

THE UNIVERSITY OF TOLEDO (UTOLEDO)



INSTITUTIONAL COMPLIANCE

PLAN AND MANUAL

SEPTEMBER 2020

Purpose:

The University of Toledo (UToledo) Institutional Compliance Office continues to update its resources and training to keep members of the university community apprised of any new policies or procedural changes that impact UToledo.

In addition to the Institutional Compliance Plan, the Institutional Compliance Office can help with other internal training needs. Managers may seek assistance on any subject matter related to the Institutional Compliance Plan.

The UToledo [Standards of Ethical Conduct](#) provides overarching guidance on executing the topics discussed in this document. The accompanying [chart](#) will direct you to the specific resources listed.

The Institutional Compliance Office provides other resources for the entire UToledo community and is an avenue for employees with concerns of wrongdoing or suspected violations of UToledo policies or laws. For example, members of the UToledo community are encouraged to report any suspected fraud, theft or other misconduct to their supervisors. However, in situations when this would not resolve the problem, employees are encouraged to contact the Internal Audit and Institutional Compliance Office , Human Resources or the Office of Inclusion, as appropriate.

In addition to the reporting mechanisms listed above, an anonymous hotline is available as a means of reporting misconduct in situations where a member of the university community fears reprisal, embarrassment, or for other reasons does not feel comfortable utilizing normal reporting channels.

Anonymous Reporting Line: (888) 416-1308

Note: The compliance issues in each section are not intended to be exhaustive. Managers must be familiar with and ensure compliance with all policies and procedures impacting the area in which the manager works.

For more information on UToledo [Standards of Ethical Conduct](#) or other compliance issues or resources, contact the Internal Audit and Institutional Compliance Office at (419) 530-8718, or e-mail david.cutri@utoledo.edu.

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1. FINANCIAL RESPONSIBILITIES

A business manager, as defined by The University of Toledo, is anyone named as the responsible individual for an active department. Business managers may have budget responsibility for more than one active department. The following sections outline some of the responsibilities and financial duties of a business manager named on a department, agency account, center, grant or any other unit that has a budget.

Budget Process

A business manager is accountable for the financial integrity of his or her academic department or administrative office. Financial integrity is maintained by careful attention and adherence to the unit's budgets within the university's financial reporting system. Any alterations to Board approved original budgets require the business manager to submit an approved Budget Change Form, Capital Budget Change Form, or a Position Data Request to the Finance Department. Business managers should refer to the Budget Changes policy for appropriate approval levels.

For policy details go to:

- https://www.utoledo.edu/policies/administration/finance/pdfs/3364_40_01.pdf

Account Reconciliation and Oversight

Business managers are responsible for requesting budget changes and financial report adjustments (journal entries), approving transactions, requesting payments, and managing labor costs. All transactions must be processed in compliance with the university's policies and procedures.

A business manager's monthly review of Financial Activity reports is a critical component of the university's internal financial controls. Reports available to business managers include but are not limited to, a statement of financial activity for all revenues and expenses controlled by the business manager, various detailed reports on personnel and other expenses, and summary level reports for senior management.

Remember: You must review your Financial Activity reports monthly and make sure all transactions recorded in your reports are valid and appropriate expenditures of university funds.

For policy details go to:

- <http://www.utoledo.edu/policies/administration/finance/pdfs/3364-40-22%20%20Receipt%20of%20cash.pdf>

Segregation of Duties

Business managers are responsible for maintaining an adequate segregation of duties (custody, approval, accounting, and reconciliation), which is a critical component of the university's internal financial controls. An example of proper segregation of duties include different staff members opening mail, preparing deposits, and reconciling financial activity reports. Other tasks that should be separated among staff members include billing and collection functions and purchasing duties such as ordering goods or services, receiving items and authorizing payment.

Managers of small departments having difficulty with segregation of duties are responsible for contacting the Institutional Compliance Office, the Office of the Controller, Internal Audit, or the appropriate college administrator for guidance.

Remember: The more people these duties are distributed among, the stronger your checks and balances.

Cash Management

Each department receiving payments of any sort should keep a cash receipts journal and provide a receipt to those from whom payments are collected. To provide a strong system of internal controls, one person in the department should collect the payments, and another person should prepare the deposit. A supervisor in the department should regularly compare the cash receipts journal to the financial activity reports to ensure that collections are being deposited on a timely basis and accurately recorded.

At the end of each month, the person in the department who has budget responsibility should review the financial activity reports and the general ledger or revenue document, as applicable, to confirm each deposit has been credited correctly. This person should also check the detailed reports against the department's cash receipts journal.

Remember: Make sure someone in your department records checks in a log, and then compares the log to the deposit slips and financial activity report monthly ensuring that revenue is accounted for and deposited in a timely manner.

For policy details go to:

- <http://www.utoledo.edu/policies/administration/finance/pdfs/3364-40-22%20%20Receipt%20of%20cash.pdf>

Petty cash poses a significant financial risk, and managers should eliminate the petty cash fund unless a compelling reason to retain it exists. Many petty cash transactions can be eliminated by using a P-Card or the appropriate reimbursement form. For assistance, contact the Fiscal Manager.

Gifts or Donations from the University

As the university is a not-for-profit institution that is supported, in part, by gifts and donations, it is generally inappropriate for any member of the faculty or staff to make gifts or donations in the name of the university to any individuals, groups, or organizations.

In certain circumstances, however, it may be in the university's interest to make such gifts, or the university may take part in a benefit or civic function which requires the purchase of tickets. Approvals from the Provost, Executive Vice President, Vice President or Dean for exceptions to the general policy must be secured prior to making the donation.

Grant funds may not be used for charitable contributions unless the contribution is specifically allowed by the grantor. Contact Restricted Accounting for additional information.

For policy details go to:

- <http://www.utoledo.edu/policies/administration/advancement/pdfs/3364-55-02%20Gifts%20in%20support%20of%20the%20university.pdf>

Gift Acceptance and Processing

All private donations (gifts) received by any area of the university must be sent to the Office of Institutional Advancement for processing within one working day of receipt of the donation, to ensure the donor receives legal credit and proper acknowledgement.

If a donor has expressed intent to give a gift of real or personal property, securities, a planned gift, or a gift of \$250 or more, the Office of Institutional Advancement must be contacted. Institutional Advancement will coordinate an internal review to determine if the university can accept the gift and to arrange for proper transmission of any accepted gifts to the university.

For policy details go to:

- <http://www.utoledo.edu/policies/administration/advancement/pdfs/3364-55-02%20Gifts%20in%20support%20of%20the%20university.pdf>

Gifts to Employees

In most cases, university funds are *not* to be used to purchase a gift for an employee or group of employees. "Gifts" include, but are not limited to flowers, holiday or wedding presents, and gift certificates. Any such gifts must be purchased with personal funds. Departments may take up voluntary collections for such purposes.

Cash gifts or cash equivalents such as gift cards and gift certificates are always taxable income to the employee. Authorization from Accounts Payable is required before a unit/department can purchase cash equivalents for distribution as gifts or tokens of appreciation to employees.

The following gifts **may** be purchased by a unit/department with the approval of the appropriate Dean/Vice President:

- a modest retirement gift to an employee in recognition of their years of service to the university (not to exceed \$400)
- flowers upon the death of an employee, or an immediate family member of an employee (not to exceed \$200)

Employees **may not solicit personal** gifts in connection with their employment under any circumstances. University employees are generally permitted to accept non-cash business courtesies and personal tokens of appreciation of nominal value (less than or equal to \$150) offered by outside parties.

The term “Gift” **shall** include, but is not limited to:

- promotional items
- complimentary event tickets
- holiday gifts

The term “Gift” **shall not include:**

- payment for an employee’s meals
- any compensation, discount, or other benefit offered to an employee in exchange for services performed by that employee
- tickets for admission to University of Toledo sponsored events

Individual employees **may not accept at any time**, from outside parties, any of the following:

- securities
- real property
- cash (including gift cards and gift certificates)
- Unsolicited offer of a single Gift of more than nominal value (\$150) or multiple Gifts from the same source totaling more than \$300 in value during a single fiscal year.

University business units **may not** accept Gifts exceeding \$500 in value from a single source during a single fiscal year including, but not limited to:

- payment for departmental outings
- holiday gift baskets

Gifts of securities, real property, personal property or money that are offered to a university business unit are subject to the university’s Gift Acceptance and Processing policy and must be reported to the Office of Institutional Advancement. Exceptions to this policy must be requested using the Gift Policy Exception Form. Once approved, the form must be sent to the Controller’s Office. Gifts approved as exceptions must also be disclosed by the employee pursuant to the university’s Conflict of Interest policy.

For additional policy information, please go to:

- <http://www.utoledo.edu/policies/administration/advancement/pdfs/3364-55-02%20Gifts%20in%20support%20of%20the%20university.pdf>

Fundraising Events

All University of Toledo (UT) faculty and staff members, and in some instances student groups, must obtain approval from the Office of Institutional Advancement prior to planning, publicly announcing and/or conducting fundraising events aimed at generating charitable contributions for the university, its schools, colleges, programs, and/or student groups. In addition, a clearance form documenting the cost of the event, the list of invitees and the Fair Market Value of all benefits returned to attendees in exchange for the entrance fee must be submitted to the Office of Institutional Advancement prior to sending invitations.

For policy details go to:

- <http://www.utoledo.edu/policies/administration/advancement/pdfs/3364-55-04%20%20Philanthropic%20fundraising%20activities%20and%20request%20for%20gifts.pdf>

Employee and Guest Reimbursements

The university will reimburse reasonable business expenses incurred by employees and university guests while conducting authorized university business or performing services for the benefit of the university. Employees are encouraged to use P-Cards for expenses incurred while traveling and conducting university business. However, the university will also reimburse for expenses, if they are approved by the department's budget manager and supervisor.

IRS regulations require that reimbursement requests for all expenses be submitted to Accounts Payable within 60 days of the date the expenses were paid or incurred. If the university chooses to provide advanced funds, excess amounts related to those advanced funds **MUST** be returned to the university within 120 days of the date expenses were paid or incurred. Failure to comply with these time frames may require the university to include the reimbursement or the excess funds in the recipient's taxable income.

