



THE CATHOLIC UNIVERSITY OF AMERICA

Compliance and Ethics Program

Washington, DC 20064

(202) 319-6170 <http://compliance.cua.edu/> CUA-COMPLIANCE@CUA.EDU

FACULTY POLICY GUIDE

June 2017

Introduction

This Guide provides an overview and summary of key policies that faculty members need to be aware of. The Guide is organized by common faculty activities and roles. This Guide is published under the “How Do I...” section of the Compliance and Ethics Program website (<http://compliance.cua.edu/>), and on the University policy website at <http://policies.cua.edu/faculty/index.cfm>. If a printed version of this Guide is used, please visit either of these links to be sure the print version is the most up-to-date.

In addition, the [Faculty Handbook](#) sets forth constitutive principles and the procedures that implement them. The Handbook is published on the policy website at <http://policies.cua.edu/faculty/index.cfm>. Faculty also may have additional responsibilities applicable to their own school or unit and its practices and procedures.

Outline: Faculty Members in Their Role as...

1. Employees of the University
2. Instructors/Teachers
3. Advisors to Graduate Students
4. Speakers in the Private and University Capacities
5. Purchasers and Purchasing Managers
6. Recipients of Sexual Offense Reports or Other Crimes
7. Researchers
8. Supervisors
9. Travelers

Policy Questions?

For questions about policies, contact the Responsible Official listed in the policy. Questions about faculty specific policies also can be addressed to Vice Provost for Policy Lucia Silecchia silecchia@law.cua.edu. Questions about University-wide or administrative policies can be addressed to Chief Ethics and Compliance Officer Vin Lacovara (CUA-COMPLIANCE@CUA.EDU).

FACULTY POLICY GUIDE

1. As Employees of the University

Reinforcing the University's Ethical Culture. Per the University's [Code of Conduct](#), as staff and faculty we are expected to be accountable for our actions, act honestly and fairly and courteously, promote a culture of equality and inclusiveness, avoid even the appearance of conflicts of interest, and refrain from abusing our authority or harassing others. As the front line of our University, faculty are crucial demonstrators of these commitments and of the University's faith-based culture.

Non-Discrimination. Per the [Non-Discrimination, Anti-Harassment, and Title IX Compliance Policy](#), no person will unlawfully be denied employment, admission, or educational opportunity, or otherwise be discriminated against at The Catholic University of America in its programs or activities. Allegations of non-discrimination harassment should be reported to the Equal Opportunity Officer/Title IX Coordinator per the above policy. If the allegation pertains to a sexual offense, review the [Sexual Offenses Policy \(Students\)](#) or the [Sexual Offenses Policy \(Employees and Third Parties\)](#) as applicable.

Conflicts of Interest. Conflicts are situations where an individual's interests and those of the University diverge, or may appear to diverge. Conflicts are not only financial, but occur in externally-funded research, in employment/supervisory situations, with respect to time commitment, and in terms of loyalty to the University. Conflicts are eliminated or managed by **reporting** the situation in advance, **recusing** oneself from decision making, and **refraining** from involvement in the matter. For a quick reference guide to common conflicts, how to deal with them, and a summary of conflict policies, review [How do I know if I have a conflict and what should I do about it?](#) Review the University's [Conflict of Interest Tutorial](#) for specific examples of conflicts situations and how they are be managed. Contact the Chief Ethics and Compliance Officer (CUA-COMPLIANCE@CUA.EDU) for guidance.

Non-Retaliation and Reporting Ethical Misconduct. Per the University's [Code of Conduct](#) and [Reporting Ethical Misconduct and Non-Retaliation Policy](#), suspected unethical conduct or non-compliance with laws or University policies should be reported to a supervisor, a University official who has responsible for the area of concern, to the [Chief Ethics and Compliance Officer and Chief Privacy Officer](#) (tel. 202-319-6170, CUA-COMPLIANCE@CUA.EDU), or through the [Compliance and Ethics Helpline](#). If uncertain whether to report concerns, err on the side of caution and report. Anyone who is uncomfortable coming forward should review the quick reference guide [How Do I Report Compliance Concerns Anonymously?](#) All reported concerns can be made free from fear of retaliation.

Appropriate Relationships. Per the [Sexual Offenses Policy \(Employees and Third Parties\)](#), a consensual dating or sexual relationship between a staff employee, a member of the faculty (including adjunct faculty) and a student, or an employee that the staff/faculty directly supervises, is prohibited when the staff/faculty has any current or foreseeable professional responsibility for the student or the employee.

