



Chancellor's Working Group on Ethics and Integrity Report and Recommendations

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THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL

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Executive Summary

In May 2015, the Ethics and Integrity Working Group (hereinafter the Working Group) was created and charged by Chancellor Carol L. Folt to examine and offer recommendations on how the University of North Carolina at Chapel Hill might strengthen its commitment to ethics and integrity. Through extensive research and frank discussions, the Working Group identified four key areas for potential action:

1. Develop a unifying campus statement on ethics and integrity.
2. Identify influences that shape the campus culture of ethical behavior.
3. Inventory ethics training across all campus units; evaluate the awareness of expectations and consequences of unethical behavior; and identify areas for consolidation and improvement.
4. Develop a plan for broad and comprehensive programs for reporting unethical behavior and questions of integrity, including identifying areas for expansion of an ethics reporting tool and assessing the cultural issues associated with widespread integration and expansion of an ethics reporting tool.

Within these areas, the Working Group developed the following recommendations:

- I. Reaffirm the University's Commitment: Adopt a statement on ethics and integrity to serve as the overarching declaration of ethical principles to be adhered to by all members of the University community.
- II. Embed the University's Commitment: Address influences that shape the campus culture of ethical behavior by:
 - a. Holding all members of the University community to the same standards for ethical behavior, integrity, and compliance and applying those standards consistently in the investigation of concerns and potential violations.
 - b. Conducting a meaningful review of the University's policy on retaliation and communicating a clear commitment to upholding protections against retaliation.
 - c. Creating opportunities for constructive structured dialogue around the issue of conflict avoidance and conflict management and developing training programs around these issues.
 - d. Sharing investigation outcomes with affected parties to the extent allowed by law.
 - e. Developing a comprehensive exit interview/survey program that is consistent across the University.
 - f. Inviting the campus community to participate in ongoing discussions about demonstrating the University's commitment to ethics and integrity.

- III. Educate and Train: Ensure that all members of the University are aware of the expectations and consequences associated with ethical behavior by:
 - a. Providing leadership by creating the position of Chief Integrity and Policy Officer.
 - b. Supporting the work of the Chief Integrity and Policy Officer through a representative group of faculty and staff.
 - c. Sharing information, new initiatives, and best practices on ethics and integrity programs across campus units.
 - d. Reporting systemic problems or gaps to appropriate lines of authority to facilitate corrective action; maintaining the autonomy of the Chief Integrity and Policy Officer to serve as an independent investigator and to compel corrective action when unit responsibilities are not being properly fulfilled.
 - e. Overseeing and managing the ethics and integrity portion of all training and orientation sessions.
 - f. Communicating the University's commitment to ethics and integrity.

- IV. Expand Reporting and Establish Oversight: Expand opportunities for members of the University community to report concerns and potential violations by:
 - a. Considering expanding reporting categories in EthicsPoint, the University's Compliance Line, taking into consideration the advantages, disadvantages, and input from offices with existing reporting and compliance functions.
 - b. Communicating all reporting mechanisms broadly to the University community.
 - c. Forming a representative group of campus constituencies to review EthicsPoint reports and identify trends and areas of concern.

These recommendations are discussed in depth in Section III of this report.

The Ethics and Integrity Working Group and the Policy and Procedures Working Group arrived at a joint recommendation to create the position of Chief Integrity and Policy Officer and establish a new Office of Integrity and Policy. This independent, central office, under the direction of the new Officer, would support the University by strengthening cultural and procedural best practices related to ethics and policy. The office would be responsible for three primary functions:

1. Awareness and Promotion: Foster awareness of the Statement of Ethics, encourage a culture of ethics and integrity, and help the University community be aware of the resources available for everyone to take an active part in upholding University expectations and values.

2. **Monitoring and Reporting:** Serve as a resource for University units, identifying policies and procedures that need review or updating, finding gaps or conflicts in policies and procedures, and sharing recommendations to help units resolve identified issues. In addition, the office will act as a clearinghouse for reporting concerns and violations, pointing people to the best resources, and ensuring appropriate resolution and communication of issues reported through EthicsPoint.
3. **Policy Management:** Manage a central web repository for all policies across the University, enabling consistent and clear policies and providing implementation support for the entire policy lifecycle.

This recommendation is discussed in depth in Section IV of this report.

I. Working Group Charge and Membership

The Ethics and Integrity Working Group (hereinafter the Working Group) was charged by the Chancellor to examine how the campus might create an optimal culture, principles, and practices to reinforce integrity and ethical behavior throughout the University. The Working Group was asked to consider both culture and practices, including specific policies and processes that will enable clear, consolidated channels through which all members of the University community can effectively speak up and share ethical concerns anonymously or confidentially.

The Working Group was asked to recommend ways in which the University could best oversee its commitment to integrity and compliance with all applicable laws, regulations, and policies. Finally, the Working Group was asked to identify additional processes, systems, personnel, and training to reinforce integrity and ethical behavior, including academic honesty, at every level.

Working Group membership encompassed a diverse cross section of the University community, with members representing faculty, administrators, staff, students, and trustees.

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II. Process

The Ethics and Integrity Working Group (hereinafter the Working Group) received its charge from the Chancellor at its first meeting on May 26, 2015, and continued to meet on a weekly basis through early November. Working Group meetings were open to the public and announced in accordance with North Carolina's open meetings laws (G.S. Chapter 143, Article 33C). All presentations, reports, and resource materials were posted on a Sakai site available to all working group members. A calendar noting meetings, discussion topics, and periodic deadlines was maintained and available for all members on the Sakai site. The Working Group was ably assisted by two dedicated Chancellor's Fellows, Olivia Farley and Katrina Hauprich. The Fellows conducted a significant portion of the research and data collection described in this section, coordinated meeting logistics, maintained the Sakai site, assisted with the preparation of this report, and, as recent graduates of the University, contributed substantively to the Working Group's discussions. The UNC School of Government's Publications Division assisted in the preparation of this report by providing invaluable editing and proofreading services.

The Working Group began its efforts by reviewing existing ethics-related programs, training, practices, regulations, and reporting/compliance mechanisms on campus. It received a total of 13 presentations from various campus offices and programs, including information from or about the following:

- University Ombuds Office
- UNC School of Medicine *Program on Behaviors Towards Medical Students*
- UNC Department of Athletics *Up and Out Incident Reporting Guidelines*
- Department of Public Safety Clery Act compliance requirements
- Office of University Counsel Compliance Line (EthicsPoint)
- Research Compliance Program
- Office of the University Registrar FERPA compliance requirements
- Risk Management
- Office of Human Resources orientation programs (SPA and EPA) and personnel policies
- UNC College of Arts & Sciences orientation program
- UNC Equal Opportunity and Compliance Office
- Faculty Onboarding ethics and integrity resources
- UNC Honor System

Based on its review of existing campus programs, the Working Group determined that a number of programs and resources related to ethics and integrity are already in place. Some of these resources, such as the University Ombuds Office and the School of Medicine's *Program on Behaviors Towards Medical Students*, are viewed as national models. Any additional programs or initiatives recommended by the Working Group would augment or enhance this existing foundation.

After surveying existing campus programs and resources, the Working Group identified four key areas of potential action and divided into subgroups charged with further investigation and data collection in each area (see Appendix A for subgroup members). The subgroups focused on the following key areas:

- Subgroup 1:** Develop a unifying campus statement on ethics and integrity.
- Subgroup 2:** Identify influences that shape the campus culture of ethical behavior.
- Subgroup 3:** Inventory ethics training across all campus units; evaluate the awareness of expectations and consequences of unethical behavior; and identify areas for consolidation and improvement.
- Subgroup 4:** Develop a plan for broad and comprehensive programs for reporting unethical behavior and questions of integrity, including identifying areas for expansion of an ethics reporting tool and assessing the cultural issues associated with widespread integration and expansion of an ethics reporting tool.

The subgroups conducted research throughout the summer and early fall, identifying issues and opportunities and bringing forward preliminary recommendations for consideration by the entire Working Group. The subgroups drafted preliminary reports, all of which were reviewed and discussed multiple times by the entire Working Group. During this process, the Co-Chairs briefed and received feedback from the Chancellor, the Chancellor's Cabinet, the Deans' Council, and the UNC-Chapel Hill Board of Trustees.

The Working Group's efforts were conducted in concert with the Policy and Procedures Working Group, which was charged by the Chancellor with examining and offering recommendations to strengthen the University's system for managing policies. The Chairs of both working groups identified areas of mutual interest and developed a plan for coordination to avoid duplication of effort and, where appropriate, to develop joint recommendations. The Working Group met twice with the Chair of the Policy and Procedures Working Group, Todd Nicolet, Associate Dean for Operations at the UNC School of Government, and was briefed by the Policy and Procedures Working Group's consultant, Parthenon-EY. The joint recommendation that emerged from this coordinated effort is contained in Section IV of this report.

The subgroups conducted extensive research on the four key areas identified for action. These research efforts included:

- **Inventory of Ethics Statements:** Subgroup 1 reviewed ethics statements already in existence at UNC-Chapel Hill, such as the student Honor Code, the Faculty Code, and the UNC Division of Finance Statement of Ethics. The group then reviewed and compiled a list of the ethics statements of 27 universities, including UNC-Chapel Hill's peer institutions, as well as the ethics statement of the Association of American Universities (AAU) (see Appendix B).
- **Inventory of Ethics Training and Education Programs:** In conjunction with Subgroup 3, the Chancellor's Fellows conducted an inventory of ethics-related training programs across campus and compiled a list of these programs, identifying the program name, coordinating office, topics covered, and whether

the program is mandatory for the intended audience. This research was intended to reflect the experience of any UNC-Chapel Hill constituent who sought online information about training. Because the research was focused on identifying reasonably accessible programs, some unit-specific training programs, which are not widely advertised, may have been omitted from this inventory. The inventory was reviewed by Working Group members for comments, corrections, and additions. Through this effort, Subgroup 3 identified a total of 42 ethics-related programs (see Appendix C).

- Inventory of Campus Reporting Mechanisms: In conjunction with Subgroup 4, the Chancellor's Fellows conducted an inventory of campus mechanisms for reporting alleged violations of policy and other matters of concern and compiled a list identifying the reporting mechanism, coordinating office, topics covered, procedures, and whether the reporting is confidential or anonymous (see Appendix D). This research was intended to reflect the experience of any UNC-Chapel Hill constituent who sought online information about reporting violations. The subgroup acknowledges that some unit-specific reporting mechanisms, which are not widely advertised, may have been omitted from this inventory. This inventory was reviewed by Working Group members for comments, corrections, and additions. Through this effort, Subgroup 4 identified 20 distinct reporting mechanisms covering a wide array of policies and potential misconduct.
- Benchmark Interviews—Reporting Mechanisms and Administrative Structure: Members of Subgroup 4, with support from the Chancellor's Fellows, conducted telephone interviews with nine benchmark universities to gain a deeper understanding of the structure of those institutions' ethics and compliance programs. The purpose was to determine the universities' use of and experience with EthicsPoint or other online reporting mechanisms. This information was compiled in a detailed chart and summarized to provide concise information for the Working Group's review (see Appendix E).
- Administrative Structure (Parthenon-EY Research): The Working Group benefited from research conducted by Parthenon-EY on compliance-related administrative structures. Parthenon-EY studied the policy office structure of 10 benchmark universities, reviewed the policy structure for all publicly available policies at UNC-Chapel Hill, and conducted interviews with UNC-Chapel Hill campus stakeholder groups. The details of this research will be included in the forthcoming report to be submitted by the Policy and Procedures Working Group.
- Administrative Structure: The Working Group also benefited from research conducted by Paul Krause, Senior Associate Athletic Director and former Senior Advisor to the Chancellor for Strategy and Planning, on organizational design, enterprise risk management, and policy office structures at six representative universities.

From this research, the Working Group confirmed its initial assessment that the campus already has in place a number of programs and resources related to ethics and integrity; it did not identify any significant gaps in programs, resources, or reporting mechanisms. Instead, the Working Group identified the need to:

- Reaffirm clearly the University's commitment to ethics and integrity.
- Understand and manage the influences that shape the University's culture.
- Create a common and comprehensive framework of ethical behavior across the University.

- Produce high-quality programs to reinforce a culture of ethical behavior.
- Communicate the University's commitment to resources and reporting mechanisms that encourage ethical behavior.
- Bring consistency to existing ethics-related programs.
- Develop a mechanism through which programs and resources can be coordinated to produce a comprehensive approach to ethics and integrity across the University as a whole and among all University constituencies.

After analyzing the research described above, the Working Group engaged in extensive, open, and frank dialogue through which it identified a number of opportunities to strengthen and build on existing programs to address the identified needs. The group arrived at a series of recommendations that are discussed in the following two sections. Section III presents the recommendations from the Working Group in the areas considered by the four subgroups. Section IV presents the joint recommendation from both working groups on an administrative structure through which the University's ongoing efforts related to ethics and policy may be implemented and carried forward.

III. Recommendations of the Ethics and Integrity Working Group

In this Section, the Ethics and Integrity Working Group (hereinafter the Working Group) presents its recommendations in the context of the four subgroup areas. Taken together, the recommendations present a four-faceted approach that builds on and strengthens existing programs and resources to address the concerns raised in the Chancellor's charge to the Working Group (see Section I):

1. Set expectations for ethical behavior.
2. Embed those expectations by addressing influences that shape a campus culture of ethical behavior.
3. Educate and train members of the University community on policies, procedures, and appropriate standards of conduct.
4. Expand opportunities for reporting alleged violations of policy and unethical behavior.

These recommendations identify *what*, in the group's opinion, should be done. Equally important is *how* these recommendations are to be implemented. The Working Group proposes that implementation be carried out by a new Chief Integrity and Policy Officer under the direction of the Chancellor (see Sections III.C and IV). Ultimately, many if not all of these recommendations could become ongoing functions of a new Office of Integrity and Policy (see Section IV).

In presenting these recommendations, the Working Group believes it is important to acknowledge that:

- Effecting cultural change is a long-term endeavor.
- In some instances, implementing these recommendations will involve long-term efforts.
- Some recommendations require input from many campus constituencies.
- Some recommendations involve administrative changes that will be affected by the availability of fiscal and personnel resources.
- The work of the Policy and Procedures Working Group, which is undertaking a critical review of the University's policy ecosystem and high-risk areas, is underway and will offer recommendations that are vital to this overall effort.

The Working Group does not view these factors as barriers to success; rather, it recognizes them as realities that must be taken into account when endeavoring to bring about the kind of change contemplated in the Chancellor's charge.

III.A. Reaffirm the University's Commitment: Statement on Ethics and Integrity (Subgroup 1)

A number of universities and colleges across the country have adopted overarching statements on ethics and integrity (see Appendix B for the list of institutions researched). Adopting such a statement at UNC-Chapel Hill will reaffirm and strengthen the University's commitment to and expectations for ethical behavior by all members of the campus community.