The university requires original receipts for all transactions, except meals of \$25 and under. Exceptions may be approved in limited cases by the Fiscal Manager with adequate alternative documentation. In order to meet IRS requirements, appropriate documentation must accompany all requests for reimbursement. Substantiating information should include:

- Clearly stated business purpose
- Amount of each separate expenditure (e.g. itemized receipt)
- Date of expenditure
- Place
 - For travel, destination or location of travel by name of city or similar designation
 - For entertainment, names, if any, address or location, destination and type of entertainment if such information is not apparent from the designation or place
- Documentary evidence (receipts)

Reimbursable expenses include:

Transportation Expenses

- Local travel – travel that does not require overnight lodging; this normally includes trips to non-routine destinations for business purposes that are not part of the normal and usual position requirements.
- Air travel
- Automobile travel (private) – reimbursed on a per-mile basis, based on IRS standard mileage rates
- Car Rental – with proper documentation, expenses for fuel, parking and tolls will be reimbursed for rented vehicles. Contact the Purchasing Office for a list of rental agencies that accept UTolledo discount codes.

Living and Other Expenses

- Hotel/Motel Accommodations
- Meals – original receipts required for all meals over \$25
- Meal Reimbursement for extended work hours
- Entertainment – In addition to the documentation referenced above, include name, title and organization affiliation for each attendee (Exception: For larger events where catering is involved, a flyer or brochure describing the event or a prepared guest list may be submitted as substantiating information in lieu of listing the names, titles, and organizations of all attendees.)
- Registration/Seminar Fees
- Communication Expenses (e.g. phone, internet)

International Travel:

Reimbursement of expenses incurred in foreign currency must be submitted on an Individual Reimbursement Request Form in U.S. dollars with an explanation and translation of the foreign receipts.

Travelers must use the currency rates that were in effect at the time the costs were incurred. Travelers may use the per diem method of expense reimbursement for international travel with the approval of the Fiscal Manager. Additional approval is needed from both Grants Accounting and ORSP for per diem reimbursement related to grant-funded travel.

Travel Reimbursement to Domestic and International University Guests:

Reimbursement of expenses made to guests of the university, for services performed for the benefit of the university, are generally not taxable. However, the university requires proper immigration and/or tax documentation prior to payment.

Grant Funded Travel:

Special restrictions may apply to grant funded travel. Contact Grants Accounting or ORSP for more information.

For the Individual Reimbursement Request form & instructions covering all types of reimbursements, go to:

https://www.utfoundation.org/foundation/home/Child_UTStaff.aspx?request=6

- For policy details go to:
http://www.utoledo.edu/policies/administration/finance/pdfs/3364_40_03.pdf

Administration of Externally Funded Grants and Contracts

The submission of a grant or contract proposal for external funding constitutes a formal transaction between University of Toledo (UT) and the funding organization or agency. Therefore, it is very important that proposal submissions are handled by the appropriate departments.

The Office of Development is responsible for providing clearance to UToledo faculty and staff to formally cultivate and solicit private funders. The Office of Research and Sponsored Programs (ORSP) coordinates the proposal, review and approval for all grant and contract proposals, regardless of their funding source.

Remember: Anyone that applies for a grant or other external funding is acting on behalf of the university and must work with ORSP and/or Development prior to submitting a proposal or contacting a private funder.

All federal grants, and some municipal and state grants, require adherence to the Fly America Act. The act requires international airfare to be purchased, with few exceptions, on a U.S. flag carrier airline, or an airline with headquarters in the U.S. Failure to do so may result in the ticket not being approved for purchase or other penalties.

- For more information on the Fly America Act go to:
<http://www.tvlon.com/resources/FlyAct.html>

In addition to the Fly America Act, grant expenditures may be subject to special restrictions. For example, per the federal Office of Management and Budget (OMB circular A-21), federal grant funds may not be used to purchase alcohol. The Office of Research and Sponsored Programs (ORSP) can assist managers and Principal Investigators (PIs) in determining what is allowable for travel and entertainment expenses. It is strongly recommended that managers and PIs contact ORSP about such expenses ahead of time.

Purchase Orders

Purchases over \$5,000 require a requisition and approval from Purchasing Services prior to the order being placed. Additional approvals may be required, depending on the type of purchase and/or dollar amount (e.g. Contract review, General Counsel, Information Technology, etc.). Once all approvals have been received a purchase order is generated and sent to the vendor authorizing the order.

To begin the process, end users should enter a requisition into the Lawson e-Procurement system detailing the purchase (price, quantity, description, etc.). Once received, it will be reviewed by a professional buyer, who will look for appropriate business need/price, vendor selection, compliance with existing policies, bid processes, fiscal year accounting and any potential conflict of interest. Additionally, the requisition will encumber funds on the departments financial reporting.

Purchasing requires backup documentation for all purchase requisitions to support the purchase. This can include a contract, quote, proposal or other support. Once approved by all levels, a purchase order is generated and sent to the vendor for fulfillment.

Some types of purchases require special processes, such as:

- All computer purchases (desktops, laptops, tablets) require a requisition regardless of dollar amount.
- Gift purchases (e.g. gift cards, parking passes) must be approved by Accounts Payable, regardless of dollar amount.
- Facility projects (e.g. remodeling, painting) must be coordinated with Facilities and Construction
- International vendors have special tax and legal concerns. Involve Purchasing Services as early in the process as possible to ensure proper review.
- Purchases of used equipment require procurement approval, regardless of dollar amount.
- Vehicle purchases and leases must be signed for by Procurement Services, not by the department

For more information visit: <http://www.utoledo.edu/depts/purchasing/>

For policy details go to:

- <https://www.utoledo.edu/policies/administration/finance/pdfs/3364-40-15.pdf>

Procurement Card

The University P-Card is available to full-time employees to provide them with the flexibility to quickly and easily obtain goods and services while allowing departments to maintain control over these purchases. The program streamlines small dollar-value purchases to improve efficiency and reduce administrative costs.

The P-Card typically has a limit of \$5,000 per transaction and should be utilized to make small-dollar purchases whenever possible.

P-Cards can be used to charge general expenses as well as travel and other entertainment expenses. There are, however, restrictions for P-Card use including:

- The P-Card is only authorized for University of Toledo (UT) expenses and cannot be used for personal expenses.
- Card sharing is not allowed.
- All computer (e.g. desktops, laptops) purchases require a requisition, regardless of dollar amount. Printers, desktop software and accessories do not require a requisition, unless over \$2,500.
- Gift cards or other taxable expenses (e.g. parking passes, club memberships, etc.) cannot be purchased via the P-Card unless pre-approved by Accounts Payable.
- Splitting purchases to circumvent transaction limits is not allowed.
- Ohio Sales tax generally should not be applied to P-Card transactions as UToledo is a not-for-profit institution.
- P-Cards cannot be used for consulting services.
- P-Cards cannot be used for leasing expenses.
- Cardholders may not purchase travel/entertainment items for their approving official's individual use.
- Cardholders are not to use the P-Card to purchase items that will be charged against a sponsored program unless they are in accordance with the terms of that specific grant or contract.

All transactions on the P-Card must be properly documented within the Concur system in order to comply with UToledo policy and IRS rules. This includes documenting any credits/refunds and transaction fees. Some specific guidelines for documentation include:

- All transactions require a business purpose.
- Travel, hotel stays, and conference registrations also require the dates of the trip or event.
- Meals and entertainment expenses also require the names/titles/company/UToledo affiliations for all attendees

Misappropriation of university funds will result in the immediate forfeiture of the card and cardholders may be required to reimburse the university. Further disciplinary action may occur, up to and including termination of employment.

P-Card purchases are approved online and must be checked monthly. P-Card statements must also be reconciled with detailed receipts on a monthly basis. This documentation, along with original receipts, must be maintained by the department for a minimum of seven years, per IRS requirements.

Full-time faculty and staff are eligible to apply for a P-Card. Employees must fill out an application, obtain departmental approval, have a current criminal background check on file and complete P-Card training.

Remember: Make sure you pay special attention to P-Card transactions when viewing monthly card statements and reconciling financial activity reports. Match all transactions to original receipts and appropriate supporting documents.

- For policy details go to: http://www.utoledo.edu/policies/administration/finance/pdfs/3364_40_16.pdf

Vendor Selection & Competitive Bidding

Departments should take care when choosing a vendor to ensure that they are selecting one who is able to provide the best possible product or service for the university. Purchasing Services maintains relationships with a variety of preferred vendors who have an agreement in place to provide lower costs, higher quality or other benefits over competitors and highly recommends utilizing these providers whenever possible.

When a preferred vendor is not able to meet needs, the department may select another provider. Factors that should be considered include quality, price, services, delivery times, billing, ownership structure, stability and location. Procurement is available to assist as needed in this process.

All new vendors must be authorized by Purchasing or Accounts Payable prior to use. New vendors are required to fill out paperwork that is required by the IRS and other tax entities to determine their payment eligibility.

Purchases over \$25,000

If the total purchase is over \$25,000, a competitive bid must be conducted and the basis for the vendor selection documented. This can be accomplished through either obtaining written quotes from multiple companies or through a formal Request for Proposal (RFP) process.

Purchases made from preferred vendors, as listed on the Purchasing Services website, are exempt from the competitive bid process. Exceptions may also be given by Purchasing Services, where the exemption would be in the best interest of the university.

Purchasing is available to assist departments with the bid process. Purchasing regularly reviews the marketplace to better understand vendors' offerings and has expertise in the selection process. This also removes any potential bias from the selection.

All bid documents for purchase must be kept on file as these records are subject to audit.

For more information visit: <http://www.utoledo.edu/depts/purchasing/index.html>

Remember: Keep all bid documents (or rationale for lack of competitive bidding) on file, as these records may be audited.

For policy details go to:

- <https://www.utoledo.edu/policies/administration/finance/pdfs/3364-40-15.pdf>

Equipment and Asset Disposal

The Salvage Program provides a way for university departments to safely and efficiently dispose of unneeded equipment. All assets purchased with University funds or obtained by a department because of its connection to The University of Toledo (UT, e.g. donations or grants), are the property of UT Toledo and the university holds responsibility for their disposal.

All assets being disposed must be authorized by Purchasing Services. **Departments are not authorized to dispose of their own equipment.**

Examples of assets that go through the salvage program include:

- Artwork
- Audio/visual equipment
- Cell phones
- Computers (desktops, laptops, tablets, monitors, printers, etc.)
- Furniture and appliances
- Vehicles

Small office supplies (e.g. binders, staplers, pens) can be disposed of per department procedures.

To dispose of equipment or assets no longer needed, a department must fill out an asset disposal form, available at the Purchasing website. Purchasing will then evaluate the items and determine if they should be re-deployed, discarded or sold.

Remember: You may not give away or donate university equipment or assets to either employees or non-university parties. You must go through Purchasing to dispose of assets.

For more information visit:

- http://www.utoledo.edu/depts/purchasing/Top%20Menu%20Links/Surplus%20Property/Equipment_Disposal.html

For other policy details go to:

- <http://www.utoledo.edu/policies/administration/finance/pdfs/3364-40-18%20Capitalized%20equipment%20property%20control.pdf>

Fixed Asset Management

A fixed asset is a tangible piece of property owned or leased by The University of Toledo that will be used for the duration of more than one year. Fixed assets include but are not limited to the following: buildings; building renovations; office furniture; computers; and, cell phones. Accounting should be contacted prior to purchasing fixed assets with grant funds as specific record keeping and approval may be required by the government or private sponsor.

