

WHAT'S NEW

Chief Compliance, Ethics, and Privacy Officer

We are excited to introduce you to Chelsey J. Clements, the University of Florida's new Chief Compliance, Ethics, and Privacy Officer, who joined UF in May. In this role, Chelsey leads and coordinates UF's enterprise-wide compliance and ethics program, including UF Compliance and Ethics. Chelsey also maintains regular communication with UF administration and the UF Board of Trustees, keeping them apprised of important compliance and ethics related matters. Additionally, she oversees the continuing advancement of UF's already robust training, policy, and procedure development.

Prior to assuming this role, Chelsey was a shareholder at the law firm, Carlton Fields, P.A. where she focused on commercial and construction litigation. Chelsey is a double gator, receiving both her undergraduate and law degrees at the University of Florida.

Welcome to UF Compliance and Ethics, Chelsey!

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COI CHRONICLES

Understanding Supplier Conflicts of Interest

By David Altman and John Ciminillo, Conflict of Interest Analysts

Ensuring ethical practices in supplier relationships is crucial for maintaining integrity and trust in our institution's finance and accounting processes. This article outlines the key aspects of supplier/vendor conflicts of interest and provides a clear understanding of the policies and regulations governing these relationships.

Relevant Laws and Policies

UF employees must navigate several important policies and regulations to avoid conflicts of interest when engaging with suppliers and vendors. According to the Florida Code of Ethics for Public Employees:

- **Prohibition on Purchases:** Employees cannot make official UF purchases from businesses where they, their spouse, or their child have managerial roles or a material interest greater than 5%. Nor can an employee privately sell, rent, or lease to their own unit or any unit over which the employee has purview. (Florida Statutes, Section 112.313(3)).
- **Outside Employment:** Employees are prohibited from having outside employment that creates a continuing or frequently recurring conflict between private interests and the performance of public duties, or that would impede the full and faithful discharge of public duties. (Florida Statutes, Section 112.313(7)).
- **Restrictions on Procurement of Contractual Services:** An employee acting in an official capacity may not directly or indirectly procure contractual services for his or her own unit from any business entity of which a relative is an officer, partner, director, or proprietor or in which the officer or employee or his or her spouse or child, or any combination of them, has a material interest. (Florida Statutes, Section 112.3185).

In addition to state regulations, UF has its own policies to manage conflicts of interest:

- **Disclosure Requirements:** Employees must disclose any outside activities and financial interests as outlined in the UF Policy on Conflicts of Commitment and Conflicts of Interest.

- **Appearance of Impropriety:** The same policy restricts actions that may give the appearance of impropriety, ensuring that employees' private interests do not influence their public duties.

Exemptions

While these guidelines are strict, there are limited exemptions under the Florida Code of Ethics (Section 112.313(12), Florida Statutes):

- **Sole Source:** The entity is the only provider of the needed service or product.
- **Research Sponsorship/Technology Licensing:** The entity sponsors UF research or licenses UF technology.
- **Minimal Transactions:** The total business is less than \$500 per calendar year.
- **Competitive Bidding:** The entity is selected through a competitive process.

The UF Conflicts of Interest (COI) Program and our other Compliance Partners evaluate these potential exemptions to ensure compliance with all legal requirements.

Key Takeaways and Closing Remarks

To maintain transparency and integrity in supplier relationships, here are the three key takeaways:

1. **No Purchases from Employee Owned or Managed Businesses:** UF employees must not make official purchases from businesses owned or managed by themselves or their immediate family/household members.
2. **Vendors/Suppliers Restrictions:** Vendors or suppliers must not sell to UF divisions or units where they or their family members are employed in purchasing or decision-making roles.
3. **Disclosure of Potential Conflicts:** Both employees and suppliers/vendors are required to disclose any potential conflicts of interest to UF before initiating any business activities that could benefit themselves or their relatives. Exceptions are limited and specific, such as sole source situations.

If you or your family member own more than 5% of, or manage a company that registered as a supplier at UF before February 2022, please contact the COI Program at UF-COI@ufl.edu for a conflict review.

Unsure What to Disclose? Check out [our website](#) explaining UF's current disclosure requirements

UF Research Integrity, Security & Compliance

By Cassandra Farley, Director, UF RISC

New Responsible Conduct of Research training required by researchers conducting research sponsored by NSF

Effective May 20, 2024, the National Science Foundation (NSF) populations that are required to be trained in the Responsible and Ethical Conduct of Research (RECR) was expanded to include faculty and other senior/key personnel (PAPPG 24-1). For more information about the requirement and how to complete the required training, visit <https://research.ufl.edu/rcr/rcr-training/citi-rcr-training/>.

Please contact RCR@research.ufl.edu with any questions.

New Policy: Licensing of Private Remote Sensing Systems

UF has recently implemented a policy that sets forth the procedures to manage the licensure and operation of Private Remote Sensing Systems. Private Remote Sensing Systems can conduct remote sensing and collect unenhanced data by an instrument in orbit of the Earth. For more information, view the policy [here](#).

