



# Office of State Ethics recent enforcement actions

One of the goals of this newsletter is to keep University employees informed of the activities of the Office of State Ethics, the outside agency responsible for administering and enforcing the State Code of Ethics.

Recently, the Office of State Ethics (OSE) issued fines against several current and former state employees for violations of the State Code of Ethics. One of these fines was against a former UCONN employee. This employee had served as a member of an RFP

(Request for Proposal) committee evaluating bids for a contract with one of the University's departments. At the same time, she was seeking employment with one of the companies bidding on that contract. The Office of State Ethics claimed she failed to report this as a conflict of interest and therefore violated CGS section 1-86(a). The Office of State Ethics entered into an agreement with the former employee and ordered her to pay a civil penalty of \$5,000.

Another fine resulted from an OSE investigation concerning

a former Commissioner of the Department of Public Works. The former Commissioner was accused of accepting a gift over \$1,000 from a "prohibited donor." The former Commissioner entered into an agreement with the Office of State Ethics and the Attorney General's Office and was ordered to pay a total of \$30,000 to the State.



## Can a Prohibited Donor Pay for an Employee to Attend a Meeting?

The Office of Audit, Compliance and Ethics (OACE) has asked the Office of State Ethics (OSE) to clarify whether it is ever permissible for a prohibited donor to pay for expenses related to an employee's attendance at a meeting.

The OSE responded that a prohibited donor may reimburse the University for actual "necessary ex-

penses" (i.e., travel expenses, lodging, meals) **only** for those individuals that are active participants at a conference or for employees whose attendance is crucial at a business meeting.

In other words, "necessary expenses" are for those employees that do have a critical role at the event and the type of expenses to be

reimbursed are defined. Please remember that in certain circumstances a disclosure form must be filed with the OSE to verify the necessity of the expenses.

Please refer to the OACE or OSE websites for more information regarding "necessary expenses."

*The "Compliance courier" is a quarterly newsletter issued by the Office of Audit, Compliance & Ethics. Each issue will provide updates on important compliance issues. For questions or concerns or to suggest future articles, please contact Kimberly Fearney at (860) 486-6195.*

### Did you know.....

**That under the Freedom of Information Act, any member of the public has a right to request copies of documents you have created, including emails?**

## AAUP Consulting Update

As a follow-up to last Fall's article regarding the new AAUP Consulting Policy, the Provost recently approved a change to the processing of consulting requests. This "Fast Track" approval allows for more efficient processing of certain types of consulting requests that fall in the category of "academic activity." Specifically, these types of activities are purely academic in nature and are normally expected of faculty members as part of their professional development. Examples include: review of scholarly manuscripts, service on federal granting agency review panels and delivery of colloquia at other institutions. In order to take advantage of the "Fast Track" process, remuneration for these activities cannot exceed \$500.

For these types of requests, approval has been delegated to the department head, with copies of the approvals sent to Dr. Ilze Krisst of the Office of Research Compliance (Provost's designee) for recordkeeping. Remember, faculty members will still need to obtain approval from the department head prior to the start of the activity. All other forms of consulting will require formal approval in advance from the department head, Dean and Provost's designee.

For more information regarding the consulting approval process, including the most up-to-date forms, please refer to the Office of Research Compliance's website at <http://www.compliance.uconn.edu/viewnews.php?articleid=195>

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Institutional Success"*

"Even the most rational approach to ethics is defenseless if there isn't the will to do what is right."

— Alexander Solzhenitsyn

## Annual Compliance Training Underway

Annual Compliance Training for this academic year was launched in November and continues through the end of June. All University employees are required to complete this training each academic year.

Three separate sessions are being offered this year, each designed to address the

specific compliance issues of staff and faculty. The first program is being offered to new employees who did not complete last year's training. The new employee sessions cover in depth the Code of Conduct and University Guide to the State Code of Ethics. The second program is being offered to staff who completed last year's training. The staff sessions include updates on the Code of Conduct and Code of Ethics and new information on compliance at the University. The Faculty sessions include all the elements of the staff session, but also include a comprehensive overview of the new AAUP Consulting Policy. Information on the Conflicts of Interest in Research policy is currently being added to this session. The Faculty session will satisfy all compliance training requirements for continuing Principal Investigators, Co-Investigators and staff with fiscal grant management

responsibilities. For new Principal Investigators, Co-Investigators and grant management staff, the Fundamentals of Sponsored Project Administration training offered by OSP will still need to be completed in addition to one of the before mentioned sessions.

All sessions are being held at the Dodd Center in the Konover Auditorium on the Storrs Campus. The schedule of sessions can be found on the Office of Audit, Compliance & Ethics' website at <http://www.audit.uconn.edu/training.htm>

Regional Campus sessions have been scheduled; please check with your campus Director's office for dates. For those who are unable to attend a live session, on-line training is scheduled to be available shortly. All programs will be available on-line except for the Fundamentals of Sponsored Project Administration Training. Any questions, please feel free to contact Kim Fearnery at (860) 486-6195.



Photo by Peter Morenus