Faculty and staff are responsible for stewardship of the fixed assets purchased or utilized by the departments/units they oversee. These responsibilities may include maintenance, safeguarding, inventorying, and reporting on fixed assets that are lost, transferred, or no longer needed.

Procedures for determining appropriate fixed asset maintenance, safeguarding, and inventorying procedures are outlined in detail in the Fixed Asset Management Policy. Faculty and staff should use reasonable judgment to determine whether fixed asset inventory procedures are necessary. Inventorying procedures are only necessary when the benefit of designing, implementing, performing, and documenting the procedures exceeds the associated costs. Fixed assets which are more essential, valuable, and/or easy to move are more likely to necessitate inventorying procedures. Inventorying procedures, when necessary, should consider the dollar value, type, and use of fixed assets and may include physical verifications, in-place verifications, or visual inspections.

Faculty and staff should contact the Controller's Office with department/unit specific questions related to fixed asset maintenance, safeguarding, and inventorying procedures.

For more information, visit:

- http://www.utoledo.edu/depts/purchasing/Property_Control/Asset_Management.html

Identity Theft “Red Flags”

The Red Flags Rule was created by the Federal Trade Commission (FTC), along with other government agencies such as the National Credit Union Administration (NCUA), to help prevent identity theft. The rule was implemented on December 31, 2010. The Red Flags Rule was based on sections 114 and 315 of the Fair and Accurate Credit Transactions Act of 2003 (FACTA).

There are two different groups to which this rule applies; financial institutions and creditors. FACTA’s definition of “creditor” applies to any entity that regularly extends or renews credit – or arranges for others to do so – and includes all entities that regularly permit deferred payments for goods or services.

The Red Flags Rule sets out how certain businesses and organizations must develop, implement, and administer their Identity Theft Prevention Programs. The Program must include four basic elements, which together create a framework to address the threat of identity theft.

The four basic elements of the program are:

1) Identify Relevant Red Flags

- Identify the red flags of identity theft you’re likely to come across in your area

2) Detect Red Flags

- Set up procedures to detect those red flags in your day-to-day operations

3) Prevent and Mitigate Identity Theft

- If you spot the red flags you’ve identified, respond appropriately to prevent and mitigate the harm done

4) Update the Program

- The risks of identity theft can change rapidly, so it’s important to keep the Program current and educate the staff

The Red Flags Rules provide all creditors the opportunity to design and implement a program that is appropriate to their size and complexity, as well as the nature of their operations.

The red flags fall into five categories:

- alerts, notifications, or warnings from a consumer reporting agency
- suspicious documents
- suspicious identifying information, such as a suspicious address
- unusual use of – or suspicious activity relating to – a covered account
- notices from customers, victims of identity theft, law enforcement authorities, or other businesses about possible identity theft in connection with covered accounts

Relevant University policy in this area can be found at:

[http://www.utoledo.edu/policies/administration/compliance/pdfs/3364-15-12 Identity theft dete.pdf](http://www.utoledo.edu/policies/administration/compliance/pdfs/3364-15-12%20Identity%20theft%20dete.pdf)

2. HUMAN RESOURCES RESPONSIBILITIES

Recruitment

Job descriptions are required for all full-time positions within each area. New and re-evaluated positions must be approved by the Executive Vice President of Finance and Administration or Provost and then posted through the Human Resources Website to begin the recruitment process.

When looking to hire a candidate for a full-time staff position, Human Resources (HR) has guidelines to assist with the recruitment process. Follow these guidelines to ensure compliance with the university's recruitment procedures.

At every step in the recruitment process, it is important that hiring managers work with their assigned Human Resources Adviser. A criminal background check, reference check, and educational verification will be performed on all finalists. Hiring managers wishing to conduct reference checks are to follow the procedures outlined in the Pre-employment Reference Checks and Educational Verification policy. Once a candidate has been selected for employment, only Human Resources can make the official job offer.

When looking to hire a candidate for a faculty position, the Provost has a list of guidelines to assist in the process. Consultation with the faculty of the academic unit is required for the appointment of all full-time faculty and departmental chairs.

Remember: Regardless of what position you're hiring for, the university's equal employment policy and nondiscrimination standards must be followed.

- For the reference checks policy and form go to:
<https://www.utoledo.edu/policies/administration/humanresources/pdfs/3364-25-47%20%20Background%20check%20policy.pdf>

Employment of Relatives

Relatives of University of Toledo employees do not receive preferential consideration for employment at the university. Relatives may work in the same departments, though no individual will be employed in a department under the immediate supervision of a relative. Relatives are persons related by blood, marriage or legal procedure.

If a conflict occurs, attempts will be made to find a suitable position within the department or university where one of the employees may transfer. If no accommodations can be made, one of the employees may be asked to resign.

Remember: Consult with Human Resources to ensure that a relative is not supervising or giving preferential treatment to another relative in your area.

Form I-9

Human Resources sends all newly hired and rehired full-time staff (Provost's Office for full-time faculty) a Form I-9 to fill out prior to or on their first day of employment. A Form I-9 is required by the federal government. It verifies an individual's employment eligibility to work in the U.S. and must be completed within three business days of the date of employment.

To complete the I-9, employees must present original documents, not photocopies. The only exception is a certified copy of a birth certificate. Either HR or the manager must verify the employment eligibility and identity documents presented by the employee and record the document information on the form.

An employee who fails to produce the required document(s), or a receipt for a replacement document(s) (in the case of lost, stolen or destroyed documents), within three business days of the date employment begins, can be terminated. An employee who shows a receipt has ninety days to present the original documents.

Managers are responsible for ensuring that part-time faculty and staff and student employees are sent a Form I-9 and that employees complete the form prior to or on their first day of employment.

- For the employment eligibility verification policy (I-9) go to:
https://www.utoledo.edu/policies/administration/humanresources/pdfs/3364_25_116.pdf

Introductory Period

All newly hired, rehired, promoted or transferred staff members are required to serve six months of continuous employment in an introductory period. Employees are not subject to progressive discipline during the introductory period. Managers are encouraged to utilize the introductory period to train and evaluate an employee's effective adjustment to work tasks, conduct, procedures, attendance, and job responsibilities.

Employees whose performance is unsatisfactory during the introductory period may consider requesting an extension to the introductory period. One-time extensions of the introductory period are approved by Human Resources and are granted up to a maximum of three months.

Time Reporting

Managers are responsible for ensuring that any employees they supervise accurately report time. All non-exempt (hourly) employees, including non-exempt full-time staff, part-time staff and student employees, must record all the hours they work in the time keeping system, so they are paid in accordance with the Fair Labor Standards Act. Non-exempt (hourly) staff cannot be asked to volunteer their time to do University of Toledo (UT) work, nor can they be offered compensatory time or gift certificates in lieu of pay. Adding hours to "reward" an employee is prohibited and considered falsification of time reporting records.

All full-time staff is responsible for reporting paid time-off (vacation, floating holidays, summer hours) in the time reporting system.

Remember: All hours of non-exempt staff work must be recorded in the time reporting system. There is no "comp" time at UToledo for non-exempt staff. There is "comp" time for non-bargaining unit employees in selected pay situations. Policy attached:

<http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364-25-56%20Comp%20time%20accrual%20and%20use.pdf>

For more information go to:

- HSC: http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364_25_22.pdf
- MC: http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364_25_126.pdf

Benefits

Time-off Benefits:

These benefits include the following types of permitted time off:

- Holidays and vacation time
- Time off to help employees meet personal and civic responsibilities
- Time off for personal health reasons and family care-giving

Holidays and Vacation Time:

All full-time staff employees accrue vacation time each calendar year that can be used for taking time off from work. The university also observes several holidays providing additional time off for employees.

For more information go to:

- Vacation:
http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364_25_36%20Vacation%20policy.pdf

Time Off to Help Employees Meet Personal and Civic Responsibilities:

The university's Paid Absence policy allows employees time off for civic responsibilities, death or serious illness in the family, and for other personal emergencies. Management notification and approval is required for certain types of paid time off.

For more information go to:

- Paid Absences:
http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364_25_126.Pdf

Time Off for Periodic Personal Health Reasons and Family Caregiving:

The university provides employees with time off for periodic as well as long-term health and family care-giving needs.

For work related illness or injury, please contact the Safety and Health Department at 419-530-3620 or by email at jeff.newton2@utoledo.edu.

Family Medical Leave Act and Short-term Disability:

All eligible employees are provided with job protection for periods of absence (continuous or intermittent) of up to twelve weeks per rolling twelve-month period for the following situations:

- A serious health condition of an employee
- A serious health condition of an immediate family member of an employee (child, spouse or parent)
- The birth and care of a child or the placement of a child with an employee for adoption or foster care

For more information go to:

- Family and Medical Leave Act: http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364_25_30_Family_and_Medical.pdf
- HR leaves of absence Web page: <http://www.utoledo.edu/depts/hr/leaveofabsence.html>

Other Leaves: Personal, Military, and Faculty Research:

At the university's discretion, personal leaves of absence may be granted for unusual or extreme circumstances for up to a maximum of three months. Examples include personal or family needs of a serious and urgent nature, educational opportunities and professional development.

For more information go to:

- Military Leaves:
<http://www.dol.gov/whd/forms/WH-384.pdf>

Work-Life Balance:

UToledo offers a range of policies and programs such as flexible work scheduling and voluntary reduced work time to help eligible faculty and staff effectively balance the responsibilities of work with personal and family commitments and activities.

For more information go to:

- Voluntary Reduced Work Time:
http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364_25_32_Voluntary_reduction.pdf

Employee Assistance Program (EAP):

The EAP provides information and resources to deal with many issues of daily living. Services include short term counseling in person or by telephone. The program includes:

- the Legal/Financial Connection to assist with legal issues
- the Family Resource Link, a searchable data base of information and resources to assist with childcare and eldercare needs

For more information go to:

- EAP:
<https://www.utoledo.edu/depts/hr/benefits/employee-assistance.html>

Student Employees

The Office of Student Employment should be consulted about questions regarding on-campus student employment (including work study, international students, and graduate students). Student Employment handles student employment policies and procedures governing job postings/descriptions, hiring, employment paperwork, supervision, retention, disciplinary issues, and terminations of student employees on campus.

Student employees must meet and maintain specific requirements concerning university enrollment and work hours. During the school year, student employees are restricted by both University of Toledo policies and federal government regulations. Managers must be familiar with and ensure compliance with the various classifications of student employees and the applicable university policies.