Representatives of campus constituencies should be invited to provide input on the statement, which ultimately should be presented to the UNC-Chapel Hill Board of Trustees for adoption as the campus's overarching statement on ethics and integrity. Campus constituencies that should be consulted about the statement prior to presentation to the Board of Trustees include (but are not limited to):

- Faculty Council
- Employee Forum
- Student Government (Student Body President and others designated by the President, Graduate and Professional Student Federation, and Honor Court)
- Chancellor's Cabinet
- Deans' Council
- Chancellor's Advisory Committee

The statement on ethics and integrity does not replace existing policies or codes of ethics applicable to individual departments, units, or constituencies, such as the student Honor Code. Instead, the statement builds on these existing values to serve as the University's overarching declaration of ethical principles that should be adhered to by all members of its community. It is not intended, however, to serve as an independent basis for discipline or sanction. Rather, it is the University's statement of the core values that underlie campus policies and procedures, with a concentrated focus on policies related to ethics and integrity. For example, the statement could serve as the framework for a central online communications portal where University policies related to ethics and integrity and reporting channels are easily accessible.

Once adopted, the statement should be communicated to the University community, alumni, and others in the manner best designed to reaffirm and strengthen its commitment to ethics and integrity.

The Working Group presents the following statement for consideration:

Carolina's Commitment to Ethics and Integrity

As the community of the University of North Carolina at Chapel Hill, we commit ourselves to the highest degree of integrity in fulfilling the University's mission to "*discover, create, transmit, and apply knowledge to address the needs of individuals and society.*"¹

1. N.C. GEN. STAT. § 116-1(b).

We will:

Respect the University's rich diversity of thought and culture by treating all members of the community in a fair and dignified manner.

Promote a culture that encourages ethical behavior in all that we do.

Represent the University by conducting ourselves in a manner that enhances the University's reputation.

Accept individual responsibility for all of our actions.

Hold all members of the University community accountable for adherence to the highest ethical principles.

Protect the University by reporting any lapses in honesty and integrity.

Empower members of the campus community to fulfill their ethical and legal responsibilities without fear of retaliation.

Educate all members of the campus community about these ethical principles and all applicable laws and policies.

Require fair and equal enforcement of all laws and policies.

The ethical principles articulated here reaffirm the University's commitment to upholding the dignity of individuals and advancing the common good of our community. The University of North Carolina at Chapel Hill accepts its solemn obligation faithfully to sustain and transmit these values to future generations.

III.B. Embed the University's Commitment: Address Influences That Shape the Campus Culture of Ethical Behavior (Subgroup 2)

In identifying influences that shape the culture of ethical behavior on our campus, Subgroup 2 is operating under the following assumptions:

- Although they overlap, compliance, integrity, and ethical behavior are not identical or interchangeable.
- The culture of higher education plays a large part in shaping the University's view of integrity and ethical behavior.
- It is critically important that the University reflect on, identify, and address those aspects of its culture that may prevent people from making appropriate choices and taking action in the face of possible unethical behavior, lack of integrity, or noncompliance with the University's standards of ethical behavior.

Consistent Standards for All

The University is a community of high achievers. Its reputation is built on the work of excellent students involved in scholarship, research, community engagement, and other educational experiences; faculty who are leaders in innovative research, teaching, engaged scholarship, and public service; staff who are themselves innovators and contributors to all aspects of campus life while meeting their responsibilities to keep campus operations running; and administrators who are at the forefront of the issues facing higher education and who are responsible for developing policies and procedures that reflect the University's values and comply with legal requirements. These policies and procedures enable others to study, work, and be active members of the campus community and allow the University to deal with the ever-changing dynamics of higher education.

An important element of a positive campus culture that encourages adherence to high standards of integrity and ethical principles is equal and consistent application of laws, policies, and standards of behavior. If the campus community perceives (rightly or wrongly) that some of its members are above, or are treated as being above, the policies, values, and guiding principles of the institution, individuals will be discouraged from questioning such members or reporting allegations of their misconduct. Whether such perceptions are grounded in reality is, for purposes of this discussion, irrelevant. The perception that some members of the community are too powerful, too well connected, too successful, or too important to be held to the same standards as the rest of the community undermines the entire infrastructure of the campus's value system.

To prevent such perceptions or, to the extent they exist, to correct them, the campus must insist on fair and equal enforcement of all laws, policies, and standards for all members of the community and at all levels of the institution, and it must clearly and strongly communicate its commitment to do so.

Civility Cannot Result in Inaction

In general, the University exemplifies the culture of civility; this is almost always a strength. Members of the campus community expect interactions between colleagues, peers, students, and teachers to be framed in a context of politeness, courtesy, and respect.

The University assumes that all members of the campus community are acting in good faith and meeting their responsibilities. Indeed, it would be a dramatic change to assume otherwise, and such an assumption would hurt the University. However, when evidence of misconduct is brought to the appropriate entity on campus, it must be examined with an open mind. The University must find ways to encourage everyone to raise concerns and take those concerns seriously.

Members of the campus community may be reluctant to disagree openly with someone even if they think something may be amiss. This reluctance may arise due to fear of jeopardizing a professional relationship, out of concern for others' well-being, or because raising an issue would be considered a challenge.

There also may be a perception that even when issues are raised formally, no action is taken. This perception may occur if an individual expresses a concern and is given no information on the resolution of the matter. Alternatively, an individual may have discussed or considered addressing an issue formally but failed to take action due to a belief that nothing will change or because he or she was dissuaded by other individuals who wanted to avoid conflict. In other cases, individuals may fail to pursue formal action because they are afraid of possible negative consequences.

Another contributing factor can be the lack of action on the part of persons in authority. When such a person does not exercise his or her authority to investigate or address a problem, the perception of inaction and conflict avoidance is reinforced and, in fact, becomes reality. Sometimes the decision to take no action is reasonable under certain circumstances, but in the face of allegations of misconduct, it can never be viewed as reasonable. In such situations, the decision may result from a lack of knowledge, a misunderstanding of one's own authority, a practice of avoiding conflict, or a desire not to know of problems.

The practice of avoiding conflicts, difficult conversations, and decisions, coupled with the restrictions on sharing personnel information, can contribute to the perception that action will not be taken and, in some instances, can actually result in inaction where action is needed.

Accountability and the Fear of Retaliation

A significant deterrent to reporting possible misconduct is the fear of retaliation. Many factors contribute to this fear. Among those factors are the lack of clarity about the University's policy concerning retaliation, the difficulty of proving retaliation, and a perceived lack of consistency in the policy's application.

Pride in Carolina

Almost every member of the campus community is proud to be at the University and is protective of it. Questions about the University's commitment to the highest ethical ideals and about any lapse in the upholding of those ideals are taken seriously. This pride and sense of responsibility are assets to the University.

However, this pride and the accompanying protective impulse may inhibit an individual's willingness to acknowledge problems and to deal with them.

The University needs to help everyone understand that the greatest source of pride should be a commitment to UNC-Chapel Hill's values and to its long-term interests.

A Commitment to Change

A commitment to ethical behavior, integrity, and compliance in every aspect of campus life may require significant changes in some areas. The fact that the University is engaging in this conversation demonstrates its commitment to making change. But conversation is not enough—some will say, “show me” or “actions speak louder than words.” From the highest University official on down, everyone must continue to reaffirm the campus community's commitment to high standards of ethics and integrity.

Recommendations and Suggested Sequence of Implementation

First Steps:

1. The Chancellor should make a bold public statement on integrity, ethics, and compliance, announcing unambiguously the University's recommitment to living its values. Such a statement should be made available to everyone in the University community (including alumni) and beyond.

2. The University should conduct a meaningful review of its policy on retaliation and make changes if necessary.
3. The University must apply the same standards in investigating and responding to all concerns that are brought forward.
4. The University should create opportunities for constructive structured dialogue around the issue of conflict avoidance and conflict management. Emphasis should be placed on understanding that pride in the University must not affect accountability and adherence to ethical standards. These dialogues should be creative, practical, and relevant to the intended participants.

Concurrent with First Steps:

1. The University must regularly reiterate its values and principles and make clear through word and deed that all are held to the same standards for ethical behavior, integrity, and compliance.
2. University leadership should regularly reiterate the University's protections against retaliation.
3. To the extent allowed by law, the appropriate authorities should consider sharing investigation outcomes with affected parties.

Next Steps:

1. The University should develop a comprehensive training program around roles and authority and a separate program for conflict management. This training should be creative, ongoing, practical, and relevant to the different populations of the University community.
2. The University currently has no systematic means of capturing the issues and concerns of individuals leaving departments, courses, or the University. Development of a comprehensive exit interview/survey program that is consistent across the University community will assist in identifying potential issues and trends. One consideration in developing an effective program must be a mechanism for reassuring individuals leaving the University that information they disclose in this setting will not be used against them at a later time.
3. Campus leaders should develop ways to invite both self-identified and anonymous input on how the campus community can demonstrate commitment to its values. This would allow everyone to participate in the ongoing discussion and would serve as a reminder that good ideas can come from anyone.

III.C. Educate and Train:

Inventory of Ethics Training across Campus, Evaluation of Expectations and Consequences, and Oversight (Subgroup 3)

Inventory of Ethics Training Across Campus

Research of University programs identified at least 30 training programs related to ethics and integrity (see Appendix C). While this figure represents a variety of existing programs with a significant investment of resources, these programs would benefit from a consistent presentation of solid principles related to the University's culture and values, particularly in terms of ethical behavior and integrity. A common starting point and consistent language could help to instill a sense of mutual responsibility.

For example, several distinct groups in the University community receive orientation training: incoming undergraduate, graduate, and professional students; teaching assistants; staff; faculty; and postdocs. There appears to be inconsistency in both the language that is used to address ethics and integrity and the materials that are presented during orientation. Requirements for participation in the various programs also appear to be inconsistent.

In addition, there appears to be some difficulty in obtaining information regarding existing resources related to ethical behavior and in reporting concerns about possible violations of the University's principles. The availability of resources needs to be widely communicated to the campus community, and those resources should be easily accessible by students, staff, and faculty. Campus resources such as the Ombuds Office (which does not accept formal complaints or notice for the University); reporting mechanisms through Human Resources, the EOC Office, the Department of Athletics *Up and Out* Incident Reporting Guidelines, and EthicsPoint; and the training on ethical behavior currently offered through the EOC Office, Human Resources, Student Affairs, and individual departments should be widely communicated and easily accessible.

Evaluation of Expectations and Consequences

The lack of mandatory training for faculty and teaching assistants suggests that there are inconsistent expectations about faculty members' and teaching assistants' responsibility for academic integrity. In addition, there is insufficient discussion of the consequences of non-compliance for every responsible party at the University. The statement of expectations also varies greatly depending on who provides the training and what materials are used to deliver the message.

Recommendations

The following recommendations were discussed for near-term implementation:

1. The University should create a full-time position of Chief Integrity and Policy Officer (or roughly equivalent title) at the level of the Chancellor's Cabinet. This individual would report directly to the Chancellor.

2. The independence and autonomy of the Chief Integrity and Policy Officer would also be enhanced by additional protections for this position, such as specified terms.

In addition, to maintain independence and effectiveness, the Officer should report periodically to the Board of Trustees.² He or she would lead a new Office of Integrity and Policy (discussed fully in Section IV of this report). The proposed role and responsibilities of the Chief Integrity and Policy Officer are discussed in Section IV and would include the following:

- Serve as the primary leader of ethics and integrity initiatives at the University.
 - Establish a standing committee composed of representative faculty and staff from throughout the University community who would serve as Ethics Partners for their respective units. Each individual would serve as a resource for his or her unit in handling issues related to ethics and integrity. The creation of a system of partners throughout the University would aid in reporting and would establish consistent communication across all departments. In addition, the inclusion of faculty members on this committee would enhance faculty engagement and governance across campus.
 - Convene regular meetings of the Ethics Partners to share information, promote new initiatives, and discuss and disseminate best practices among units. Importantly, this group could also serve as an “early warning indicator” of systemic problems in behaviors or gaps in processes on campus.
 - Report systemic problems or gaps to appropriate lines of authority to facilitate corrective action. The Officer would also maintain autonomy to serve as an independent investigator and compel corrective action when unit responsibilities are not being properly fulfilled.
 - Oversee and manage the ethics and integrity portion of all training and orientation sessions at the University level to establish centralized accountability (“ownership”) for the presentation of this information and promote the use of a common set of language, materials, and expectations.
 - Serve as a collection point for all reports that are submitted via the University’s Compliance Line (EthicsPoint), which would then be communicated to appropriate units for investigation and resolution. The Officer would oversee tracking of the status and resolution of all reports to ensure that they are investigated in a timely fashion and resolved appropriately. Where appropriate and permitted by law, the Officer would also ensure that resolutions are communicated to the individual who made the report (hereinafter the reporter).
 - Emphasize the use of existing resources when possible, identify places where additional resources can be brought to bear, and collaborate with other units on campus for investigative purposes.
2. Launch a new campaign led by Chancellor Folt to reaffirm the University’s values. This new campaign would feature a statement from the Chancellor that communicates the University’s commitment to ethics and integrity and helps to develop a shared sense of responsibility and community at the University.

Ideas for Future Initiatives

Several possibilities were discussed for potential future consideration:

1. Create new standardized orientation sessions for all members of the University community that provide consistent information about ethics and integrity and emphasize its importance in all aspects of the University's mission.
 - The orientation should be high-quality and in-person if possible and should be emphasized as part of the culture at the University.
 - The orientation should focus on highlighting existing resources, such as the Ombuds Office (which is a confidential and off-the-record resource), while also establishing a common set of expectations, an understanding of reporting tools, and zero tolerance for retaliation.
 - The University needs to develop a deliverable message that will be taken seriously by all parties; it needs to place the right emphasis at the University level to ensure that the message reaches every unit; and it needs to ask for reinforcement of that message at the unit level.
2. Establish refresher courses for every level of the University to communicate updated information/policies/procedures, reinforce information from initial orientation sessions, and re-emphasize the culture at the University.
3. Create additional opportunities in the curriculum for first-year students to cover ethics, integrity, resources, University policy, student life, and other related topics in order to reduce the volume of information offered during first-year orientation sessions. These opportunities could include a reinforced emphasis on topics covered in existing courses; additional sections of "Navigating the Research University," where information on ethics and academic honesty is currently presented; or creation of a new "University 101" course. This type of initiative would require an analysis of the University and its resources to ensure that delivery of the curriculum is efficient, effective, and complete.

III.D. Expand Reporting and Establish Oversight: Reporting Mechanisms (Subgroup 4)

In identifying opportunities to expand options for reporting alleged violations of policy and unethical behavior, the subgroup focused on three points of inquiry:

1. Identify areas of expansion of EthicsPoint.
2. Draft charter responsibilities for a representative group that would be responsible for reviewing EthicsPoint reports.
3. Assess the cultural issues of widespread integration and expansion of EthicsPoint.

EthicsPoint at UNC-Chapel Hill

The UNC-Chapel Hill Compliance Line, housed in the Office of University Counsel, is an option for making an anonymous report using either the Internet or a telephone line to help the campus community identify and address compliance concerns about financial; research; HIPAA; or Environment, Health, and Safety (EHS) matters on campus in a positive, constructive environment. This Internet and telephone reporting service is not maintained on the University's systems, nor is it maintained by University employees. Reports can be filed anonymously, and the reports are held securely and confidentially on an external server. EthicsPoint, Inc., based in Portland, Oregon, is the commercial service provider for the University's Compliance Line. This commercial service provider was chosen for the quality and security of its service after careful review of several vendors' proposals.