UPCOMING EVENTS

October Safety Month

UF Environmental Health & Safety will be hosting a series of events throughout the month of October to raise awareness and promote a strong safety culture at UF. Please stop by their tabling events to meet EH&S staff, learn more about their safety initiatives, and grab some giveaways. Check out this [flyer](#) for more details.

November Compliance and Ethics Month

Join us in November to celebrate *Compliance and Ethics* Month. UF and UF Health will be planning activities throughout the month on the topics of compliance, ethics, and privacy. Stay tuned!"

Youth Compliance News

By Sophia Andrews, Assistant Director of Youth Compliance

Summer Camp Update

Summer at a university often serves as a great semester to plan a vacation or prepare for the upcoming fall semester. For those who work with youth it is our busiest time of the year. UF Summer Camps provide essential childcare through educational and recreational programs. A variety of camps are hosted throughout campus and across the state by various units including the University Athletics Association and UF Health. Summer 2024 has allowed the university to host over 100 youth camps. Thank you to all our faculty, staff, students, and volunteers who supported summer youth activities.

As we conclude the summer camp season, it is important to ensure your department is maintaining camp records. Camp program directors or coordinators please complete the [2024 Post Summer Camp Survey](#).

Youth Compliance Consultations

Are you considering hosting youth activities? Are you currently hosting youth activities? If so, schedule a consultation with Youth Compliance. A consultation can be customized to address the needs and scope for your specific program. A Youth Compliance consultation can be conducted one-on-one or amongst a group.

Youth Activities include but are not limited to: Campus Tours, K-12 Fieldtrips, Summer Camps, Minors in Laboratories, Community Outreach/Engagement, Third-party groups, University Sponsored Student Organization youth activities.

Meeting Request: [Book a Consultation](#)

Questions or Concerns: [Youth Compliance Contact Form](#)

SECURITY IN **ACTION**

Secure-In-Place Devices

By Joe Carriker, Director of Physical Security

As part of the University of Florida’s ongoing commitment to enhancing the safety and well-being of students, faculty, staff, and visitors, the University is installing secure in-place locking systems inside many academic classrooms. Our mission is to enhance safety, reduce risk, and provide technology to the university community designed to protect where there is a potential for active threats.

The secure-in-place technology is strategically positioned to fortify vulnerable areas and deter outside threats while law enforcement responds. These secure-in-place devices are strictly for emergency use. In certain classrooms, electronic locks can be activated with the secure-in-place device. These devices are particularly prevalent in Hough and Heavener Hall, where electronic doors are installed in classrooms and doors with card readers. For classrooms without electronic control, mechanical locks are installed to empower the community to secure their space from within a classroom door.

It is the responsibility of every member of the University community to be vigilant and respond promptly if they perceive an active threat outside their room. This includes activating the secure-in-place device or using the available device to lock their door, thereby securing their immediate area. This proactive response is a vital component in upholding the safety of our community.

Once the electronic secure-in-place device is activated, UF Police will be immediately notified. If you have locked your door with a mechanical lock, call 911 immediately and advise them of the emergency.

It is important to note that any misuse or tampering with this system is a direct violation of UF policy and the Student Code of Conduct. We must all understand the gravity of these actions and the potential harm they can cause to our community's safety.

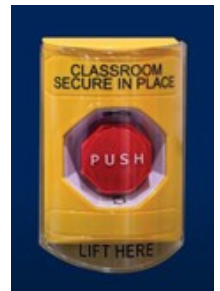
The devices will be located near the teaching podium or exit in the classroom. The University community should familiarize themselves with their areas and learn how to secure their spaces before an emergency occurs.

What do secure-in-place devices look like?

Call 911 if used in an emergency or if an emergency notification is received to secure in place, lock door.



Push in an emergency and your electronic door locks will secure. UFPD will also be notified.



On Campus Caterers

By Tara Hollow, Assistant Director, Operations

“Breaking bread, building bridges” is a saying that rings true in all of our lives. Campus life is no different. Whether it’s a business meeting, a networking event, or a celebration, food is a universal language that brings people together and can help lead to positive outcomes and constructive conversations.

Before the food and fun can commence, we must first ensure compliance with University policy. In order to help keep our campus event attendees safe and mitigate risk to the University, the Food and Beverage Services and Alcoholic Beverage policies were developed. It is your responsibility to familiarize yourself with UF policy, but here are some takeaways you should know:

- All events taking place on Campus, meaning all UF owned, -occupied, or -controlled lands and buildings throughout the state of Florida, must use Palm and Pine Catering or another UF Approved Caterer
- UF Approved Caterers are obligated to keep their insurance, licenses, and UF agreements up to date by submitting them to the Self-Service Portal
- Approved Caterers are constantly being added to or removed from the list, therefore, it’s your responsibility to ensure your caterer is current

- If you are looking to work with a specific caterer or need a caterer outside of the Gainesville area, the Business Services team is happy to assist you with having caterers approved that meet UF’s conditions on becoming an approved caterer be emailing them at catering@bsd.ufl.edu
- GatorConnect Permitting is required in order to serve alcoholic beverages, have a Mobile Food Facility (including food trucks), and to grill on University property
- Alcoholic beverages may NOT be served prior to 5:00pm, Monday through Friday
- Event organizers are required to serve non-alcoholic beverages and a sufficient amount of non-salty, non-snack food to be eligible to serve alcoholic beverages at an event
- Alcoholic beverages may be served by On-Premise TIPS trained UF employees meeting the criteria outlined in the Alcoholic Beverages policy

For more information related to catering please visit: UF Catering - Business Services Business Services (ufl.edu) and direct any questions to Business Services at (352) 392-0306 or catering@bsd.ufl.edu.

