Agenda:

• Announcements
• University Compliance
• Volunteer Policy
• Research Administration Services
• Service Center Core/Facilities Rate Calculations
RA Announcements:

- **September 19, 2013 ERAZ:**
  *Please note the change of location*
  9:30-11:00am
  School of Nursing Auditorium; Rm P01
  1520 Clifton Road

- **Kathleen Bienkowski is here!**

- **Year end is here too!**

- **Newsletters** are available at:
  
  http://blogs.emory.edu/ranews
Introducing: Administrative Compliance

Organizational home: Internal Audit Division

Mike Mandl
EVP, Fin & Admin

Audit & Compliance Committee (Trustees), EVPs

Mr. Michael J. Bordoni
Chief Audit Officer

Ms. Starlyss T. McSlado
Executive Administrative Assistant

Mr. Scott J. Stevenson
Associate Chief Audit Officer

Ms. Sarah Putney
Administrative Compliance Director

Ms. Scott Jenkins
Senior Compliance Officer

Mr. Mark Hasitz
Director, IT

Ms. Deeka V. Pavate
Director, University Internal Audit

Ms. Christine Alibbi
Manager, University Internal Audit

Ms. Elizabeth Searles
Audit Senior, University Internal Audit

Ms. Renee Krol
Audit Senior, Healthcare Internal Audit

Ms. Stacy R. Wood
Director, Healthcare Internal Audit

Mr. Jay Thomas
Audit Senior, Healthcare Internal Audit

Ms. Nadine Alliance
Manager, Healthcare Internal Audit

VACANT
Audit Senior, Healthcare Internal Audit
Scope

• Compliance with regulatory, legal, and policy requirements that are:
  – Applicable to the University (not Emory Healthcare)
  – Not healthcare-related
  – Not research-related

• Organizational ethics
  • Decision-making on what is the “right thing to do”
  • Norms (expectations for behavior) for conducting our business
  • Reasons for those norms (values, principles)

• Note: we don’t audit per se, but our colleagues in Internal Audit do (typically after baseline compliance is established)
Role & Activities

- To promote compliant and ethical behavior at Emory University by:
  - Assessing compliance, contributing to risk assessments
  - Supporting University governance via the Audit & Compliance Committee (Board of Trustees)
  - Working with departments that own the compliance issues
    - Conducting compliance reviews
    - Facilitating improved compliance
      - Recent changes to rules
      - New rules
  - Educating
  - Serving as a reporting channel
  - Serving as a safe harbor consultation resource
Key Partners

- Office of Research Compliance
- Compliance Office, Emory Healthcare
- Departments – that means you!
- Office of General Counsel
You care about doing THE RIGHT THING.
And you Care about Emory

Maybe something is going on at work that doesn't seem quite right... but
• You aren't sure it breaks any rules
• You are afraid to say something
• You don't trust the Trustline

Want to talk to someone confidentially? No problem.

You can talk privately with Emory’s Safe Harbor consultants, a service of the University’s Compliance & Ethics Program. Without formally reporting anything, you can:
• Meet at a place where you feel comfortable
• Ask a “what if” or hypothetical question
• Express your concerns
• Find out about policies that may be violated by a fact scenario
• Learn what the options are
Trust Line

Are you aware of potential ethical, legal, and/or business conduct violations or concerns at Emory?

Tell Us. It Matters.

Call the Emory Trust Line
1-888-550-8850

- Administered through an independent company
- Available 24 hours a day, 7 days a week, 365 days a year
- Anonymous and confidential reporting
Examples of Issues

• Higher Education Opportunity Act
  – Consumer information disclosure website
• Clery Act (crime on campus)
  – Education and training of “campus security authorities”
  – Annual reporting
  – Applications to study-abroad programs
• Export controls:
  – Depts of Treasury, Commerce, and State
  – Rules applicable to financial transactions (payments to vendors)
Examples of Current Projects

- Coordinating business plan for an IT product that would conduct export control screenings in several departments
- Support for employees reporting ethical violations:
  - Developing survey on employee awareness of resources at Emory for supporting ethical decision-making, reporting violations, and post-reporting support (non-retaliation)
  - Reviewing non-retaliation policies
- Clery Act (crime on campus)
  - Conducting compliance assessment of study abroad programs
  - Facilitate clear SOPs and guidance tools (roles, responsibilities)
Historical context

• Universities are following a 15+ year trend begun in corporate governance to develop in-house compliance and ethics programs
  – Started in defense contracting industry

• Organizational compliance and ethics programs are required by Federal Sentencing Guidelines
Emory’s Ethical Foundation

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

http://www.emory.edu/president/governance/ethical_principles.html

– Expectations for ethical behavior (norms)
– Principles to guide decision-making and behavior
– Which of these do you think are included?
  • Wise stewardship
  • Fair treatment
  • Honest dealing
  • Care and compassion
  • Collegiality
  • Responsibility
Contact us if…

• You have an ethical concern about an activity at Emory (not research, not healthcare)
• You would like a compliance assessment done
• You would like a safe harbor consult
• You would like to report a concern
• You have an idea to share to improve compliance and ethics at the University
Contact Information

Administrative Compliance, Internal Audit Div.
1599 Clifton Road NE, 5th Floor, SE Corner

• Sarah Putney, JD, Director - sputney@emory.edu
  404-712-9750

• Brian Scott ("Scotty") Jenkins - bsjenki@emory.edu
  404-727-6162

• Trust Line: 1-888-550-8850
Unpaid Research Intern Program

Procedure for Establishing Internship in Woodruff Health Sciences

RAM 6/20/13
What is an Unpaid Internship?

