What is expected of you?

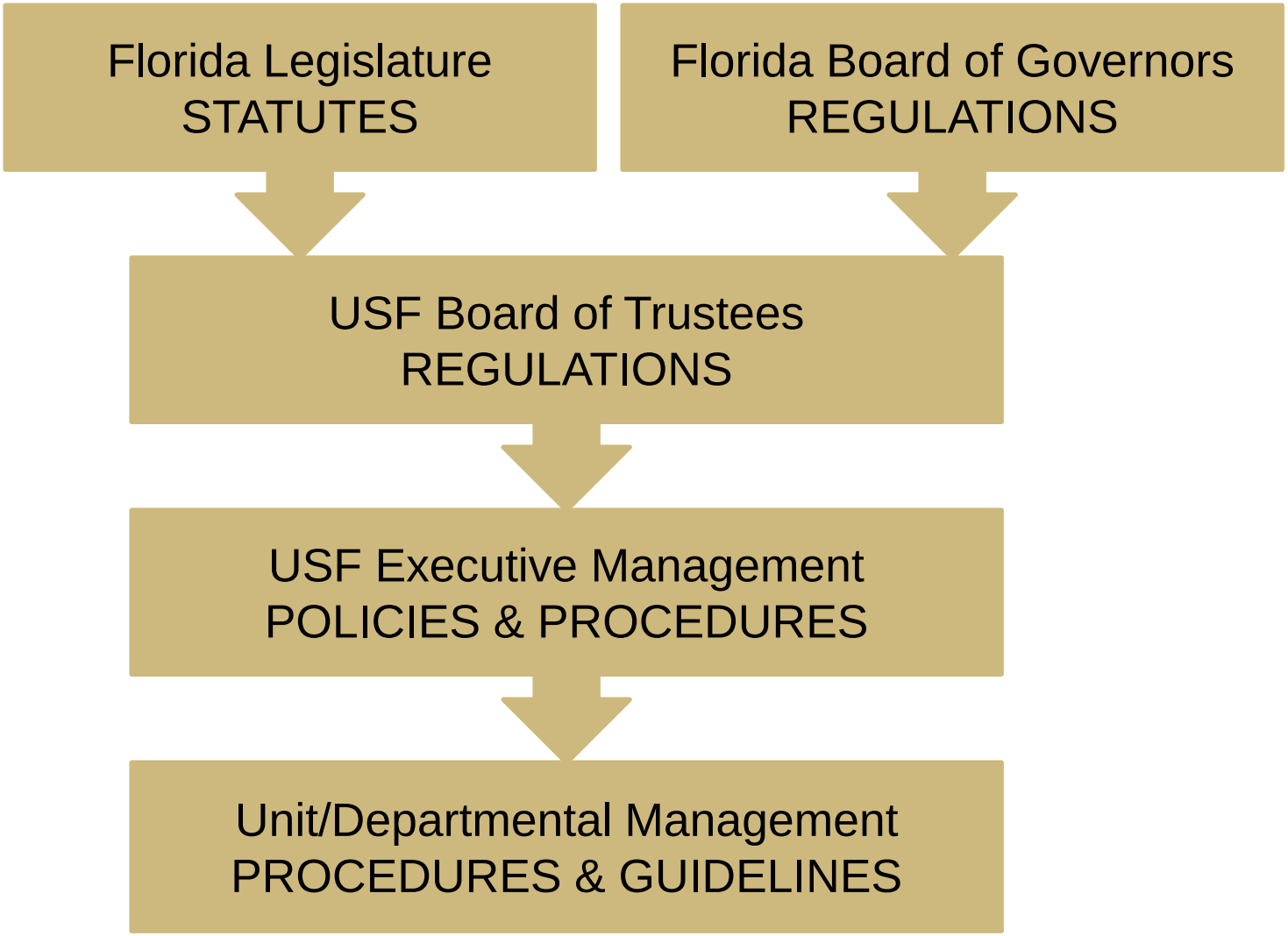
Be a role model

Stay informed

Raise questions

Report concerns

Compliance Framework



USF Polices & Regulations

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What is Ethics?

- Honesty

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

Prohibits or restricts us from private gain

Sets standards of conduct for all employees

Conflicts of Interest:

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

Why adhere to the FCOE?

Penalties can include:

No Quid Pro Quo Gifts

Do not solicit or accept

No Solicited Gifts

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

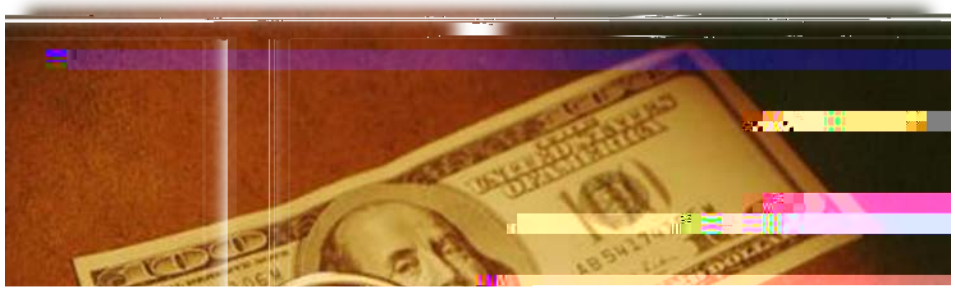
No Gifts to Influence

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

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

No Gifts > $100

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



And a Procurement Employee is?

Decision, Approval, Disapproval, or

But there’s more…

Organizational units and departments may have more restrictive gift guidelines.

