



EMORY UNIVERSITY

Compliance Program Manual

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Message from the President

Emory’s mission is to “create, preserve, teach, and apply knowledge in the service of humanity.” In keeping with the demand that teaching, learning, research, and service be driven by the highest standards of excellence and integrity, we continually strive to be an institution that is ethically engaged. Our goal is to ensure that the actions of every member of our community are in line with our guiding principles, policies, and procedures, as well as relevant legal and regulatory requirements.

Understanding and complying with the laws, regulations, and policies that impact the work that we do as a university may at times be a complex, potentially even a confusing endeavor. That is why the Office of Compliance and the Internal Audit Division created this manual.

I encourage you to consult this valuable manual frequently and to reach out to additional campus resources when you need guidance in fulfilling Emory’s mission and adhering to our principles.

Claire E. Sterk
President, Emory University

Message from the Office of Compliance and Internal Audit Division

The number of laws, regulations and policies that impact the multitude of activities carried out at Emory University is enormous, and keeping up with these requirements can be challenging. Although the Office of Compliance and the Internal Audit Division are separate units with distinct operational charges, both units recognize that a strong compliance program demonstrates the commitment of the University and its employees not only to the laws that govern our activities, but also to the ethical principles at the core of the University as an institute of higher education, research, and health care. Accordingly, the Office of Compliance and the Internal Audit Division have collaborated on this publication as a means of providing faculty and staff members with an overview of the University's compliance program.

This publication provides faculty and staff members with information about some of the major policies and regulatory requirements that govern employee activities and introduces employees to the strong ethical principles that form the basis for Emory's mission and work. We hope this publication will serve both as a useful overview for new employees, and a handy reference guide for current faculty and staff.

For employees who are seeking additional assistance in navigating regulatory and policy requirements, we welcome the opportunity to help. Employees may contact the Office of Compliance or the Internal Audit Division at the numbers listed later in this publication or stop by either office to visit. The Office of Compliance also provides training and education on ethical decision making and the ethical standards upon which the regulatory and policy requirements are based.

Employees are always encouraged to report any compliance issues directly to the Office of Compliance, the Internal Audit Division, or through the University Trust Line Program by calling 1-888-550-8850 or reporting online at www.mycompliancereport.com/EmoryTrustlineOnline. The Trust Line is administered by an independent third party and reporting may be done anonymously. For employees who are unsure whether a particular matter constitutes a compliance issue, the Office of Compliance provides the [Safe Harbor Consult Program](#). Under this program, employees can speak with the Office of Compliance about a hypothetical situation on which they would like to receive guidance.

We at the Office of Compliance and Internal Audit Division look forward to working together with our colleagues to achieve the same standard of excellence in our compliance program that Emory has achieved in its academic, healthcare, and research activities.

Kris West
Chief Compliance Officer
Emory University

Scott Stevenson
Chief Audit Officer
Emory University

Introduction and Purpose

Emory University is committed to fostering a community that values compliance with applicable legal and policy requirements, as well as understanding the ethical principles that underlie those requirements. This publication provides an overview of the University's program of compliance by summarizing the legal, policy, and practice requirements that Emory employees are expected to follow. It also sets forth the ethical principles that govern the University community, as articulated in Emory's Mission, Vision, and Ethical Principles statement, which all members of the community should strive to uphold.

Although this publication touches on a great many areas, it is not a comprehensive collection of all applicable laws and policies to which employees must adhere in carrying out their duties. Every employee is responsible for being aware of University, school, department and unit policies that apply to his or her work,¹ as well as keeping informed about federal, state, and local laws and regulations that impact his or her scope of duties.

¹ If you are also an Emory Healthcare employee, please be aware that Emory Healthcare's Office of Compliance Programs produces its own compliance manual to which you must refer for guidance.

Emory University Compliance Program

All Emory University employees should strive to do the right thing and encourage each other to do so as well. Being “ethically engaged” sometimes requires us to go above and beyond basic expectations, looking at our duty to other members of our community.