Since its inception at the University in 2005, there have been 71 reports through the Compliance Line. Fifty-two reports (73.2%) were submitted online, and 19 reports (26.8%) were submitted through the hotline call center. Many reports have been transferred to the University's Internal Audit Department. Because the UNC-Chapel Hill EthicsPoint system does not have an "Other Reports" category, claims related to Human Resources matters are forwarded to the Office of Human Resources, the Equal Opportunity Compliance Office, and/or the Office of the Provost, as appropriate.

The vast majority of the reports (85.9%) were submitted by persons who wish to remain anonymous. Follow-up can be difficult when there is limited information because users may not check back into the system to respond to follow-up questions (see Appendix F for more information on EthicsPoint at UNC-Chapel Hill).

Areas for Expansion of EthicsPoint

At this time, additional information is needed to determine specific areas for expansion of EthicsPoint at UNC beyond the current reporting categories (financial, research, HIPAA, and EHS). Based on a survey of higher education institutions with a reporting hotline, eight or nine categories are typically listed. As noted from research provided by the Chancellor's Fellows (see Appendix E), categories included the following:

Academic Affairs	Harassment	Research
Athletics/NCAA	Hazing	Risk/Safety
Code of Conduct	HIPAA	Smoking
Conflict of Interest	Human Resources	Student Life
Criminal/Fraud	Information Technology	Title IX
FERPA	Intellectual Property	Workplace Conduct
Finance/Accounting	Personnel Misconduct	

Responsibility for further exploring the appropriate categories to add to EthicsPoint could be assigned to the new Chief Integrity and Policy Officer recommended in Section IV. The new Officer should consult with the offices within the University that are currently responsible for reporting and compliance functions.

Advantages and Disadvantages of Expanding EthicsPoint

The advantages of expanding EthicsPoint include providing an opportunity to address previously unknown or underreported issues and enabling potentially broader access by the campus community to an anonymous reporting mechanism. Disadvantages include capturing incomplete information, a sometimes limited ability to fully investigate a complaint due to the anonymous nature of the reporting, and the inability to report back to the interested party (again, due to the anonymous nature of the reporting mechanism).

Managing Expectations

Because the reporting mechanism is anonymous, the quality of the investigation depends on the amount of information provided by the reporter, the reporter's willingness to respond to additional inquiries, and the amount and quality of the documentation administrators can locate relevant to the allegation. Many allegations of financial impropriety are fairly straightforward to investigate because of the University's ability to audit financial records. Other categories may not be as straightforward in terms of availability of existing documentation, thus making both investigation and follow-up with the reporter challenging.

Developing Reporting Tools

In developing reporting tools, the University should:

- Communicate to the campus community the availability of other reporting lines in addition to EthicsPoint.
- Continue to encourage direct and timely reporting of concerns or threats that involve special compliance issues, public safety and security, or the need for immediate action.
- Develop a system for EthicsPoint reporting that is straightforward, accountable, and allows for follow-up of investigations.
- Identify the reporting tool with a broader title—individuals may not associate the phrase “compliance line” with broader issues of ethics and integrity.
- Expand EthicsPoint advertising and make information and instructions more accessible to the campus community.
- Consider the reporter when developing categories and classifications for selection; individuals may not identify or label their concerns in the same way that categories are labeled in the EthicsPoint system.
- Develop a coordinated communication system across units.
- Recognize that a reporting tool may not address the ability to resolve perceptions of “why report—nothing will be done,” because the mechanism is anonymous and thus limits the ability to provide follow-up to the reporter. Consider communicating more clearly the anonymous follow-up feature provided by EthicsPoint where a reporter can create a username and password so that the reporter can check on the status of his or her report and respond to follow-up questions from investigators while maintaining anonymity.

- Address the concerns of anonymity and confidentiality by determining how to protect the identity of the reporter in an open records environment.
- Provide additional access levels with an expanded reporting tool that monitors for potential emergency and time-sensitive reports.

Responsibilities for a Representative Group That Would Be Responsible for Reviewing EthicsPoint Reports

Reviewing EthicsPoint reports could be one of the functions of the new Office of Integrity and Policy recommended in Section IV of this report. Forming a representative group of University constituencies to periodically review EthicsPoint reports and data could provide an opportunity to identify trends and monitor follow-up by campus offices charged with investigation. Having such a group in place could serve the goals of balance, transparency, responsiveness, and timeliness.

It is important that the application of North Carolina's public records act (G.S. Chapter 132) be fully researched and understood before proceeding with a system for reviewing EthicsPoint reports. If North Carolina law requires these reports to be open to public inspection, the anonymous nature of this reporting mechanism could be compromised, thus defeating one of its primary benefits.

Cultural Issues of Widespread Integration and Expansion of EthicsPoint

The key to the success of any reporting mechanism is having a well-informed community. The communications efforts discussed throughout this report should include a clear statement on the availability of EthicsPoint and the categories of alleged violations that may be reported anonymously through it. These communications efforts should also inform the community of the availability of all reporting mechanisms.

IV. Joint Recommendation of the Ethics and Integrity Working Group and the Policy and Procedures Working Group:

Creation of an Office of Integrity and Policy

The Ethics and Integrity Working Group (hereinafter the Working Group) and the Policy and Procedures Working Group respectfully submit the following recommendation to the Chancellor for her review and consideration.

Introduction

While the Ethics and Integrity Working Group and the Policy and Procedures Working Group approached the University's needs from different angles, the two groups formed mutually reinforcing observations and submit a shared recommendation. This recommendation is presented within the larger report from the Ethics and Integrity Working Group and will be further informed by the forthcoming report from Policy and Procedures. Although the latter report will not be finalized for a few months, the core recommendation below has been reviewed and approved by the Policy and Procedures Working Group and was informed by stakeholders from across campus. That said, the detail provided in the reports from both working groups will be critical for the successful establishment of the proposed office.

Recommendation

The Working Group recommends the creation of a new office at UNC-Chapel Hill to strengthen a culture of ethical behavior and integrity and provide a robust structure for policy management practices that support such behavior. The title of the office should reflect an emphasis on both the promotion of a culture of ethics and integrity and the effective policy management required to support such behavior. The suggested title for this new office is the Office of Integrity and Policy.

This central office would support the institution by strengthening cultural and procedural best practices related to ethics and policy. It is critically important that the office operates and be accepted as reinforcing the culture of ethics and integrity across the institution through a service orientation balanced with investigative authority. Units across the University are responsible for implementing and enforcing effective policies, and this office would provide the support to enable them to do so effectively and efficiently.

The key risk to creating a central office is that it adds layers of bureaucracy without benefit. Even worse, a central office could become focused on being a policy authority, creating additional approval processes and an undue burden on units across campus. Encouraging a culture of ethics and integrity cannot be done effectively through mandate. This office must use its investigatory authority in the service of improving units rather than policing them, which is why this report intentionally encourages a focus on policy and separates the office from traditional risk management and compliance functions. Additionally, the success of the office should not be measured by numbers of policies or policy-related incidents. While an impact on one or both of these data sets may be an outcome of the services provided, focusing on such data

sets as measures of success would cause the office to become a policy authority to better control the measures to which it is being held accountable, emphasizing policies at the expense of practices. Instead, success should be measured by documenting work completed, surveying campus leaders and constituencies, and assessing the amount and quality of service provided to units across the institution. An effective office will be service-oriented and focused on reinforcing culture through communication, guidance, and support built on a foundation of consistent, accessible policies.

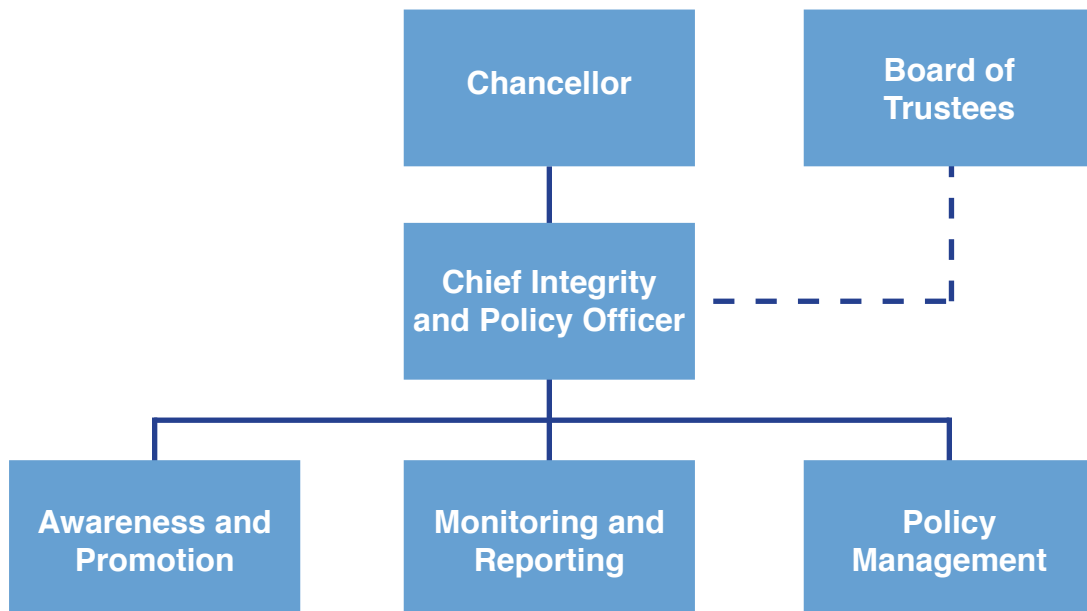
Integrity and Policy Officer

The office would be led by a Cabinet-level position, the Chief Integrity and Policy Officer (or roughly equivalent title). The position would report functionally to the University’s Board of Trustees and administratively (that is, in its day-to-day operations) to the Chancellor.³ The roles and responsibilities of the Chief Integrity and Policy Officer include three principal areas of responsibility: awareness and promotion; monitoring and reporting; and policy management (see Section III.C. for further discussion of specific roles and responsibilities of the Chief Integrity and Policy Officer). The Officer will focus on helping the University keep integrity in procedures and policy at the forefront of its actions.

Office Structure

Led by the Chief Integrity and Policy Officer, the Office of Integrity and Policy would have three functional units, as illustrated in Figure 1.

Figure 1: Office of Integrity and Policy



3. As noted in Section III.C, the independence and autonomy of the Chief Integrity and Policy Officer would be enhanced by additional protections for this position, such as specified terms.

Awareness and Promotion

The office would foster an awareness of the Statement of Ethics, encourage a culture of ethics and integrity, and help the University community be aware of the resources available for everyone to take an active part in upholding University expectations and values. To advance these functions, the office would:

- Initiate opportunities to educate, train, and reinforce a culture of ethics and integrity.
- Work with Ethics Partners identified from each unit to share information, promote new initiatives, and serve as points of contact for investigating issues.
- Recommend updates for orientation training for incoming undergraduate, graduate, and professional students; teaching assistants; staff; faculty; and postdocs to improve consistency and quality.
- Develop materials that promote the values and principles in the Statement of Ethics.
- Develop a comprehensive exit interview/survey program to help identify opportunities to strengthen a campus culture of ethics and integrity.
- Provide periodic review of training materials and the exit interview instrument.
- Develop a plan to communicate to the entire University community the various channels through which individuals may report concerns and potential policy violations.
- Report periodically on office activities and initiatives.

Monitoring and Reporting

The office would serve as a resource for University units, identifying policies and procedures that need review or updating, finding gaps or conflicts in policies and procedures, and sharing recommendations to help units resolve identified issues. In addition, it would act as a clearinghouse for reporting concerns and violations, pointing people to the best resources, and ensuring appropriate resolution and communication of issues reported through EthicsPoint. To advance these functions, the office would:

- Ensure that policies are reviewed and updated with a frequency that correlates to the level of risk they incur or are associated with for the University.
- Identify proactively or through coordination of efforts with other campus units, such as the Internal Audit Department and the Office of Internal Controls, areas that could benefit from policy and procedures reviews; perform associated reviews; and make recommendations to the appropriate lines of authority for improving policies, monitoring/enforcement, and compliance.
- Provide guidance to units seeking support or help with policy implementation and reporting.
- Report systemic problems or gaps to appropriate lines of authority to facilitate corrective action.

- Facilitate and encourage the use of all channels for reporting concerns and violations:
 - EthicsPoint (anonymous reporting)
 - Campus unit channels (for example, Human Resources, FERPA, Title IX, Honor Code, the Department of Athletics *Up and Out* Incident Reporting Guidelines, etc.)
 - Ombuds Office (not an avenue of notice to the University, but individuals in this office can provide guidance on conflict resolution and reporting mechanisms)
- Manage reports submitted via EthicsPoint as follows:
 - Collect reports and communicate with appropriate units.
 - Track status and resolution of reports and communication of resolution where appropriate and permitted by law.

Policy Management

The office would develop and maintain the documentation for all policies across the University, making consistent and clear policies available to the entire campus through a central web repository. To advance these functions, the office would:

- Develop a central policy website that serves as a repository for all policies across the University.
- Ensure that policies follow a standard template designed to facilitate communication and implementation.
- Enter all policies and policy changes in the web repository.
- Organize policies with hierarchies and categories that make it easier to search or browse for relevant policies.
- Provide guidance to units developing or revising policies.
- Develop feedback mechanisms that allow people to share the effectiveness of policies and offer suggestions for policy improvement.
- Work with the Monitoring and Reporting unit of the office to identify gaps and conflicts in policies.

Implementation of this Recommendation

The Working Group and the Policy and Procedures Working Group recognize that the administrative and regulatory process imposed on the University through which the new Office of Integrity and Policy (or any new office) would be established prevents rapid implementation of this recommendation. Both groups further recognize that many details

relating to the organization of the office, such as staffing levels, personnel job descriptions, and internal organization, will be informed by the ongoing work of the Policy and Procedures Working Group and affected by the availability of resources, fiscal constraints, and the need to utilize existing resources and personnel and avoid duplication of functions within the University. Both groups also believe that the Chief Integrity and Policy Officer should be actively involved in establishing the office. Therefore, this report suggests a phased approach to implementing this recommendation by first naming the Chief Integrity and Policy Officer, who would then be charged with the responsibility to develop the administrative plan for establishing the office, taking into consideration the factors identified above. Once the office is fully established, consideration could be given to integrating into its organizational structure other campus functions and positions related to integrity and policy.

Both groups recommend that an announcement regarding the creation of this office be accompanied by a campaign led by Chancellor Folt to reinforce the University's values. This campaign would feature a statement from the Chancellor that communicates the University's commitment to ethics and integrity and helps to develop a shared sense of responsibility and community at UNC-Chapel Hill (see Section III.C. for additional discussion of the communications campaign).

