

Calendar Year
2015 Annual
Report

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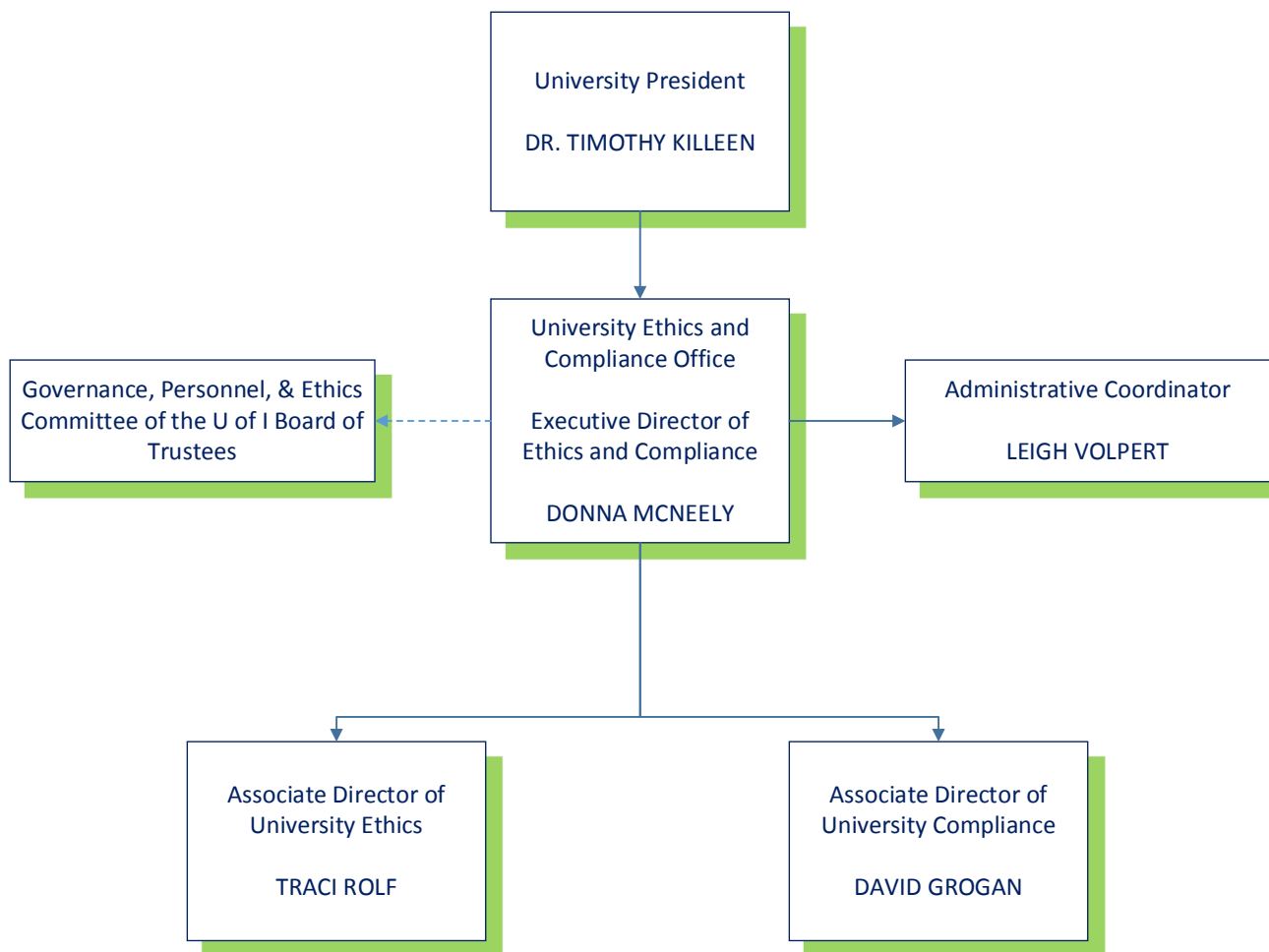
Reported to the Board of Trustees
March 16, 2016

University of Illinois
Ethics and Compliance Office

March 3, 2016 GPE Committee

Office Organization

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Executive Order 15-09

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- Executive Order 15-09 (EO 15-09) further restricted gift acceptance by university employees by eliminating the acceptance of gifts under \$100, reducing meal allowances, and adding the Executive Ethics Commission (EEC) to the Educational Materials and Missions (EMM) approval process
- Sought and received University Ethics Officer delegation of authority to approve all U of I EMM requests on behalf of the EEC
- Ethics Matters Newsletter was issued to inform employees and increase compliance
- All approved 2015 ethics training programs and our website were revised to reflect these new restrictions

Ethics Training

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- Developed all courses – content and scenarios for all IL public universities under a fee based contract
 - Board of Trustees (offline format)
 - Seasonal and Temporary (offline and online formats)
 - New Hire (offline and online formats)
 - Faculty, Staff, Graduate Assistants (also used for classroom training)
- Coordinated pilot testing, accessibility testing, and content approval with vendor
- Developed and managed all communications for employees

Ethics Training

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- Classroom Training – conducted to accommodate users without access to computers or the ability to complete an online course (Housing, Facilities, Physical Plant, Medical Center, Parking Services, and Biological Resources)
 - UIC Campus – 15 sessions with 481 trainees
 - UIUC Campus – 5 sessions with 870 trainees
- Employees granted exemptions during the online training, due to approved leave or other circumstances preventing completion, must be followed and brought into compliance upon return
- Follow-up continues until the next training window begins

Ethics Training

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- 2015 Ethics Training Summary
 - 99.9% compliance rate – full compliance anticipated by March 15, 2016
 - 49,531 employees completed annual training
 - 14,727 completed new hire ethics orientation
 - 18 employees remain noncompliant at February 17, 2016
 - Disciplinary action has been coordinated with campus human resources and departments for all employees not completing the online version timely – approximately 90 employees.