In addition to promoting ethical engagement, a key part of every compliance program is to ensure that stakeholders are aware of the legal and policy requirements that govern Emory’s activities and know where to seek assistance in complying with them and/or to report non-compliance. In furtherance of this goal, information about components of Emory’s compliance program and underlying ethical principles is set forth below, along with a summary of the major legal and policy requirements with which employees are expected to comply.

Offices with Major Roles in Ensuring the Effectiveness of the Compliance Program

The Emory University Office of Compliance

Office of Compliance Mission Statement

The Office of Compliance is committed to helping ensure that Emory University’s activities adhere to the highest legal, professional, and ethical standards. The Office of Compliance assists University units in complying with the laws, regulations and policies that govern institutions of research and higher education through education; assessment; assistance with policy and process development; auditing; and monitoring.

Emory has appointed a Chief Compliance Officer to oversee the day-to-day functions of the Emory University Compliance Program. The Chief Compliance Officer (CCO) heads up the Office of Compliance. Additional oversight for the Compliance Program is accomplished through regular reporting of the CCO to both the Executive Vice Presidents of the University and the Emory University Board of Trustees’ Audit & Compliance Committee. Line management for the Office of Compliance is provided through the Executive Vice President for Academic Affairs and Provost.

The Office of Compliance coordinates with Emory University Internal Audit, Emory Healthcare Office of Compliance and Emory University Office of the General Counsel through membership of all of these units on the Executive Compliance Committee (ECC). The ECC meets regularly to discuss compliance issues, coordinate efforts, and collaborate on compliance initiatives.

The Office of Compliance provides independent oversight for the University’s administrative and research compliance program and carries out this responsibility by:

- Overseeing and providing assistance with risk assessment process and prioritizing risks.
- Developing awareness and expertise in statutory/regulatory requirements and keeping abreast of new statutory/regulatory developments.
- Assessing program compliance with governing statutes, regulations and policies.
- Providing assistance when regulatory agencies review University compliance with statutory/regulatory compliance.
- Developing an annual compliance plan, including auditing and monitoring elements, based on risk assessment/prioritization.

- Providing input on policy and process development to ensure compliance, as well as receiving and providing input on corrective action plans to remedy compliance deficiencies.
- Receiving, investigating and providing appropriate follow-up with respect to concerns expressed via the Trust Line and other reporting routes, in accordance with applicable University policies.
- Reporting findings to programs, schools, units and the Audit and Compliance Committee of the Board of Trustees.
- Providing training and educational opportunities to the Emory community on compliance issues and ethical decision-making.
- Promotion of a culture of compliance and ethics.
- Consultations on compliance or ethics-related matters.
- Participation in meetings of compliance partners in research and administrative compliance areas.
- Coordination with other compliance University units at Emory, such as Emory Healthcare's Compliance Office and Internal Audit.

The Compliance Office can be contacted at:

- Office of Compliance Main Line: 404-727-2398
- Office of Compliance Email: compliance@emory.edu

Internal Audit Division

Internal Audit Division Mission Statement

The Internal Audit Division's mission is to provide independent, objective assurance and advisory activities designed to add value and improve the operations of the Institution. Internal Audit helps the Institution accomplish its objectives by bringing a systematic, ethics-driven, disciplined approach to evaluate and improve the effectiveness of governance, risk management, and internal control processes. Our activities strengthen organizational performance and promote the safeguarding and effective use of assets and resources.

The Internal Audit Division contributes to the success of the overall compliance program by assessing the program's effectiveness. Specifically, the Emory Internal Audit Division provides independent and objective reviews of the compliance program and/or operational units' compliance activities to evaluate:

- the completeness and adequacy of management's assessment of compliance risks
- the effectiveness of risk mitigation strategies and business internal controls designed to ensure compliance with ethical, professional and legal standards.

Questions for Internal Audit Division can be directed to:

- Internal Audit Main Line: 404-727-6146
- Internal Audit Email: audit@emory.edu

Ethical Principles Underlying the Compliance Program

Emory's Mission, Vision, and Ethical Principles

Emory's Mission

Emory University's mission is to create, preserve, teach, and apply knowledge in the service of humanity.