Appendices

Appendix A: Subgroup Membership

Subgroup 1: Reaffirm the University's Commitment: Statement on Ethics and Integrity

Julie Byerley
Michael Gerhardt
Ferrel Guillory
Norma Houston
Russ Shafer-Landau

Subgroup 2: Embed the University's Commitment: Address Influences That Shape the Campus Culture of Ethical Behavior

Wayne Blair
Julie Byerley
Paul Pogge
Terry Rhodes
Houston Summers

Subgroup 3: Educate and Train: Inventory of Ethics Training Across Campus, Evaluation of Expectations and Consequences, and Oversight

Jennifer Conrad
Haywood Cochrane
Gena Carter
Olivia Farley
Katrina Hauprich

Subgroup 4: Expand Reporting and Establish Oversight: Reporting Mechanisms

Pat Crawford
Kerri McNeill
Joy Renner

Appendix B: Ethics Statement Inventory

Institution	Statement
American Association of University Professors	Statement on Professional Ethics
Boston University	President's Statement of Commitment to Ethical Conduct Code of Ethical Conduct
Columbia University	Administrative Code of Conduct and Statement of Ethical Conduct
Duke University	Statement of Ethical Principles and Code of Conduct
Emory University	University Leadership Ethical Principles
George Washington University	Statement of Ethical Principles: Integrity and Respect; Responsibility and Accountability; Conflicts of Interest and Commitment; Harassment and Abuse of Power; Stewardship and Reporting
Indiana University	Principles of Ethical Conduct: Scope, Guiding Principles and Standards of Conduct
Johns Hopkins University	NONE
Northwestern University	Standards for Business Conduct: Individual Responsibility and Accountability; Compliance with University Policies and Procedures; Respect for Others; Conflicts of Interest and Commitment; Compliance with Applicable Laws and Regulations; Compliance with Contracts, Grants and Other University Obligations; Stewardship of University Resources; Recordkeeping; Internal Controls; Appropriate Treatment of Confidential Information; Electronic Resources Privacy; Obligation to Report; Consequences of Violations
Ohio State University	Code of Ethics
Penn State University	Values and Culture: Integrity, Respect, Responsibility, Discovery, Excellence, and Community (Note: ethics statement development is ongoing; web-based opportunity for input and feedback)
Texas A&M	Core Values: Excellence, Integrity, Leadership, Loyalty, Respect and Selfless Service Ethics & Code of Conduct

Appendix B: Inventory of Ethics Statements

Institution	Statement
<p>University of Southern California</p>	<p>Code of Ethics Know the Code Brochure Compliance and Ethics Program</p>
<p>University of California – Berkeley</p>	<p>Statement of Ethical Values: Integrity, Excellence, Accountability, Respect Standards of Ethical Conduct: Fair Dealing; Individual Responsibility and Accountability; Respect for Others; Compliance with Applicable Laws and Regulations; Compliance with Applicable University Policies, Procedures and Other Forms of Guidance; Conflicts of Interest or Commitment; Ethical Conduct of Research; Record Privacy and Confidentiality; Internal Controls; Use of University Resources; Financial Reporting; Reporting Violations and Protection from Retaliation</p>
<p>University of California – Los Angeles</p>	<p>Statement of Ethical Values for University of California True Bruin: Integrity, Excellence, Accountability, Respect</p>
<p>University of Connecticut</p>	<p>State Code of Ethics</p>
<p>University of Illinois</p>	<p>Code of Conduct University Ethics and Compliance Office Mission and Responsibilities:</p> <ul style="list-style-type: none"> • Promote an organizational culture that encourages ethical conduct and a commitment to compliance with laws, rules, guidance and University policies • Optimize compliance with University policies, procedures, and guidelines, which are based on the expectations defined in the University Code of Conduct • Enhance decision making at all levels by raising awareness of applicable laws, rules, guidance and University policies • Enhance employee due diligence to proactively detect, report, and respond to actual or perceived violations of law or policy • Contribute to the University's reputation for integrity as a world-class research and teaching institution
<p>University of Maryland – College Park</p>	<p>Mission and Goal Statement: (somewhat embedded in mission statement; could not find separate ethics statement) Principles of Ethical and Responsible Conduct: Respect for Others; Equal Opportunity; Avoidance of Conflict of Interest; Responsible Conduct in Research; Responsible Stewardship and Use of University Property, Technology, and Funds; Environmental Health, Safety and Sustainability; Respect for Privacy and Confidentiality; Appropriate Conduct with Respect to Gifts, Travel, and Entertainment; Appropriate Use of University Identity; Responsible Reporting of Suspected Violations and University Response</p>
<p>University of Minnesota – Twin Cities</p>	<p>Mission Statement: (somewhat embedded in mission statement; could not find separate ethics statement)</p>

Appendix B: Inventory of Ethics Statements

Institution	Statement
<p>University of Pennsylvania</p>	<p>Ethical and Responsible Conduct: Brief statement and link to policies/guidelines Statement of Faculty Responsibility</p>
<p>University of Pittsburgh</p>	<p>Mission Statement: (does not include mention of ethics, could not find separate ethics statement)</p>
<p>University of Southern California</p>	<p>Code of Ethics Know the Code Brochure Compliance and Ethics Program</p>
<p>University of Tennessee</p>	<p>Code of Conduct – General Principles and Statements of Ethical and Responsible Conduct: Ethical and Responsible Conduct; Responsible Reporting of Suspected Violations; Respect for Others; Avoiding Conflicts of Interests; Responsible Use of University Resources; Responsible Conduct in Research; Commitment to Environmental Health and Safety; Responsible Use and Protection of Confidential Information</p>
<p>University of Texas – Austin</p>	<p>Mission & Values: Core Purpose, Student Honor Code and the University Code of Conduct</p>
<p>University of Virginia</p>	<p>University Code of Ethics: (10 point list of action) Ethics Website with brief statement: One of the enduring characteristics of the University of Virginia is its commitment to integrity and high ethical standards. Long known for the Honor System, which has governed student conduct for more than a century and a half, the University has established complementary programs that underscore its historical emphasis on responsible and ethical behavior. These programs are working together to integrate ethics, honor, and integrity into all aspects of University life.</p>
<p>University of Washington-Seattle</p>	<p>Vision Statement: Integrity, Diversity, Excellence, Collaboration, Innovation and Respect</p>
<p>University of Wisconsin-Madison</p>	<p>Mission Statement: (does not include mention of ethics, could not find separate ethics statement)</p>

Appendix C: Inventory of Ethics Trainings and Education Programs at UNC-Chapel Hill

Training	Coordinating Office	Topics Covered	Mandatory?
Academic Integrity and Ethics	The Graduate School	A series of fundamental statements and guidelines that serve as resources for graduate students to maintain academic integrity. Source: http://gradschool.unc.edu/academics/resources/ethics.html	No
Academic Leadership Program*	Institute for the Arts and Humanities	Fellows are selected to engage in a series of activities to help them develop leadership skills, clarify their career commitments, build a leadership network within the campus and extend their contacts to other leaders beyond the University. The ALP fellowship year includes: <ul style="list-style-type: none"> • A week of leadership training with the Center for Creative Leadership in Greensboro, one of the nation's most respected leadership development organizations. Fellows participate in CCL programs with senior executives from the military, government, business and the not-for-profit sector. • Semester-long weekly seminars in the spring in which faculty discuss critical issues facing the University and formulate possible responses • Opportunities to meet with senior leaders inside and outside the University • One overnight and one full day retreat focused on career development, leadership skill assessment and the creation of a personal vision Source: http://iah.unc.edu/programs/ruel-w-tyson-ir-academic-leadership-programs/academic-leadership-program/	No, there is an application process with 8 Fellows selected annually.
Americans with Disabilities Act (ADA) Training	Equal Opportunity and Compliance Office	This session is designed to provide employees, supervisors and HR professionals with an overview of the ADA and ADAAA. It will also help remove negative stereotypes regarding employees with disabilities and separate ADA myths from facts. It highlights the need for us to appreciate the Ability in disability. It will also increase awareness of the University's Reasonable Accommodations in Employment Policy and familiarize employees and supervisors with their responsibilities and available resources. Source: http://eoc.unc.edu/training/for-employees/	No
Associate Professor Program*	College of Arts & Sciences in collaboration with the Institute for the Arts and Humanities	The 2015–2016 program will consist of six dinners and four lunchtime events. Dinners, hosted by alternating pairs of senior faculty leaders, will provide time and space for participants to forge connections beyond their departments and to discuss professional and academic issues of common interest. Lunch events will focus on topics such as: sustaining work-life balance at mid-career, managing increased expectations and opportunities for university service, developing leadership and negotiating skills, preparing for promotion to full professor, and positioning oneself in the academy as an established scholar. Source: http://iah.unc.edu/programs/faculty-life-cycle-programs/associate-professor-program/	No. All College faculty are invited to participate in the program in the first year following their promotion to associate professor.
Campus Security Authority Clery Act Training	Department of Public Safety	Online training to help designated Campus Security Authority (CSA) understand responsibilities and which crimes fall under the Clery Act. Source: http://clery.unc.edu/training/	Yes

* This training/program was included because it presents a potential platform for covering topics specific to ethics and integrity.

Appendix C: Inventory of Ethics Trainings and Education Programs at UNC-Chapel Hill

Training	Coordinating Office	Topics Covered	Mandatory?
<p>Chairs Leadership Program*</p>	<p>College of Arts & Sciences in collaboration with the Institute for the Arts and Humanities</p>	<p>The Chairs Leadership Program offers first-time and reappointed chairs a year of monthly confidential conversations in which they can share ideas, identify best practices and explore important issues related to the important roles they play within the university. Topics for discussion may include the chair's role in mentoring and evaluating new faculty, developing incentives and rewards for faculty productivity, strategic leadership and departmental goal setting, dealing with difficult interactions, developing new departmental resources and encouraging a collegial climate. The CLP incorporates a mentoring component by including in each class a mix of returning and newly appointed chairs.</p> <p>Source: http://iah.unc.edu/programs/ruel-w-tyson-jr-academic-leadership-programs/chairs-leadership-program/</p>	<p>No, the College recommends but does not require participation by newly appointed and reappointed chairs.</p>
<p>Core Skills Program for Faculty Leadership*</p>	<p>Center for Faculty Excellence</p>	<p>The Core Skills Program for Faculty Leadership helps faculty members identify and develop the skills they need to lead effectively in a variety of academic leadership roles. The program helps faculty members become more knowledgeable about how to perform key leadership tasks such as:</p> <ul style="list-style-type: none"> • Leading groups and meetings • Setting goals with individuals, groups, and organizations • Supervising one-on-one • Managing challenging interactions • Negotiating • Leading change • Resolving conflicts • Providing resilient leadership under stress <p>The program also helps faculty leaders strengthen their network of support and build valuable interdisciplinary contacts across UNC.</p> <p>Source: http://cfe.unc.edu/leadership/programming-and-events/</p>	<p>No. Workshops are presented individually. Faculty can elect to register for just one or for any number of the workshops in the series.</p>
<p>EDUC 130: Navigating the Research University*</p>	<p>Office of Undergraduate Education</p>	<p>This course will provide students with knowledge requisite for success at a research university. Students will explore the value of a liberal arts education as well as survey educational theories of academic motivation, resiliency, and self-advocacy. Through critical thinking, thoughtful analysis, and writing, students will examine the roles of research, diversity, and engagement in a community of scholars. The course material will be presented within a framework of students' current work toward academic success and their path to degree attainment.</p> <p>Source: http://studentsuccess.unc.edu/resources-carolina/academic/educ-130/</p>	<p>No. This course is open to all undergraduate students and is recommended for any student attending summer session with an academic eligibility status of IP or PR.</p>
<p>EPA Recruitment Training</p>	<p>Equal Opportunity and Compliance Office</p>	<p>Classroom training for employees who are responsible for recruiting positions designated as Exempt from the State Personnel Act (EPA) and employees seeking a better understanding of processes and procedures that promote diversity and non-discrimination in the recruitment process. Training explains how to conduct successful recruitment searches for EPA positions. Course material includes an overview of recruitment and search procedures to ensure the University's commitment to diversity and non-discrimination, general information about EPA RecruitmentWeb, and search committee responsibilities. The course will also provide information on how to develop recruitment plans, initiate searches, advertise for candidates. <i>(continued on next page)</i></p>	

* This training/program was included because it presents a potential platform for covering topics specific to ethics and integrity.

Appendix C: Inventory of Ethics Trainings and Education Programs at UNC-Chapel Hill

Training	Coordinating Office	Topics Covered	Mandatory?
<p>EPA Recruitment Training (continued)</p>	<p>Equal Opportunity and Compliance Office</p>	<p>review and evaluate applications, interview candidates and complete hires. Source: http://eoc.unc.edu/training/for-employee-recruiters/</p>	
<p>Ethics CPE Workshop</p>	<p>Finance Division</p>	<p>CPE (Continuing Professional Education) workshop entitled Ethics 101, which meets the NC State Board Requirements for North Carolina CPAs to receive two (2) CPE credits. Includes a discussion of Ethics applicable to CPAs in NC, but is not specific to Higher Education. Provides an opportunity to meet some professional certification requirements and is less expensive/more convenient than other options. Source: Information about this training was submitted by a Working Group member.</p>	<p>No</p>
<p>Ethics in the Workplace</p>	<p>The Parr Center for Ethics</p>	<p>Ethics in the Workplace is a semi-annual three hour workshop course offered to UNC-Chapel Hill employees through Human Resources. This course is designed to include an overview of ethical theories and has a strong emphasis on ethical decision making procedures. Participants discuss and evaluate cases relating to ethical dilemmas in the workplace (from dealing with inappropriate behavior from a fellow employee to evaluating one's ethical values in relation to institutional values in the workplace). Ultimately, the goal of the workshop is to provide an opportunity for UNC-Chapel Hill employees to consider ethical issues arising in the workplace and, further, to provide these employees with tools for evaluating and successfully resolving these issues. Source: http://parrcenter.unc.edu/programs/ethics-in-the-workplace/</p>	<p>No</p>
<p>Equal Employment Opportunity Institute Training</p>	<p>Equal Opportunity and Compliance Office</p>	<p>This course helps managers and supervisors required to take this course by law understand federal and state equal employment opportunity/affirmative action laws in the context of daily work situations to ensure a welcoming and inclusive environment at the University. Source: http://eoc.unc.edu/training/for-employees/</p>	<p>Yes, must be completed by all managers & supervisors within one calendar year.</p>
<p>Faculty Administrator Development Program (FADP)*</p>	<p>Center for Faculty Excellence</p>	<p>The goal of the FADP is to provide faculty leaders early in their tenure with the tools to succeed in their new position. The FADP strengthens their network of support and contacts across UNC, orients them to campus administrative systems, and helps them develop as leaders. The program introduces participants to these important campus systems:</p> <ul style="list-style-type: none"> • Diversity and Multicultural Affairs • Human Resources • Legal Affairs • Information Technology • Finance and Administration • Ombuds Office • Outreach (alumni, communications, development, governmental affairs) <p>These sessions introduce participants to these offices, identify the key responsibilities participants have in each area, help participants understand how best to discharge those responsibilities, and let participants know who to call for help when needed. Source: http://cfe.unc.edu/leadership/programming-and-events/</p>	<p>No</p>

* This training/program was included because it presents a potential platform for covering topics specific to ethics and integrity.