Information Security and Privacy. (*see also student privacy*) All members of the University community must protect the security, confidentiality, and privacy of information entrusted to them regarding students, employees, business partners, the government. The [Information Security and Assurance Policy](#) defines what information is "confidential" and provides guidance for protecting that information when using of e-mail and other University systems, when using mobile devices, and when

computing off-campus. The [Acceptable Use Policy](#) provides guidance regarding proper use of University accounts and access, intellectual property, and avoiding interference with University systems.

Disability Accommodations. Staff and Faculty employees with disabilities should be referred to the Equal Opportunity Officer (tel. 202-319-6594), who will determine what accommodations are reasonable per the [Reasonable Accommodations for Employees with Disabilities Policy](#).

Compliance Training. All staff and faculty employees are required to complete four mandatory online University training modules every two years: 1) Compliance Awareness; 2) Privacy and Information Security; 3) FERPA; and 4) Harassment Prevention. All four modules can be accessed from any computer by visiting <http://training.cua.edu/>.

2. As Instructors/Teachers

Obligations to Students. Faculty members are expected to meet a class punctually and regularly and notify the Chair or Dean when unable to do so. Only those students who have completed registration for the course are to be admitted to class or to dissertation guidance. A faculty member may not reschedule the regular time or place of classes without authorization from the Registrar.

Faculty members are expected to assess the quality of students' work by examination at the scheduled time and place, or by other appropriate means. Faculty members are responsible for preparing and monitoring examination. When requested, a faculty member must serve as an examiner at oral examinations required for advanced degrees.

The faculty member must submit grades earned in courses according to the announced schedule. A grade that has been reported may not be changed except for a valid reason stated in writing to the Dean. Explanations of grading systems are found in the *Announcements* and in the student policies referenced below.

Academic Dishonesty. Academic dishonesty, such as cheating, plagiarism and fabrication, undermines the learning experience and is inconsistent with the ethical standards of the University. Faculty members are expected to report to the Chair or the Dean instances of academic dishonesty. The [Academic Dishonesty Policy](#) describes academic dishonesty, the duty to report, and links to the related procedures for addressing it.

Appeal of Failing Grades. Instructors have the right to judge the quality of the academic performances of their students free of external coercion. Per the [Appeal of Failing Grades Policy](#), failing grades may be overturned if a student demonstrates that the instructor allowed non-academic criteria to influence the assigning the grade of failure.

Student Record Privacy. The Family Educational Rights and Privacy Act (FERPA) protects the privacy and confidentiality of student education records, which are any records directly related to a student (current or former) kept in any medium (written, printed, film, computer, etc.) FERPA-protected student information can be shared with school officials with a legitimate educational interest. Nevertheless, FERPA allows for disclosures of student information in emergencies. If in doubt, don't hesitate to raise your concerns with appropriate University personnel. If you believe there is a threat to safety or security or other emergency, contact the Department of Public Safety immediately at (202)

319-5111. For a quick reference guide, see [How Do I Share Student Information Properly?](#) For details, see the full [Student Records Policy](#).

Intellectual Property. Federal copyright laws protect authors' literary, artistic and other intellectual products. Faculty members may reproduce, distribute or otherwise use the works of others subject to "fair use" limitations. The 4 Factor Test for determining "fair use," and guidance for complying with copyright restrictions, is contained in the [Copyright Guidelines](#) in the University's [Copyright Policy](#). Additional resources are set forth at <http://libraries.cua.edu/access/copymain.cfm>.

While the University, by default, holds the copyright to works made for hire by staff and faculty employees, the University transfers any copyright it has in "scholarly works" to the employee who authored those works with certain conditions. Those conditions are set forth in the [Copyright Ownership Policy](#).

Per the [Recording Classroom Lectures Policy](#) Students may record faculty members' lectures only if the faculty member gives permission, or if Disability Support Services has provided authorization to do so as an accommodation for a student's disability. sets forth the limitations on what uses

Disability Accommodations. "Disability" means a physical or mental impairment that substantially limits one or more of the major life activities of an individual, a record of having such an impairment, or being regarded as having such an impairment. Faculty members, department chairs and deans play a joint role with Disability Support Services in promoting equal access to qualified students with disabilities. Faculty members should refer students who wish to request an accommodation for a disability to [Disability Support Services](#) (tel. 201-319-5211, CUA-DSS@CUA.EDU). DSS will communicate accommodation requirements to faculty members, and assist in resolving concerns regarding accommodations. All disability information must be kept confidential.