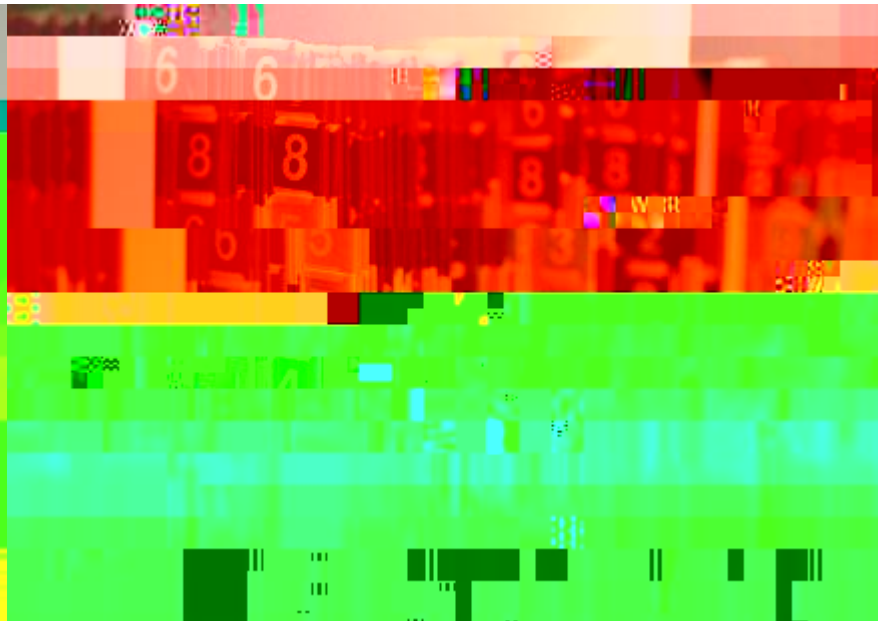
e.g. USF Health, Purchasing

Misuse of Non-Public Information

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

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

This applies to current & former employees.

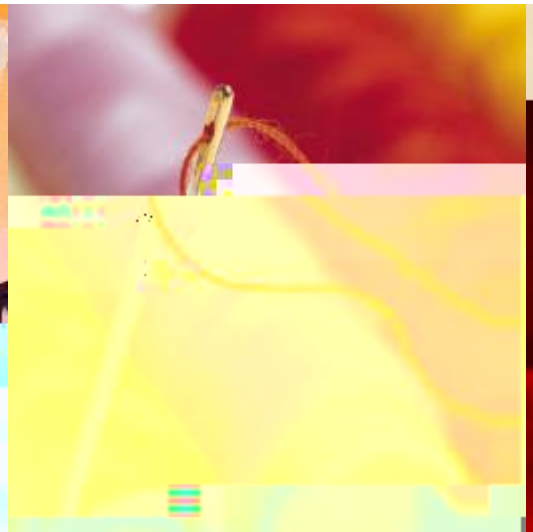


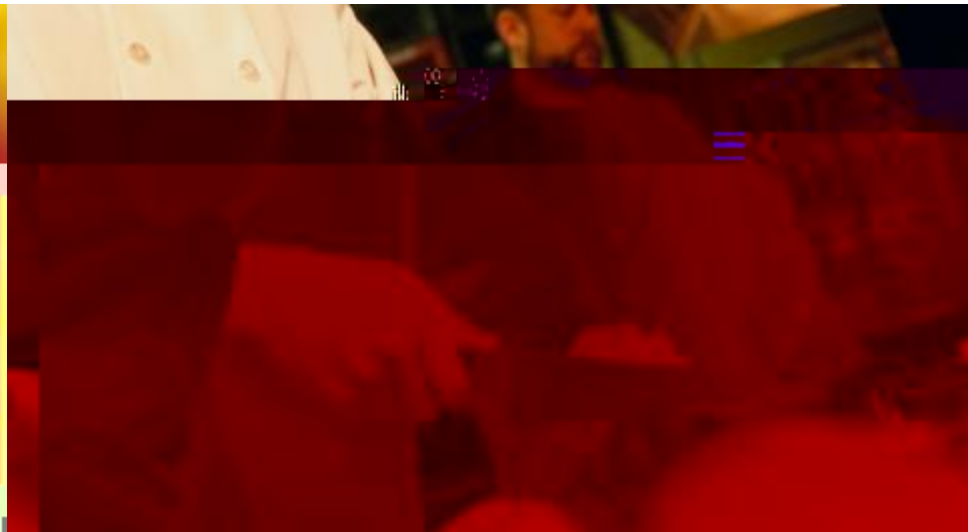
Conflicting Business, Employment, or Contractual Relationships

No Selling to the USF

Unless a statutory exemption applies...

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

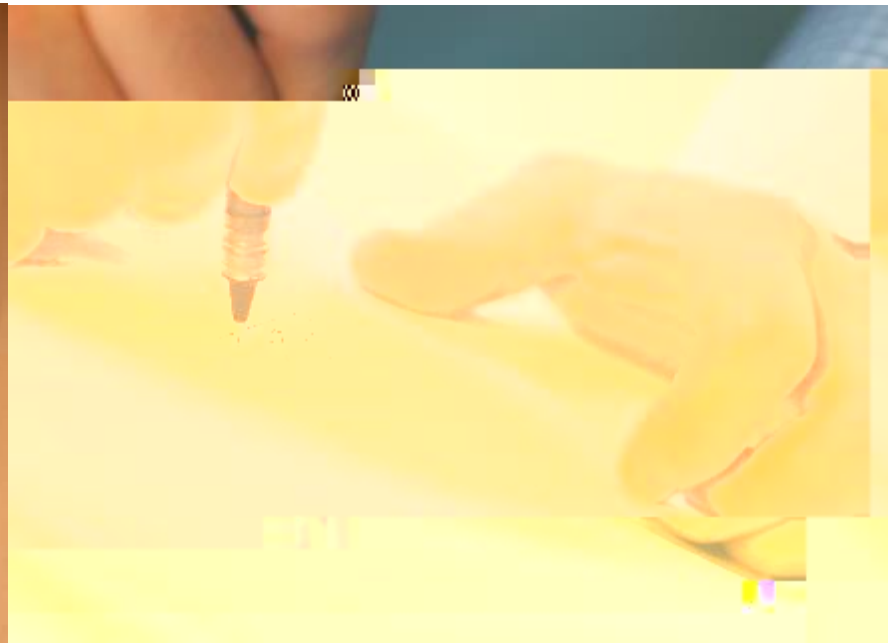




No Vendor Employment/Contracts

Unless a statutory exemption applies...