Appendix C: Inventory of Ethics Trainings and Education Programs at UNC-Chapel Hill

Training	Coordinating Office	Topics Covered	Mandatory?
Faculty Learning Community (FLC) on Strategy and Leadership*	Center for Faculty Excellence	<p>The FLC on Strategy and Leadership engages a select group of Carolina faculty leaders in a collaborative process of exploring these questions and discovering the answers for their units. Participants meet monthly during the academic year for discussions of readings and videos, peer mentoring, and presentations by senior campus leaders.</p> <p>Source: http://cfe.unc.edu/leadership/programming-and-events/</p>	No
FERPA Training	Office of the University Registrar	<p>This online course provides an overview of the Family Educational Rights and Privacy Act (FERPA) and must be taken once. An annual acknowledgement of a Terms of Use agreement, which includes a section on FERPA, confidentiality of student data and an emphasis that users should not misuse their system to look at records for which they do not have legitimate educational interest to view, is required for all users.</p> <p>Source: http://registrar.unc.edu/academic-services/uncferpa/ferpa-instructions/</p>	Yes, any employee who will interact with student data.
GRAD 721: Research Ethics	The Graduate School	<p>This course focuses in on some of the main topics for the modern researcher: stewardship of data, research misconduct, professional training, funding, publication practices, and research for both human and animal subjects. This is a discussion-based course that examines potential ethical dilemmas in research and possible solutions.</p> <p>Source: http://gradprofdev.web.unc.edu/courses/</p>	No
HIPAA Training for Business Associates	Research Compliance Program	<p>This online course provides an overview of the Health Insurance Portability and Accountability Act (HIPAA). Annual training is required.</p> <p>Source: http://research.unc.edu/offices/research-compliance-program/privacy/hipaa/training/</p>	Yes, every Business Associate.
HIPAA Training for Campus Personnel	Research Compliance Program	<p>This online course provides an overview of the Health Insurance Portability and Accountability Act (HIPAA). Annual training is required.</p> <p>Source: http://research.unc.edu/offices/research-compliance-program/privacy/hipaa/training/</p>	Yes
HIPAA Training for the School of Dentistry	Office of Computing and Information Systems (SOD)	<p>This online course provides an overview of the Health Insurance Portability and Accountability Act (HIPAA). Annual training is required.</p> <p>Source: https://www.dentistry.unc.edu/experience/policies/hipaa/</p>	Yes, all faculty, staff and students.
HIPAA Training for the Health Care System	UNC Health Care IT Compliance, Information Security, and Privacy	<p>This online course provides an overview of the Health Insurance Portability and Accountability Act (HIPAA). Annual training is required.</p> <p>Source: http://intranet.uncchealthcare.org/hospitaldepartments/hipaa/training</p>	Yes, all employees.
HIPAA Training for the School of Medicine, the School of Nursing, and the School of Pharmacy	Office of Information Systems (SOM)	<p>This online course provides an overview of the Health Insurance Portability and Accountability Act (HIPAA). Annual training is required.</p> <p>Source: http://www.med.unc.edu/security/hipaa/hipaa-train</p>	Yes, all students and employees.

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Appendix C: Inventory of Ethics Trainings and Education Programs at UNC-Chapel Hill

Training	Coordinating Office	Topics Covered	Mandatory?
<p>Human Subjects Protection Training (CITI Online Course)</p>	<p>IRB and Office of Human Research Ethics</p>	<p>CITI is a web-based training package on issues relating to human subjects research. The CITI web site is maintained by the University of Miami, with content developed by a national consortium. CITI contains modules on topics like informed consent, vulnerable populations, ethical principles and IRB regulations. Each module has a short quiz at the end to assess understanding. Over 1300 institutions are using CITI for their mandatory training. The modules are grouped by categories of research. Only one group needs to be completed, to be selected based on the type of research an individual normally conducts. 1. Biomedical Research 2. Social and Behavioral Research 3. Data and Specimens Only Source: http://research.unc.edu/offices/human-research-ethics/getting-started/training/</p>	<p>Yes, required of all study personnel who are engaged in the planning, conduct or analysis of research at UNC-Chapel Hill that involves human subjects.</p>
<p>New Employee Orientation – “Programs, Policies & Services” Portion</p>	<p>Human Resources</p>	<p>This training covers Programs, Policies & Services for new employees. Information specific to ethics and integrity includes: <ul style="list-style-type: none"> • EOC Office Resources and Trainings • Discrimination & Harassment • Dispute Resolution Programs: HR, Mediation, Ombuds Office, EOC, Employee Assistance Program, policy-defined grievance and appeals program Source: http://academicpersonnel.unc.edu/faculty-policies-procedures-guidelines/faculty-appointments/general-information/benefits-orientation-enrollment/</p>	<p>No. The Benefits Portion is mandatory, but the Programs, Policies & Services Portion is not.</p>
<p>New Faculty/Chairs Orientation</p>	<p>College of Arts & Sciences</p>	<p>30-minute discussion with a representative from Office of University Counsel to talk about applicable policies, mostly FERPA. Source: Information about this training was submitted by a Working Group member.</p>	<p>No</p>
<p>New Faculty Program*</p>	<p>Institute for the Arts and Humanities</p>	<p>The IAH New Faculty Program is designed to introduce newly arrived arts and humanities faculty in the College of Arts and Sciences to interdisciplinary conversations and mentoring networks at UNC-Chapel Hill. The program engages a cohort of faculty through academic and social events throughout the academic year. Events include opportunities to: <ul style="list-style-type: none"> • Meet faculty from across disciplines • Explore the local community and economy • Make connections with faculty members outside your discipline doing similar scholarly work • Exchange ideas, impressions, and experiences with other new faculty members Source: http://iah.unc.edu/programs/faculty-life-cycle-programs/new-faculty-program/</p>	<p>No, it is open to tenure-track and tenured faculty at all ranks who are within their first three years of appointment at UNC-Chapel Hill.</p>
<p>New Graduate TA Online Orientation*</p>	<p>Center for Faculty Excellence</p>	<p>Provides opportunities to meet and talk with new and experienced TAs from across the disciplines and to learn to manage the dual role as graduate student and instructor. Includes Five Modules: <ol style="list-style-type: none"> 1. Connecting with Learners 2. Focus on Big Questions 3. Guided Learning 4. Exploring TA Roles 5. Essential Questions Source: http://cfe.unc.edu/teaching-and-learning/resources-for-graduate-students/</p>	<p>No</p>

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Appendix C: Inventory of Ethics Trainings and Education Programs at UNC-Chapel Hill

Training	Coordinating Office	Topics Covered	Mandatory?
New Postdoc Orientation*	Office of Postdoctoral Affairs	<p>An opportunity for new postdocs to be introduced to the staff of the Office of Postdoctoral Affairs (OPA) and gather information about policies, health insurance, benefits, and other campus services that are available to them during their appointment at UNC-Chapel Hill.</p> <p>Source: http://research.unc.edu/offices/postdoctoral-affairs/postdocs/new/</p>	Yes
New Student Orientation	New Student & Carolina Parent Programs	<p>Various presentations over the two-day new student orientation session. Information specific to ethics and integrity includes:</p> <ul style="list-style-type: none"> • Academic Integrity • FERPA • Resources to Care for Yourself: Dean of Students, Wellness, Counseling, Health Services, Housing, LGBTQ Center, Women's Center • Resources to Support Peers: One Act, HAVEN, Safe Zone • Accountability for maintaining integrity: Honor Code, IT Policy, Alcohol Policy • Respectful relationships <p>Source: https://nscpp.unc.edu/first-year-students/orientation/orientation-schedule-and-outcomes</p>	Yes
Orientation for Faculty New to Carolina*	Center for Faculty Excellence	<p>Orientation Schedule Includes:</p> <ul style="list-style-type: none"> • Welcome to Carolina • "Your Questions Answered" • Tracks for Promotion • Campus Resources • Magellan Games <p>Source: http://cfe.unc.edu/new-faculty/</p>	No
The Parr Center for Ethics Programming	The Parr Center for Ethics	<p>The Parr Center for Ethics offers a broad range of programs for the University of North Carolina at Chapel Hill community—from high school students to medical school students; from attorneys to retirees; as well as faculty and staff from numerous departments.</p> <p>Source: http://parrcenter.unc.edu/programs/</p>	No
Preventing Employment Discrimination	Equal Opportunity and Compliance Office	<p>Online training to help employees identify, avoid and report behaviors that appear to violate employment discrimination laws.</p> <p>Source: http://eoc.unc.edu/training/for-employees/</p>	No
Preventing Unlawful Harassment in the Workplace	Equal Opportunity and Compliance Office	<p>Classroom training to help employees work toward creating a workplace that is free from sexual harassment.</p> <p>Source: http://eoc.unc.edu/training/for-employees/</p>	No

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Appendix C: Inventory of Ethics Trainings and Education Programs at UNC-Chapel Hill

Training	Coordinating Office	Topics Covered	Mandatory?
<p>PHRS 801 (Section 001): Ethical Dilemmas in Translational Research</p>	<p>School of Pharmacy</p>	<p>There are no prerequisites for PHRS 801. The course is offered in the Fall semester and utilizes a seminar format, combining lectures with opportunities for interactive discussion and group activities. For the first 8 weeks, the course will cover 9 chapters from "Responsible Conduct of Research (authors Shampoo and Resnik). General ethical topics include research misconduct, conflicts of interest, data management, mentoring, authorship, peer review, publication, plagiarism, and ethical decision-making. To give proper perspective for students in Pharmaceutical Sciences, the conceptual framework of this course is centered on ethical issues involved in the delivery of safe and effective medications to patients. Both real and hypothetical problems are presented for discussion and analysis. Topics specific to our research and discovery environment include: fraud and misrepresentation of data, scientific honesty, academic recognition and financial success, intellectual property and patenting, ethical issues in human subjects research, ethical issues in animal research, clinical data safety and monitoring, and ethical issues relevant to pharmacogenomics research. Guest lecturers from each of the Pharmaceutical Sciences divisions, as well as UNC experts outside of the School, will provide experience-driven learning opportunities. Students will read assigned pages from each chapter prior to class and the invited speakers will lecture/engage the class in discussion on topics related to the assigned reading.</p> <p>Source: Information about this training was submitted by a Working Group member.</p>	<p>Yes, PHRS 801 is a required 1 credit hour course for all first year students in the Pharmaceutical Sciences graduate program. Most importantly, PHRS 801 satisfies NIH and NSF requirements for responsible conduct of research training required for all research personnel supported on grants.</p>
<p>Research Ethics Workshops</p>	<p>The Parr Center for Ethics Program is offered through the Biological and Biomedical Sciences Program (BBSP)</p>	<p>With a focus on ethical awareness and ethical decision making, these workshops serve as a vital component of the ethics training required for BBSP students. BBSP ethics training workshops emphasize student discussion and analysis of ethical issues pertaining to work in the sciences, including contemporary cases of plagiarism and falsification of data in research. In addition, BBSP students gain a basic understanding of important ethical theories (utilitarianism, deontology, care ethics, virtue ethics) and how they can apply these theories when confronting ethical dilemmas.</p> <p>Source: http://parrcenter.unc.edu/programs/research-ethics/</p>	<p>No. Open to graduate students in the BBSP.</p>
<p>Responsible Conduct of Research (Ethics Training)</p>	<p>Biological and Biomedical Sciences Program (BBSP) in the School of Medicine</p>	<p>BBSP graduate student Responsible Conduct of Research (RCR) training program includes: 1) mandatory RCR training, 2) a defined process for graduate students to address RCR issues, 3) continuous evaluation and improvement of our RCR training program, and 4) conferences, seminars and workshops on RCR to provide continuous training opportunities during a graduate student's career.</p> <p>The mandatory RCR training takes place in seven 90 minute sessions that are part of the BBSP first year group (FYG) curriculum; thus, there are 10.5 hours of small group contact time involving students, faculty and biomedical postdoctoral scholars. Discussion groups consist of no more than 16 students. One biomedical postdoctoral scholar and one faculty member are assigned to each FYG to facilitate case study discussions of key topics in RCR. Topics covered in the interactive discussion sessions include:</p> <ol style="list-style-type: none"> 1. UNC specific RCR resources, contacts, and programs 2. Mentorship and social responsibility 3. Research misconduct and digital image manipulation <p><i>(continued on next page)</i></p>	<p>Yes, required for all BBSP first year students.</p>

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Appendix C: Inventory of Ethics Trainings and Education Programs at UNC-Chapel Hill

Training	Coordinating Office	Topics Covered	Mandatory?
<p>Responsible Conduct of Research (Ethics Training) <i>(continued)</i></p>	<p>Biological and Biomedical Sciences Program (BBSP) in the School of Medicine</p>	<p>4. Animal and human subject use 5. Authorship and peer review 6. Plagiarism 7. Intellectual property and conflict of interest. Source: http://bbbsp.unc.edu/current-students/#RCR</p>	<p>Yes, required for all BBSP first year students.</p>
<p>Responsible Conduct of Research (RCR) Trainings</p>	<p>Office of Postdoctoral Affairs, NC TraCS Institute, Graduate School</p>	<p>Several RCR training opportunities are provided at UNC-Chapel Hill that meet NIH and NSF requirements. While there are no specific curricular requirements for RCR instruction, the following topics have been incorporated into various RCR trainings offered: 1. conflict of interest – personal, professional, and financial; 2. policies regarding human subjects, live vertebrate animal subjects in research, and safe laboratory practices; 3. mentor/mentee responsibilities and relationships; 4. collaborative research including collaborations with industry; 5. peer review; 6. data acquisition and laboratory tools; management, sharing and ownership 7. research misconduct and policies for handling misconduct, responsible authorship and publication Source: Information about this training was submitted by a Working Group member.</p>	<p>Yes, all trainees, fellows, participants, and scholars receiving support through any NIH training grant, career development award (individual or institutional), research education grant, or dissertation research grant must receive instruction in RCR; and all students and postdoctoral researchers supported by NSF sponsored projects must receive instruction in RCR.</p>
<p>Responsible Employee Training</p>	<p>Equal Opportunity and Compliance Office</p>	<p>This training informs employees designated as “Responsible Employees” of their reporting requirements. Source: http://eoc.unc.edu/training/</p>	<p>Yes</p>
<p>Search Committee Training Module</p>	<p>Equal Opportunity and Compliance Office</p>	<p>Online (or classroom) training for hiring supervisors and search committee members to provide guidance for faculty and staff hiring committees seeking to recruit, hire, and retain an excellent and diverse workforce. Source: http://eoc.unc.edu/training/for-employee-recruiters/</p>	<p>Yes</p>
<p>Seminar Series for Early Career Faculty Development*</p>	<p>Center for Faculty Excellence</p>	<p>The Seminar Series for Early-Career Faculty Professional Development is an opportunity for early-career faculty members to become more knowledgeable about key professional skills, including:</p> <ul style="list-style-type: none"> • Understanding and leveraging the strengths of one’s personality • Managing time • Building relationships and coping with conflict • Understanding departmental culture • Planning for academic success <p>The program also helps early-career faculty members strengthen their network of support and build valuable interdisciplinary contacts across UNC. Source: http://cfe.unc.edu/leadership/programming-and-events/</p>	<p>No. Workshops are presented individually. Faculty can elect to register for just one or for any number of the workshops in the series.</p>

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Training	Coordinating Office	Topics Covered	Mandatory?
State Ethics Act Training	Office of the Chancellor	Requirements and prohibitions under G.S. Chapter §138A applicable to all covered persons on campus. Source: Information about this training was submitted by a Working Group member.	Yes (for covered persons: Board of Trustees, Chancellor and Vice Chancellors.)
Title IX Awareness and Violence Prevention Faculty/Staff Online Course	Equal Opportunity and Compliance Office	This mandatory online training course discusses the laws governing discrimination and violence, helps you identify these issues on campus, and provides the resources available to you if you or someone you know experiences discrimination or violence. Source: http://eoc.unc.edu/training/for-employees/	Yes, including part-time, temporary, and student employees.
Title IX Awareness and Violence Prevention Student Online Course	Equal Opportunity and Compliance Office	This mandatory online training course discusses the laws governing discrimination and violence, helps you identify these issues on campus, and provides the resources available to you if you or someone you know experiences discrimination or violence. Source: http://eoc.unc.edu/training/for-students/	Yes, including part-time and distance learning students.

