

WHAT'S NEW

New Faces and New Roles

It is our pleasure to introduce you to the newest team members of UF Compliance and Ethics. In addition, we would like to inform you of two staff members who recently transitioned into new roles within our team.

New Staff:

Bonnie Chen is our new Administrative Assistant as of January 6, 2025. She holds a Bachelor of Science and a Master of Arts in Education & Technology for Learning from Hofstra University. Before she came to UF, she had been teaching for 12 years. She most recently taught middle school math and previously taught elementary school math and science. Her excellent customer service skills and experience as a teacher will be a great addition to our office.

Erica Roberts joined our team as a new Title IX Investigator on February 1, 2025. She completed her undergraduate studies at the University of Florida. Erica worked with the UF Child Protection Team and the Child Advocacy Center for twenty years, with a focus in child safety. Her expertise in forensic interviews and investigations will be invaluable to our team.

New Roles:

After working the last few years in the Conflict of Interest Program, John Ciminillo and David Altman have transitioned into new roles.

John Ciminillo, who became a Certified Compliance and Ethics Professional (CCEP) in 2024, transferred to the role of Privacy Analyst on December 6, 2024. His experience in regulatory compliance and excellent analytical and communications skills will continue to greatly benefit our compliance team.

David Altman transitioned into a Policy Coordinator role on January 13, 2025. He will be instrumental in coordinating the policy approval process in alignment with UF's Policy on Policies. With a diverse background in law, compliance, and conflict of interest management, David brings a keen eye for detail and strong problem-solving skills. His expertise will help streamline policy development and ensure alignment across the UF enterprise.

Gazette Highlights

Compliance Superstars Recognition

Pg 2

Youth Compliance News

Pg 5

**New Policy or Just a Tweak?
A Guide for University Units**

Pg 3

**New Federal Regulations
Impacting UF Research**

Pg 6

Training Opportunities

Pg 7

**Clery Compliance News
Conflict of Interest**

Pg 4

**Accessing Protected Health
Information**

Pg 8

COMPLIANCE Superstars

Through our superstar program, we recognize partners who have demonstrated a commitment to compliance and acting with integrity in all that they do. We are pleased to present our two new Compliance & Ethics Superstars!



Jackie Lavinder received the Compliance and Ethics Superstar Award on 2/10/25. Jackie was nominated by her supervisor who shared the following with us: “Jackie works very closely with over 500 sites ensuring over 7500 compliance items for students annually who go on clinical rotations. Her work fostering strong relationships, communication, and ensuring compliance for students and the college are essential for the University and accreditation. She ensures the College of Pharmacy maintains the highest level of compliance by ensuring the integrity to our processes and procedures.” Congratulations, Jackie!



Sandra Smith received the Compliance and Ethics Superstar Award on 2/11/25. Sandra was nominated by a colleague who shared the following with us: : “Sandra Smith is a key contact for our college’s Foreign Gifts and Contracts reporting. In her role with Clinical and Translational Science Institute, she is responsible for collecting and aggregating information about financial transactions with foreign sources. Her reliability in managing this important area has proven invaluable, as her work ensures the accuracy and timeliness of these critical reports.” Congratulations, Sandra!

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](#).

New Policy or Just a Tweak? A Guide for University Units

By David Altman, Policy Coordinator

Policies at the University of Florida do more than set rules—they safeguard the university's mission, ensure compliance with laws and regulations, uphold ethical standards, promote operational efficiency, reduce institutional risk, and set clear expectations for behavior. As a public institution, UF is also responsible for stewarding the public trust, ensuring its policies are well-structured, transparent, and aligned with institutional priorities.

Given their importance, any policy changes—whether creating a new policy, making substantive revisions, or implementing minor administrative updates—must follow a structured process to maintain clarity, consistency, and compliance.

For UF units considering a policy change, one key question is: **Do we need a new policy, a substantive revision, or just an administrative update?** Understanding these distinctions is the first step in keeping UF's policies effective, relevant, and in alignment with institutional priorities.

New Policy vs. Substantive vs. Administrative Revisions

To determine the best path forward, consider the type of change your unit is seeking:

- **New Policy:** A formal directive that establishes standards of conduct and applies broadly across multiple colleges, departments, or units (as opposed to a unit/college-specific policy). A new policy is required when no existing university policy addresses the issue at hand.
- **Substantive Revision:** A significant change to an existing university policy that alters its meaning or scope. This includes modifications to the policy statement, requirements, applicability, or responsibilities, including the Responsible Office or Responsible Executive.
- **Administrative Revision:** A minor change that does not impact the intent or meaning of the policy. Examples include updates to department names, job titles, broken links, or formatting corrections.