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



Buying for USF

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

Ownership of > 5% of the

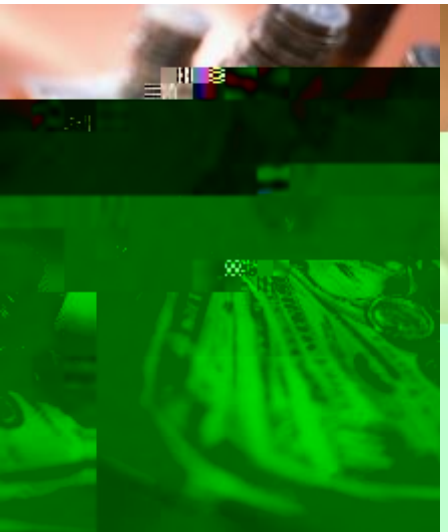
Statutory Exemptions

Some examples…

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

Contractual Services

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



Look & Sound Familiar?

Decision, Approval, Disapproval, or Recommendation
Preparing Purchase Requests
Influencing Specifications or

Nepotism

Nepotism

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

Related Persons

Husband or wife

Parent or child

Brother or sister

Grandparent

Grandchild

Aunt or uncle

First cousin, niece, or nephew

Spouse of a child, brother, sister, or parent

Parent, child, brother or sister of spouse

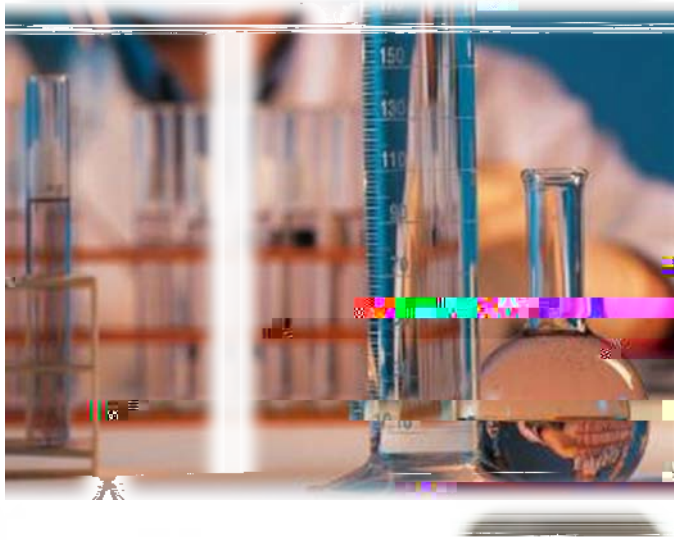
Fiancé or Fiancée

Persons intending to marry or form a household

Same legal residence

Outside Activity

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



Types of Outside Activities Requiring Disclosure and Prior Approval in eDisclose

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

For faculty, this is limited to professional, compensated activity

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

Annual FCOE Disclosure

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

Outside Activity Disclosure

Outside

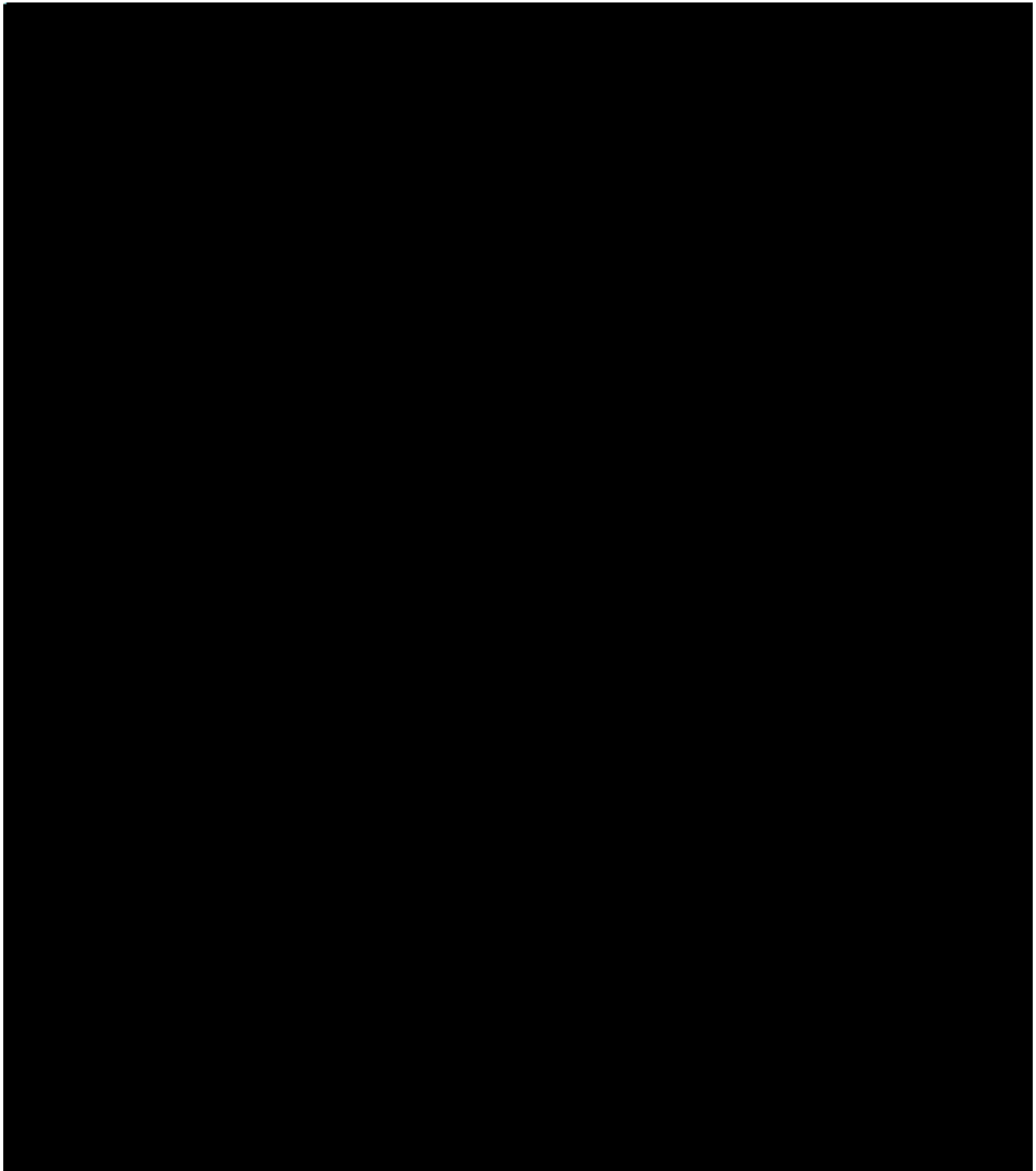
All employees must disclose and receive prior approval before engaging in any of the 6 types of outside activity outlined in policy.