This research was intended to reflect the experience of any UNC-Chapel Hill constituent who sought online information about training. Because the research was focused on identifying reasonably accessible programs, some unit-specific training programs, which are not widely advertised, may have been omitted from this inventory.

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Appendix D: Inventory of Campus Reporting Mechanisms

Reporting Mechanism	Department(s)	Topics Covered	Procedure	Anonymous and/or Confidential?
Athletics Compliance	Department of Athletics	The University of North Carolina and its Department of Athletics are committed to abiding by the rules of the NCAA and the Atlantic Coast Conference. It is important that Student Athletes, Parents, Coaches & Staff, Faculty, Recruits, Agents, and Alumni & Boosters are aware of the rules and regulations that must be followed. Any information which could indicate a threat to security or safety on campus or involving anyone affiliated with UNC-Chapel Hill. This includes: something you suspect to be a crime; suspicious behavior or circumstances; something which may threaten the safety or security of an individual (including discrimination and harassment); something which may threaten the safety or security of the University.	The various rules and policies assist our University in continuing to operate with honor and dignity. If you ever have a question about NCAA rules, contact UNC Compliance. Questions or anonymous tips may be submitted through the UNC Compliance website. Source: http://compliance.unc.edu/	Optional – Anonymous tips can be submitted through UNC Compliance website .
Athletics “Up and Out” Incident Reporting Guidelines	Department of Athletics		UNC-Chapel Hill Student Athletes should follow the outlined reporting guidelines, based on the nature and immediacy of the threat. Department staff are expected to promptly report up and out any information of this nature. Source: http://studentathletes.web.unc.edu/files/2012/07/Situational-Resource-for-Student-Athletes.pdf	
The Compliance Line (EthicsPoint)	Office of University Counsel	Financial; Research; Environment; Health and Safety; HIPAA; or a foundation affiliated with UNC.	All reports submitted through EthicsPoint’s “University of North Carolina at Chapel Hill Compliance Line” secure web page or telephone line will be given careful attention by appropriate University of North Carolina at Chapel Hill administrators. We ask that you retain your report key and password and return to the website within 10 working days of filing a report to check for comments or follow-up questions. University policy prohibits retaliation or reprisal for making a report or inquiry in good faith or for seeking guidance on dealing with potential or suspected noncompliance. The University expects that reports made through the Compliance Line will be made in a good faith effort to address legitimate issues needing correction or guidance. Source: https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=13027	Reporting is confidential and may be submitted anonymously.
Conflict of Interest Reporting	Conflict of Interest Program	COI Paid Authorship Disclosure; COI Travel Disclosure; Self-Initiated Conflict of Interest Disclosure; Notice of Intent to Engage in External Professional Activities for Pay (EPAP)	The Activities, Interests and Relationships Management System (AIR) is for use by UNC-Chapel Hill Investigators, Inventors and Administrators in identifying circumstances that may give rise to potential conflicts of interest related to research, technology transfer or administrative responsibilities. For each University research project (sponsored or unsponsored), the Project-Specific Conflict of Interest Disclosure form must be timely filed for each University employee, student or trainee involved in the design, conduct or reporting of the research project for whom one or more of the answers (<i>continued on next page</i>)	

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Reporting Mechanism	Department(s)	Topics Covered	Procedure	Anonymous and/or Confidential?
<p>Conflict of Interest Reporting <i>(continued)</i></p>	<p>Conflict of Interest Program</p>	<p>COI Paid Authorship Disclosure; COI Travel Disclosure; Self-Initiated Conflict of Interest Disclosure; Notice of Intent to Engage in External Professional Activities for Pay (EPAP)</p>	<p>posed in the disclosure form is "yes". The University PI is obligated to ensure that any potential conflict of interest that exists in relation to the research project is reported as required by this University policy. Faculty and staff in certain administrative positions responsible for resource allocation, personnel decisions, business contracts, purchasing, technology transfer, and other sensitive activities are required to complete an annual questionnaire regarding external relationships that might create or be perceived to create conflicts of interest with their University responsibilities. Source: http://air.unc.edu</p>	
<p>Discrimination, Harassment and Retaliation Reporting</p>	<p>Equal Opportunity and Compliance Office</p>	<p>The Equal Opportunity and Compliance Office handles student, employee, and visitor reports of discrimination and harassment based on age, color, disability, genetic information, national origin, race, religion, sex (including gender, gender expression, or gender identity), sexual orientation, and veteran status. This includes reports of sexual misconduct, including sexual harassment and sexual violence. This office also handles reports of relationship violence and stalking.</p>	<p>Students, employees, applicants and visitors who believe they have experienced discrimination, harassment (including sexual misconduct), and/or retaliation should submit a report or contact the Equal Opportunity and Compliance Office. A member of the Equal Opportunity and Compliance Office staff will be in contact with you shortly to schedule an appointment to discuss your report. Source: http://eoc.unc.edu/discrimination-and-or-harassment-complaint-form/</p>	
<p>EPA Non-Faculty Grievance Complainant</p>	<p>Office of Human Resources</p>	<p>Contested discharge for cause; alleged violations of the Complainant's rights guaranteed by the First Amendment to the United States Constitution or Article I of the North Carolina Constitution; Harassment or Discrimination based on: age, disability, race/color, ethnicity, sex, sexual orientation, religion, political affiliation, national origin, creed, gender identity, gender expression; Discontinuation without appropriate notice, or without temporary extension of appointment in the absence of such notice, as provided for in the EPA Non-Faculty Employment Policies; Alleged violation of a specific University rule, regulation, or policy, state law or policy, or federal law pertaining to the employment relationship between the Complainant and the University that adversely and materially affected the Complainant's terms and conditions of employment; Retaliation for filing a Grievance in good faith or for cooperating or otherwise participating in good faith in an investigation of a Grievance.</p>	<p>You must submit this Grievance Filing Form within 30 calendar days of the event (or knowledge of the event) that you are requesting to be reviewed; or, within the extended deadlines listed in Part 3 of the form; otherwise, your Grievance cannot be accepted. The form may be submitted by mail, fax or personal delivery. Source: http://hr.unc.edu/policies-procedures-systems/epa-non-faculty-employee-policies/dispute-resolution-and-grievance/epa-non-faculty-grievance-policy-of-the-university-of-north-carolina-at-chapel-hill/</p>	

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Reporting Mechanism	Department(s)	Topics Covered	Procedure	Anonymous and/or Confidential?
<p>Facilitated Conversation Request</p>	<p>Office of Human Resources</p>	<p>The Facilitated Conversations Program is available to all university employees for addressing workplace issues. If an employee requests a facilitated conversation, then all parties involved must agree to participate in order for the facilitated conversation to occur. If a supervisor requests a facilitated conversation for one or more employees (with or without the presence of management), the employees are required to participate.</p>	<p>The requesting party must submit a completed Facilitated Conversation Request Form to Employee & Management Relations (E&MR) in the Office of Human Resources indicating the nature of the issue and the parties involved. E&MR will contact the parties. If the request is accepted (if applicable), then E&MR will assign facilitator(s) and schedule a time and location for the meeting, generally within two weeks of the request. Some facilitation may require more than one meeting. If an agreement is reached, each party involved will sign a written agreement statement and will receive a copy of the completed statement. E&MR will review all agreements to ensure compliance with State policy. If no agreement is reached, then E&MR will provide a summary of the facilitation to the parties involved. Source: http://hr.unc.edu/policies-procedures-systems/spa-employee-policies/employee-relations/mediation-policy/</p>	
<p>Faculty Grievance Complaint</p>	<p>Faculty Grievance Committee and Faculty Hearings Committee within the Office of Faculty Governance</p>	<p>Grievances within the Faculty Grievance Committee's jurisdiction include matters directly related to a faculty member's employment status and institutional relationships within the University. The Faculty Hearings Committee has jurisdiction over cases involving suspension, diminishment in rank or discharge of any faculty members, and of cases involving non-reappointment of faculty members on probationary term appointments, including when the faculty member alleges that one of the impermissible grounds for non-reappointment is present in his or her case.</p>	<p>Members of the Faculty may contact the Faculty Grievance Committee with respect to a potential formal grievance. The committee must follow the "Procedures for the Faculty Grievance Committee" as outlined in the Faculty Code and Policies. Source: http://faccoun.unc.edu/faculty-code-and-policies/procedures-for-the-faculty-grievance-committee/</p>	<p>Proceedings are confidential.</p>
<p>Hazing Hotline</p>	<p>Office of Fraternity & Sorority Life and Community Involvement</p>	<p>Incidents that are physically, emotionally, or psychologically detrimental to the student and damage the integrity of the fraternity and sorority new member education/intake process.</p>	<p>UNC-Chapel Hill students, parents, faculty, staff and community members can submit reports. This form is sent directly to the Director of Fraternity and Sorority Life and Community Involvement. The University's ability to investigate reported incidents, enforce the university's expectations, and protect future students depends on the accuracy and specificity of the information provided. You are encouraged to provide as much specific detail as possible so that appropriate action can be taken to address the reported behavior. Source: https://ofslci.unc.edu/fraternity-sorority/report-concern-hazing-hotline</p>	<p>Reports may be submitted anonymously.</p>

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Reporting Mechanism	Department(s)	Topics Covered	Procedure	Anonymous and/or Confidential?
<p>Honor System Academic Misconduct</p>	<p>Office of Student Conduct</p>	<p>Academic Dishonesty violations are listed in full detail in Section II.B. of the <i>Instrument of Student Judicial Governance</i>, and include: Plagiarism; Falsification, fabrication, or misrepresentation of data, other information, or citations in connection with an academic assignment; whether graded or otherwise; Unauthorized assistance or unauthorized collaboration; Cheating on examinations or other academic assignments; Violating procedures pertaining to the academic process; Deliberately furnishing false information; Forging, falsifying, or misusing University documents, records, etc.; Violating other University policies that are designed to ensure academic integrity, etc.; and Assisting or aiding another to engage in acts of academic dishonesty.</p> <p>For more information about whether a behavior constitutes a potential Honor Code violation, please contact the Office of Student Conduct at 919-962-0805 or jpa@unc.edu.</p>	<p>Any person may report suspected misconduct by a UNC-Chapel Hill student to the Honor System. A report may be filed using the online reporting system. The Office of Student Conduct will review the report and refer it to the appropriate Student Attorney General for review. Instructors who report suspected academic dishonesty should issue the accused student a grade of "IN", or "Incomplete" for the course in question. The Office of Student Conduct will contact the Registrar's Office and have the incomplete grade changed to "NG" until the case has been resolved. Instructors must report the suspected violation to the Honor System, and should not address the suspected violation independently. Those who experience trouble using the online form may submit written reports concerning potential Honor Code violations, along with relevant supporting materials, to the Office of Student Conduct, Campus Box 5100, Chapel Hill, NC 27599.</p> <p>Sources: https://studentconduct.unc.edu/report-violation-honor-system https://publicdocs.maxient.com/reportingform.php?UNCCChapelHill&layout_id=5</p>	
<p>Honor System Non-Academic Misconduct</p>	<p>Office of Student Conduct</p>	<p>Non-Academic Misconduct includes behaviors adversely affecting members of the University Community. Examples of behaviors constituting a Non-Academic Misconduct include, but are not limited to: fighting, hazing, drug use, lying, and disorderly conduct.</p> <p>For more information about whether a behavior constitutes a potential Honor Code violation, please contact the Office of Student Conduct at 919-962-0805 or jpa@unc.edu.</p>	<p>Any person may report suspected misconduct by a UNC-Chapel Hill student to the Honor System. A report may be filed using the online reporting system. The Office of Student Conduct will review the report and refer it to the appropriate Student Attorney General for review. Those who experience trouble using the online form may submit written reports concerning potential Honor Code violations, along with relevant supporting materials, to the Office of Student Conduct, Campus Box 5100, Chapel Hill, NC 27599.</p> <p>Sources: https://studentconduct.unc.edu/report-violation-honor-system https://publicdocs.maxient.com/reportingform.php?UNCCChapelHill&layout_id=2</p>	
<p>ITS Policy and Security Concerns</p>	<p>Information Technology Services</p>	<p>Acceptable Use Problems; Issues Involving Copyrights; Issues Involving System Security; Other Issues or Policy Concerns.</p>	<p>To report acceptable use problems at UNC-Chapel Hill, call 919-962-HELP or send email to: postmaster@unc.edu.</p> <p>For issues involving copyrights or other policy concerns, call 919-445-9393 or send email to: copyright@unc.edu.</p> <p>For issues involving system security, call 919-962-HELP or send email to: security@unc.edu.</p> <p>For any other issues, please send email to abuse@unc.edu.</p>	

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Reporting Mechanism	Department(s)	Topics Covered	Procedure	Anonymous and/or Confidential?
<p>Missing Persons</p>	<p>Office of the Dean of Students</p>	<p>Missing Persons</p>	<p>Contact 911 or the UNC-Chapel Hill Department of Public Safety at (919) 962-8100 to report a missing person. The Office of the Dean of Students can also receive information regarding missing persons and provide support to those concerned for our students. Source: https://deanofstudents.unc.edu/safety-and-security/missing-persons</p>	
<p>Prohibited Conduct</p>	<p>Equal Opportunity and Compliance Office</p>	<p>The policy prohibits the following forms of conduct: Discrimination, Harassment, Sexual Assault or Sexual Violence, Sexual Exploitation, Interpersonal Violence, Stalking, Complicity, Retaliation.</p>	<p>The University strongly encourages anyone to report Prohibited Conduct to the University – through an anonymous report or a formal report. If criminal activity has occurred, the University also strongly encourages you to report such incidents to law enforcement, which is a separate reporting option. While reporting is encouraged as soon as possible following an incident, these reporting options are available to you at any time. The University through the Student Complaint/Title IX Coordinator or Equal Opportunity and Compliance Office can assist you with making a police report or, if requested, with connecting you to the court system to seek a civil no-contact order. Source: http://sexualassaultanddiscriminationpolicy.unc.edu/make-a-report/</p>	<p>Optional – Anonymous reports can be submitted through the Office of the Dean of Students or the Department of Public Safety's "Silent Witness".</p>
<p>Reporting of Criminal Convictions for Currently Employed Faculty and Staff</p>	<p>Office of Human Resources</p>	<p>“Criminal conviction” means all criminal convictions and pleas that are acknowledgments of criminal responsibility, including but not limited to prayers for judgment that occur on or after the effective date of this policy, registration as a convicted sex offender with any governmental authority as a result of any prior conviction for a sex offense, and/or any convictions or pleas that are acknowledgments of criminal responsibility subject to the jurisdiction of a military court. Convictions for routine traffic-related infractions (e.g., speeding, unsafe movement, improper equipment) are not required to be reported under this policy unless driving is a required part of the employee’s regularly assigned job duties.</p>	<p>Employees are required to report criminal convictions within five business days of the conviction or other covered criminal disposition or at the first possible opportunity if the employee is incarcerated. The employee is required to report this information to the Employee and Management Relations Department of the Office of Human Resources or, at the employee’s option, to his/her Supervisor or Department Head. The employee must provide to the University written documentation (for example, a written court record of the conviction or plea) that describes the criminal conviction(s) in question. Supervisors and/or Department Heads who have had such matters reported directly to them, either from the employee or through any other source, must immediately convey this information to Employee and Management Relations. The Employee and Management Relations Department will forward the relevant information and documentation to the appropriate University office for review and assessment. Source: http://hr.unc.edu/policies-procedures-systems/spa-employee-policies/employment/reporting-of-criminal-convictions-for-currently-employed-faculty-and-staff/</p>	