To fulfill this mission, the University supports the full range of scholarship, from undergraduate to advanced graduate and professional instruction, and from basic research to its application in public service. While being a comprehensive research university, Emory limits its academic scope to those fields in which, by virtue of its history and location, it can excel. Hence its academic programs focus on the arts and sciences, business, law, theology, and the health professions. These disciplines are unified by their devotion to liberal learning; by cooperative interdisciplinary programs; and by the common pursuit of intellectual distinction.

Emory's complete Mission Statement can be found at http://president.emory.edu/university_leadership/university_mission.html.

Emory's Vision

Emory: A destination university internationally recognized as an inquiry-driven, ethically engaged, and diverse community, whose members work collaboratively for positive transformation in the world through courageous leadership in teaching, research, scholarship, health care, and social action.

Emory's complete vision statement can be found at http://president.emory.edu/university_leadership/university_vision.html.

Emory's Ethical Principles

As an ethically engaged institution, Emory University affirms the conviction that education exerts a powerful force to enable and ennoble the individual, and that the privilege of education entails an obligation to use knowledge for the common good.

In harmony with this conviction, we who belong to the Emory community affirm that the pursuit of knowledge and truth is the university's reason for existence. We pursue these ends honestly, unflinchingly, and whole-heartedly, as we treasure and seek to foster academic freedom and the widest possible diversity of opinion in an atmosphere of civil discourse.

Members of Emory are expected to strive for the highest degree of integrity. The university's resources, both natural and fiscal, are entrusted to us for the common good and for future generations; the university and we, its members, are expected to exercise wise stewardship over these resources and to guard against their misappropriation or misuse. All conflicts of interest and of commitment are to be promptly addressed, and all possible steps are to be taken to eliminate the conflicts or to manage them to ensure that they do not undermine the integrity of our institution or ourselves.

Emory seeks to uphold the dignity and rights of all persons through fair treatment, honest dealing, and respect. Emory is committed to creating an environment of work, teaching, living, and learning that enables all persons to strive toward their highest potential. Members of the Emory community in positions of authority carry a particular obligation to exercise care and compassion, and appropriately confidential or personal information must be safeguarded.

As an organization comprising thousands of persons in a shared enterprise, Emory fosters collegiality in order to advance our mission of teaching, research, service, and healthcare. While frictions often emerge, we seek to resolve conflict through the active practice of community.

By our participation in the Emory community, each of us assumes responsibility for our actions and will be held accountable for them. Similarly, members of our community are responsible for holding each other and the university to these ethical principles. Members of the Emory community are expected to abide by these principles, regardless of the letter of the law.

*Approved by the Board of Trustees
9 February 2005*

Emory's Statement of Ethical Principles can also be found at
http://president.emory.edu/university_leadership/ethical_principle.html

Standards of Conduct

Code of Business Ethics and Conduct and Standards of Conduct

Emory University has a Code of Business Ethics and Conduct. Under this Code Emory faculty and staff are expected to carry out their activities for and on behalf of Emory in accordance with Emory standards and policies and without any prohibited conflict of interest. Additionally, faculty and staff are expected to promptly report criminal activity or evidence of misconduct. The complete Code of Business Ethics and Conduct can be found on the [Emory Policies website](#) or the link below.

Emory also maintains a Standards of Conduct policy that set forth performance standards to which employees must adhere in carrying out their job duties. The policy, which can be found on the [Emory Policies website](#) or at the link below, contains a non-exclusive list of rules and regulations that govern workplace performance. Employees should review both the Code of Business Ethics and Conduct and the Standards of Conduct.

Resources:

Code of Business Ethics and Conduct (<http://policies.emory.edu/4.115>)

Standards of Conduct (<http://policies.emory.edu/4.62>)

Reporting Violations and Misconduct

Another major component of a successful compliance program is the expectation that each member of the Emory community report all legal, policy, or ethical violations of which he/she becomes aware and that there will be no retaliation against a reporter for making a good faith report. There are a number of different channels that an employee may pursue to make a report, and these are discussed below.

Reporting to a Supervisor

Depending on the circumstances and type of violation, it may be best to report the violation to a work supervisor first. If an employee is not comfortable reporting a matter to a supervisor; circumstances make reporting to a supervisor difficult; or the employee believes that the supervisor's response was inadequate, then the employee may contact the Office of Compliance [(404) 727-2398 or compliance@emory.edu] or the Internal Audit Division [audit@emory.edu or 404-727-6146].