Submit when…

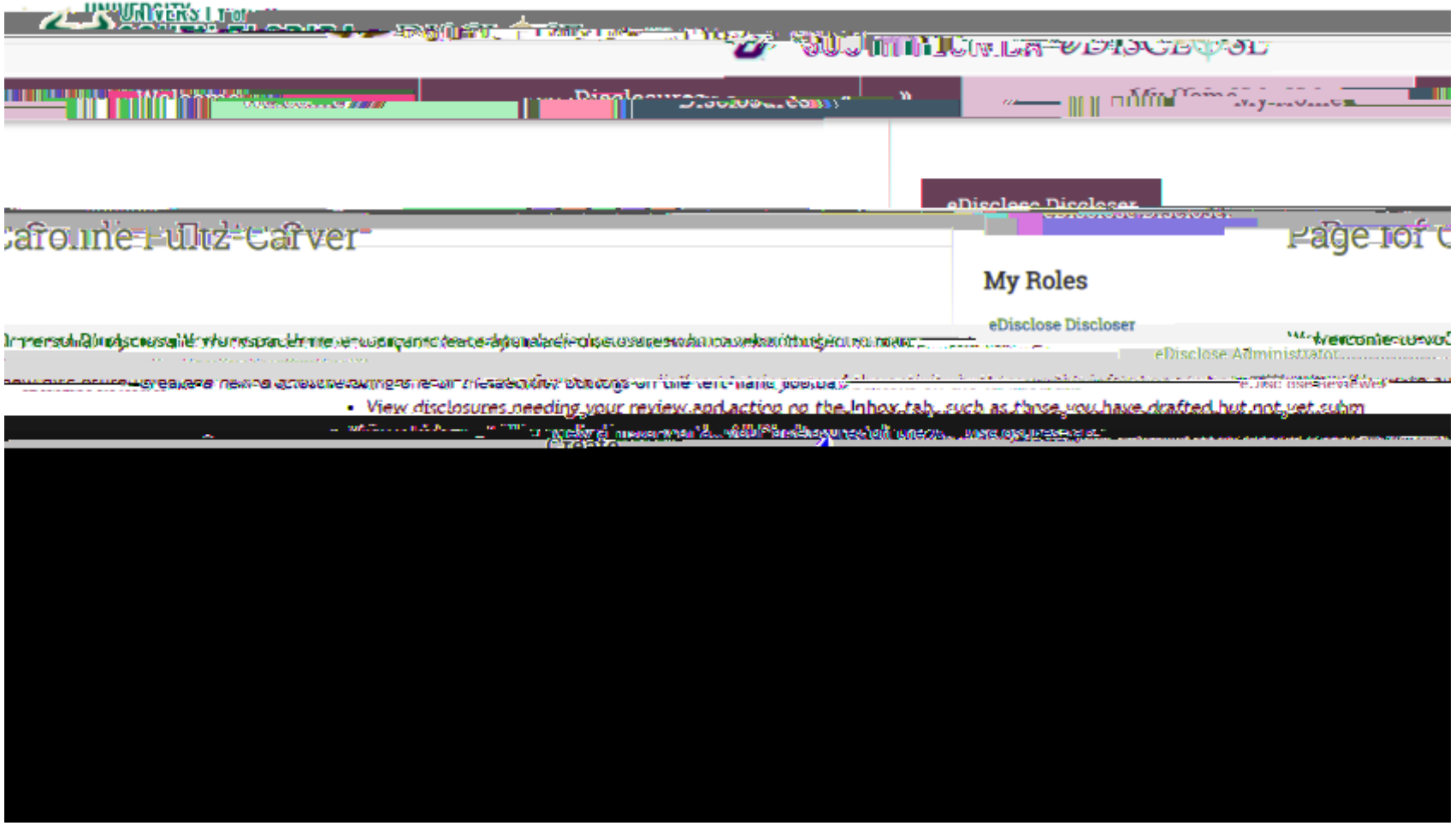
1) Your approval expires and the activity is ongoing
(approval cannot exceed 12 months)

