



THE CATHOLIC UNIVERSITY OF AMERICA
Compliance and Ethics Program

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COMMON UNIVERSITY POLICIES FOR MANAGERS AND SUPERVISORS

The University is subject to hundreds of laws that govern common activities such as hiring, purchasing, privacy, non-discrimination, and travel. To help employees follow these laws the University regularly revises University-wide policies on its [Policy Website](#).

While by no means an exhaustive list, below are common policies of which managers and supervisors should be aware. If you have questions about University policies or about compliance with applicable laws, contact Vin Lacovara, Chief Ethics and Compliance Officer, at tel. (202) 319-6170 or CUA-COMPLIANCE@CUA.EDU.

Hiring and Supervision

1. [Employment Practices and Procedures](#) and [Independent Contractor Policy](#) – contact the Office of Human Resources as soon as the need to hire a staff employee arises. This includes temporary and part-time hires, student employees, and interns. If the need for a contractor arises, contact the Office of General Counsel in advance to be sure the individual meets IRS criteria for independent contractor status.
2. [Family and Medical Leave Policy](#) – staff and faculty employees are eligible to take job-protected, unpaid leave for the birth or adoption of a child or 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; for military caregivers; for "safe leave"; and for parental leave, which allows parents of children to attend school related events. Contact the Office of Human Resources for assistance in administering these forms of leave.
3. [Discipline and Termination Policy](#) – employees with conduct or performance issues must be disciplined properly, and discipline needs to be consistent. Consult the Office of Human Resources regarding discipline for an employee based on performance, and involve Human Resources prior to implementing any suspension or termination proceeding.

Non-Discrimination

4. [Non-Discrimination/Equal Opportunity Policy](#). No person may be denied employment, admission, or educational opportunity, or otherwise be discriminated against or harassed in University programs on any basis protected by applicable laws.

5. [Reasonable Accommodations Policy \(Employees\)](#) – the University provides reasonable accommodations upon request to qualified individuals with a disability who are employees or applicants for employment.
6. [Accommodations at University Events Policy](#) – primary responsibility for making University events accessible to those with disabilities rests with the University unit or group sponsoring the event. Event organizers must place an accessibility notice statement in all materials announcing the event.

Sexual Offenses

7. [Sexual Offenses Policy \(students\)](#) and [Sexual Offenses Policy \(Employees and Third Parties\)](#) – sexual offenses are unlawful behaviors that will not be tolerated at the University. The University takes allegations of this type very seriously. Employees who are “responsible employees” must report potential sexual offenses to Frank Vinik, the Title IX Coordinator (tel. 202-319-4177), to the Dean of Students, or to the Department of Public Safety.

Reporting and Non-Retaliation

8. [University Code of Conduct](#) – we are all responsible for bringing suspected unethical conduct to the attention of University officials when we have a good faith belief that the conduct has occurred. Ethical misconduct means non-compliance with a law, University policy, the Code of Conduct, or other standard or requirement applicable to the University. We are all responsible for cooperating with investigations.
9. [Non-Retaliation Policy](#) – retaliation against members of the University community for making good faith reports of potential non-compliance or for cooperating in University investigations is strictly prohibited. Individuals who take adverse action against employees for raising good faith concerns or cooperating with investigations are subject to disciplinary action.

Emergencies and Workplace Injuries

10. [Emergency Preparedness, Reporting, Response and Recovery Policy](#). All members of the University community are strongly encouraged to prepare for potential emergencies in advance by developing a Personal Emergency Plan. Emergencies should be reported immediately to Public Safety at tel. (202) 319-5111. If the situation warrants, the University will instruct the campus community to take appropriate action.
11. [Workers Compensation Policy](#). In the event of an on-the-job injury or illness, the employee should immediately obtain appropriate medical treatment. If emergency medical treatment is needed, the employee or someone in the area should contact Public Safety at tel. (202) 319-5111 to request emergency assistance. The cognizant supervisor must report the injury or

illness to the Office of Human Resources no later than three days from its onset so the injured employee is supported, and so insurance and reporting requirements are met.

Privacy and Information Security

12. [Information Security and Assurance Policy](#) – information and documents that are personally-identifiable, medical, financial, or pertain to students must be protected from unauthorized disclosure. Employees also should be cognizant that using mobile devices for work purposes, as well as off-campus computing, pose additional privacy and information security risks.
13. [Acceptable Use Policy](#) – all users of University technology resources must do so in a responsible manner that supports the University’s mission and administrative functions. Use of such resources may not be for personal profit, interfere with the users employment obligations or with operation of University computing facilities, or violate University policies or applicable laws.
14. [Student Records Policy](#) – subject to some exceptions, a student’s education record includes any information about that student maintained in any format (handwritten, printed, film, digital, etc.) Information from a student’s education record should only be shared with school officials as defined in the policy, or where a student consent form has been provided.

Purchasing and Contracts

15. [Prohibited Transactions Policy](#) – only purchases that are specifically permissible may be made with University funds, regardless of their source. Employees who are uncertain whether a specific purchase is permissible should contact Strategic Sourcing & Business Services at askprocurement@cua.edu.
16. [Procurement Policy](#) and [Standardization Policy](#) – authority and responsibility for obligating University financial resources rests with Strategic Sourcing & Procurement Services. Purchasers of goods and equipment must utilize the preferred vendors and the University-wide purchasing standards set forth at <http://treasurer.cua.edu/Procurement-Services/StandComm/index.cfm>.
17. [Procurement Card Policy](#) and [Corporate Travel Card Policy](#) – the procurement card may be used for many low dollar purchases, but there are specifically-enumerated restrictions in the policy. Use the corporate travel card or the expense reimbursement mechanism for travel expenses (see *Travel* below).
18. [Contract Approval and Signature Authority Policy](#) – all contracts, regardless of dollar value, must be reviewed in advance per this policy. Only a very limited number of employees who have specifically-designated authority may sign a contract on behalf of the University. This policy should be read in conjunction with the purchasing policies listed above.

Conflicts of Interest

19. [Conflict of Interest Policy for Staff and Faculty](#) – all employees must carry out their University duties and administer University resources only in furtherance of the University’s mission and interests, and may not use their positions or knowledge gained on the job to inappropriately influence decisions for the personal advantage of themselves, their family, or their friends. Employees must disclose potential conflicts of interest in writing and obtain advance approval to proceed before initiating or engaging any University transaction or decision.

Budgeting

20. [University Budget Policy](#) and [Reserve Funds Policy](#) – University departments are responsible for submitting in a timely manner detailed operating budgets, associated staffing/salary information, reserve fund information, and capital budgets to the Vice Presidents or Provost for review. Departments are responsible for monitoring spending and notifying the Budget Office in advance of potential cost overruns.

Travel and Insurance

21. [Travel Policy](#) – all travel expenses must have a clearly identified business purpose, must be substantiated, and must be allowed specifically by the Travel Policy. Review this policy in advance of traveling.
22. [Global Education Policy](#). All employees and students traveling abroad on behalf of the University must purchase the University’s mandatory international insurance coverage, and must be familiar with travel safety protocols. See the [Center for Global Education, Health and Safety](#) website for important information.