Trust Line

Employees also may anonymously report violations through the Emory Trust Line at 1-888-550-8850 or reporting online at www.mycompliancereport.com/EmoryTrustlineOnline. The Trust Line is administered by an independent company staffed by specialists who take reports from callers. If an individual desires to remain anonymous, the specialist will assign him/her a unique reference code that will be used throughout the investigative process. Emory investigators or other staff will not be able to trace the call or determine the caller's identity based on this reference code or report. Depending upon the information a caller provides, however, his/her identity may be inadvertently discovered during the investigation.

Reporting Crimes

All property thefts of any type and all other criminal incidents should be reported immediately to the Emory Police Department (EPD). To report a call to the EPD, call 404-727-6111 or the EPD TIPS LINE at

404-727-8477. Person also may report a crime in person at the EPD office. In emergency situations, callers should use 404-727-6111 or call 911. The TIPS line is not for emergencies.

Child Abuse Reporting Requirements

There are legal requirements to report certain types of crimes. Unless there is an exception under Georgia law, all Emory University faculty, staff, volunteers, students, and third-parties must report suspected child abuse of which they become aware when they are performing their duties, regardless of whether they are on or off-campus. Failure to report child abuse is a misdemeanor crime in the State of Georgia, and it is a violation of Emory Policy.

Clery Act Reporting Requirements

Under the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), Emory University must publicly report its security policies and statistics about crimes occurring on and around its campuses. Under the act, some employees are considered Campus Security Authorities (CSAs) who must report all applicable crimes to the Emory Police Department. CSAs include individuals associated with campus police and security departments and other persons who have responsibility for campus security (e.g., persons monitoring entrance to university facilities); officials who have significant responsibility for student and campus activities; and individuals/units designated in Emory's campus security policy as persons/units to which students and employees should report criminal offenses. If you are unsure about your reporting responsibilities or status as a CSA, you should contact the Emory Police Department or the Office of Compliance for guidance.

Title IX Reporting Requirements

Emory employees who are made aware of an allegation of sexual misconduct involving any student must notify a Title IX Coordinator directly or through the applicable reporting structure. Employees who serve in a professional role in which communications are afforded confidential status under the law (e.g., medical providers, therapists, and professional and pastoral counselors) are not bound by this requirement, but may, consistent with ethical and legal obligations, be required to report limited information about incidents, without revealing the identities of the individuals involved.

Additional options for reporting violations or suspected violations are outlined in the Resources section at the end of this booklet.

Resources:

Theft & Other Criminal Incidents Policy (<http://policies.emory.edu/4.68>)

Child Abuse Reporting Policy (<http://policies.emory.edu/4.119>)

Clery Act Reporting ([Quick Guide for CSAs](#))

Sexual Misconduct Policy (<http://policies.emory.edu/8.2>)

Title IX Coordinator Contact Information

(<http://sexualmisconductresources.emory.edu/coordinators/>)

Non-Retaliation

Emory strives to foster an environment where employees can safely and comfortably report legal, criminal, ethical, and policy without fear of retribution. Emory, therefore, prohibits retaliation against any employee who makes a good faith report of wrongdoing.

Resources:

Non-Retaliation Policy (<http://policies.emory.edu/4.121>)

Investigation of Violations and Misconduct

Once a matter is reported, an appropriate investigation will ensue. Depending on the nature and type of allegations, the investigation may be conducted according to specific investigative procedures prescribed in a particular Emory policy. An allegation of research misconduct, for example, will prompt an investigation in accordance with the process outlined in Emory Policy 7.8 on Research Misconduct. Similarly, an investigation of alleged discriminatory harassment will be conducted according to the investigation process in the Equal Opportunity and Discriminatory Harassment Policy.

For reports made through the Trust Line, the Trust Line administrator, within 24 hours (or possibly sooner, depending upon the level of urgency associated with the call), shall provide a detailed written report of the allegations to an Emory contact person in the Emory University Office of Compliance or the Emory Healthcare Office of Compliance Programs. Either of these offices, in turn, will triage the report and contact the appropriate departments or units to conduct an inquiry. The results of the inquiry will be provided to the Trust Line administrator, who will then communicate with the reporter.