3. Academic Assistance to Graduate Students

Faculty members (other than those serving as faculty advisors) who provide academic assistance to graduate students in preparation of term papers and dissertations should take care that the assistance provided is subsidiary in level and scope to the work itself. Further details and guidance is set forth in Part III of the Faculty Handbook at [Assistance in Graduate Student Research](#).

4. Speakers in their Private and University Capacities

Contacts with the Media. Faculty and staff are actively encouraged to provide comment to the news media on their areas of expertise. However, the Associate Vice President for Marketing and Communications is the only University spokesperson designated to convey to the media information about the University or about University matters. Likewise, only Marketing and Communications is authorized to provide University news and publicity to the media. Accordingly, when information to be provided to the media may pertain to the University or University news, consult with the Office of Marketing and Communication in advance. See the [Speaking to the News Media Policy](#) and the [Press Releases Policy](#) for details.

Use of CUA Logos and Trademarks. Faculty, staff and students may use the University’s approved names, logos, and/or other marks where necessary to identify themselves on matters of official University business. All such uses must follow the University’s [Trademark Policy](#) and the University’s [Style and Visual Identity Guide](#). Only specifically-designated University officials may use the University Seal to authenticate official University documents. No other use of the seal is permitted.

Social Media. Staff, faculty and students who use University social media accounts are subject to the same University policies and requirements that apply to in-person activities, including but not limited to: non-discrimination and anti-harassment; protecting confidentiality and privacy; use of University marks; copyright; speaking to the media; and use of photographs and videos. See the University’s [Social Media Policy](#) for details.

Political Activities. The University supports participation in political activities by members of the University community. At the same time, the University is a non-profit, private institution governed by Section 501(c)(3) of the Internal Revenue Code, which prohibits the University from directly or indirectly participating in any political campaign for or against a candidate for elective public office. Accordingly, to protect the University’s tax-exempt status, University schools, departments or unit, and no member of the University community speaking for the University may use University resources to engage in such political activities. The University’s [Political Activities Policy](#) defines “political activities,” and provides guidelines for individual engagement in such activities in a manner that does not endanger the University.

5. As Purchasers and Purchasing Managers

Purchasing. [Strategic Sourcing and Business Services](#) must be involved in purchases of goods or services in excess of \$2,500. Review and [Procurement Policy](#) and contact Strategic Sourcing well in advance of the planned purchase. If a University Procurement Card is to be used for a purchase, be sure that use of the Procurement Card is permitted for that type of purchase per the [Procurement Card Policy](#), which lists permissible and impermissible purchases that can be made with a Procurement Card. Any agreement that accompanies a purchase must follow the contract and signature authority policy discussed below.

Contract Approval and Signature Authority. Only individuals with specifically-delegated authority per the [Contract Approval and Signature Authority Policy](#) may sign a contract that binds the University or its programs. Only a very few individuals at the University have signature authority. Contracts also must be reviewed in advance by the Office of General Counsel. The University only will be bound by contracts that follow the review and approval requirements of the contract policy. In the event of a legal dispute, the University may not indemnify individuals who did not comply with the contract procedures. See the [Employee Indemnification Policy](#) for details.

6. As Recipients of Sexual Offense Reports or Other Crimes

Sexual Offenses. Sexual Offenses are unlawful behaviors such as sexual assault, sexual harassment, domestic or dating violence, and stalking. The University will respond to reported violations by protecting the victim and our community, by conducting prompt and thorough investigations, and by providing support. Faculty members who are “Responsible Employees” per the [Sexual Offenses Policy](#)

[\(Students\)](#) are mandated by federal law to report sexual offenses to the Title IX Coordinator, the Dean of Students, or the Department of Public Safety. Faculty members who are not required to report nevertheless are strongly encouraged to report such offenses. The University's [Title IX website](#) has frequently asked questions about what and where to report, key terms, confidentiality, the investigative process, and what support resources are in place.

Other Crimes. Potential crimes that do not involve sexual offenses should be reported immediately. If the crime occurs on campus, contact the Department of Public Safety (DPS) at tel. (202) 319-5111. If the crime occurs off campus, contact local police by dialing 911, then call the DPS. If the crime occurs abroad, contact police in the host country, then contact DPS. Further information on crime prevention and on how the University notifies the campus community of crimes is set forth in the [Crime Reporting and Response Policy](#).

