons intending to marry or form a household
- Same legal residence



Outside Activity

Any activity not part of the your USF duties and for which USF does not compensate you.




Types of Outside Activities Requiring Disclosure and Prior Approval in eDisclose

- 1) Use of USF facilities, equipment, or services
- 2) Supervision/evaluation of a USF student or employee you also supervise/evaluate as part of your USF responsibilities
- 3) Waiver or assignment of rights to inventions or works
- 4) Candidacy for or holding public office
- 5) Compensated Activity
- 6) Potential COI

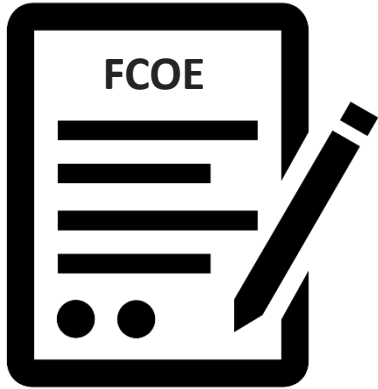
For faculty, this is limited to
professional, compensated activity



This is for situations which are none of the above, but
the employee reasonably believes it may create a COI



Annual FCOE Disclosure



- All Faculty members
- All Administration employees
- Staff employees with a P-card/FAST role
- Temporary employees with a P-card/FAST Role

Submit when...

- 1) Your existing FCOE expires
(You will receive automated reminders)

OR

- 2) There are material changes
to a previous disclosure



Nepotism Disclosure



Both related persons must disclose potential nepotism on the FCOE form and receive approval in order for the employment to continue or occur.

Submit a when...

- 1) The relationship is created or discovered
- OR**
- 2) Before hiring the related person



Outside Activity Disclosure



All employees must disclose and receive **prior** approval before engaging in any of the 6 types of outside activity outlined in policy.

Submit when...

1) Your approval expires and the activity is ongoing
(approval cannot exceed 12 months)

OR

2) There are material changes to a previous OA disclosure





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EMAIL

LEARNING & TEACHING TOOLS

BUSINESS SYSTEMS

Employee Announcements

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[GEMS Self-Service](#)[FAST](#)[GEMS](#)[Payroll Certs](#)[Data Marts](#)[HITS](#)[IFIS Space System](#)[Foundation Reports](#)[FAIR](#)[eDisclose](#)[Contract Management](#)[Hours Requested](#)

Your eDisclose Home Page



»

My Home

Welcome

Disclosures

eDisclose Discloser

My Roles

[eDisclose Discloser](#)
[eDisclose Administrator](#)
[eDisclose Reviewer](#)

Create...

New FCOE Disclosure

New Outside Activity

Disclose Outside Activity

Page for Caroline Fultz-Carver

Welcome to your Personal Disclosure Workspace. Here you can create and track disclosures you have submitted to man

- Create a new disclosure using one of the activity buttons on the left-hand toolbar.
- View disclosures needing your review and action on the Inbox tab, such as those you have drafted but not yet subm
- View a history of all your disclosures on the All Disclosures tab.

as more specifics about a particular disclosure by clicking on its name on either of the below tabs.

Use % as a wild card when filtering information on the below tabs.

