



Compliance Update and Survey Results

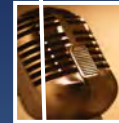


Welcome to the Spring 2015 edition of Compliance Communicator. This newsletter raises awareness of trending compliance issues that affect University employees and departments, including new and updated policies and procedures. Our 2014 Compliance Survey provided an opportunity for participants to voice their concerns related to compliance issues. This issue of Compliance Communicator will address two of the most prevailing concerns, whistleblower retaliation and the “tone in the middle.” The issue will also introduce the new Uniform Guidance for Federal awards and the revised Government Reviews University Operating Procedure.

Please take a few minutes and read up on these topics. For more information on the Compliance Program and additional resources visit our website www.uvm.edu/compliance. If you have a compliance question feel free to contact Compliance@uvm.edu or call (802)-656-3086.

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Retaliation is a severe barrier to building trust in an organization; managers

What to Do if You've been Retaliated Against

If you feel you have been retaliated against for making a good faith report of noncompliance or inappropriate behavior, you should report the retaliation. The Code of Business Conduct directs employees to file a written complaint to the Office of Audit Services or the Office of Compliance Services. These Offices will ensure the complaint is investigated by an independent level of management.

Spotlight on Policies – Government Reviews University Operating Procedure (UOP)

Do you know what to do if a government regulator shows up at your office or sends a notice of an impending review? The Government Reviews UOP outlines the steps you should take in response to these inquiries and identifies the departments on campus that are here to assist you through the process. Recent revisions were made to this procedure in order to

The UOP describes the actions you should take if contacted by a government regulator, first steps include:

- Providing a copy of the Government Reviews UOP to the regulator, and
- Notifying your supervisor and the Office of Compliance Services of the review.

The UOP explains the process of how these reviews are monitored, coordinated and managed as well as describing the role of central administrative offices including Compliance Services, General Counsel, and the VP for Executive operations.

The UOP revisions also clarify the definition of what constitutes a government review and address the University's policy of self-reporting matters of noncompliance to governmental agencies as required by law. To find out more visit:

http://www.uvm.edu/policies/general_html/govreviews.pdf

- **Respond to problems:** Asking questions and raising concerns is an important compliance activity. As a supervisor, you are the top resource employees turn to with workplace questions and issues. Your key responsibilities in this role include being available to employees and listening objectively to their issues. Equally important is your duty to handle issues properly and promptly. Never forget to close the loop with the person who raised the concern. Your approach has the power to encourage employees to come to you with important issues or shut down the process.
- **Use your resources:** If you need any assistance to properly address an employee question or concern or in handling signs of misconduct, reach out to any of the resources provided by the organization—including Compliance Services, Audit Services, General Counsel, Human Resources or your own supervisor.

Q&A



Q: Isn't it the President's responsibility to set the ethical tone for the organization?

A: Tone at the top is important, but it's not enough. The people at the top of the University must have the vision for an ethical culture and they must model it themselves. President Sullivan's statement on ethics may be found here:

http://www.uvm.edu/president/?Page=ethics_statement.html

However, the message often gets lost or diluted as it travels down the chain of command. And employees have very little if any contact with the President's wing. They take their behavioral cues from their supervisors. In the healthiest organizations the message of integrity is openly and consistently sent by all levels of leadership. But when employees want direction on how to conduct themselves at work, they look most often to their supervisors.

Federal Funds Focus: New Uniform Guidance

What is changing now?

The new guidance applies to new awards or additional funding granted on or after the December 26th, 2014 effective date. The primary changes that will be most apparent to the University community are:

- Increased flexibility for the direct charging of administrative salaries,
- Easing of rules for the direct charging of essential and allocable computing devices,
- Exclusion of participant (not human subject) expenses from the research base subject to the F&A rate,
- Greater documentation for subaward monitoring, and