Work Hour Requirements for On-Campus Student Employment:

U.S. citizens/permanent residents

U. S. citizens and permanent residents are eligible to work no more than **20 hours a week** during the school terms. These students are eligible to work up to full time during the school breaks.

Non-U.S. citizens/non-permanent residents (International students in F-1 and J-1 non-immigrant visa status)

International students (non-U.S. citizens/non-permanent residents) with a non-immigrant F-1 or J-1 student visa status are limited to working **20 hours or less a week** during the school term. These students are eligible to work more than 20 hours a week during holidays and annual vacation periods, provided they have not completed degree requirements. International students who work in excess of the allowable hours a week may lose their lawful status and risk potential deportation. Managers should confirm with the Office for International Students (OIS) that a student is taking his or her annual break prior to authorizing more than 20 hours during an academic term.

Enrollment Requirements for On-Campus Student Employment:

U.S. citizens/permanent residents

U. S. citizens and permanent residents must be enrolled at least half-time or for a minimum of six undergraduate credit hours a semester (six hours a semester, four hours for graduate students) to be employed by the university as a student service employee, a federal work study participant or a graduate assistant.

Non-U.S. citizens/non-permanent residents (International students in F-1 and J-1 non-immigrant visa status)

International students (non-U.S. citizens/non-permanent residents) with a non-immigrant F-1 or J-1 student visa status must be enrolled full-time. Full-time enrollment (see table below) is mandated by United States Citizenship and Immigration Services (USCIS).

Non-U.S. citizens/non-permanent residents (students with another visa status)

Other international students' employment eligibility will be pre-determined by their visa status in accordance with federal regulations. Contact the Office of Student Employment for guidance regarding student employment eligibility.

Enrollment requirements for student employment	U.S. citizens/permanent residents	Non-U.S. citizens (F-1 and J-1 visa status)
Undergraduate	6 semester hours	12 semester hours
Graduate	6 semester hours	12 semester hours
English Language Academy	2 courses	4 courses

Remember: Managers should verify student schedules to ensure compliance with enrollment requirements.

Taxes:

Certain tax rules apply to student employees as well. In general, while classes are in session, students do not have to pay FICA (Social Security and Medicare) taxes. The tax exemptions only apply when students are not registered for classes (like summer). The tax treatment of international students can also vary.

Remember: If students have questions about their tax treatment, direct them to the Payroll Office at (419) 530-8780.

Hiring Procedures:

1. Any student employment change must be done through the Employee Personnel Action Form system (EPAF).
2. The department must submit the EPAF through the system.
3. The student must come to the Office of Student Employment ON or BEFORE the first day of employment to complete the Form I-9. The student must fill out section 1 of the Form I-9 and all other appropriate hiring paperwork (including federal & state tax forms).
4. The student must be able to present document(s) from the List of Acceptable Documents on the Federal Form I-9 (<http://www.utoledo.edu/depts/hr/employment/pdf/i-9.pdf>) that verify identity and eligibility to work in the U.S. within 3 days of the date employment begins. Only original documents are acceptable, except for a certified copy of a birth certificate. If the Form I-9 has not been completed, the student employee may not work.
5. Completed hiring paperwork will be forwarded to the following areas for processing.
 - o State Tax and Ohio Public Employees Retirement System → Payroll
 - o Federal Tax – done on-line by student
 - o Direct Deposit – done on-line by student
 - o Personal Information Form, Declaration regarding Material Assistance, I-9 → Career Services
6. For payment dates, consult the payroll processing calendar on the Finance Department website.

Troubleshooting – The student must stop working if the Form I-9 is not completed within 3 business days of the date employment begins. The student may not resume working until the Form I-9 is completed.

For more information:

- Contact the Office of Student Employment at (419) 530- 341, or visit <http://www.utoledo.edu/utlc/career/>
- Contact the Office of International Students at (419) 530-4229, or visit <http://www.utoledo.edu/cisp/international/>

For policy details go to:

- http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364_25_11_Student_employment.pdf

Drug-Free Workplace and Legal Drinking Age Compliance

As an institution receiving federal financial assistance, The University of Toledo (UT) distributes to faculty, staff, students, and others this public policy statement certifying its compliance with the *Drug Free Workplace Act* and the *Drug Free Schools and Communities Act*.

The State of Ohio prohibits the sale, use, or possession, of alcoholic beverages by persons who are under 21 years of age. Alcohol may be served to those of legal age at university events, including classes. Event sponsors are responsible for having adequate control measures in place to ensure that:

- persons under 21 years of age are not served alcohol and
- that persons who are obviously intoxicated are not served alcohol

The responsibility for compliance with these requirements and all requirements in any other relevant policies related to serving alcohol at university events rests with the event sponsors.

The following actions are prohibited on any premises owned or controlled by UT:

- unlawful possession, use, distribution, dispensation, sale, or manufacture of controlled substances
- unlawful possession, use, distribution, dispensation, sale, or manufacture of any related drug paraphernalia in violation of applicable law
- unlawful possession, use, distribution, dispensation, sale, or manufacture of alcohol by or to minors

Compliance with this policy is a condition of continued employment. Violation of this policy may subject employees to disciplinary action, up to and including termination.

Employees are expected to report to work fit for duty free of any adverse effects of alcohol or illegal drugs. Illegal drug use or alcohol use in violation of this policy or which could jeopardize the safety of other employees, the public, or university property may subject employees to disciplinary action, up to and including termination. The university will assist and support employees who voluntarily seek help for alcohol or drug related problems before becoming subject to discipline and/or termination. University employees who violate this policy may also be required to participate in and complete an alcohol or drug abuse assistance/rehabilitation program as a condition for continued employment. UToledo encourages any employee who has a drug or alcohol problem or a related difficulty, either on or off campus, to seek help through the university's Employee Assistance Program (EAP). The EAP provides confidential referrals to drug or alcohol treatment programs and counseling. Employees may also be allowed to use accrued paid time off, be placed on a leave of absence, or be otherwise accommodated as required by law.

This policy does not prohibit employees from the lawful use and possession of prescribed medications, but only to the extent that it does not impair job performance or threaten safety, health, security, or property.

State and federal law prohibit the manufacture, possession, use, or distribution, of illegal drugs. Use of alcohol by persons under 21 years of age is illegal under state law. Violations of state or federal law may result in arrest and conviction on charges of misdemeanor or felony offense. An employee must notify the following people of any criminal drug statute conviction for a violation occurring **in the workplace** within five (5) days of the conviction:

- **Staff members:** his/her supervisor and either a Human Resources Representative or the Associate Vice Presidents of Human Resources
- **Faculty members:** his/her supervisor (appropriate department chair or dean) and either an Employee Relations Representative or the Associate Vice Presidents for Human Resources
- **Student employees:** his/her supervisor and Career Services Center Associate Director for Student Employment

For policy details, go to:

http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364_25_104.pdf

Performance Appraisals

University of Toledo staff and faculty who supervise part-time and full-time employees should conduct a written performance appraisal annually. A written introductory performance appraisal is recommended for all full-time and part-time staff prior to the completion of six (6) months of service.

The success or failure of the performance appraisal process depends greatly upon the ability and effort of the supervisor to set clear goals and performance expectations and to provide a balanced assessment of the employee's performance.

Supervisors and employees should become familiar with the core employee and managerial behaviors outlined in the staff performance appraisal form and in the guide containing the forms available at the Human Resources Website. Performance appraisal objectives outlined in the Performance Management Guidelines include:

- Setting goals, clarifying performance expectations and monitoring progress
- Motivating employees through recognition and support
- Identifying and preparing individuals for increased responsibility
- Providing formal, written performance feedback
- Developing employees professionally
- Promoting an open dialogue between employees and supervisors
- Addressing performance and/or behavior issues and concerns in a timely manner

Performance appraisals should be conducted between March and mid-May each year to coincide with the staff salary planning cycle effective on July 1. Annual pay increases should be administered in accordance with the Total Compensation Philosophy and Annual Salary Planning Guidelines and Timeline reflective of performance described in the most recent performance appraisal cycle.

Human Resources' Performance Management and Appraisal Training Program and Performance Management Guidelines provide employees and their supervisors with resources that inform best practice and offer information on what actions to take when a performance gap is recognized, or behavior is observed that does not meet the university's Code of Conduct.

Remember: Employee performance reviews are due to Human Resources in May. Consult with your area's Dean or VP for any earlier internal deadlines.

- For performance appraisal form and instructions go to:
<http://www.utoledo.edu/depts/hr/evaluations.html>
- For performance management and appraisal training and resources go to:
<http://www.utoledo.edu/depts/hr/evaluations.html>

Termination Process

Managers are responsible for completing termination requests in a timely manner for full-time staff, part-time staff and student employees. Timely processing ensures coordination of benefits, final paycheck, security and other details described in the Termination Checklist.

A voluntary resignation, when an employee chooses to leave his/her employment with The University of Toledo, is initiated through the Termination Request application in my-UT. A manager submits a request that is reviewed and approved by Human Resources for processing.

Involuntary termination occurs when a manager decides to release an employee of his/her duties. Managers must work with Human Resources for staff and Student Employment for student employees.

- For guidelines on voluntary and involuntary terminations go to: <http://www.utoledo.edu/policies/administration/humanresources/pdfs/3364-25-48%20Separation%20from%20employment.pdf>

Termination procedures for faculty are addressed by the Provost's Office. Part-time faculty terminations are addressed by respective colleges/schools.

Americans with Disabilities Act

The Americans with Disabilities Act (ADA) prohibits discrimination against qualified persons with disabilities in employment practices such as hiring, promotion, termination, compensation, training, benefits and all other terms and conditions of employment. It also requires reasonable accommodation in employment to qualified individuals with disabilities.

Managers should regularly review their department job descriptions to ensure that all physical or mental job requirements are job-related, consistent with business necessity and necessary for safe job performance. Managers are also the point of contact when an employee requests reasonable accommodation for a disability. Human Resources can advise on matters of reasonable accommodation and should be notified within three days of any requests.

Remember: Any information regarding an employee's physical or mental disability must be kept confidential, except to inform managers and others on a need-to-know basis regarding work restrictions and safety concerns.

- For more information go to: http://www.utoledo.edu/policies/administration/diversity/pdfs/3364_50_03_Non_discrimination_o.pdf

University Sponsorship of Foreign Nationals

The University of Toledo, under certain circumstances, sponsors foreign nationals for temporary employment-based visas and/or for lawful permanent residency. Consideration for such sponsorship requires an initial request by the appropriate department chair or department supervisor and must be seconded by the dean or the appropriate vice president. Approval of sponsorship requests are made by the university's immigration attorney, acting under the authority of the General Counsel. The university, however, is not legally obligated to sponsor or otherwise financially assist any foreign national for employment authorization in the United States.