Policies

Conflict of Interest

Emory University prohibits employees from undertaking any actions that would appear to be a conflict of interest without first going through appropriate channels to have the relationship reviewed and managed as necessary. A conflict of interest occurs when an individual has outside interests that could compromise the individual's ability or motivation to fulfill his or her professional obligations to an employer. These outside interests could include business or financial relationships with third parties, outside employment, receipt of gifts from those seeking to do business with the organization, or any other activity or arrangement that could unduly influence the professional judgment or obligations of the individual. While each situation is different, conflicts of interest or the appearance of a conflict of interest may arise from numerous activities, including:

- Holding, either directly or indirectly, a position or financial interest in an outside concern which provides services competitive with services rendered by Emory, or an outside concern from which Emory secures goods or services if the employee is involved in or may influence the ordering of such goods or services.
- Competing, either directly or indirectly, with Emory in the purchase or sale of property or property rights, interests or services.
- Disclosing or using non-public information obtained through Emory employment for personal profit or gain or for the profit or gain of an immediate family member.
- Accepting gratuities or special favors, such as meals, airline tickets, hotel accommodations, entertainment, sporting event tickets, etc., from any outside concern that does, or is seeking to do business with Emory, or extending gratuities or special favors to employees of Emory, under circumstances which might reasonably be interpreted as an attempt to influence the employees in the performance of their duties. This does not include the acceptance of items of nominal or minor value (\$40.00 or less) that are clearly tokens of respect or friendship and are not related to any particular transaction or activity of the university, nor does it include business-related social events where the employee is representing the university's interests.
- Retaining, directly or indirectly, consultants who have a financial interest or employment that conflicts with services (including sponsored research) provided by Emory.

If you have an existing or potential relationship or activity that may constitute or appear to constitute a conflict of interest, written disclosure must be made to your dean, director or vice president so that a determination of appropriateness can be made and approval to maintain or proceed with the relationship can be obtained.

For members of the Emory community responsible for the design, conduct, or reporting of research, there are separate requirements regarding conflict of interest issues contained in the Policy for Investigators Holding a Financial Interest in Research and there may also be school-specific policies. If you are an Emory investigator, please consult this policy and any school specific policies for information on your obligations.

There are also particular procedures for disclosure and management of conflicts of interest for trustees, principal officers, and key employees. Please refer to the Conflict of Interest – Trustees, Principal Officers and Key Employees policy for more information.

Resources:

Conflict of Interest Policy (<http://policies.emory.edu/4.87>)

Policy for Investigators Holding a Financial Interest in Research (<http://policies.emory.edu/7.7>)

Conflict of Interest – Trustees, Principal Officers and Key Employees
(<http://policies.emory.edu/4.112>)

School of Medicine Industry Relations Policy

(http://www.med.emory.edu/administration/policies/industry_relations/index.html)

Good Stewardship

To ensure transparency, sound business practice, and compliance with the law, and because of our obligation as an organization entrusted with government and private funds, Emory depends on rigorous observation of accounting, financial recordkeeping, reporting and other standards and policies and on the maintenance of internal control and compliance monitoring mechanisms.

Proper stewardship of University funds is the responsibility of all employees involved in financial transactions. Emory funds may only be used for necessary and reasonable business-related expenses incurred in the furtherance of Emory's missions. Dishonesty in all forms, fraud, theft and similar behaviors are all failures of integrity that undermine the whole Emory community.

Resources:

Institutional Fiscal Responsibility Framework (<http://policies.emory.edu/2.113>)

Financial Transaction Roles and Responsibilities (<http://policies.emory.edu/2.114>)

Business Purpose Requirements for Use of Emory Funds (<http://policies.emory.edu/2.109>)

Workplace Safety

Emory is committed to ensuring a safe working environment for all employees. The Environmental Health and Safety Office (EHSO) manages the occupational health and safety programs for Emory University. The EHSO Safety/Hygiene group maintains policies and procedures and guidelines related to workplace safety, including information on accidents and injuries.