Once you've determined whether your unit needs a new policy, a substantive revision, or an administrative revision, the next step is to follow the appropriate process as outlined in UF's [Policy on Policies \(Policy 8-001\)](#). Each type of policy change follows a

straightforward path to ensure clarity, consistency, and compliance.

New Policies and Substantive Revisions

For policies that introduce new institutional directives or significantly modify existing ones, a formal approval process ensures that all stakeholders have input and that the policy aligns with UF's standards.

• Step 1: Initiating the Policy Development Process

The Responsible Executive assigns a Responsible Office to oversee the policy, and a Policy Liaison is designated to manage the process. The unit then submits a [Policy Development Intake Form](#) to the University Policy Group (UPG), which facilitates policy review and ensures compliance with Policy 8-001.

• Step 2: Consultation and Drafting

A consultation meeting with the UPG outlines the drafting process. The Responsible Office drafts the policy using the University Policy Template, coordinating with stakeholders—including legal, compliance, and operational units—to ensure alignment with existing UF policies.

• Step 3: Review and Approval

The Responsible Executive conducts an initial review before the UPG facilitates a 14-day public comment period, allowing the university community to provide feedback. After incorporating necessary refinements, the policy is approved and published on the UF Regulation and Policy Hub, making it an official University Policy.

Administrative Revisions: A Simpler Path

For minor updates—such as correcting department names, job titles, formatting, or broken links—a much simpler process applies. The Policy Liaison submits an [Administrative Revisions Form](#) to the UPG, which then reviews and approves the changes. Once finalized, the revised policy is updated on the UF Regulation and Policy Hub, ensuring accuracy without requiring the full approval process.

Need Guidance?

Visit the [UF Regulation and Policy Hub](#) for resources, templates, and more information on the policy process.

Test Your Knowledge

How much do you know about the Policy on Policies?

Big News from the World of Clery Compliance!

**By Rebecca DeCeculare, PhD, Assistant Director
Clery Compliance**

On December 23, 2024, President Biden signed the Stop Campus Hazing Act into law amending the Clery Act. The provisions of this amendment went into effect on January 1st, 2025, with the first major milestone required to be in place by July 1st, 2025. Clery practitioners have anticipated this amendment for years, with this iteration passing through the House and Senate in 2024 with unanimous bipartisan and bicameral support. It is also the first major change to Clery since the Violence Against Women Act (VAWA) amendment in 2013.

Below are the requirements for institutions from the Stop Campus Hazing Act:

- Include Hazing as a Clery crime – this includes CSA reports and training, the Daily Crime Log, and Timely Warnings
 - The 2026 Annual Security Report will be the first report to include Hazing as a Clery crime

- Develop institutional hazing policies/procedures and prevention programs
- Publish a Campus Hazing Transparency Report (CHTR) twice per year, starting in December of 2025. This will include information on hazing incidents reports to the institution involving a student organization for which a finding of responsibility is issued

The amendment has also renamed the law from Jeanne Clery Disclosure of Campus Security and Campus Crime Statistics Act to Jeanne Clery Campus Safety Act.

Lastly, effective January 21st, 2025, Civil Monetary Penalties (CMP) associated with Title IV violations – including Clery and Drug-Free Schools and Communities Act (DFSCA) – have increased from \$69,733 to \$71,545 per violation.

Conflicts of Interest

By Cassandra Farley, Director UF RISC

Effective January 13, 2025, UF Research Integrity, Security and Compliance (RISC) assumed oversight and management of Conflicts of Interests, Outside Activities and UFOLIO and will continue to manage COI for research. RISC is excited to work with campus in this new capacity. Our goal in realignment is to assist the campus community by creating a one-stop shop for COI questions and concerns.

RISC worked closely with the UF Compliance and Ethics team to ensure a smooth transition and greatly appreciates the UFCE team for their efforts over the past four years managing UFOLIO and outside activity prior approvals.

The current policy and procedures regarding disclosures in UFOLIO remain in place. Access to, and roles in, this system have not changed. If you have any questions or need assistance, please do not hesitate to reach out to the Conflicts of Interest Program at 352-392-9174 or by email at uf-coi@ufl.edu.