Remember: This does not apply to the non-immigrant student visas (F-1) or exchange visitor visa (J-1); these visas are administered by the International Student Office (ISO). For more information, go to:

<http://www.utoledo.edu/cisp/international/h1bvisas/>

3. INFORMATION RESPONSIBILITIES

The UToledo [Standards of Ethical Conduct](#) provides overarching guidance on executing the topics discussed in this document. The accompanying [chart](#) will direct you to the specific resources listed.

Information Security Policy

The Information Security Policy helps ensure the security, availability, privacy and integrity of UToledo information systems, networks and data. It also outlines the procedures for reporting breaches of information security and ensuring compliance with various federal and state laws.

Every member of the UToledo community must report all information security breaches and any loss or improper use of UToledo data, systems or devices.

- To report such breaches or losses, managers should contact the Information Security department.
- To report potential abuses, e-mail the Information Security department.
- If health-related information is involved, the UToledo Health Information Security & Privacy policy must also be followed.

Managers must also ensure proper oversight of outside service providers with access to confidential UToledo data. UToledo contracts with these outside service providers must be reviewed by the Office of the General Counsel, regardless of dollar amount or contract duration. Before releasing data to a service provider, managers must work with the Manager of Information Security to confirm that the service provider can maintain protective data safeguards.

Remember: Regardless of the dollar amount involved, before sharing any UToledo data with an outside party, a contract must be entered into and reviewed by the Office of the General Counsel and the manager of Information Security must be consulted.

For policy details go to:

http://www.utoledo.edu/policies/administration/info_tech/pdfs/3364-65-13.pdf

Passwords

Every employee is responsible for maintaining the confidentiality of his or her own password. Passwords are one of the main mechanisms guarding confidential and critical information on the university's systems. Do not share passwords with others or write them down. To ensure security, it is recommended that employees change their passwords every 90 days. Passwords automatically expire after 180 days and must be changed. Managers who violate security policies by sharing their passwords will be held accountable for actions taken under their User ID.

Remember: Passwords must be a minimum of eight characters in length. They must contain at least one uppercase, one numeric and one special character. To ensure it cannot easily be guessed, avoid using passwords close to your name, family members' names or other obvious choices.

- For policy details go to:
http://www.utoledo.edu/policies/administration/info_tech/pdfs/3364_65_07.pdf

Access to and Responsible Use of Data

Information resources, including any accessible data, can only be used for legitimate educational or business purposes for the university.

Remember: Access to internal-sensitive data is granted only by the written authorization of the appropriate data steward and upon completion of a request for data access.

Securing Privacy - FERPA

The University of Toledo complies with the Family Educational Rights and Privacy Act (FERPA). This act protects the privacy of student education records and is required of all schools that receive funds from the U.S. Department of Education (e.g. student financial aid).

Managers are responsible for observing any legal or ethical restrictions that may apply to data accessible to everyone in his or her area, and for abiding by applicable federal, state or local laws governing the access, use or disclosure of information.

Remember: You are responsible for ensuring the confidentiality of data and the privacy of individuals at all times.

- For policy details go to:
<http://www.utoledo.edu/policies/academic/undergraduate/pdfs/3364-71-15%20%20Confidentiality%20of%20student%20records.pdf>

Business Continuity

Managers should ensure that their mission-critical information is backed up on a regular basis and recovery procedures for that information are established. If an area has department-specific servers, software or databases housed within their department, IT advises creating a plan to recover these services in the event of a disaster. For example, keep a copy of the software and databases off-site, and document plans for replacement of any necessary equipment.

Records Management

Managers whose jobs include dealing with the handling and retention of university records are responsible for knowing and following local, state or federal guidelines pertaining to records retention for their area. In addition, managers are responsible for following the UToledo Records Management Policy and Records Retention Schedule. This means that managers must know who the Records Coordinator is for their department or college and be in regular contact with that person regarding the retention and destruction of records.

Managers should notify either their department's Record Coordinator or the Records Management Department if they become aware of any changes for their area that need to be reflected on the Records Retention Schedule including any official records that are not accounted for on the Schedule.

Managers are also required to ensure that any records containing covered data as defined in the UToledo Information Security Policy are retained and destroyed in a confidential manner.

- For more information and policy details go to http://www.utoledo.edu/policies/administration/general_admin/pdfs/3364_5_05.pdf

External Communications

Unless specifically designated to speak on behalf of The University of Toledo (UT), managers should refer media inquiries to the UToledo media relations staff: [419.530.2675](tel:419.530.2675).

Copyright

The university's bookstores are the only authorized locations for the sale of copyrighted materials. Before photocopied materials can be sold in the university's bookstores, copyright permission must be obtained, and is available through the Associate Vice President for Technology Transfer or directly from the copyright holder.

- For policy details go to: <http://www.utoledo.edu/policies/academic/research/pdfs/3364-70-14%20%20Copyright%20policy.pdf>

Establishing a University Policy

Policies and procedures are created and regularly reviewed by the university to guide members of the University of Toledo community in the conduct of university business. Some policies and procedures are legally mandated, while others are developed based on experience and higher education standards.

The university policy coordinator, Elizabeth Hagen, must be contacted to coordinate the policy approval process.

Individual schools, colleges and departments may also establish unit-specific policies and procedures if they do not conflict with any university policies and procedures. These policies and procedures must always be made public to the members of the unit.

The Faculty Senate has responsibility for the university's academic policies, and the Student Experience Division has responsibility for policies affecting student life.

Remember: Contact the university policy coordinator if a new policy is needed, or if an existing policy needs revision.

- For policy details go to:
<http://www.utoledo.edu/policies/administration/legalaffairs/pdfs/3364-10-01%20Formulation%20and%20issuance%20of%20policies.pdf>

University Endorsements

Using the University of Toledo (UT) name in conjunction with an event, project or publication implies a close connection with the university, such as sponsorship or an endorsement. Before using the UToledo name, approval should be obtained from the Associate Vice President for Marketing Communications.

Remember: Members of the UToledo University community have a responsibility to protect its name.

Use of Electronic Signatures and Records

Electronic transactions have the equivalent level of legal protection that is given to paper-based transactions. All security procedures and technologies should provide authentication, nonrepudiation and integrity to the extent that is reasonable for each electronic transaction.

This establishes an overarching security procedure that requires The University to:

- Document uses of electronic transactions;
- Conduct a transaction risk assessment of each set of similar electronic transactions;
- Use, as a minimum, technology standards and/or security procedures that are appropriate for the level of transaction risk as determined by the security assessment;
- Establish and maintain documented security policies and procedures;
- Seek a waiver from Ohio Office of Information Technology (OIT) if the security procedures do not conform to the minimum technology standards as established by this rule for the level of security identified in the transaction risk assessment.

For each set of similar electronic transactions, The University must complete an electronic transaction report before acquiring or implementing electronic signatures, transactions or related technology. It must complete and update electronic transaction reports on forms provided by OIT. It must maintain electronic transaction reports for as long as the electronic records of the electronic transaction are retained in accordance with the record retention schedule.

Each electronic transaction report must include the following. These documents must be clearly referenced and maintained on file and available for audit.

- The identification and description of the set of similar electronic transactions;
- The domain under which the electronic transaction set falls;
- A risk assessment identifying the probability of breaching security and the impact;
- The security level required for the electronic transaction set per the risk assessment;
- The security procedure used for the electronic transaction set; and
- A list of documented University policies for physical, network and computer security.

The University must update electronic transaction reports to accurately reflect changes in the electronic transaction's associated risk, technology or security procedures. If The University determines that due to these changes in risk, technology or security procedures, the electronic transaction does not conform to the minimum technology standard for the level of security identified in the transaction risk assessment, it must modify the risk, technologies or procedures to bring the electronic transaction into compliance with this rule or seek a waiver from OIT.

Information pertaining to risk assessments and other aspects of electronic signatures and records can be found in Rule 123:3-1-01 of The Ohio Administrative Code and in the policy below:

http://www.utoledo.edu/policies/administration/info_tech/pdfs/3364-65-13.pdf

4. COMMUNITY RESPONSIBILITIES

The UToledo [Standards of Ethical Conduct](#) provides overarching guidance on executing the topics discussed in this document. The accompanying [chart](#) will direct you to the specific resources listed.

Professional Conduct

Managers are responsible for carrying out their duties and responsibilities in accordance with the UToledo mission, which includes conducting business in an ethical and professional manner, safeguarding UToledo resources and treating others with dignity and respect.

- For the UToledo Mission Statement go to:
<http://www.utoledo.edu/campus/about/mission.html>

Equal Employment Opportunity (EEO)

UToledo provides equal employment opportunities through the recruitment and selection of new employees, promotions, transfers, compensation, training, benefits, terminations and other terms and conditions of employment. Every university employee must carry out this policy within the scope of his or her position.

Remember: UToledo is an equal opportunity employer.

- For policy details go to:
<http://www.utoledo.edu/policies/administration/diversity/pdfs/3364-50-02.pdf>

Anti-discriminatory Harassment Policy and Procedures

No person affiliated with The University of Toledo (UT) will be the object of discrimination on the basis of race, color, ethnicity, religion, sex, gender, sexual orientation, national origin, age, marital status, parental status, family relationship status, physical or mental disability, military status, or other status protected by local, state or federal law, in its employment or its educational settings.

Managers at UToledo are responsible for relaying all complaints of discrimination or harassment to the Office of Inclusion. The Office of Inclusion is responsible for receiving, processing and resolving complaints of discrimination or harassment.

Complaints of discrimination and harassment are taken seriously by the university. Anyone who knowingly makes false allegations may be subject to disciplinary actions, including, but not limited to reprimand, suspension and/or termination.

For policy details go to:

- http://www.utoledo.edu/policies/administration/diversity/pdfs/3364_50_01.pdf

Sexual Harassment

Supervisors are required to report any incidents of alleged sexual or gender harassment to the Office of Inclusion, regardless of whether the complainant expects the alleged incident to be reported. If a student alleges harassment against another student, the complaint must be reported to The Office of Inclusion.

Reporting a sexual or gender harassment incident constitutes a complaint. Complaints will be treated with discretion and will be promptly and thoroughly investigated.

Remember: As a manager, you are required to report any sexual harassment complaints to the Office of Inclusion.

- For policy details go to:
http://www.utoledo.edu/policies/administration/diversity/pdfs/3364_50_01.pdf

Reporting Misconduct

Employees with supervisory or fiscal responsibility have a responsibility to report conduct related to university activities or business that violates civil laws, university policies or The University of Toledo's Code of Conduct. Community members who do not have supervisory or fiscal responsibilities are strongly encouraged to also report such conduct.