All Disclosures

Filter by ? ID

Enter text to search for

+

Add Filter

✕

Clear All

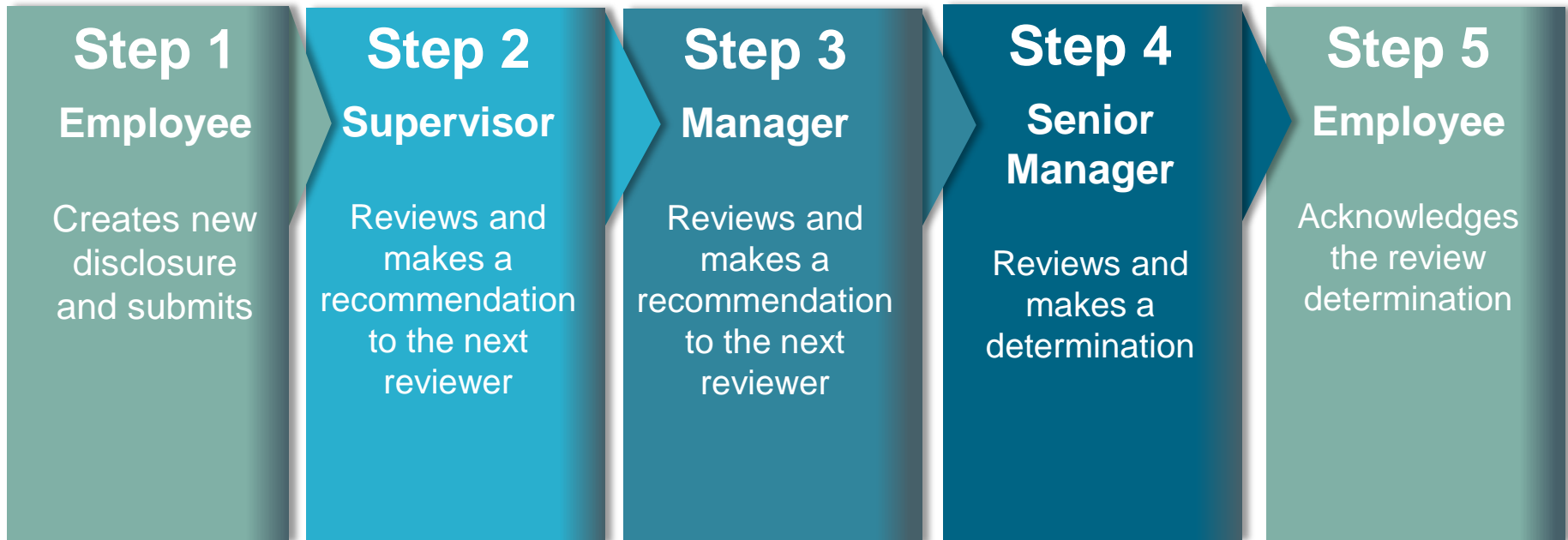
ID	Name	Date Modified
DISC-00046036	2020 Disclosure - Caroline Fultz-Carver	10/2/2020 1:48 PM

1 items

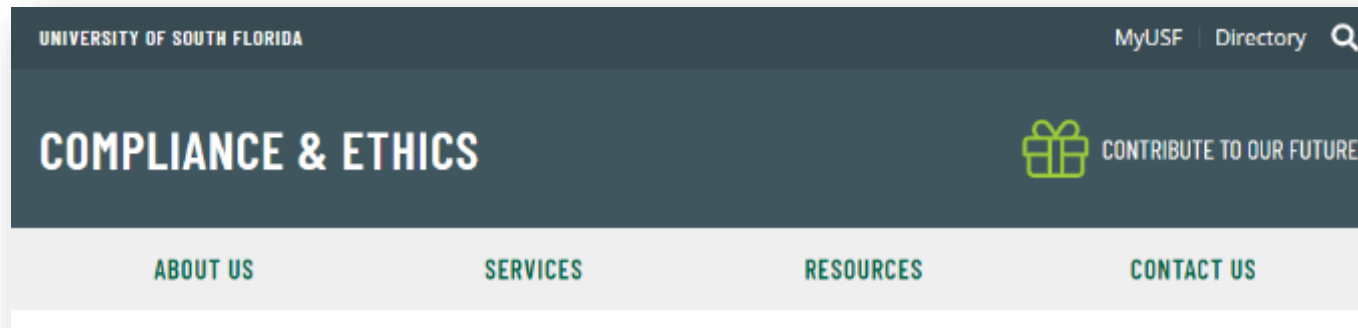
FCOE Review Process



Outside Activity and Nepotism Review Process



eDisclose Training & Resources



Resources

Compliance & Ethics / Resources / eDisclose

- OVERVIEW
- COMPLIANCE & ETHICS IN A NUTSHELL
- EDISCLOSE
- EMPLOYEE COMPLIANCE GUIDE
- PROCEDURES AND TEMPLATES
- PROFESSIONAL ORGANIZATIONS

EDISCLOSE

The eDisclose system enables Officers and Employees (Faculty and Staff) to submit and review disclosures. eDisclose enables supervisors to assign responsibilities for employee disclosures. Log-in to get started.