7. As Researchers

Sponsored Research Compliance. Faculty members who conduct work under sponsored awards from external entities must follow the University's award processing and approval requirements, must submit a conflict of interest disclosure, must report their effort accurately, and must ensure that all costs charged to sponsored awards are "allowable," "allocable" and "reasonable." For a quick reference guide with links to relevant University policies, see [How do I Comply with Research Requirements?](#) Links to the relevant policies are below:

[Compensation from Sponsored Awards and Effort Certification Policy](#)

[Conflicts of Interest – Externally-Funded Research](#)

[Sponsored Award Costing Policy](#)

[Sponsored Award Management Policy](#)

Additional policies and manuals regarding cost sharing, cost transfers, copyright ownership, and laboratory and radiation safety are set forth on the policy website under the [RESEARCH](#) section under the Faculty tab on the left-hand menu.

Responsible Conduct of Research. Faculty and others holding teaching and/or research appointments have an ethical obligation to contribute to an environment of intellectual honesty and integrity. Research must be conducted and the results disseminated honestly, accurately and fairly. The University's [Research Misconduct Policy](#) defines research misconduct, sets forth the responsibility of members of the University community to report allegations of such misconduct, and details the procedures for reviewing and resolving such allegations.

Human Subject and Animal Research. Research involving human subjects must respect the rights and welfare of the individual participants, and must have advance approval from the Institutional Review Board per the [Protection of Human Subjects in Research Policy](#). Research involving vertebrate animals must be humane, and must be approved in advance by the Institutional Animal Care and Use Committee per the [Animal Use Policy](#).

8. As Supervisors

Conflicts/Disputes in the Workplace. Disputes naturally arise in the diverse University environment. If efforts to address conflicts directly with co-workers or through supervisors are not successful, faculty are encouraged to contact the [Office of Human Resources](#) (tel. 202-319-5050) for independent guidance and support with conflict resolution.

Discipline and Termination of Staff. Faculty supervisors should provide progressive discipline to staff employees who do not demonstrate acceptable conduct appropriate to their positions. Progressive discipline entails oral or written reminders or warnings with specific steps needed to correct the problematic behavior. If suspension or termination of a staff employee becomes necessary, the faculty supervisor should contact the Associate Vice President and Chief Human Resources Officer (tel. 202-319-5050) in advance of taking any action. Details about discipline and termination are set forth in the [Discipline and Termination Policy \(staff\)](#). Discipline and termination information regarding faculty members is address in Part II of the [Faculty Handbook](#).

Emergencies. Actual or perceived emergencies on campus should be reported immediately to the Department of Public Safety at tel. (202) 319-5111. Off campus emergencies should be reported by calling 911. The University responds to emergencies by instructing the campus community to either shelter-in-place or evacuate. See the [Emergency Preparedness, Reporting, Response and Recovery Policy](#) for guidance in preparing for and responding to emergencies.

Injuries. Workers comp and first report of injury

Family and Medical Leave. Eligible faculty and staff are provided with unpaid, job-protected leave for the birth of a child, adoption of a child, placement of a child for foster care, to care for a family member with a serious health condition, or when the employee has a serious health condition. The [Family and Medical and Parental Leave Policy](#) explains the administration of these types of leave and how it works in conjunction with sick leave and annual leave. The policy should be read in conjunction with the [Sick and Safe Leave Policy](#) and the [Temporary Disability \(Sick Leave\) Policy](#). For a quick reference guide, see [What is Family and Medical Leave and How do I Apply?](#) Contact the Office of Human Resources (tel. 202-319-5050) for specific guidance.

Additional Parental and Family Benefits. Members of the tenured, regular faculty are eligible for part-time employment for up to four consecutive semesters for reasons of child-bearing or caregiving for children, parents, siblings, or spouses. Prior to tenure, a tenure-track faculty member may have more than four consecutive semesters of part-time employment for such purposes. Additionally, the tenure clock shall be extended by one year for the birth or adoption of each child, without limitation, for tenure-track faculty. See the Parental and Family Caregiver Benefits Policy for Faculty.