Individuals who knowingly make intentionally false or purposefully misleading allegations of misconduct will be subject to appropriate disciplinary action, which may include termination of employment.

Depending on the nature of the misconduct, there are a variety of reporting avenues available to community members. An anonymous hotline is also available as a means of reporting misconduct in situations where a member of the university community fears reprisal, embarrassment, or for other reasons does not feel comfortable utilizing normal reporting channels.

Individuals seeking to report misconduct can direct their concerns to the appropriate office below or utilize the anonymous hotline.

- Assistant Vice President for Diversity Investigations: (419) 530-4053
- Internal Audit Office: (419) 530-8718
- Office of Inclusion: (419) 530-5538
- Human Resources: (419) 530-4747
- Anonymous Reporting Line: (888) 416-1308
- For policy details go to:
<http://www.utoledo.edu/policies/administration/compliance/pdfs/3364-15-03.pdf>

Non-Retaliation

In accordance with the university's Reporting Misconduct policy, no person, including parties and witnesses, who, in good faith, reports or participates in misconduct investigations at The University of Toledo shall be subject to retaliation or threat of retaliation. Any act of retaliation constitutes reportable misconduct and is subject to appropriate disciplinary action, which may include termination of employment.

- For policy details go to:
<http://www.utoledo.edu/policies/administration/compliance/pdfs/3364-15-04.pdf>

Conflict of Interest

All employees have a responsibility to protect UT Toledo interests, assets and resources by properly handling conflicts of interest (COI). A COI, or the appearance of a COI, exists when a university employee has an interest which could influence the employee's ability to act in the best interest of the university. A COI can be present even if no unethical or improper action results from the conflict. In most instances, COI's can exist in the normal course of university business without negative effects, when properly disclosed or managed. Proper disclosure and management of COI's protect the employee and the university from financial and reputational harm.

Any employee who has a COI or the appearance of a COI must either (1) refrain from involvement in the matter, or (2) disclose the conflict to his or her supervisor so it can be evaluated. Examples of potential COIs include:

- Purchasing decisions – accepting gifts from vendors, or purchasing goods or services from a relative or an organization in which the employee has a financial or management interest
- Outside work – working for another organization that interferes with work at UT
- Use of UT Toledo resources – (such as excessive use of telephones, photocopiers, supplies, equipment or Internet) for personal use or outside work.

Employees seeking governmental grant funding are required to comply with governmental policies on conflict of interest. Employees should review the Conflict of Interest in Externally Sponsored Projects policy and contact the university's Office of Research and Sponsored Programs for guidance on additional requirements and compliance forms.

Remember: If employees have a conflict of interest, direct them to read the policy and to complete the Certificate of Compliance form.

For policy details go to:

- http://www.utoledo.edu/policies/academic/research/pdfs/3364_70_01.pdf

Contacts with Public Officials

All contacts with public officials made on behalf of The University of Toledo (UT) must first be cleared and coordinated with the Office of Government Relations. This applies to contacts with publicly elected officials and most administrative agencies at federal, state and local levels.

“Contacts” is defined as all invitations to attend or participate in UT-sponsored events (on or off campus), or requests for appointments, telephone calls or written correspondence with legislative or senior executive officials made on behalf of UToledo regarding legislation, rules, funding or policies.

In addition, student organizations that would like to contact public officials must first contact the Office of Student Involvement, which then works with the Government Relations office when appropriate.

*Remember: This policy does not apply to personal matters unrelated to an individual's employment or university responsibilities at UT. When contacting public offices as a **private citizen**, however, it is not appropriate to utilize UToledo letterhead, e-mail, computers, telephones, fax machines, photocopiers, or other UToledo supplies.*

- For policy details go to:
http://www.utoledo.edu/policies/administration/general_admin/pdfs/3364-5-02%20%20Governmental%20relations.pdf

NCAA Athletics Compliance

As a Division I member of the National Collegiate Athletic Association (NCAA) and the Mid-American Conference, The University of Toledo (UT) is responsible for compliance with the rules both organizations set forth. All university staff should be aware of and comply with the following rules regarding treatment of student-athletes and contact with prospective student-athletes.

Student-Athletes

- Student-athletes should be treated in the same way as other students and may not receive any “extra benefit” generally not available to all students. Student-athletes may not be given cash, loans, or gifts of any kind, including birthday or holiday gifts by faculty or staff.
- Student-athlete amateurism rules are strictly enforced. The rules prohibit interactions with agents and professional teams and the use of a student-athlete’s name or likeness to promote commercial entities. An image of a student-athlete may not be used for any university or other publication without the express permission of the Institutional Compliance Office .

Prospective Student-Athletes

- Off-campus recruitment of prospective student-athletes is limited to coaches and Athletic Department staff. Other UToledo faculty and staff may only become involved in the recruitment of prospective student-athletes when the prospect is visiting the UToledo campus. A prospective student-athlete is a person that has begun ninth-grade classes, and in some cases may be even younger.
- Recruiting restrictions also extend to prospective student-athlete’s friends, families and coaches. If a faculty or staff member encounters a coach or an Athletic Department staff member with a prospective student-athlete or family member, other than on campus as noted above, he or she should not approach or speak with them. In addition, faculty and staff may not provide free or discounted tickets or transportation to any games or events to prospective student-athletes or their friends, family, or coaches.
- For more information, visit the Athletics Department’s compliance Web site at: <http://utrockets.com/>. Select “Departments”, and then “Compliance”.

5. WORKPLACE SAFETY RESPONSIBILITIES

The UToledo [Standards of Ethical Conduct](#) provides overarching guidance on executing the topics discussed in this document. The accompanying [chart](#) will direct you to the specific resources listed.

Emergency Response

It's a manager's responsibility to ensure that everyone in his or her reporting line knows and follows the emergency and evacuation procedures. The emergency response process varies in each building at each of the different campuses. Business managers or someone within a department or area must research the evacuation procedure of their work area, floor and building, then pass along the information to everyone in that area. However, in the event of a fire alarm in any University of Toledo building, all individuals must evacuate the entire building.

If an employee or visitor experiences a medical emergency, managers should call 911 and then contact The University of Toledo Police Department. All accidents that occur on university property, whether life threatening or not, must be promptly reported to The University of Toledo Police Department so that an accident report can be issued.

Remember: Maintaining an awareness of emergency and evacuation procedures, and responding to them effectively, could save your life and the lives of those around you.

For policy details go to:

- http://www.utoledo.edu/policies/administration/safety_health/pdfs/3364-60-04%20Institutional%20emergency%20management.pdf
- <http://www.utoledo.edu/depts/safety/docs/EP-08-006.pdf>

Laboratory Safety and Hazards Communication

The Safety and Health Department along with the Radiation Safety Office, in conjunction with department safety representatives, ensure compliance with federal and state regulations related to health and safety. The safety and health department along with the radiation safety office also conduct training on how to safely use and dispose of hazardous chemicals.

Remember: If you are responsible for laboratory safety and hazards communications, make sure everyone in your department knows and follows The University of Toledo Hazardous material and environmental management policy.

6. CLINICAL RESPONSIBILITIES

The UToledo [Standards of Ethical Conduct](#) provides overarching guidance on executing the topics discussed in this document. The accompanying [chart](#) will direct you to the specific resources listed.

Please note that a comprehensive Compliance Plan for Health Care Operations has been developed and is housed online on the “my-UT” portal. Selected topical areas from this plan are discussed on the next few pages. All University employees with responsibilities at The University of Toledo Medical Center and on the academic enterprise at the Health Science Campus should understand and agree to abide by all content contained in the Compliance Plan for Health Care Operations.

Health Information Portability and Accountability Act (HIPAA) Privacy

The Health Insurance Portability and Accountability Act of 1996 (HIPAA; Pub. L. 104–191, 110 Stat. 1936, enacted August 21, 1996) was enacted by the United States Congress and signed by President Bill Clinton in 1996. It has been known as the Kennedy–Kassebaum Act after two of its leading sponsors.¹ Title I of HIPAA protects health insurance coverage for workers and their families when they change or lose their jobs. Title II of HIPAA, known as the Administrative Simplification (AS) provisions, requires the establishment of national standards for electronic health care transactions and national identifiers for providers, health insurance plans, and employers. This act gives the right to privacy to individuals from age 12 through 18. The provider must have a signed disclosure from the affected before giving out any information on provided health care to anyone, including parents. The administrative simplification provisions also address the security and privacy of health data. The standards are meant to improve the efficiency and effectiveness of the nation's health care system by encouraging the widespread use of electronic data interchange in the U.S. health care system

In January 2013, HIPAA was updated via the Final Omnibus Rule. Included in changes were updates to the Security Rule and Breach Notification portions of the HITECH Act. The greatest changes relate to the expansion of requirements to include business associates, where only covered entities had originally been held to uphold these sections of the law.

The Final Rule on Security Standards was issued on February 20, 2003. It took effect on April 21, 2003 with a compliance date of April 21, 2005 for most covered entities and April 21, 2006 for "small plans". The Security Rule complements the Privacy Rule. While the Privacy Rule pertains to all Protected Health Information (PHI) including paper and electronic, the Security Rule deals specifically with Electronic Protected Health Information (EPHI).

The HITECH Act requires HIPAA covered entities to report data breaches affecting 500 or more individuals to HHS and the media, in addition to notifying the affected individuals. This subtitle extends the complete Privacy and Security Provisions of HIPAA to business associates of covered entities. This includes the extension of newly updated civil and criminal penalties to business associates. These changes are also required to be included in any business associate agreements with covered entities.

Relevant University policy in this area can be found at:

<http://www.utoledo.edu/policies/administration/compliance/pdfs/3364-15-01%20%20Confidential%20patient%20information%20under%20HIPAA.pdf>

Authenticating Health Care Records

All notes, orders, and observations entered into a health care record, including any interpretive reports of diagnostic tests or specific treatments, such as radiologic or electrocardiographic reports, operative reports, reports of pathologic examination of tissue, and similar reports, shall be authenticated by the individual who made or authorized the entry. An entry into a health care record may be authenticated by executing handwritten signatures or handwritten initials directly on the entry, or by an electronic signature if all the following apply:

- The UToledo Medical Center permits the use of electronic signatures on electronic records.
- The UToledo Medical Center’s electronic signature system utilizes a two-level access control mechanism that assigns a unique ID to each user or a biometric access control device.
- The UToledo Medical Center takes steps to safeguard against unauthorized access to the system and forgery of electronic signatures.
- A process to verify that the individual affixing the electronic signature has reviewed the contents of the entry and determined that the entry contains what that individual intended.
- The policy adopted by The UToledo Medical Center prescribes all the following:
 - ✓ A procedure by which each user of the system must certify in writing that the user will follow the confidentiality and security policies maintained by The University of Toledo Medical Center for the system;
 - ✓ Penalties for misusing the system;
 - ✓ Training for all users of the system that includes an explanation of the appropriate use of the system and the consequences for not complying with The University of Toledo Medical Center’s confidentiality and security policies.