Youth Compliance News



By Sophia Andrews, Assistant Director of Youth Compliance

Summer Camp Planning

Now is the time to plan, book, and finalize summer camp dates and reservations. UF will host a wide range of educational and recreational summer camps on the Gainesville main campus and across the state. All youth summer camps require approval from the Office of Youth Compliance. The [Summer Camp Checklist](#) is a great resource for camp directors.

- Day camps must be registered at least thirty(30) days prior to the start of camp
- Overnight (24-hour)camps must be registered at least sixty (60) days prior to the start of camp

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 of your youth activity. A Youth Compliance consultation can be conducted one-on-one or for groups and in-person or online modalities.

Youth Activities include but are not limited to:

- Campus tours
- K-12 fieldtrips
- Summer camps
- Minors in laboratories
- Community outreach/engagement
- University Sponsored Student Organizations hosting youth activities
- Third-party groups hosting youth events on campus

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

New Federal Regulations Impacting UF Research

By Artiom Chacon, Chemical Hygiene Officer and Jason Clements, Biocontainment Coordinator, Environmental Health & Safety (EH&S)

1. EPA issued a new regulation for methylene Chloride Use:

In April 2024, the Environmental Protection Agency (EPA) issued a final rule regulating methylene chloride under the Toxic Substances Control Act (TSCA). The EPA has determined this substance poses unreasonable risk to human health primarily due to neurotoxicity from short-term exposure to the chemical and liver effects and cancer from long-term exposure. This new regulation effectively prohibits most industrial and commercial uses of methylene chloride. The use of methylene chloride in laboratories will continue to be allowed under the EPA rule, however, with new and strict regulatory procedures. No new purchases of products containing methylene chloride for non-laboratory use can be made any longer without EH&S review.

Additional information on this regulation can be found [HERE](#) and abbreviated information can be found on this [FACT SHEET](#). EH&S is developing an exposure control plan and will work with the labs to conduct the exposure monitoring for methylene chloride use. If you have any questions about the rule or its impact on your unit, please contact Chemical Hygiene Officer, Artiom Chacon (achacon@ehs.ufl.edu).

2. NIH implementing new DURC/PEPP Policy:

In May 2024, the Department of Health and Human Services issued a new policy, [United States Government Policy for Oversight of Dual Use Research of Concern and Pathogens with Enhanced Pandemic Potential](#) (DURC/PEPP), replacing the existing DURC policy and P3CO framework. These guidelines govern institutional and funding agency oversight of certain types of life sciences research involving high-consequence biological agents, toxins, and potential pandemic pathogens. The new policy,

effective May 6, 2025, expands the list of regulated agents and broadens the scope of research under oversight.

In collaboration with UF Research, the Biosafety Office is implementing measures to assess both existing and new research for compliance with this requirement. Principal Investigators (PIs) with registered projects should anticipate further communication on this topic. For questions about the policy or its potential impact, please contact the Biosafety Office at bsa@ehs.ufl.edu.

INSURANCE PURCHASES REMINDER

***By John Guerra, Associate Director,
Occupational Safety & Risk Management,
Environmental Health & Safety (EH&S)***

To ensure compliance with university policies and proper coverage, this is a friendly reminder that all insurance purchases at the University of Florida must be approved and processed through the EH&S Risk Management Department. This prevents inadequate policies or unclear coverage terms.

For procurement guidelines, visit the [Procurement's Website](#).

Need a refresher? EH&S offers summer training on insurance coverages—check the EH&S [Training Calendar](#) for upcoming details.

Have questions or need assistance? Contact [EH&S Risk Management](#) at 352-392-1591 or risk@ehs.ufl.edu - We're happy to help!

Training Opportunities

UFCE Learn over Lunch – Exploring the Truths and Myths of Export Controls

Join us: Tuesday, March 25 from 12 to 1 pm (via Zoom)

Presenter: Marsha Daerda, UF RISC Associate Director and Export Control Officer, and Stacy Beck, Compliance Analyst



U.S. export control laws and regulations govern the transfer of technology, information, and commodities overseas or to foreign nationals within the United States. UF Research, Integrity, Security and Compliance ([UF RISC](#)) assists faculty and staff with navigating these complex requirements. [Export Controls - UF Research \(ufl.edu\)](#)

On Tuesday, March 25, Marsha Daerda, UF RISC Associate Director and Export Control Officer, and Stacy Beck, Compliance Analyst, join the UF Learn over Lunch bunch to explain some of the ins and outs of export control laws and regulations (and how UF manages them). The presentation will primarily focus on truths and myths regarding the application of export controls and UF Policy regarding official UF business. We really want to know what truths and myths you would like to explore! Thus, in preparation for the session, please send loren.israel@ufl.edu questions or case hypothetical situations on which you would like to solicit advice. As always, there will be a Q&A at the end of the session.