If a work-related accident or injury occurs during regular business hours, the following guidelines should be used for reporting:

- If emergency medical attention is required, call 911. An Emory Incident Report Form should be completed and forwarded to the Emory Employee Health and Workers' Compensation Department (EH/WC) within 24 hours of the incident. If the employee is not able to complete the Emory Incident Report Form, the supervisor should complete the form.
- If non-emergency medical attention is necessary, report to the Emory EH/WC Clinic located at 1362 Clifton Road, N.E., HB 53 OR Emory University Hospital Midtown, 478 WW Orr Building , 6th Floor. If you would like to talk with the workers' compensation nurse practitioner before you report, call 404-686-7106 (Emory University Hospital Midtown-EHM), 404-686-7941 (Emory University Hospital-EUH), or 404-728-6431 (Wesley Woods).
- If the incident is minor in nature (no medical attention required) an Emory Incident Report Form must be completed and forwarded to EH/WC at workers.comp@emoryhealthcare.org or faxed to 404-727-5405.

If an accident or injury occurs after regular business hours, the following guidelines should be used for reporting:

- If emergency medical attention is required, call 911. An Emory Incident Report Form should be completed and forwarded to EH/WC within 24 hours of incident. If the employee is not able to complete the incident report form, the supervisor should complete the form.
- For after-hours incidents requiring non-emergency medical care, please contact the EH/WC nurse on call for further guidance at: 404-686-5500, PIC# 50464.
- If the incident is minor in nature (no medical attention required) an Emory Incident Report Form must be completed and forwarded to EH/WC at workers.comp@emoryhealthcare.org or faxed to 404-727-5405.

Employees are expected to report all work-related accidents and injuries immediately or as soon as reasonably possible, preferably within 24 hours.

Employees who work at the Yerkes Main Station or Yerkes Field Station must follow the Yerkes-specific reporting guidelines which can be found in the Resources section below.

Resources

EHSO Safety/Industrial Hygiene Group Website

(<http://www.ehso.emory.edu/programs/safety/index.html>)

Accident/Injury Reporting (<http://www.ehso.emory.edu/emergency/index.html>)

Yerkes Reporting (<http://www.ehso.emory.edu/emergency/yerkes.html#main>)

Equal Opportunity and Discriminatory Harassment

Emory is committed to a fair and open campus environment and is dedicated to providing equal opportunities to all individuals regardless of race, color, religion, ethnic or national origin, gender, genetic information, age, disability, sexual orientation, gender identity, gender expression, or veteran's status. Emory does not discriminate in admissions, educational programs, employment, or other matters on the basis of any of these factors or any others prohibited by law.

In keeping with its commitment to maintaining an environment that is free of unlawful discrimination and with its legal obligations, Emory likewise prohibits harassment of a discriminatory nature. This includes sexual harassment or harassment on the basis of race, color, religion, ethnic or national origin, gender, genetic information, age, disability, sexual orientation, gender identity, gender expression, veteran's status, or any factor that is a prohibited consideration under applicable law, by any member of the Emory community.

Resources:

Equal Opportunity and Discriminatory Harassment Policy (<http://policies.emory.edu/1.3>)

Drugs, Alcohol, and Tobacco

The unlawful possession, use, distribution, dispensation, or manufacture of alcohol or illegal drugs on Emory property or at Emory-sponsored events or activities is prohibited. Violation of this policy will result in progressive disciplinary actions and penalties. In addition, if you are convicted of a criminal drug statute, you must report the conviction to your supervisor or director.

Emory University is a tobacco-free campus. The use of cigarettes, cigars, pipes, smokeless tobacco, clove cigarettes, hookahs, and electronic cigarettes is prohibited on Emory property. Members of the Emory community are expected to abide by this policy and are encouraged to make others, including visitors, aware of it.

The Emory Faculty Staff Assistance Program (FSAP) provides confidential, professional services for drug and alcohol abuse to staff, faculty, and leadership. FSAP also coordinates programs and resources for tobacco cessation.