Statements of Economic Interests & Supplemental Forms

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- Just over 9,100 employees were required to complete the paper-based Secretary of State's Statement of Economic Interests form and the Supplemental Statement of Interests form in 2015 based on 2014 authority and responsibilities
- 2015 was the first year for the Supplemental Statement filing resulting in two separate filing requirements and locations
- Filer list is compiled based on the *Governmental Ethics Act*
- All filers' current addresses are compared to Secretary of State records for necessary updates with all additions, removals, and updates being delivered to the Office of the Secretary of State by February 1
- Updated list is verified for finalization during the first week of March

Statements of Economic Interests & Supplemental Forms

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- For 2016, 8,886 U of I employees, including all BOT members will be required to file a paper-based Statement of Economic Interests form with the Secretary of State following receipt of a paper mailing
- Supplemental Statements will be hosted on a CMS website with a pin number being used for access. All communications regarding completion will be by email from the EEC
- May 2nd is the due date for both. Fines accumulate for the Statement of Economic Interests form after that date – no penalties have been identified for the Supplemental Statement of Interests

Ethics Case Load - 2015

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- 107 new cases were initiated during 2015
 - 67 required some extensive follow-up
 - 14 referrals from the Executive Inspector General for the Agencies of the Illinois Governor (OEIG)
 - 2014 open cases were managed throughout 2015
- 8 OEIG data requests were processed
- Daily inquiries/discussions regarding policies, procedures, advisory services, etc.
 - Ethics Line: 1-866-758-2146
 - ethicsofficer@uillinois.edu

Case Load Analysis- 2015

- Overall cases decreased by 13 from 2014; however, several of the 2015 cases were either high profile or required significant resources:
 - Completeness of Freedom of Information Act Responses
 - Alleged Retaliation
 - Athletics
 - Time Reporting and Compensatory Time
 - Stringing of Purchases and Inappropriate Vendor Relations
- Cases require significant coordination with Access and Equity, Vice Chancellors, Human Resources, and Counsel

Compliance Initiatives - Compliance Program

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- Developed Ethics and Compliance Program Plan for FY16
- Reviewed Code of Conduct with an eye toward possible revision in coordination with strategic plan
- Coordinated the development of a policy governance proposal to manage university-wide policies
- Teamed with University Counsel and OBFS to produce *Foreign Corrupt Practices Act* guidance
- Established University-wide compliance officer network for dissemination of information and sharing of best practices

Compliance Initiatives – Title IX

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- Created a comprehensive Title IX checklist for each campus detailing the full range of compliance requirements
- Assisted in the negotiation and drafting of a contract to provide sexual harassment/misconduct prevention and response training
 - Coordinated the University-wide roll out of the training
 - Administering the training for the campuses - February/March 2016
- Reviewed UIS's Sexual Harassment Policy for compliance with regulations and continue to assist with appropriate policy revisions

Compliance Initiatives - Clery Act

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- Created a *Clery Act* checklist identifying policy content required for each campus' Annual Security and Fire Safety Report (ASFSR)
- Assisted UIS and UIC with completion of their ASFSR
- Provided comments to UIUC's draft ASFSR
- Established University-wide Clery Act coordination working group to facilitate sharing of best practices, establish report completion milestones, and eliminate duplication of effort

Compliance Initiatives – Export Controls

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- Partnered with UIUC's Office of Sponsored Programs (OSP) to lead a campus-wide working group to review export control policies and process, including travel and engagement abroad
- Currently initiating similar working group efforts at UIC
- Teamed with OSP, University Counsel and the Advanced Digital Sciences Center in Singapore to streamline U.S. export control compliance

Other Compliance Initiatives

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- **HIPAA**
 - Drafted and coordinated approval by the President of the University HIPAA Privacy & Security Official
 - Engaged with stakeholders in drafting university-wide HIPAA policies
- **Safety**
 - Confirmed campus compliance with the Drug-Free Schools and Communities Act regulations
 - Assisted with campus efforts to promote lab safety
- **Environment**
 - Assisted all 3 campuses with the preparation and submission of their 5-Year Waste Reduction Plan Updates
 - Teamed with campus sustainability offices to promote compliance with state requirements on the use of recycled products

Committee Memberships

- University Ethics and Compliance Office staff serve on or convene the following committees/groups:
 - Task Force to Prevent and Address Sexual Violence and Misconduct – University-wide
 - Privacy and Security Committee (and various sub-committees) – University-wide
 - Compliance Advisory Committee – University-wide
 - UIC Campus Compliance Committee
 - Clery Coordination Committee – University-wide
 - Export Control Working Group – UIUC and UIC
 - ERM, Audits, and Ethics Coverage Working Group
 - Policy Governance Working Group – University Administration