Hiring Staff Employees. Contact the Office of Human Resources (HR) (tel. 202-319-5050) as soon as the need to hire a staff employee arises. This includes temporary hires, student employees and interns. HR will assist in meeting the requirements of the Employment Practices and Procedures Policy. Allowing prospective employees to work prior to completion of the hiring process exposes the University to federal and local employment eligibility and timely payroll non-compliance. See [How Do I Hire Staff Employees?](#) for a quick reference guide and links to relevant policies.

Payroll Administration. Staff who are “non-exempt” employees are paid on an hourly basis, and must be paid for all actual hours worked, including overtime. All non-exempt employees must record all actual hours worked and leave taken on a non-exempt timesheet. Supervisors must review and approve all non-exempt timesheets and submit them to the Payroll Office by the last working day of the pay period. Timesheets must be signed by both the employee and the supervisor. “Exempt” employees are paid a salary, and must submit an exempt leave report for purposes of tracking leave taken. Supervisors must review and approve all exempt leave reports, which must be signed by both the employee and the supervisor. See the Staff Payroll Reporting Policy for details.

9. As Travelers

Travel on University Business. Individuals who travel for the University, regardless of the source of the funds used, must have pre-approval for the trip. All travel expenses, such as transportation, lodging, and meals and entertainment, must be permissible and must have an articulated business purpose. All expenses must be documented properly and be submitted for reimbursement in a timely manner. Expenses that do not meet these requirements, as set forth in the [Travel Policy](#), may be denied. If the travel to be undertaken is international in nature, the [International Travel Policy](#) also must be followed.

Sharing Restricted Information. Most of the University’s academic, research and administrative activities involve information that is publicly available, taught in catalogue courses, or that constitutes basic or applied research. However, on occasion, some information or technology may be subject to federal export control laws that restrict who the information or technology can be shared with. Violations can carry significant criminal and civil penalties to both the individual and the University. Before taking technology or technological information abroad or sharing it with foreign nationals in the U.S., review the [Export Control Policy](#) and seek guidance per the policy.

Anti-Bribery. Federal law prohibits giving, paying, offering, or promising to pay money or anything of value to a foreign official to influence the official so as to violate the law, secure an improper advantage, or obtain or retain business. “Foreign officials” are broadly defined, and there is no *de minimis* amount that can trigger the violation. Review the [Anti-Bribery Policy](#) and seek guidance per the policy before giving any such gifts.

Alphabetical Listing of Policies Referenced Above
See <http://policies.cua.edu> for links to all University-wide policies.

[Academic Dishonesty Policy](#)
[Animal Use Policy](#)
[Anti-Bribery Policy](#)
[Appeal of Failing Grades Policy](#)
[Assistance in Graduate Student Research](#)
Code of Conduct for Staff and Faculty
[Compensation from Sponsored Awards and Effort Certification Policy](#)
[Conflict of Interest Policy for Staff and Faculty](#)
[Conflicts of Interest – Externally-Funded Research](#)
[Conflict of Commitment Policy](#)
[Contract Approval and Signature Authority Policy](#)
[Copyright Policy](#)
[Copyright Ownership Policy](#)
[Crime Reporting and Response Policy](#)
[Disability Accommodations for Students Policy](#)
[Discipline and Termination Policy \(staff\)](#)
[Emergency Preparedness, Reporting, Response and Recovery Policy](#)
[Employee Indemnification Policy](#)
[Export Control Policy](#)
[Family and Medical and Parental Leave Policy](#)
Faculty Handbook (Index)
[Information Security and Assurance Policy](#)
[International Travel Policy](#)
[Permission to Photograph Policy](#)
[Political Activities Policy](#)
[Press Releases Policy](#)
[Protection of Human Subjects in Research Policy](#)
[Reasonable Accommodations for Employees with Disabilities Policy](#)
[Reporting Ethical Misconduct and Non-Retaliation Policy](#)
[Research Misconduct Policy](#)
[RESEARCH \(all policies\)](#)
[Sexual Offenses Policy \(Students\)](#)
[Sexual Offenses Policy \(Employees and Third Parties\)](#)
[Sick and Safe Leave Policy](#)
[Social Media Policy](#)
[Speaking to the News Media Policy](#)
[Sponsored Award Costing Policy](#)
[Sponsored Award Management Policy](#)
[Student Records Policy](#)
Style and Visual Identity Guide
[Temporary Disability \(Sick Leave\) Policy](#)
[Trademark Policy](#)
[Travel Policy](#)