OR

2) There are material changes to a previous OA disclosure



Your eDisclose Home Page

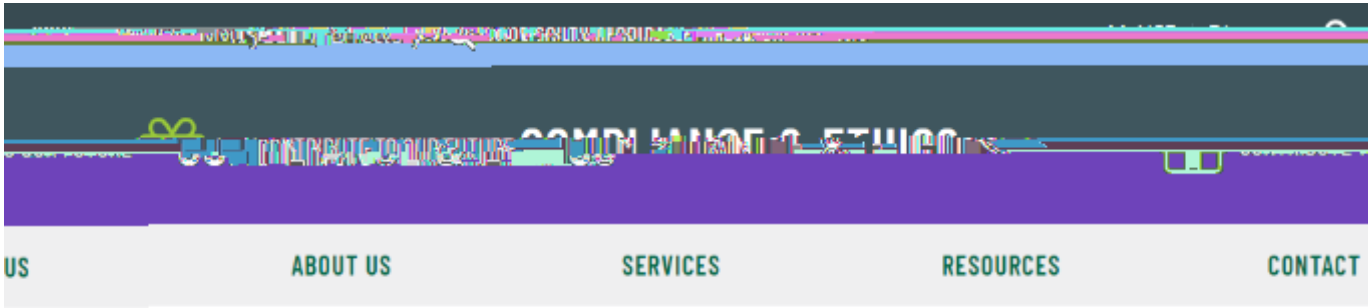


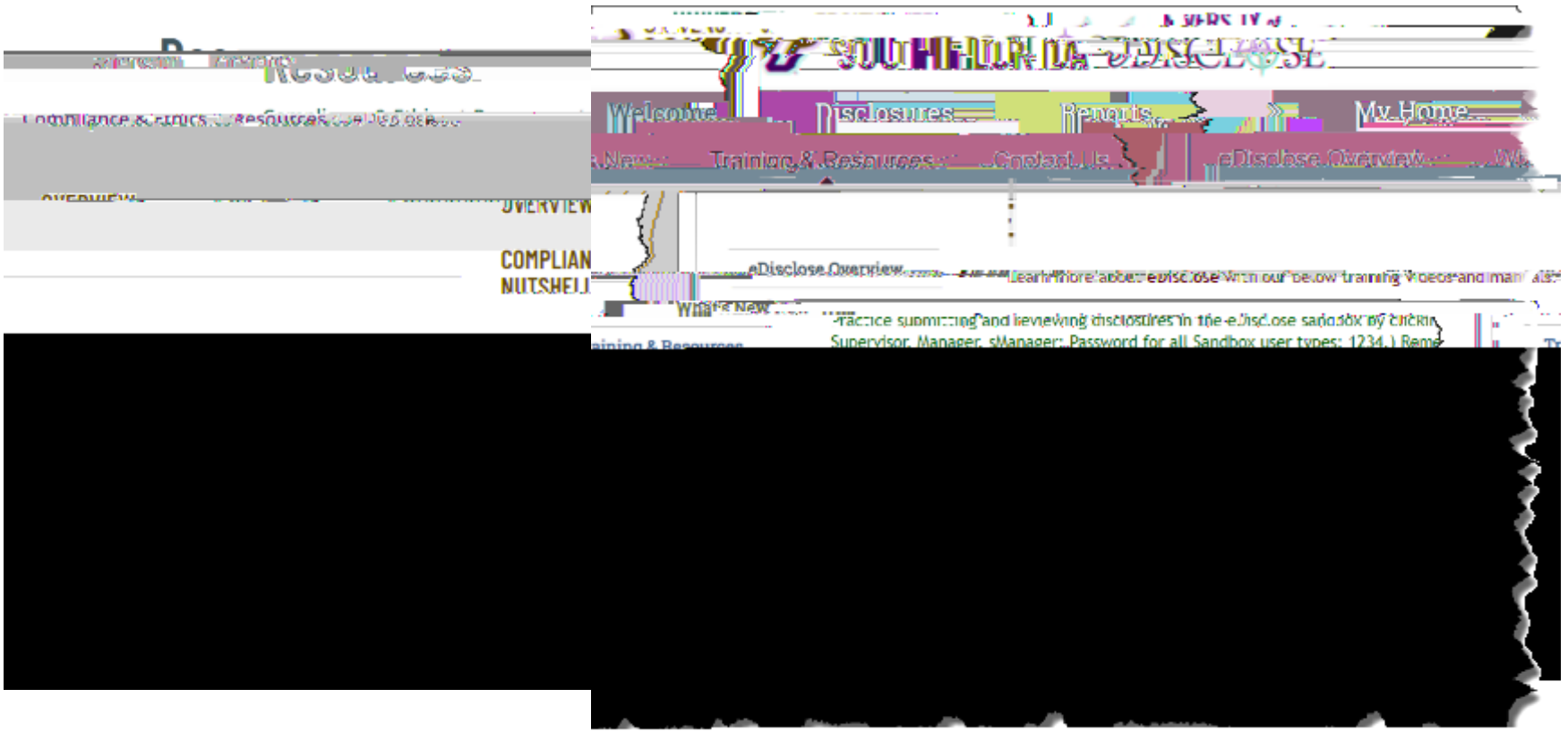
FCOE Review Process

Step 4

Senior Manager

eDisclose Training & Resources





Fraud: Prevention & Detection

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

Examples of Fraud:

Forging or altering documents

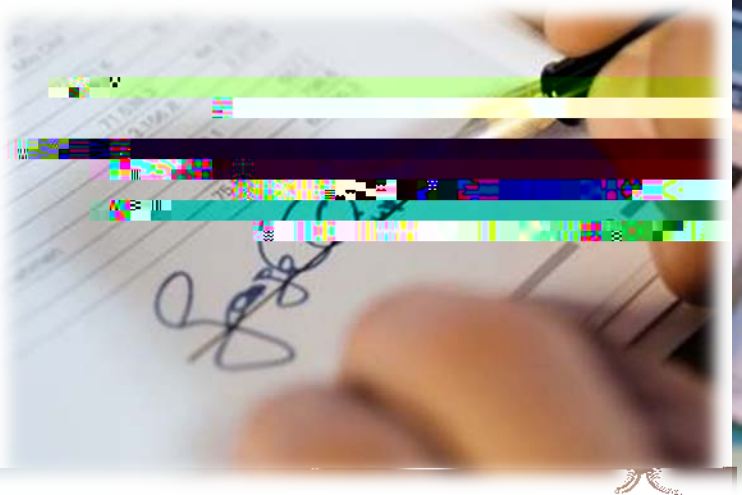
Misrepresenting information

Misappropriating funds, supplies, or other assets

Theft, disappearance, or unauthorized destruction

Improprieties in handling/reporting of money transactions

Authorizing/receiving payment for goods not received or services not performed

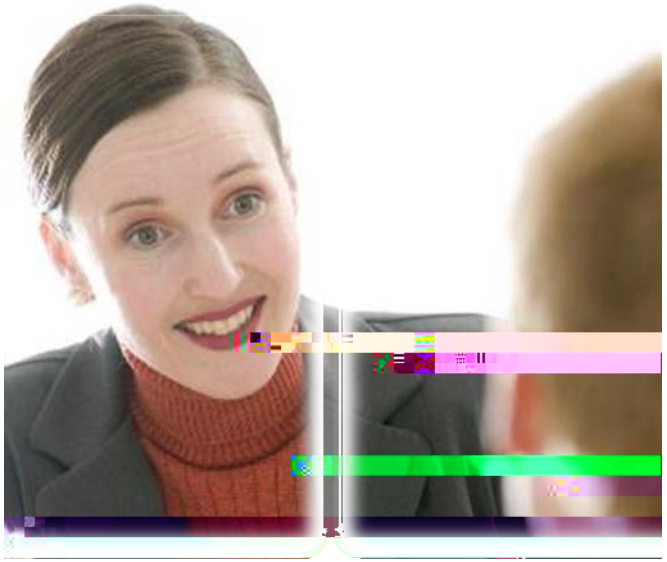


Your Responsibilities

Systems established by University Leadership

Fraud Reporting

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



What if the employee believes their Supervisor is involved?

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

Other reporting options? What if you just have question?

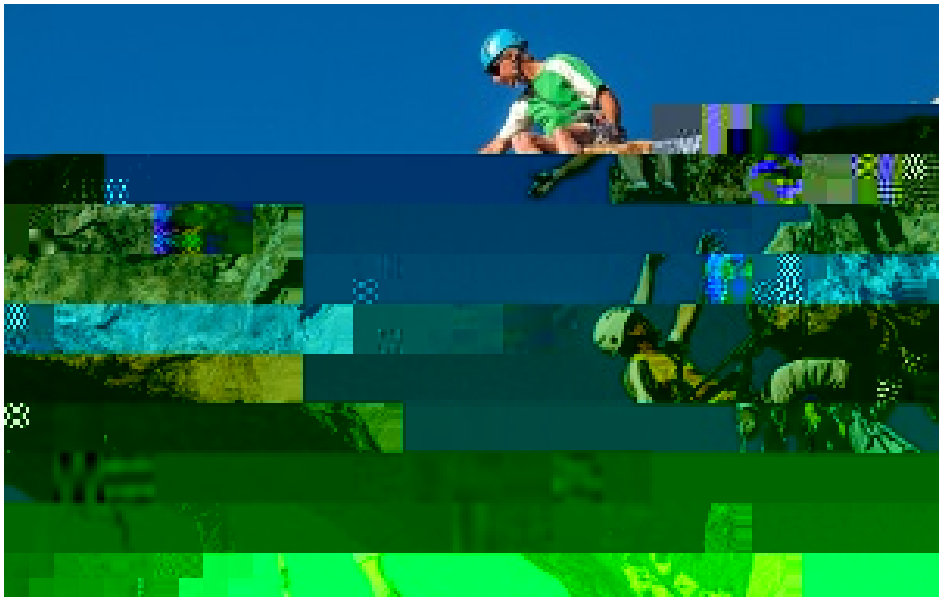
Use EthicsPoint hotline.