Appendix D: Inventory of Campus Reporting Mechanisms

Reporting Mechanism	Department(s)	Topics Covered	Procedure	Anonymous and/or Confidential?
<p>School of Medicine IT Security or Abuse Incidents Reporting</p>	<p>Information Security & Privacy Office of the School of Medicine</p>	<p>The Information Security & Privacy Office responds to and investigates incidents related to misuse or abuse of UNC School of Medicine information technology resources. This includes computer and network security breaches and unauthorized disclosure or modification of institutional or personal information. Incident reports are submitted to the UNC Healthcare System Security Incident Response Team (SIRT) which addresses security and privacy incidents. SIRT is a joint effort that includes UNC Hospitals, UNC Physicians & Associates, and UNC School of Medicine.</p>	<p>For emergency IT incidents involving threats to personal safety/physical property or illegal activities, immediately contact the campus police department at (919) 962-8100.</p> <p>For non-emergency reports of IT security or abuse incidents, send email to: sominfosec@listserv.med.unc.edu</p> <p>Source: https://www.med.unc.edu/security/report-an-incident</p>	
<p>SPA Grievance Complaint</p>	<p>Office of Human Resources</p>	<p>Disciplinary Action; Involuntary Separation Due to Unavailability; Hiring Action; Veteran's Preference; Annual Performance Appraisal; Personnel File; Harassment or Discrimination based on: age, disability, race/color, sex, sexual orientation, religion, political affiliation, national origin, gender identity, gender expression, veteran status, genetic information; Retaliation</p>	<p>Your completed "SPA Grievance Initial Filing Form" must be received by the Grievance Office in the Office of Human Resources within 15 calendar days of the event(s) or your knowledge of the event(s) being grieved. The form may be submitted by mail, fax or personal delivery.</p> <p>Source: http://hr.unc.edu/employee-management-relations/spa-grievance-policy-resources/</p>	
<p>University Ombuds Office</p>	<p>University Ombuds Office</p>	<p>The University Ombuds Office is a safe place where all Carolina staff, faculty, students and administrators are welcome to come and talk in confidence about any campus issue, problem or dispute. The office supplements, but does not replace, the University's formal channels, such as the grievance policy. They are a confidential, impartial, informal and independent resource.</p>	<p>The ombuds have the authority to contact senior officers of the University, to gather information if a visitor requests that a situation be investigated, to mediate or negotiate settlements to disputes, to bring issues to the attention of those with authority to address concerns, to expedite administrative processes, and to make recommendations for change in policy or practice when appropriate. They are not decision makers and do not have the power to establish, change, or set aside any University rule or policy.</p> <p>Source: http://www.ombuds.unc.edu/contact.html</p>	<p>This is a confidential resource.</p>
<p>Workplace Violence Reporting</p>	<p>Office of Human Resources</p>	<p>Intimidation, Bullying, Stalking, Threats, Physical Attack, Domestic and Family Violence, Property Damage, Weapons</p>	<p>Violence currently in progress or immediate threats of violence should be reported to UNC Public Safety (dial 911) for emergency response coordination. The reporting party should then report the threat to Employee & Management Relations in the Office of Human Resources. Employee and Management Relations should receive the reporting form as soon as practicable, generally within two business days of the incident. Should a violence incident go unreported and is later discovered to have occurred, management remains obliged to report the incident to E&MR in the Office of Human Resources. E&MR will coordinate with other University administrative units to investigate the report. <i>(continued on next page)</i></p>	

Appendix D: Inventory of Campus Reporting Mechanisms

Reporting Mechanism	Department(s)	Topics Covered	Procedure	Anonymous and/or Confidential?
<p>Workplace Violence Reporting <i>(continued)</i></p>	<p>Office of Human Resources</p>	<p>Intimidation, Bullying, Stalking, Threats, Physical Attack, Domestic and Family Violence, Property Damage, Weapons</p>	<p>Depending on the nature of the incident, the University may require management in the department(s) in which the incident occurred to perform a more detailed investigation. Source: http://hr.unc.edu/policies-procedures-systems/spa-employee-policies/employee-relations/violence-in-the-workplace-policy/</p>	

This research was intended to reflect the experience of any UNC-Chapel Hill constituent who sought online information about reporting violations. The subgroup acknowledges that some unit-specific reporting mechanisms, which are not widely advertised, may have been omitted from this inventory.

Appendix E: Benchmarking Interviews – Reporting mechanisms and administrative structure

University Classification:	Benchmark 1	Benchmark 2	Benchmark 3
Public/Private	Private	Private	Public
Size (Number of Undergraduate Students)	Medium (5,000 - 15,000)	Medium (5,000 - 15,000)	Large (greater than 15,000)
Structure of Ethics and Compliance Program:			
Is there a central office?	Yes, Central Compliance Office. They are in transition mode—compliance was housed in the Office for Audit and Advisory Services, but they are in the process of establishing this central office now.	Yes, Institutional Compliance is housed within the Office of Audit, Compliance and Privacy.	Yes, Office of Ethics, Compliance and Audit Services.
What areas are included?	University Compliance and Policy	<p>“Audit, Compliance and Privacy” Role of the Compliance Office Specifically:</p> <ul style="list-style-type: none"> • Provide compliance resources to the areas across the university/health system with compliance responsibilities. • Manage the Principles of Responsible Conduct and provide general training on compliance policies, reporting policies, reporting resources, etc. 	<ul style="list-style-type: none"> • Standards of conduct and policies and procedures • Oversight and governance • Education and training • Communication and reporting • Enforcement and screening • Auditing and monitoring • Response and prevention
What is the size of the office? (How many employees?)	Three employees, maybe four based on operational needs (still in development because office is very new).	Two employees: Institutional Compliance Officer and Administrative Assistant. They have been considering hiring an Assistant Compliance Officer.	System wide office: 22 staff members, Chief Compliance Officer and Deputy Compliance Officer.
What is the oversight structure?	Central Compliance Officer reports jointly to the Executive Vice President and the Provost.	The Office reports to the Associate VP of Audit, Compliance and Privacy, who reports to the Executive Vice President.	The Office reports directly to the Board of Regents. Individual Ethics and Compliance Officers at each University report to the Chancellor and the Chief Compliance Officer.
How is information coordinated throughout the various areas?	Through the University Compliance Committee	Compliance Lead meetings	Monthly calls, integrated communication as part of main responsibilities
Do you have supporters across campus or department contacts? Is the process committee driven?	The University Compliance committee is made up of about 35 members—including all of the “compliance managers” across campus and one representative from each school. The committee is chaired by the Compliance Officer (formerly chaired by the Associate VP for Audit and Advisory Services) and meets on a monthly basis. It was formed to serve as a cross section of all key university operations. At meetings they discuss current news and issues related to their campus and other universities and have discussions about key compliance (<i>continued on next page</i>)	There are Compliance Leads from across the university who have compliance responsibilities. These leads have quarterly meetings hosted by Institutional Compliance to discuss different compliance topics and provide updates on requirements/changes taking place across campus.	No, this is a system level office. Each University has an Ethics Officer that reports to the Chief Compliance Officer. All university community members report to their university level contact.

Appendix E: Benchmarking Interviews—Reporting Mechanisms and Administrative Structure

	<p>areas. Because compliance requirements are specific to each area, they have a "compliance framework" (similar to the COSO framework) that they created to guide the management of compliance, regardless of the unique functions of each office. The committee also spends time discussing cross-sectional compliance issues, such as FERPA and data security. In general, their purpose is to raise awareness and share information and sometimes even identify gaps in compliance and bridge different groups.</p>		
<p>Reporting Mechanisms:</p>			
<p>Tool—What reporting tool do you use? i.e. EthicsPoint, The Network, etc.</p>	<p>EthicsPoint</p>	<p>EthicsPoint web tool They manage their own hotline, but they input the information from those calls into the EthicsPoint system in order to keep all the data in one place.</p>	<p>EthicsPoint</p>
<p>Categories—Why were these categories included; why were other categories not included? (i.e., academics)</p>	<p>Academic, Athletics, Conflict of Interest, Criminal/Fraud, Harassment, Intellectual Property, Information Technology, Research, Safety, Workplace Conduct</p>	<p>Financial, Human Resources, Patient Issues, Student Issues, Risk and Safety, Research, Privacy, Security and Information Technology, Conflicts of Interest, Athletics, Other</p>	<p>Child/Elder Abuse, Conflict of Interest/Commitment, Discrimination/Harassment, Economic Waste/Misuse of Resources, Fraud, Theft or Embezzlement, Health Science Compliance, Privacy Violations/Computer Security, Public/Environmental Health & Safety, Research/Academic Misconduct, Retaliation Against Whistleblowers, Workplace Misconduct, Inquiry, Question, Suggestion, Concern</p>
<p>Coordination—Who manages this function?</p>	<p>Central Compliance Officer</p>	<p>Institutional Compliance</p>	<p>Chief Investigation Officer and Education/EthicsPoint Coordinator manage all things EthicsPoint.</p>
<p>Oversight—Who has access? Oversight?</p>	<p>All reports go to the Central Compliance Officer. Their role is to ensure timely and effective resolutions of each report.</p>	<p>All reports go to the Institutional Compliance Officer.</p>	<p>The System Officers and the University level Ethics Officer have access to data.</p>
<p>Routing—How are cases assigned to the appropriate department for investigation?</p>	<p>Certain categories of reports are sent immediately to the coordinator for that area (i.e., research reports are automatically sent to the person who handles research investigation). Other reports that do not have a clear coordinator are triaged by the office and then forwarded to the appropriate person <i>(continued on next page)</i></p>	<p>The Institutional Compliance Officer will assign cases to various investigators/departments based on the type of report.</p>	<p>Each University has an Ethics Officer that redirects reports to the appropriate unit and reports to the Chief Compliance Officer. All university community members report to their university level contact.</p>

Appendix E: Benchmarking Interviews—Reporting Mechanisms and Administrative Structure

	<p>(i.e., academic dishonesty—office identifies which school/program is implicated and decides where to send the report). All report investigators have been trained about how to use EthicsPoint and what is expected to be in the report when the case is closed.</p>		
<p>Volume—How long have you had the hotline in place? Volume of reports?</p>	<p>In place for 5 - 6 years, receive about 70 reports per year.</p>	<p>Have had a hotline since 1998, added the web function with EthicsPoint in 2009. Since then, they get 45 - 70 issues per year reported specifically through the hotline (there are many other ways that reports are received).</p>	<p>Hotline since 2008. EthicsPoint since 2010.</p>
<p>Advertising—Do you advertise the hotline? Does advertisement include to students? How do you advertise?</p>	<p>Yes, they continue to market it as much as possible. Every staff and faculty member receives publications about it and other advertisements (keychains, coasters, etc.). They also hang posters in conference rooms and key HR areas. In order to market to students, they have signage about EthicsPoint and how to report in their university shuttle buses.</p>	<p>They advertise in various places—online, on print materials, on the back of their "Principles of Responsible Conduct" brochure. Students don't tend to be a large user of the system, but they are allowed to report and some do.</p>	<p>Info on Office of the President's website and all individual campus websites. State requires the system to post posters on campuses and to send new email/poster annually.</p>
<p>Anonymity?—If you are a public institution, do you assure anonymity? If so, how?</p>	<p>Private</p>	<p>They encourage people to report through the hotline if they desire anonymity. In most cases they can be effective in their investigation if the report is anonymous, but depends on the situation. They make every effort to ensure confidentiality if the reporter does self-identify.</p>	<p>EthicsPoint allows reporters to remain anonymous and check back in to answer follow-up questions.</p>
<p>Reports—Do you report on cases received through the hotline? If so, for whom and what is included in the report?</p>	<p>They provide a brief report to the Audit, Risk and Compliance Committee every time a report has closed with information about the resolution (found to be true/false), whether there was prior knowledge about this issue, and disposition (what action was taken).</p>	<p>Provides quarterly reports for the Executive Vice President. Also, reports to the Board of Trustees with information about the types of categories and the volume of reports in each, the call intake method used (web, hotline, non-hotline), and a summary of each case with information on whether it was substantiated, not substantiated, or not enough information to move forward with an investigation.</p>	<p>System level office reports to the President.</p>
<p>Lessons Learned/Areas for Improvement—Any recommendations or lessons learned from the process of setting up your ethics and compliance program and/or hotline management</p>	<p>1. The key from the beginning is to tailor the program to the campus environment. 2. Need to bring together a constituent group to discuss the merits of the hotline, determine what areas of reporting should be included, and feel empowered and included in the process. <i>(continued on next page)</i> 3. Need to have support from senior leadership—Chancellor, Provost, and University Counsel—and someone who will</p>		<p>It is critical that an Officer position has to be at the highest level of authority, reporting to the Chancellor. Do not bury this position in general council.</p>

Appendix E: Benchmarking Interviews–Reporting Mechanisms and Administrative Structure

	<p>champion the effort and recognize that in reality, this is their tool and the office is just managing it.</p> <p>4. At the beginning, there were some concerns about false reports, but reality has counteracted those concerns and they have not received mischievous reports (nor do they investigate unless there is enough information).</p> <p>5. Important to engage reporters and always make sure that they are paying attention to patterns in order to address bigger issues.</p> <p>6. Work closely with Office of University Counsel to determine what they can tell a reporter and what they cannot.</p>		
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Appendix E: Benchmarking Interviews—Reporting Mechanisms and Administrative Structure

University Classification:	Benchmark 4	Benchmark 5	Benchmark 6
Public/Private	Public	Public	Public
Size (Number of Undergraduate Students)	Large (greater than 15,000)	Large (greater than 15,000)	Large (greater than 15,000)
Structure of Ethics and Compliance Program:			
Is there a central office?	Yes, Office of Institutional Compliance. Centralized oversight, decentralized compliance functions.	No compliance office on campus. All compliance is filtered through Health Systems Compliance Office.	Yes, University Compliance Services.
What areas are included?	Institutional Compliance and Policy	Health Care System Compliance and Reporting (HIPAA), Controlled Substances and Privacy. All reports are filtered through Chief Compliance Officer and triaged to responsible parties.	Risk Assessment, Policy Management, Training and Investigation
What is the size of the office? (How many employees?)	Five employees: Associate Director of Institutional Compliance, Associate Vice Provost, Policy Director and two administrative associates.	Two employees: Chief Officer and Administrative Assistant. There is a Compliance Officer in the Office of the Vice Chancellor for Research that also reports to the Health Systems Compliance Office.	Eight employees, (seven currently because Associate VP position is vacant).
What is the oversight structure?	Associate Vice Provost reports to the Executive Committee (equivalent to Chancellor's Cabinet).	The Chief Compliance Officer reports directly to the Executive Officers, President.	The Director of the office/Chief Compliance Officer reports directly to the President of the University.
How is information coordinated throughout the various areas?	There is a Partner Network of 25 unit contacts. When the Office was created two years ago, the Associate Vice Provost conducted a risk assessment and determined the units that needed a compliance liaison. He spent the first 100 days of his appointment conducting interviews and getting buy-in from all levels of the community. People began asking to join the network. Great direction and results. Each partner reports up their chain of command and reports trends/major concerns to the office.	Communication is mostly maintained through colleague to colleague direct communication. There was a Compliance Committee 5 - 7 years ago that proved ineffective because there were too many topics and individuals did not feel like they were addressing their concerns. They needed more members and overlap of topics, so the committee split into smaller, content-based groups that worked a lot better and became relationship-based. These smaller networks helped to create communication channels that report back to the Chief Compliance Officer.	Quarterly Executive Compliance Committee Meetings with the President and his direct reports (Provost, Chief Legal Officer, CFO, Provost, Audit, etc.) to discuss risk areas on campus and provide updates on standing issues (Title IX, cybersecurity, etc.) This is a chartered group.
Do you have supporters across campus or department contacts? Is the process committee driven?	Partners Network (see above)	Department Contacts with specific compliance-based responsibilities, mostly research.	Compliance Officers Group made up of 50 - 70 folks from around campus meet 2 - 4 times per year to discuss compliance efforts in their specific departments. The Risk Assessment Program Manager from UCS maintains ongoing communication with the people on the ground who deal with compliance in their specific departments.