“Electronic record” means a record communicated, received, or stored by electronic, magnetic, optical, or similar means for storage in an information system or transmission from one information system to another. Electronic records include those communicated, received, or stored by EDI, electronic mail, facsimile, telex, or similar methods of communication.

“Electronic signature” means the following authentication steps with an electronic record:

- A code consisting of a combination of letters, numbers, characters, or symbols that is adopted or executed by an individual as that individual’s electronic signature;
- A computer-generated signature code created for an individual;
- An electronic image of an individual’s handwritten signature from a pen computer.

“Health care record” means any document pertaining to a patient’s medical history, diagnosis, prognosis, or medical condition that is generated in the process of the patient’s treatment.

Other information pertaining to authenticating health care records can be found in section 3701.75 of The Ohio Revised Code.

7. COMPLIANCE RESPONSIBILITIES

The UToledo [Standards of Ethical Conduct](#) provides overarching guidance on executing the topics discussed in this document. The accompanying [chart](#) will direct you to the specific resources listed.

All University of Toledo (UT) managers are responsible for knowing and complying with the university's policies and procedures, including those highlighted in the [Standards of Ethical Conduct](#) and accompanying training session. Participation in Compliance Standards Training (at new hire orientation or upon request) and the Manager Control Self-Assessment Certification process is a requirement upon hire, and an annual attestation of the Institutional Compliance Plan by UToledo senior leaders is an annual requirement.

UToledo identifies certain university activities as high risk with respect to compliance. Managers are accountable for cooperating with the responsible parties for each high-risk area to ensure that the controls established to mitigate UToledo risks are followed. In addition, managers are responsible for participating in specialized training as required, to address risks specific to their area.

The prevention, detection and reporting of misconduct is the responsibility of all UToledo employees. Managers are expected to recognize risks and exposures in their area of responsibility and be aware of indications of fraud or other misconduct. Any concerns regarding compliance or alleged compliance violations should be addressed through typical managerial channels when appropriate. Reporting suspected non-compliance can be done in several ways:

- A letter stating an alleged impropriety can be mailed to the Institutional Compliance Office , 2801 W. Bancroft St., Toledo, OH. 43606, or the letter can be e-mailed to lynn.hutt@utoledo.edu
- The compliance department can be called directly regarding any questions or concerns. The department's number is (419) 383-6933

Other resources exist at the university, depending on the situation:

- Assistant Vice President for Diversity Investigations (419) 530-4053
- Internal Audit, (419) 530-8718
- Office of Inclusion, (419) 530-5538
- Human Resources, (419) 530-4747
- Safety and Health Office, 419-530-3600

An anonymous hotline is also available as a means of reporting misconduct in situations where a member of the university community fears reprisal, embarrassment, or for other reasons does not feel comfortable utilizing other reporting channels.

- Misconduct Reporting Hotline: (888) 416-1308

Persons, who in good faith, report or participate in a misconduct investigation at UToledo shall not be subject to retaliation or the threat of retaliation. Any act of retaliation constitutes reportable misconduct and is subject to appropriate disciplinary action, which may include termination of employment.

Remember: Managers may be asked to participate in Quality Assurance Reviews and are responsible for completing the Manager Control Self-Assessment Certification, which requires managers to attest to following the policies and procedures outlined in this handbook.

- For more information visit:
<http://www.utoledo.edu/offices/compliance/index.html>

8. EXTERNALLY FUNDED GRANTS AND CONTRACTS ADMINISTRATIVE RESPONSIBILITIES

The UToledo [Standards of Ethical Conduct](#) provides overarching guidance on executing the topics discussed in this document. The accompanying [chart](#) will direct you to the specific resources listed.

Proposal Review and Approval Process

Externally funded grants and contracts raise compliance and business issues that require special handling and approvals. Principal Investigators (PI) are responsible for following university policies and procedures that apply to proposal and award management.

PIs seeking privately funded grants (i.e. corporate or foundation support) must work with Development to obtain initial clearance before solicitation of a private funding source begins. ORSP coordinates the proposal review and approval process for all grant proposals, regardless of the funding source. ORSP conducts an initial review to identify any possible financial risks to the university and to ensure that proposals comply with applicable laws and university policies and procedures. After this initial review process, externally funded grant and contract proposals require, at minimum, formal approval from:

- *The appropriate Dean or VP and*
- *The Provost or his/her authorized designees (including the VP for Advancement specifically for all grants and contracts submitted through Advancement) as indicated through a delegation memo.*

ORSP coordinates the process of obtaining these approvals. In the case of privately sponsored grant agreements, Development will ensure that any additional approval requirements are met.

Awards Acceptance and Set-up

Upon receipt of a grant or contract award, ORSP or Development will notify the PI and relevant offices, and coordinate the award review, negotiation, acceptance, contract execution and setup process.

ORSP is responsible for coordinating the award review, negotiation, acceptance, contract execution, and, award setup process. Development handles award negotiations and acceptance for privately sponsored grant agreements, which includes submitting grant agreements for review by General Counsel as required by university policy; negotiating changes with the sponsor, as needed, in consultation with the PI; and obtaining signature of an authorized organizational representative.

PIs who receive award notifications and/or checks are responsible for bringing them to Development or ORSP, depending upon where the proposal originated.

Financial Management of Grant Awards

All external grants are jointly managed by ORSP, Grants Accounting, and the PI. Development participates with PIs, ORSP, and Grants Accounting to manage all privately funded grants. The PI or grant administrator is responsible for reviewing the monthly financial activity reports to monitor the financial status of the grant and should reconcile expenses on a monthly basis to determine if spending of grant funds is appropriate, occurring at the correct pace, and necessary cost reallocations are done on a timely basis.

Award modifications (including budget revisions, no-cost extensions, and changes in work scope), foreign travel, and purchases greater than \$2,500 must be approved by ORSP. In instances where the sponsor provides funding on a reimbursement basis, the VP of Finance or his/her designee, in consultation with the Provost or his/her designee will determine a limit on University of Toledo funds that will be advanced to the project prior to reimbursement. The Grants Accounting Department is responsible for invoicing and for accounts receivable management, including the deposit of all cash receipts.

Stewardship of Grant Funds

PIs and grants administrators have the responsibility to protect The University of Toledo's interests, assets and resources. As part of the proposal review and approval process, the PI is required to complete and sign a certification page that includes a conflict of interest certification. PIs with funded projects must complete a new Individual Conflict of Interest Form annually for the duration of the sponsored project and as new potential or actual conflicts of interest develop. Grants administrators should review the Conflict of Interest in Externally Sponsored Projects policy for more information on compliance with university procedures and government regulations on conflict of interest.

Grant funds may only be used for grant-related expenses. Grant funded electronics, such as cell phones and computers, should be used to support the project, and personal use should be limited. Travel costs should be consistent with the amounts and descriptions in the budget narrative.

Cost transfers may be used, in a timely manner, to correct accounting errors, but funds may not be transferred across grants for convenience. If third party cost sharing is being provided, the PI or grants administrator should work with Grants Accounting and the third party to track and document cost sharing of grant funds. If institutional cost sharing is being provided, it should be used at a rate and in a manner consistent with the award budget.

Hiring and Supervision of Grants Staff

Staffing for funded projects should be consistent with the award budget. Personnel actions and redistributions must be approved by ORSP. University policies regarding job descriptions, hiring procedures, time reporting, student employee work hour requirements, performance appraisals, and leaves of absence are applicable to grant funded personnel. Additionally, if the grant funding is from a federal source, the PI and other grant staff must complete accurate time and effort reports on a timely basis.

Procurement of Goods and Services

University policy regarding procurement card use, purchase requisitions, and contract requirements and procedures apply to all grant funded purchases of goods or services. The PI or grant administrator should use University of Toledo preferred vendors whenever possible to reduce costs. The use of consultants should be consistent with the award budget and the PI or grant administrator should monitor the delivery of contract deliverables and address any issues in a timely fashion.

Reporting

PIs and grant administrators should be aware of the reporting requirements associated with their grant awards. Although Grants Accounting is responsible for the preparation and release of all financial status reports, the PI is responsible for the preparation of all programmatic/technical reports and submission of these reports to ORSP. ORSP coordinates with the PI and Grants Accounting to ensure the submission of financial and programmatic/technical reports is occurring according to the funder guidelines. The PI is also responsible for meeting deadlines for any additional deliverables beyond the usual financial and technical reports.

Grant Closeout

ORSP, Grants Accounting, and the PI share responsibility for the closeout of grant and contract accounts.

The PI is responsible for:

- accurately tracking and projecting spending to avoid over or under spending the account
- initiating the termination of recurring charges to the project
- initiating final cost transfers for expenses incorrectly charged to the grant account
- preparing final technical/programmatic reports required by the funder
- requesting final invoices from providers of goods and services to the grant project
- notifying grant funded staff of their termination date

ORSP is responsible for:

- notifying the PI of an approaching closeout
- instructing the PI regarding closeout procedures
- initiating personnel changes as needed

The Grants Accounting Department is responsible for:

- preparation and confirmation of final financial reports with the PI, as needed
- inactivation of grant and contract accounts
- coordination of retention of all award documents and records for the time period required by University of Toledo policy and by funder requirements

Remember: If a no-cost extension is available and necessary, the PI must request the extension at least 60 days before the end date of the grant award.

Training

ORSP, Development, and Grants Accounting are responsible for providing training in grants administration to PIs and others in the university community. At a minimum, PIs are required to attend annual business manager training provided by the Internal Audit and Compliance Department.

- For additional information on the grants process, visit the Office of Research and Sponsored Programs web site at: <http://www.utoledo.edu/research/index.html>
- To review the Conflict of Interest in Externally Sponsored Programs policy, go to: http://www.utoledo.edu/policies/academic/research/pdfs/3364_70_01.pdf

Control Self-Assessment Checklist
(Required to be acknowledged and signed by all University of Toledo employees upon hire)

The UToledo [Standards of Ethical Conduct](#) provides overarching guidance on executing the topics discussed in this document. The accompanying [chart](#) will direct you to the specific resources listed.