- eDisclose Log-in →
- OA Disclosure Responsibility →
- FCOE Review Process →
- OA Review Process →

UNIVERSITY of SOUTH FLORIDA eDISCLOSE

- » My Home
- Welcome
- Disclosures
- Reports

- eDisclose Overview
- What's New
- Training & Resources
- Contact Us

eDisclose Overview

Learn more about **eDisclose** with our below training videos and manuals.

Practice submitting and reviewing disclosures in the eDisclose sandbox by clicking on the **Sandbox** link in the top right corner. (Remember: This is for training purposes only. Do not enter real information in the Sandbox; because disclosures are visible to all Sandbox users.)

Outside Activity (OA) Training +

- 01-How to Disclose Outside Activity
Step-by-step video explaining how to disclose an outside activity (4 min)
- 02-How to Review Outside Activity
Step-by-step video explaining how to review an outside activity disclosure (4 min)
- 03-How to Request Clarification
Step-by-step video explaining how Reviewers can request clarification (4 min)



Fraud: Prevention & Detection

Willful or deliberate act or omission with the intention of obtaining unauthorized benefit, service, property, or something of value by deception, misrepresentation, or other unethical or unlawful means.



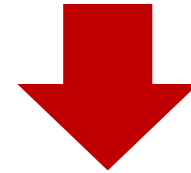
Examples of Fraud:

- Forging or altering documents
- Misrepresenting information
- Misappropriating funds, supplies, or other assets
- Theft, disappearance, or unauthorized destruction
- Improprieties in handling/reporting of money transactions
- Authorizing/receiving payment for goods not received or services not performed



Your Responsibilities

- Know the types of fraud for your area
- Be alert for any indication of fraudulent or dishonest acts
- Follow the established system of internal controls



Systems established by
University Leadership

Need More Help?

Contact the Office of
Internal Audit



Fraud Reporting

Employees observing, suspecting, or having been made known of fraud should immediately report to their Supervisor.



What if the employee believes their Supervisor is involved?

Report it to the next highest level of Management or Office of Internal Audit

Other reporting options? What if you just have question?

Use EthicsPoint hotline.

EthicsPoint Hotline

The USF has engaged
EthicsPoint

—a third party hosted
hotline — which enables
safe, secure, and
anonymous reporting of
activities which may
involve misconduct, fraud,
abuse, and other violations
of USF policies.



3 easy ways to report from anywhere



www.ethicspoint.com



www.usf.edu/uac



1.866.974.8411

USF EMPLOYEE OMBUDS

(serving all faculty, administration, & staff)

- Facilitator
- Resolution Generator
- Safe Confidant
- Feedback Provider
- Informal Mediator
- Fairness Booster
- Communication Aid
- Regulation & Policy Resource
- Active Listener
- Career Coach
- Referral Office
- Process Improver



Email: omb@usf.edu

Phone: 813-974-7777

Office: CGS 303 (Patel Building)

Website: <http://www.usf.edu/ombuds/>

Retaliation, Retribution, Reprisals



No tolerance for retaliation, retribution, or reprisals against an employee or student who, in good faith, files a complaint, grievance, or report of violations of law, rule, regulation, policy, or other misconduct.

Some Examples...

- Discharge, suspension, transfer, demotion
- Withholding bonuses
- Reduction in salary or benefits
- Deflated performance evaluations
- Inappropriate assignment of low grades

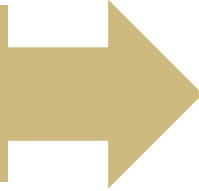


Consequences...

Disciplinary Action
(up to dismissal)

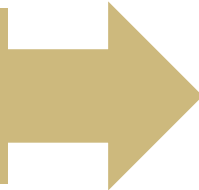
Reporting Retaliation

Sexual Harassment or
Discrimination



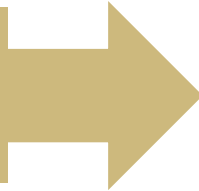
Office of Diversity
& Equal Opportunity

Response to filing
of a grievance



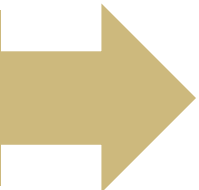
Employee Relations
within Human Resources