Resources:

Substance Abuse/Drug-Free Workplace Policy (<http://policies.emory.edu/4.66>)

Tobacco Free Environment Policy (<http://policies.emory.edu/4.113>)

Research

Emory is committed to ensuring that research is conducted in accordance with applicable federal and state laws, regulations and guidelines, as well as university policies. Emory is committed to safeguarding the health and welfare of human research subjects, as well as ensuring that all animal research is conducted in an appropriate and humane manner.

Emory is a good steward of research funding and is committed to ensuring that the legal and fiduciary responsibilities of grantors/contractors are met. Emory is committed to the comprehensive management of Emory innovations to maximize the benefit to the University and to humanity.

Resources:

To access the various policies governing research at Emory, go to the Emory Policies website (<http://policies.emory.edu/>) and see the Research section. Policies are accessible via the subheadings.

Privacy and Confidentiality

In the course of their employment, Emory University employees work with various types of information that is confidential and subject to various federal laws (e.g., HIPAA, FERPA, etc.), state laws, third-party agreements, and University policies. It is important for you to be aware of and follow all applicable laws,

agreements, and rules pertaining to the use, protection, and disclosure of such information both in the course of your employment with Emory and after it ends.

Resources:

- Statement of Confidentiality (<http://policies.emory.edu/4.79>)
- Confidentiality and Release of Information About Students (<http://policies.emory.edu/8.3>)
- FERPA Policy (<http://www.registrar.emory.edu/Students/FERPA/index.html>)
- HIPAA Policies Site (<https://hipaa.emory.edu/home/Policies/index.html>) Login: Emory username and password

Security: Log-in IDs, Passwords and Encryption

Emory University uses many electronic applications for business purposes, education modules, and research. Log-in IDs and passwords are unique to individuals and can constitute legal signature, so it is very important that they be safeguarded. It is Emory policy that log-in IDs and passwords only be used by the individual to whom they belong. **Sharing or inappropriate use of your log-in ID or password subjects you to disciplinary action, up to and including termination from employment.** All mobile devices, such as laptops, flash drives and disks must be encrypted. Contact the Library and Information Technology Help Desk for more information.

Resources:

- Information Technology Conditions of Use (<http://policies.emory.edu/5.1>)
- Smart Device Security Policy (<http://policies.emory.edu/5.14>)

Institutional Data Management

Institutional data is important for supporting Emory's teaching, research, public service, and operational missions. It is, therefore, critical that academic and administrative data used for internal and external reporting on University characteristics and operations be truthful and accurate. If you work with University data in your job, you must ensure the integrity and accuracy of the data, only destroy the data in accordance with applicable retention policies, and maintain the security and confidentiality of the data in accordance with applicable laws and policies. Personal use of institutional data is prohibited, and it must not be accessed or manipulated for personal gain, or out of personal interest or curiosity.

Resources:

- Institutional Data Management Policy (<http://policies.emory.edu/10.13>)

Records Management

Emory supports a sound records management program to ensure efficiency in the creation, use, handling, control, maintenance, and disposition of its records in both paper and electronic format. The objectives of the program are to ensure compliance with state and federal statutory requirements, reduce risk associated with unintended disclosure of sensitive information, and protect vital and historical information about Emory. All employees are responsible for managing their records in accordance with Emory's program.

Resources:

- Records Management Program (<http://records.emory.edu/index.html>)

Export Controls and Sanctioned Individuals and Entities

Emory University's policy is to ensure that instruction, research, and educational activities are carried out openly, without prohibitions on the publication of research results or academic activities, except for certain limited pre-publication review by research sponsors to protect their proprietary interests. Nonetheless, the University recognizes that there may be instances when research involves the dissemination of certain technology, information, materials or equipment that are be subject to federal export control regulations. If your research or activities involve controlled technology, you must comply with all applicable regulations.

Emory University also complies with all applicable legal, regulatory and contractual requirements intended to prevent it from making prohibited payments to individuals or entities, including those from sanctioned or embargoed countries, found on any government-issued restricted, blocked, or denied party lists. To ensure that Emory payees are screened, it is important that you use the proper channels for making payments to third-party individuals and entities.