- Unpaid Research Internship Programs are established to enhance the educational experience of a trainee or student and provide experience in a research environment.
- In the early phases of an Internship the Intern may only shadow a faculty member or research team member.
- With appropriate training and close supervision the intern may progress to tasks that may be deemed minimal work.
- The Interns will not be credentialed or insured to work independently or have unsupervised contact with patients/participants.
Fair Labor Standards Act

- The Fair Labor Standards Act prohibits the use of volunteers to provide regular staffing duties.
- The Unpaid Internships have been established to distinguish the difference between a volunteer providing staffing needs and an educational experience.
- The interns can never be used to fill a regular staffing need.
How to Establish an Internship

• Submit Unpaid Internship Program request and description to the Assistant Dean for Research for the relevant School for review.
• Describe the program as outlined in full procedure.
• Once the Internship Program has been approved interns may be accepted into the program.
• ALL requirements must be completed prior to the program start date.
  – WOC paperwork, ID badge, background check, Training, Health Screening, etc. (full list of requirements posted on SOM web site)
Compliance Oversight

- Each Dept. is responsible for establishing a process to confirm that all Interns are well supervised and in compliance with current standards.
- The School is responsible for oversight of Department compliance.
- Programs found to be non-compliant will be immediately ended.
QUESTIONS?

• Contact Trish Haugaard at phaugaa@emory.edu or call 404-727-3774
AVP, Research Administrative Services (RAS) & RAS Implementation Update
RAS Implementation Update

• New name: Research Administration Services (RAS). (E.g.: “RAS – Cancer & Imaging”)

• Phase 1 RAS Units (Cancer & Imaging and Public Health) are up and running
  – ~30 SOPs developed; ~15 implemented; 15 remaining will be rolled out over next 2-3 months

• 4 of 5 training sessions for Award Setup are complete; training on other new RAS activities scheduled for late July and early August

• Finalized 15 standard job descriptions for roles within RAS units
  – HR is developing a standard and consistent process for moving staff into these new titles in RAS units

• Finalizing first drafts of RAS KPI Dashboards and reports

• Updated EPEX routing to reflect RAS responsibilities and streamline approval process

• Further automation of FSR reconciliation process
Research Administration Services Rollout Timeline

Phase 1 (Launched)
- RAS Cancer & Imaging
- RAS Public Health

Phase 2A: RAS Medicine
- Planning
- Launch, Ph1
- Launch, Ph2

Phase 2B: RAS 3 - Pediatrics
- Planning
- Launch, Ph1
- Launch, Ph2

Phase 3: RAS 4-5
- Planning
- Launch, Ph1
- Launch, Ph2

Phase 4: RAS 6-7
- Planning
- Launch, Ph1
- Launch, Ph2

Phase 5: RAS 8 - 10
- Planning
- Launch, Ph1
- Launch, Ph2

Timeline is preliminary and may be adjusted.
Service Center/Core Facility Rates

Josh Rosenberg
Director of Cost Studies
(404) 727-1677
Josh.rosenberg@emory.edu
Service Center/Core Facility Rates

Examples of Governmental Concerns

- Inadequate policies, procedures and/or oversight.
- Inappropriate billing rates.
- Monitoring of fund balances & treatment of surplus (too large = Fed overpaid).
- Working Capital Reserves not greater than 60 days expenses.
- Do billing rates exclude unallowable costs?
- Are billing rates based on actual or estimates of actual costs?
Service Center/Core Facility Rates

What do we need from you and how can we help?

- Rate calculation support for FY13 and for FY14.
- Service Center Working Group (Trish and Josh)

Next Steps

- Inventory development and list of contact people.
- Simplify SOM rate worksheet template.
- Consider stopping the ability to recharge.
- Trainings:
  - Q&A development
  - What we can and cannot charge
  - How to set rates
  - Individual sessions
Any Questions?
Reminders:

- **NEXT MEETING:**
  September 19, 2013 – 9:30 am to 11:00 am
  School of Nursing Auditorium; Rm P01
  1520 Clifton Road

- Find information about ERAZ at
  [http://www.or.emory.edu/eraz/index.html](http://www.or.emory.edu/eraz/index.html)

- Email topics and suggestions for future meetings to
  eraz@emory.edu.

- Your opinion and thoughts matter. Please complete
  the survey that will be sent out after this meeting.
See you in September!