EthicsPoint Hotline

USF EMPLOYEE OMBUDS

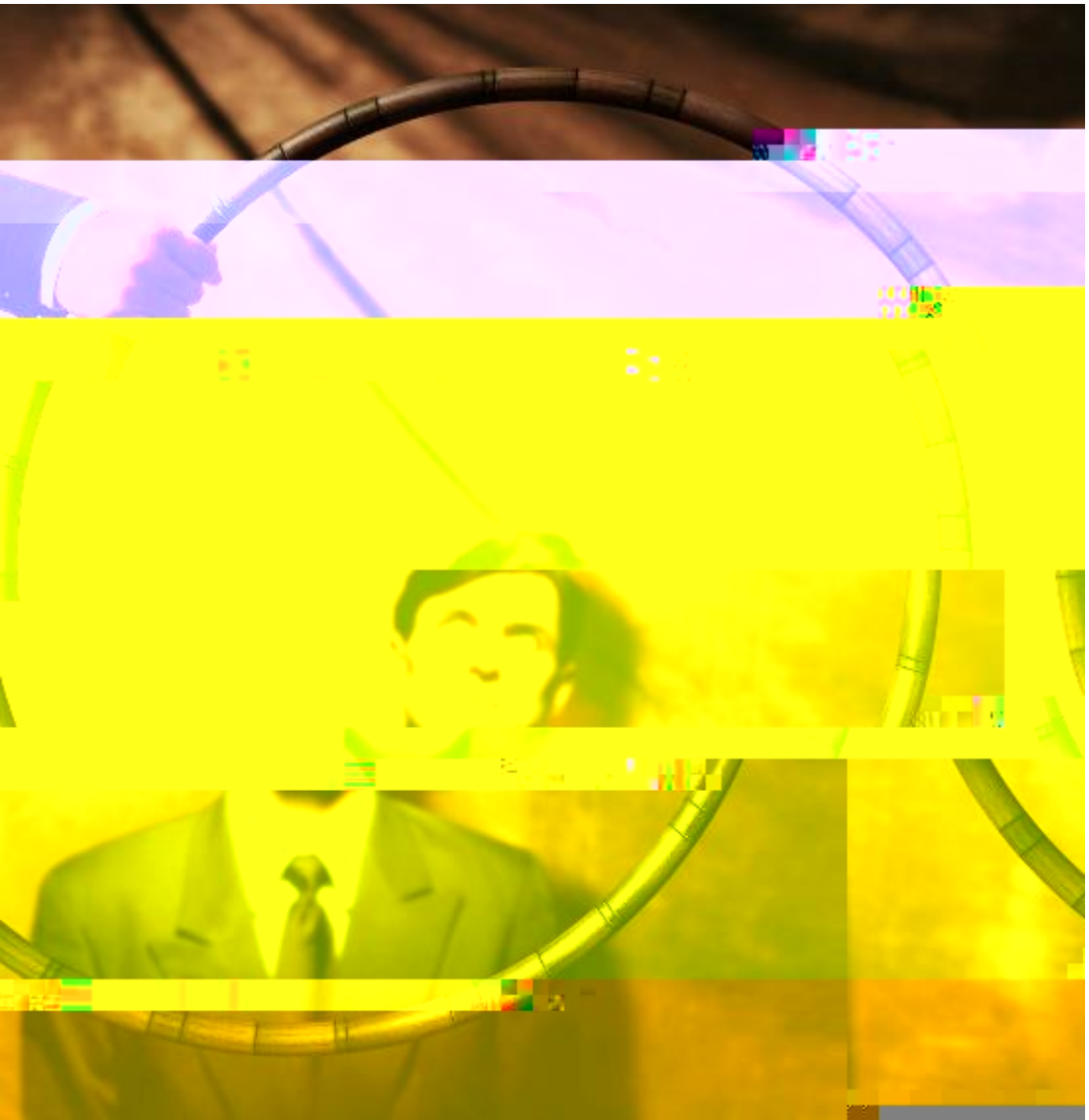
(serving all faculty, administration, & staff)

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



Email: omb@usf.edu
Phone: 813-974-7777
Office: CGS 303 (Patel Building)
Website: http://www.usf.edu/ombuds/