Perpetrator is
faculty or student



Office of the Provost

Other (or you're just
not sure which unit)

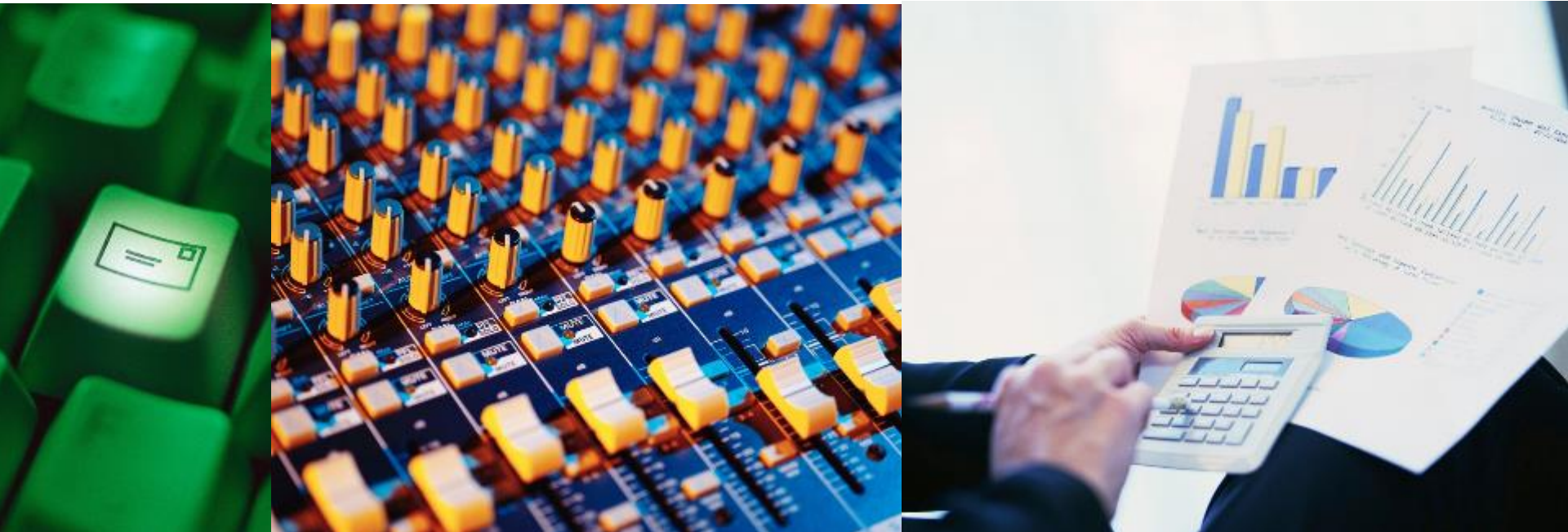


Office of Internal Audit

USF Records

Under Florida Public Records law, most USF records are public and open to inspection by any person requesting access.

e.g. e-mail, sound recordings, photos, just about anything made or received in the transaction of official business



Responding to Records Requests



- Inform your Supervisor
- Follow your Unit's written procedures
- Consult USF Policy 0-106
- Contact General Counsel for guidance and assistance
- Be aware, that there may be copying & redaction charges

Information Technology Resources

- Login IDs and passwords are sensitive & confidential
- Employees are responsible for all actions taken using their login ID
- Follow USF information security & proper use standards
- Limit incidental personal use
- Do not violate copyright agreements or state law
- Use of USF computing resources is not completely private.



External Contacts



What if the media contacts you?

University Communications & Marketing

USF Policy 0-207



What if you are served a legal process?

Office of the General Counsel

USF Policy 0-103

External Contacts, more what ifs...



What if you want to serve as an agent or sales representative on USF campuses for an external organization?

Bull Market or Vice President's approval
USF Policy 0-018



What if you want to send a request to an elected or appointed official for legislative action?

Office of the Government Relations
USF Policy 0-011



UNIVERSITY OF
SOUTH FLORIDA
SYSTEM

Office of Compliance & Ethics

3702 Spectrum Blvd.

Suite 180, CGS401

Tampa, FL 33612-9444

(813) 974-2705

usf.edu/compliance-ethics