Appendix E: Benchmarking Interviews—Reporting Mechanisms and Administrative Structure

Reporting Mechanisms:			
Tool—What reporting tool do you use? i.e. EthicsPoint, The Network, etc.	EthicsPoint	Network Web Reporting System	The Network
Categories—Why were these categories included; why were other categories not included? (i.e., academics)	Academic Affairs, Accounting and Financial, Athletics, Human Resources, Information Technology, Medical, Research, Risk and Safety Matters, Other	Employee Concerns: Discrimination, Disruptive Behavior, Employee Relations, Falsification of Records, Sexual Harassment, Substance Abuse, Theft of Goods/Services, Conflict of Interest, Retaliation of Whistleblowers, Workplace Violence/Threats, Theft of Cash, Theft of Time, Wage/Hour Issues	Anything can be reported through the hotline.
Coordination—Who manages this function?	The Office manages this tool. Associate Vice Provost has main contact and so does the director of Internal Audit.	Chief Compliance Officer	University Compliance Services
Oversight—Who has access? Oversight?	All reports come to the Associate Vice Provost.	Any reports made that don't involve the Health Care System directly are sent to Internal Audit.	All reports come directly to the Chief Compliance Officer, as well as his Executive Assistant and the Investigations Program Manager.
Routing—How are cases assigned to the appropriate department for investigation?	They triage info to responsible departments at the appropriate level of responsibility. They will go straight to senior administration if necessary. The Office will make suggestions to the responsible department, which is always met with appreciation.	Chief Compliance Officer decides where to send it to be triaged.	The Chief Compliance Officer shares the report with the triage group—made up of the Directors of Legal, HR and Audit—and they determine which office should handle the investigation.
Volume—How long have you had the hotline in place? Volume of reports?	Only had line for two years. Not a large amount of calls/reports, fewer than 50.	235 hotline calls in 2014. 2,375 contacts to report concern. Majority of calls were employee concerns (HR).	10 - 15 reports per month.
Advertising—Do you advertise the hotline? Does advertisement include to students? How do you advertise?	They have put together a new working group to address how to display the hotline/reporting tools. Information is distributed in new member packages and stickers. The 25 Partners also have responsibility to advertise in their units. Information is also in the Code of Conduct.	They present at annual faculty/staff training and at new faculty/staff orientation. Hotline info is in the Code of Conduct. They send out an email about the hotline to all department heads, who forward the message to their entire units. They send them this way because people are more likely to read an email from their boss than from a massive listserv. They also have an annual ice cream social which is well attended and they distribute marketing gifts. (ex: magnets).	Yes, they make a considerable effort to ensure people know that high priority student areas—i.e., Athletics—can be reported anonymously. The President always reminds people about the tool when he addresses groups on campus and they tell students about it. There are a lot of other reporting mechanisms on campus, especially related to student misconduct, but they try to advertise as much as possible and promote the fact that reporting is anonymous.
Anonymity?—If you are a public institution, do you assure anonymity? If so, how?	They allow reports to be made anonymously.	They allow anonymity for all reports. Majority of people choose to identify themselves. Anonymity makes things more difficult, (continued on next page)	They distinguish between anonymity and confidentiality and promise confidentiality to the maximum extent allowed.

Appendix E: Benchmarking Interviews—Reporting Mechanisms and Administrative Structure

<p>Reports—Do you report on cases received through the hotline? If so, for whom and what is included in the report?</p>	<p>The Office reports to the Executive Committee quarterly.</p>	<p>however they feel it is important, especially for health care concerns.</p> <p>The Chief Compliance Officer directs all reports from the hotline to the appropriate party.</p>	<p>They have a quarterly reporting requirement to the Board of Regents, so they follow the legal requirements by submitting those reports. They also report to the Executive Compliance Committee (mentioned above) about areas of high risk based on reports received and other factors.</p>
<p>Lessons Learned/Areas for Improvement—Any recommendations or lessons learned from the process of setting up your ethics and compliance program and/or hotline management</p>	<p>1. Make sure this process is done in stages. 2. Engage the community; you need their buy-in, support and resources.</p>	<p>Recommendations:</p> <ol style="list-style-type: none"> 1. This effort will only be successful if it is met with top executive level support (Chancellor, BOT etc.) The message about the new office/position must come from them. 2. Survey the campus about knowledge of compliance. This will help measure the behavior change before and after you revamp compliance advertising and training. 3. Make sure everyone on campus hears about the compliance resources more than just once a year. 	<p>They are confident in their system for managing reports. One big issue they are addressing now is what to do with reports that involve Title IX, VAWA, Clery, etc. They are working with The Network to create a way for people to identify whether what they are reporting has implications for these legal acts, so that they can use the reporting tool to collect the statistics they need. This would allow responsible employees and others to report these issues anonymously in order to ensure that the statistics are accurate.</p>

Appendix E: Benchmarking Interviews—Reporting Mechanisms and Administrative Structure

University Classification:	Benchmark 7	Benchmark 8	Benchmark 9
Public/Private	Public	Public	Public
Size (Number of Undergraduate Students)	Large (greater than 15,000)	Medium (5,000 - 15,000)	Large (greater than 15,000)
Structure of Ethics and Compliance Program:			
Is there a central office?	Yes, but it is intentionally decentralized. This office represents the system.	No. Chief Ethics Officer only	Yes. Office of University Compliance and Integrity
What areas are included?	Ethics and Compliance, some policy	Internal Audit	Compliance, Integrity, Policy, Public Records
What is the size of the office? (How many employees?)	One employee. Would not recommend.	Internal Audit (2) and member of System (Regents) has access to EthicsPoint.	13 people in this office.
What is the oversight structure?	Each institution in the system is different. Director oversees all reports made and directs them to the individual institution. There is not a compliance officer at each institution.	Audit has oversight over all of EthicsPoint. Various central officers also have access limited to their area with an appropriate number of users (1 with backup; 4 in HR because of volume).	<ul style="list-style-type: none"> • Prior to 2006, internal audit ran all their reporting of issues. • 2006, started using EthicsPoint. • 2013, BOT started to research how to run an ethics and integrity process looking toward the corporate model of central control. • Nine month consultant review to centralize and coordinate the functions into a central office. • 2013, the Director of the Compliance and Investigations plays the coordinating role and dedicated to ethics and compliance. • Title IX office reports to him. He has access to the Student Conduct database and can monitor or assist when needed.
How is information coordinated throughout the various areas?	Information is shared through various working groups, for example: human resources, faculty and other employees. Sometimes overlap meetings are held to discuss overarching topics. This person does not see a need for a compliance working group.		Other imbedded ethics/integrity/compliance groups report to office and they have access to all those groups' investigations and processes. If there is a report related to the administration in those offices or if the central office feels the report should not go to that area for investigation, legal is the default investigator.
Do you have supporters across campus or department contacts? Is	The head of each functional unit within each department serves as a contact.	Monthly 'triage' group (legal, audit, compliance, other investigating units) that meets once a month to discuss ongoing cases to coordinate (<i>continued on next page</i>)	

Appendix E: Benchmarking Interviews–Reporting Mechanisms and Administrative Structure

the process committee driven?		efforts and prevent duplication and to identify possible trend data (long term).	
Reporting Mechanisms:			
Tool–What reporting tool do you use? i.e. EthicsPoint, The Network, etc.	EthicsPoint	EthicsPoint	EthicsPoint
Categories–Why were these categories included; why were other categories not included? (i.e., academics)	Campus Relations, Discrimination & Harassment, Employee Relations, Environmental Health & Safety, Financial Concerns, Misuse or Misappropriation of Assets or Information, Policy and Process Integrity	Financial Matters; Safety; GTRI (Research); Academic; Human Resources; Information Systems; Athletics	Healthcare, HR, Athletics, Research and Financial. Why not academics? Major uproar from faculty about not being included in the process in 2005 - 2006.
Coordination–Who manages this function?	Each institution has their own hotline. All reports come to the director and are triaged to the appropriate person within the university mentioned. Generally the institution will handle the report and necessary process unless assistance is requested or required.	Reports based on category automatically go to the appropriate central office user.	The director meets monthly with groups to go over open cases. Separate for campus and healthcare; financial group would include police, HR, internal audit, administrators to facilities and legal affairs. Also meets with other teams who handle compliance or investigate issues, such as HR teams.
Oversight–Who has access? Oversight?	Director has oversight over all of EthicsPoint. Individual universities have at least one compliance person.	Audit has oversight over all of EthicsPoint. The Director of Internal Audit is also the Chief Ethics Officer. A staff auditor and Associate Director of Forensic Audits have access to EthicsPoint.	The office reports trending of the reports to the BOT and the senior leadership.
Routing–How are cases assigned to the appropriate department for investigation?	Reports are automatically directed to the appropriate university and from there directed to the individual unit.	Reports based on category automatically go to the appropriate central office user. If the reporter names a specific user, that report will not route to that individual.	
Volume–How long have you had the hotline in place? Volume of reports?	Hotline since 2008	300 overall—at least 6 years in place, typically 3 - 4 reports per month with bulk about HR related issues.	150 - 160 reports per year. Bulk are HR.
Advertising–Do you advertise the hotline? Does advertisement include to students? How do you advertise?	Web pages, posters, special events.	Actively market the hotline with quarterly postcards and are looking for electronic methods to increase awareness. There are increased reports after distribution.	No widespread campaign because of fear of overwhelming system. Info is posted clearly on the compliance pages and in documents in units that give the employee a list of the ways to report and resolve issues which includes the anonymous EthicsPoint option. Students receive info about EthicsPoint in their Title IX information and in other trainings/orientations.

Appendix E: Benchmarking Interviews—Reporting Mechanisms and Administrative Structure

<p>Anonymity?—If you are a public institution, do you assure anonymity? If so, how?</p>			
<p>Reports—Do you report on cases received through the hotline? If so, for whom and what is included in the report?</p>	<p>Individual universities handle reporting responsibilities.</p>		
<p>Lessons Learned/Areas for Improvement—Any recommendations or lessons learned from the process of setting up your ethics and compliance program and/or hotline management</p>		<p>1. (Weakness): If the reporter selects the incorrect category the report is sent to the incorrect office. 2. Mitigate: Audit has oversight and can re-direct. It's a manual process; it's the responsibility of the central office to notify audit when this happens so the report can be re-directed. Doesn't always happen, but audit reviews the information on a regular basis... typically may get 3 - 4 reports per month, over 50% are related to HR. 3. Institution has a goal to simplify the categories that are described on the EthicsPoint site to be less confusing to limit the number of items that need to be re-directed. (HR uses EthicsPoint as a case-management tool for appeals, etc.)</p>	<p>1. Minor issues with system of triage. Some cases require immediate attention. 2. Purchased a case management system.</p>

Appendix F: EthicsPoint at UNC-Chapel Hill

EthicsPoint at UNC-Chapel Hill

<http://universitycounsel.unc.edu/legal-links/compliance-line/>

Subgroup 4 developed questions to review with the Associate University Counsel, who serves as the point person for EthicsPoint at UNC-Chapel Hill.

Administration

Currently, the Associate University Counsel is the only person with access to reports that are submitted through EthicsPoint. She routes each report to the appropriate unit or office for investigation.

Volume of cases

Since the EthicsPoint process was created at UNC-Chapel Hill in 2005, a total of 71 cases have been reported through this mechanism.

Public access to information in EthicsPoint system

Information from EthicsPoint is not printed, forwarded, or emailed; nor does it reside on a UNC server. The information resides on the EthicsPoint server, which is separate from the UNC server.

Topics included on EthicsPoint at UNC-Chapel Hill:

- Currently, four compliance categories are included in the UNC-Chapel Hill EthicsPoint system:
 - Financial
 - Research
 - HIPAA
 - Environment, Health, and Safety
- The system is compliance focused; it was developed as a result of the federal sentencing guidelines.
- The system is related to criminal liability—not civil or administrative sanctions.
- The system works best for areas where there is documentation to investigate.
- There are links to the EthicsPoint site from the offices included in the topics list.

Flow of information

1. EthicsPoint receives a report and notifies the Associate University Counsel via email that there is a new report; the Associate University Counsel makes no determination as to the quality or validity of the report.

- 2 The Associate University Counsel contacts the appropriate administrative office/supervisor with jurisdiction over the matter reported (she does not notify the administrator who may be named in the report).

Follow-up communications to the reporting party

All communication occurs through EthicsPoint, there is capability for follow-up questions and live chat, and the reporter is given a password to return to the site to see if there are additional questions. However, since EthicsPoint is anonymous, there is no way to notify the reporting person that follow-up questions are waiting.

Sharing reports

Reports are not shared because the campus advertises EthicsPoint as an anonymous resource and it must protect the anonymity of the reporting party. For this reason, the campus does not print, save, email, or otherwise share the reports other than through the EthicsPoint server and only with the person assigned to investigate. Caution must be exercised when considering sharing EthicsPoint reports, even in redacted form. Depending on the nature of the information provided in the report, it may be possible to identify the reporter if only certain people are privy to the information shared.

Although the campus does not generate reports from EthicsPoint about submissions received through the hotline, information gained from these EthicsPoint reports is likely incorporated into other reports created by the administrators who investigate them (for example, the Internal Audit's report to the UNC-Chapel Hill Board of Trustees).



THE UNIVERSITY
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at CHAPEL HILL