Retaliation, Retribution, Reprisals



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

Some Examples…

Discharge, suspension, transfer, demotion

Withholding bonuses

Reduction in salary or benefits

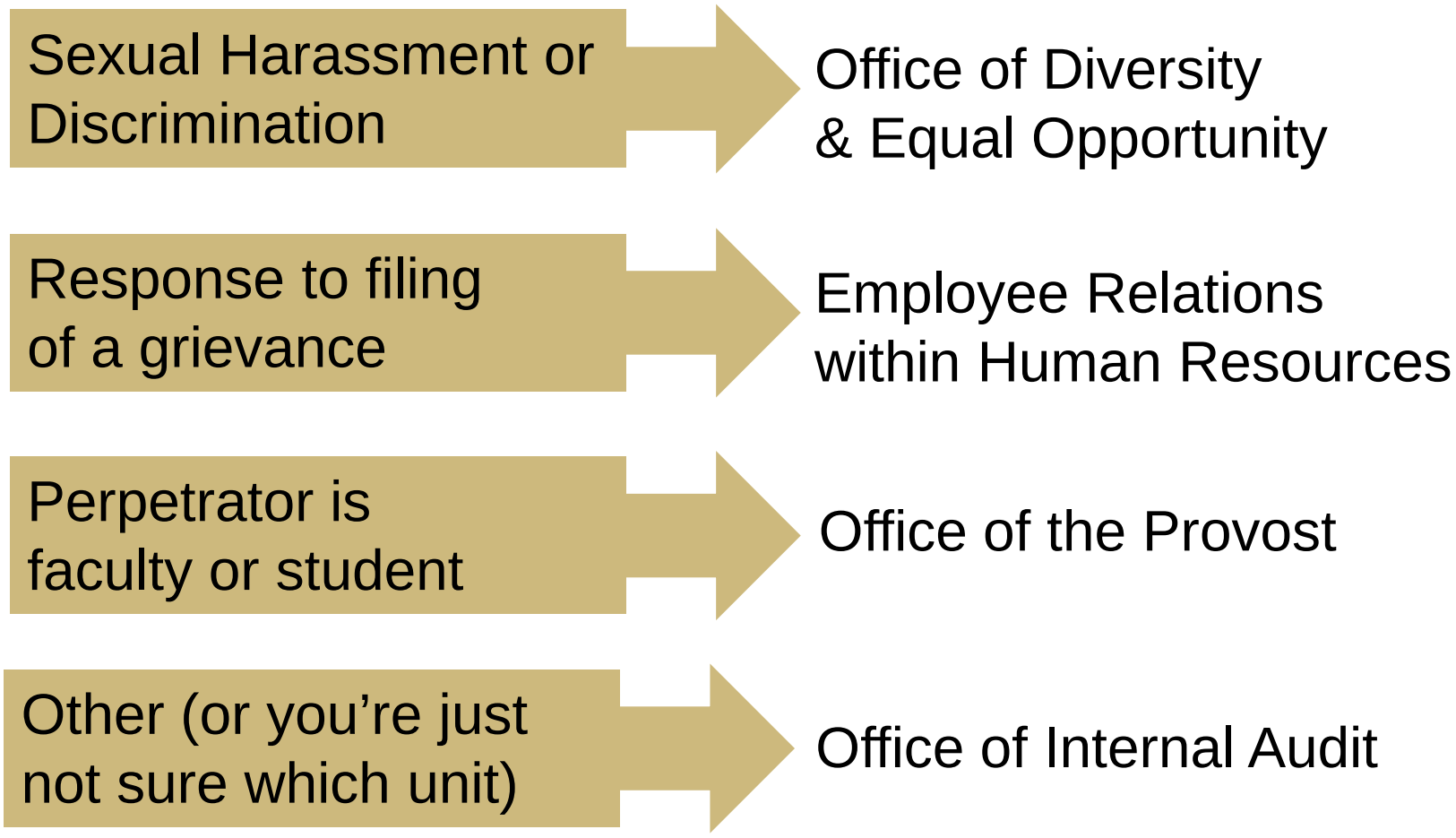
Deflated performance evaluations

Inappropriate assignment of low grades

Consequences…

Disciplinary Action
(up to dismissal)

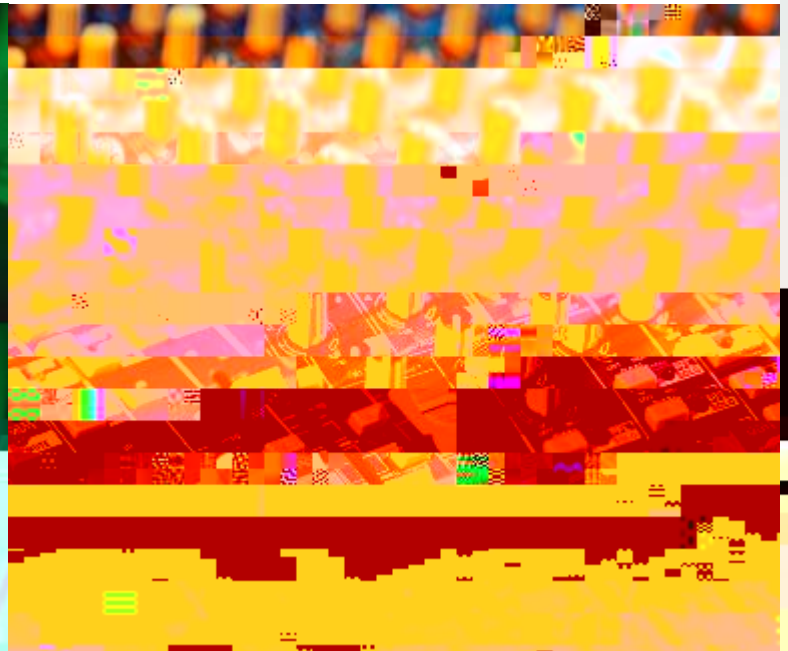
Reporting Retaliation



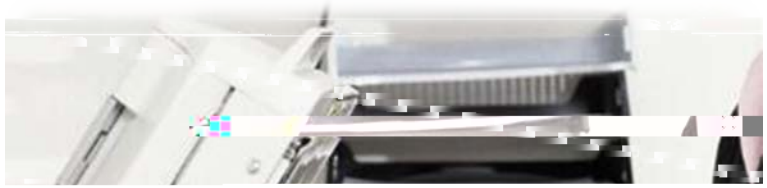
USF Records

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

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



Responding to Records Requests



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

External Contacts

What if the media contacts you?

University Communications & Marketing
USF Policy 0-207

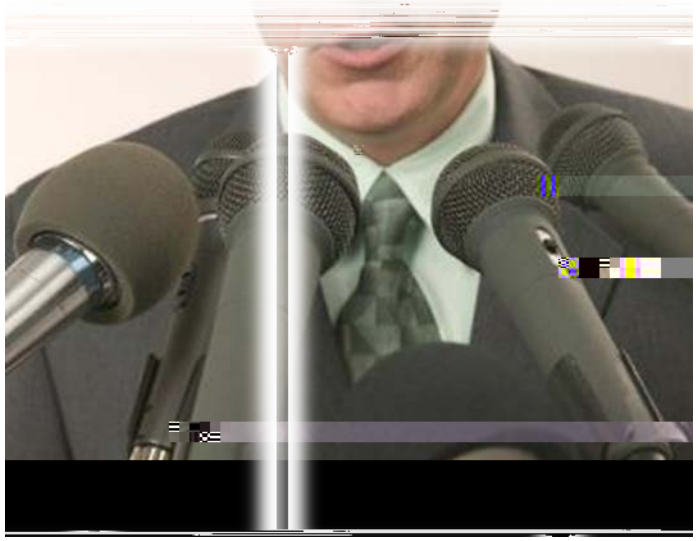
What if you are served a legal process?

Office of the General Counsel
USF Policy 0-103

External Contacts, more what ifs…

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

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



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

Office of the Government Relations
USF Policy 0-011

UNIVERSITY OF SOUTH FLORIDA SYSTEM

Office of Compliance & Ethics

3702 Spectrum Blvd.
Suite 180, CGS401
Tampa, FL 33612-9444

(813) 974-2705

usf.edu/complianceethics