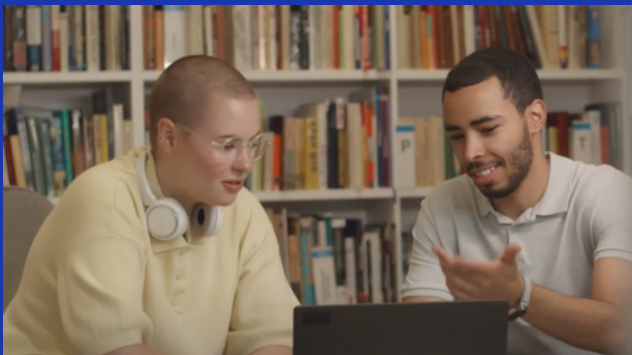
Though not required, attendees are encouraged to take the online training “Export Controls: The Basics” (UF_RSH613_OLT) through [myTraining](#) prior to the webinar.

For review, please find the UF Policy on [Export Control Compliance](#) on the UF Policy Hub.

Click [here](#) to register for the webinar.

UFIT TRAINING JUST RELEASED!

A Time-Saving Tool: Fast Path Solutions



CFO DIVISION UPCOMING TRAINING

PRO302: The Color of Money

March 4, 2025

1:30 – 4:30PM

[Register Here](#)

PRO303: Internal Controls at UF

March 6, 2025

9:00AM – 12:00PM

[Register Here](#)

PRO338: Fraud Awareness

March 11, 2025

9:00AM – 12:00PM

[Register Here](#)



Accessing Protected Health Information (PHI)

Do's and Don'ts

By Melanie DiMartino, Compliance Communication Specialist, UF Health Compliance & Privacy Services

According to a recent study by The HIPAA Journal, 2023 was the worst year on record for healthcare data breaches in the U.S., impacting approximately 133 million records.

All members of the clinical enterprise are required to maintain the privacy and confidentiality of patients at UF Health. Always follow UF Health's policies and procedures on privacy and security to help minimize the risk of a data breach at UF Health. Make sure you have a business need-to-know before accessing Protected Health Information ("PHI"), only access the minimum necessary information that is needed to do your job, and NEVER access information for personal reasons.

Here are some helpful reminders to keep in mind:

DO:

- Only access the information necessary to perform your job duties.
- Only disclose information when there is a business need-to-know or to individuals authorized to receive the information.
- Before accessing PHI, ask yourself, is this information necessary to do my job?
- Follow UF Health's policies and procedures regarding accessing PHI.
- Immediately report unauthorized access and any other known or potential breaches to Privacy Services.
- Contact Privacy Services directly if you have questions or need clarification on any UF Health privacy policies.
- Avoid accessing PHI belonging to patients you know in a personal capacity. Instead, refer them to another co-worker for assistance to help eliminate any potential for conflict.

DO NOT:

- Access records out of curiosity, for non-work related or personal reasons.
- Use your employee credentials to directly access your own or your minor child's medical record. Use the patient portal or contact Release of Information in the Health Information Management Department instead.
- Share patient information with colleagues who do not have a legitimate business need-to-know.
- Access, use or disclose information that exceeds what is necessary to accomplish the intended purpose.
- Fail to report to Privacy Services instances of unauthorized access or any other type of known or suspected privacy violation.

Privacy violations are taken very seriously, and they will result in corrective action up to and including termination from employment based on UF Health policies.

If you have questions or need to report an issue, contact Privacy Services directly at:

- UF Health Central Florida: 352-323-5356 or privacy@shands.ufl.edu
- UF Health Shands: 352-627-9050 or privacy@shands.ufl.edu
- UF Health Jacksonville: 904-244-1979 or privacy@jax.ufl.edu
- UF Health St. Johns: 904-819-4221 or privacy@shands.ufl.edu

For anonymous reporting, please contact the UF Health Compliance Hotline

- UF Health Hotline Number: 888-329-3569
- Online Reporting Link: ycompliance.report.com/report?cid=UFH

References: Alder, S. (2024, January 21). Security breaches in healthcare in 2023. <https://www.hipaajournal.com/security-breaches-in-healthcare/>