Financial Responsibilities

1. Two sets of eyes reviewed each transaction.
2. Monthly reviews of financial reports were conducted, and department reconciliation and oversight requirements were met.
3. Budgetary and administrative tasks were appropriately segregated between different staff members.
4. The cash receipts journal was checked against Banner reports.
5. Petty cash was eliminated or a need for it was determined.
6. The department did not make any gifts or donations on behalf of The University of Toledo (UT).
7. University funds were not used to purchase gifts for employees. Authorization from Accounts Payable was obtained prior to purchasing cash equivalents for distribution as gifts or tokens of appreciation to department employees.
8. Gifts were not solicited from outside parties.
9. Approval was obtained from the Office of Institutional Advancement prior to planning, publicly announcing or conducting any fundraising events.
10. A P-Card or the employee reimbursement form was used for all local travel, entertainment or other reimbursable items, and included original receipts and a description of the expense.
11. A P-Card or the travel expense form was used for all out-of-town travel, entertainment or other reimbursable items, and included original receipts and a description of the expense.
12. Contract negotiation and execution procedures were met, and contracts were reviewed by the appropriate authorities.
13. The initial clearance process was followed prior to submitting a proposal for external funding. Development was contacted prior to submitting or contacting a private funder. ORSP was contacted for all other proposals.
14. The Fly America Act guidelines were followed when federal grant money was used to fly internationally.

15. Grant funds were not used for charitable contributions.
16. Purchase requisitions were entered to initiate purchases of more than \$5,000 from outside sources for goods and services prior to the order being placed or work conducted. (Exceptions were first cleared with the director of Purchasing Services.)
17. Bids and written justification were received for Requests for Proposals (RFPs) or purchases totaling more than \$25,000 and documentation of the bid is on file and available for review with the department.
18. This department utilized a Procurement Card (P-Card) for purchases less than \$5,000 (or the pre-determined threshold for a few exceptions). These purchases were used only for UToledo business. P-Card transactions were also reconciled monthly with P-Card statements, and receipts are available in the department for review. The department's P-Card reports were submitted for approval within two weeks of the P-Card statement closing date.
19. Purchasing Services was contacted before discarding any university assets, such as equipment or furniture.

Human Resource (HR) Responsibilities

1. Job descriptions were maintained for all departmental positions.
2. HR recruitment procedures and reference checks were completed for all potential new employees.
3. No preferential consideration was given to relatives of employees, and no employees worked in a supervisory capacity with a relative as a direct report.
4. All new employees filled out a Form I-9 prior to or on their first day of employment at UT.
5. During a staff member's first six months, he or she received training and evaluation.
6. Time reporting reports were reviewed and approved for all non-exempt employees, and no compensatory time was added as a "reward", and all time worked was recorded.
7. Employees were directed to follow the procedures on HRTD's Web site for time off for Family Medical Leave (FMLA).
8. HR was notified when any leaves of absence were requested, and a Leave of Absence form was filled out.
9. All employees' floating holidays were recorded by both exempt and non-exempt employees.
10. Student employee hours did not exceed the maximum number of hours the student employee was eligible to work based on their academic and citizenship status.
11. The department maintained a drug-free workplace. The consumption of alcohol on UT Toledo property was restricted to persons 21 years of age or older.
12. Performance reviews for all employees were completed by May 15.
13. Progressive discipline procedures were followed when an employee's performance was unsatisfactory.
14. In accordance with the Americans with Disabilities Act, job descriptions were regularly reviewed to ensure that all physical or mental job requirements are job-related, consistent with business necessity and necessary for safe job performance.
15. Prior to hiring a new consultant or independent contractor, the Accounts Payable Department or University Finance Department helped determine the proper employment classification.
16. Proper procedures were followed when any foreign nationals sought temporary employment visas or applications for permanent residency.

Information Responsibilities

1. Information security breaches, data losses and abuses were properly reported.
2. Contract requirement and review procedures were followed prior to sharing any confidential UToledo data with an outside service provider.
3. Passwords and other sensitive electronic information were not disclosed, and information resources were used for educational and business purposes only.
4. This department made sure that its information resources were used for educational and business purposes only.
5. Sensitive electronic materials, such as student academic records, were closely guarded in accordance with the Family Education Rights and Privacy Act (FERPA).
6. This department ensured that mission critical information was properly and regularly backed up and had recovery processes in place.
7. Local, state and federal records retention laws as well as UToledo Records Management Policy were followed. A Disposal Certificate was filled out when records were disposed of or destroyed.
8. No documents, records or information that fell within the scope of a legal hold were disposed of, transferred or destroyed.
9. The department referred all media inquiries regarding UToledo students, administration or operations to the Office of Communications.
10. The university's policies governing copyright and intellectual property rights were followed.
11. The university's name and logos received approval for use and were used appropriately.

Community Responsibilities

1. UToledo mission was adhered to – business was conducted in an ethical and professional manner, the university’s resources were safeguarded, and others were treated with dignity and respect.
2. UToledo EEO policy was followed in recruitment and selection of new employees, promotions, transfers, compensation, training, benefits, terminations and other terms and conditions of employment.
3. All complaints of discriminatory harassment were appropriately reported.
4. All complaints of sexual or gender harassment were appropriately reported.
5. Conflicts of interest were avoided or disclosed and evaluated.
6. No political candidates were endorsed or opposed using UToledo as a forum to do so. The appropriate avenue for contacting political officials was used.
7. As a manager, I ensured department staff complied with NCAA and Mid-American Conference rules regarding treatment of student-athletes and contact with prospective student-athletes.

Workplace Safety Responsibilities

1. Emergency and evacuation procedures were followed.
2. The Chemical Hygiene and Hazards Communication policies were followed.

Compliance Responsibilities

1. Compliance Standards Training was completed (at new hire orientation or upon request), and the policies and procedures outlined in the [Standards for Ethical Conduct](#) were followed.
2. The department worked with managers of high-risk areas (e.g. FERPA, Safety, etc.) to take appropriate steps in mitigating any specific risks to the department.
3. All direct reports completed General Compliance Training.

Grants Manager Control Self-Assessment Checklist
(Required to be acknowledged and signed by all University of Toledo employees upon hire or upon assuming grant management responsibilities for the first time – principal investigator or co-principal investigator)

The UToledo [Standards of Ethical Conduct](#) provides overarching guidance on executing the topics discussed in this document. The accompanying [chart](#) will direct you to the specific resources listed.

Financial Responsibilities

1. Two sets of eyes reviewed each transaction, so that no one person initiated and approved any one transaction.
2. Monthly reviews of financial reports for grant awards were conducted to monitor expenses, ensure appropriate spending pace, and make necessary cost transfers.
3. Either a P-Card or the employee reimbursement form was used for all grant related travel and proper procedures, such as submission of original receipts, and detailing the business purpose and other information as required, were followed. Travel was consistent with the award amount and the travel plan described in the budget narrative.
4. Contract review procedures, including financial thresholds, negotiation authority, execution authority, legal review and filing requirements as determined by the Contract Requirements and Procedures policy, were followed.
5. All proposals to private funders were first submitted to the Office of Development, and all other proposals to the Office of Research and Sponsored Programs (ORSP) before submitting them or contacting a prospective external funder.
6. Fly America Act guidelines were followed when federal grant money was used to fly internationally.
7. Grant funds were not used for charitable contributions.
8. Purchase requisitions were used to initiate purchases of more than \$5,000 from outside sources for goods and services prior to the order being placed or work conducted. (Exceptions were first cleared with the director of Purchasing Services.)
9. When a P-Card was used for grant purchases of \$2,500 or less, including travel, receipts were maintained and the monthly cardholder statement with notes detailing the business purpose and other information as required was submitted within two weeks of the P-Card closing date.
10. Bids and written justification were received and are on file for all requests for proposals (RFPs) *or* purchases totaling more than \$25,000 or an approved exception from either Purchasing Services or an executive officer was obtained.

Human Resource (HR) Responsibilities

1. Job descriptions were maintained for all grant funded positions.
2. HR recruitment procedures were followed, and reference checks completed for all potential new employees.
3. No preferential consideration was given to relatives of employees, and no employees worked in a supervisory capacity with a relative as a direct report.
4. Staffing was consistent with award budgets *or* approval from ORSP was received where it was not.
5. Time and effort reporting required for federal grant funding was completed accurately and promptly by grants staff.
6. Time reporting reports were reviewed and approved for all non-exempt employees. No compensatory time was added as a “reward”, and all time worked was recorded.
7. HR was notified of any leave of absence requests, including time off for Family Medical Leave (FMLA), and Leave of Absence form was filled out.
8. Student employee hours did not exceed the maximum number of hours allowable based on their academic and citizenship status.
9. Performance reviews for all grants staff were completed by May 15.
10. Progressive discipline procedures were followed when an employee’s performance was unsatisfactory.
11. All Americans with Disabilities Act (ADA) requirements were met.
12. Prior to hiring a consultant or independent contractor, the Accounts Payable Department or University Finance Department helped determine the proper employment classification.

Information Responsibilities

1. Information security breaches, data losses and abuses were properly reported.
2. Contract requirement and review procedures were followed prior to sharing any confidential UToledo data with an outside service provider.
3. Computer passwords and other sensitive electronic information were not disclosed.
4. Information resources were used for educational and business purposes only.
5. Sensitive electronic materials, such as student academic records, were closely guarded in accordance with the Family Education Rights and Privacy Act (FERPA) and HIPAA Privacy requirements were effectively communicated to grants staff with access to sensitive student data and/or medical records.
6. Critical information relating to sponsored programs was properly and regularly backed up, and the department had recovery processes in place.
7. Local, state and federal records retention laws as well as the UToledo Records Management Policy were followed and sponsor requirements were met in maintaining key information after grants ended. A Disposal Certificate was filled out when records were disposed of or destroyed.
8. No documents, records or information that fell within the scope of a legal hold were disposed of, transferred or destroyed.
9. All media inquiries pertaining to sponsored programs were cleared through the Office of Communications.

Community Responsibilities

1. UToledo mission was adhered to – business was conducted in an ethical and professional manner, the university’s resources were safeguarded, and others were treated with dignity and respect.
2. All complaints of discriminatory harassment were appropriately reported.
3. All complaints of sexual or gender harassment were appropriately reported.
4. Conflicts of interest were avoided or disclosed and evaluated.

Workplace Safety Responsibilities

1. The Chemical Hygiene Plan and Hazards Communication policies were followed.

Compliance Responsibilities

1. The QAR Process training was completed, and the policies and procedures outlined in the [Standards for Ethical Conduct](#) were followed.

Externally Funded Grants and Contracts Administrative Responsibilities

1. All deliverables were received on schedule.
2. Any modifications to the award agreement were coordinated through ORSP.
3. Any no-cost extensions were requested at least 60 days before the end of the grant award.
4. All activities (i.e. ending recurring expenses, terminating or transferring staff, cost transfers, submission of invoices) necessary to close out the grant project were completed.
5. All technical and financial reporting deadlines were met.