Resources:

Policy on Export Controls (<http://policies.emory.edu/7.11>)

Export Controls and Restricted Party Screening in Procurement and Payment Applications Policy (<http://policies.emory.edu/2.123>)

Anti-Corruption Laws

Emory University engages in activity around the world. If you conduct business on behalf of Emory abroad, it is important that you comply with applicable anti-corruption laws. These laws include the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act, and could include similar laws in other countries, depending on where you are conducting business. These laws prohibit direct or indirect bribery of U.S. and international government officials, political parties, party officials, or candidates for public office or employees of commercial organizations to obtain or retain an improper business advantage. The laws also prohibit knowingly falsifying books and records or knowingly circumventing or failing to implement adequate internal accounting controls, which could facilitate or conceal bribery.

Dealing with the Government

Governmental Relations

Payments to Governmental Employees/Contractors: Emory prohibits offering or making payments or giving anything of value to government employees or contractors, as required by applicable laws, regulations and policies. If you become aware of any such inappropriate interaction, report it to your supervisor or to the Office of Compliance immediately.

Political Contributions: Emory funds and resources may not be used to support political campaigns or political parties. As a non-profit organization, Emory may not provide funds or Emory property, including space, work time, telephones, copiers, email or computer network services, for political purposes. Of course, Emory encourages individual citizenship. Employees who participate in the political process, however, must do so on their own time and expense, and they may not give the impression that they are acting on behalf of Emory.

Statements to the Government

Emory University employees must make good faith efforts to ensure that all representations and submissions to government agencies, employees, and contractors are accurate. Care must be taken to review and assure the accuracy of statements and data on applications, reports, and other documents

submitted to the government for any reason, such as a grant application or as a response to an inquiry, audit, or investigation. Giving incomplete, inaccurate, or misleading information to the government may lead to termination from employment and possible legal prosecution. Emory University's Office of the General Counsel should be consulted before responding to any to legal or judicial requests for information (e.g., subpoenas, requests for production of documents).

Government Investigations

Emory University cooperates fully with government audits and investigations. Each employee should speak with his/her supervisor to learn the unit's process for handling responses to legal requests such as subpoenas or other official governmental requests for information. Any employee that is served with a search warrant, subpoena or other legal request for information about Emory University must immediately notify his/her supervisor. Your supervisor must contact the Office of the General Counsel for direction on how to respond.

Records requested by subpoena or audit letter will be identified, isolated and protected pending submission to the government. Any scheduled destruction of the requested records must be immediately suspended until the completion of the investigation and the full response to any inquiry has been completed. The requested records must not be changed in any way.

Emory has the right to legal representation during a government investigation or inquiry. Any employee who is contacted by a government agent for an interview concerning his/her activities on behalf of Emory should contact the Office of the General Counsel to discuss having a University attorney attend the interview with the employee.

Resources

Reporting Suggestions

	Contact Information	Types of Issues
Trust Line	Phone: 1-888-550-8850 Online: mycompliancereport.com/EmoryTrustLineOnline	Any potential ethical, legal, or business conduct violation; guidance on compliance-related issues
Office of Compliance	Phone: 404-727-2398 Email: compliance@emory.edu	Any potential ethical, legal, or business conduct violation; guidance on compliance-related issues
Internal Audit Division	Phone: 404-727-6146 Email: audit@emory.edu	Any potential financial violations; advice on developing risk mitigation strategies and business internal controls
Emory Police Department	Phone: 404-727-6115 Emergency: 404-727-6111 Confidential Tips Line: 404-727-TIPS (404-727-8477)	Criminal conduct; workplace violence; Clery Act Crimes
Office of Equity and Inclusion	Phone: 404-727-9867	Harassment or discrimination
Office of the General Counsel	Phone: 404-727-6011	Legal advice regarding University matters
Human Resources/Employee relations	Employee Relations Phone: 404-727-7625	Employment and labor law issues; policy violations; employee behavior and office morale; performance issues; hiring issues
Title IX Coordinators	Judith Pannell (Title IX Coordinator for Students) Phone: 404-727-4079 Email: jpanne2@emory.edu Lynell Cadray (Title IX Coordinator for University) Phone: 404-727-2611 Email: Lynell.cadray@emory.edu	Sex discrimination; sexual misconduct