GatorConnect, permitting, and any policy related questions should be sent to the Office of the Vice President for Business Affairs at (352) 392-1336 or ufba-events@ufl.edu.

Injury/Incident Reporting Platform

By John Guerra, Associate Director, Occupational Safety & Risk Management

Environmental Health and Safety (EH&S) is excited to announce the launch of the new Injury/Incident Reporting platform, designed to **streamline** and **enhance** the efficiency of how all faculty, staff, students, volunteers, visitors, and contractors on University of Florida (UF) properties throughout the State of Florida or while on UF business can report an injury, illness, near-miss, or safety concern. We would like to embrace this change by highlighting the **benefits**, such as improved accuracy and timely reporting with this new **easy-to use** in-house **centralized data** reporting system. It will not only ensure all incident details are promptly and consistently reported but will allow for a robust investigation and mitigation program that can help **identify root causes** quickly. The Injury/Incident Reporting platform will also lead to measurable training programs and leading indicators that will ultimately cultivate a safer and healthier living, learning, and workplace environment.

Report an Injury/Incident to EH&S

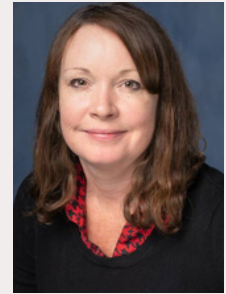
EMERGENCY CONTACTS

| | |
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| <p>Fire/Emergencies 911</p> <p>EH&S 352-392-1591</p> <p>UF Police 352-392-1111</p> <p>Needlestick Hotline 352-265-2727</p> <p>AmeriSys (Workers' Comp) 1-800-455-2079</p> <p>Other:</p> | <p style="text-align: center;">Is the injury serious or life threatening?</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;"> <p>Yes</p> <p>↓</p> <p>Call 911</p> </div> <div style="text-align: center;"> <p>No</p> <p>↓</p> <p>Apply first aid</p> </div> </div> <p style="text-align: center;">Report injuries to AmeriSys by calling 1-800-455-2079.</p> <hr/> <p style="text-align: center;">Report all incidents to:</p> <div style="display: flex; justify-content: center; align-items: center;"> </div> |
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COMPLIANCE Superstars

Kimberly Auld

Kimberly Auld received the Compliance and Ethics Superstar Award on July 10, 2024. Over this past year, we've enjoyed working with Kim on the foreign gifts and contracts report. We are especially thankful for her attention to detail, inquisitive mind, and her willingness to go the extra step to ensure accurate and timely reporting. Thank you, Kim for all your support in meeting these important regulations!



Kimberly Auld
Accounting Specialist for Finance and Administration
UF College of Medicine

Congratulations Kim!

If you know someone you would like to nominate as a future Compliance Superstar, please feel free to submit your nomination using our [Compliance and Ethics Superstar Nomination Form](#).

Making \$ense From Dollars

Annual Fraud Awareness Reminder

By *Melissa Tate, Associate Director, UF Antifraud Framework*

The University of Florida is committed to fostering an organizational culture where risk management structures are established to prevent and detect fraud, waste and abuse. The University has zero-tolerance for fraudulent activity and is resolute in upholding the highest level of ethical and business practices.

As UF employees, we are all responsible for safeguarding the University's assets and resources. Part of being a responsible steward is to be aware of the possibility of fraud in our organization. In accordance with [University of Florida Regulation UF-1.500](#), all levels of management must be familiar with the types of fraud, risks, and symptoms of fraud that may occur in their operational areas of responsibility and must be alert for any indication of fraud.

The University has implemented the [Antifraud Framework](#), a fraud risk management program, to provide hands-on support in the prevention and detection of fraud. Additionally, the Fraud Awareness Training course (PRO338) provides in-depth training to further equip employees to protect the university against fraud.

Employees are encouraged to take this training at least annually and as part of the new employee onboarding process.

Every member of the University community has the responsibility to report any actions or activities of concern that are not, or do not appear to be, in compliance with University policy and procedures. Please visit <http://www.compliance.ufl.edu/> for more information about what to do and how to report fraud, abuse, or actions of concern. If you are not comfortable making a report via normal administrative channels, you can also report your concerns by contacting the UF Compliance Hotline, which is a 24-hour, 7 days-a-week resource for reporting potential legal, policy, or ethical conduct violations or concerns. Anonymous reporting is available:

1. Call the University Compliance Hotline at 1-877-556-5356, 24 hours a day, 365 days a year.
2. Complete an online form located at: <https://app.mycompliancereport.com/report?cid=uofl>.

For questions about the Antifraud Framework or to request advisory services in your area, please contact us here: <https://uf.tfaforms.net/f/Finance-Hub>