BOARD OF REGENTS OF THE UNIVERSITY OF WISCONSIN SYSTEM

I.5. Audit Committee

Thursday, August 23, 2018
9:00 a.m. – 10:15 a.m.
Gordon Dining and Event Center, 2nd Floor
770 W. Dayton Street
Concerto Room
Madison, Wisconsin

a. Approval of the Minutes of the June 7, 2018 Meeting of the Audit Committee

b. Internal Audit

1. Fiscal Year 2019 Audit Plan Progress Report

2. Progress on Management Responses to Audit Reports

3. Report of the Chief Audit Executive

- Summarized Results of Audits Issued

c. Internal Controls and Enterprise Risk Management

1. Enterprise Risk Management

2. Update on Information Security Policy for Employees Whose Affiliation Has Changed (Emeriti, Sponsored Retirees, etc.)

3. UW System Management's Response to the Recommendations in the Legislative Audit Bureau's Audit Report 18-4

d. Ethics and Conflict of Interest

- Ethics Training

e. Move into closed session to discuss information security findings and responses as required by s. 19.85(1)(d), Wis. Stats.

UW SYSTEM ADMINISTRATION
OFFICE OF INTERNAL AUDIT
FISCAL YEAR 2019 AUDIT PLAN PROGRESS

BACKGROUND

One of the responsibilities of the Audit Committee, as outlined in the committee charter, is to review and approve the annual internal audit plan and receive interim progress reports at least quarterly.

REQUESTED ACTION

No action requested. Item for information and discussion only.


DISCUSSION

The attached chart provides a summary of audit progress for the Fiscal Year 2019 Audit Plan.

RELATED BOARD OF REGENTS POLICIES

NA

UW SYSTEM ADMINISTRATION
OFFICE OF INTERNAL AUDIT
FISCAL YEAR 2019
AUDIT PLAN PROGRESS

	Title and Audit Type	Status
1	Payroll (Continuous Monitoring)	Monitoring is ongoing
2	Purchasing Cards (Continuous Monitoring)	Monitoring is ongoing
3	Shop @ UW (Continuous Monitoring)	Planning has begun
4	System Security and Access (Information Technology)	Five reports issued and fieldwork in progress
5	Transactions with Foundations (FY 2018)	Fieldwork and reporting in progress
6	Contract Management	Reporting in progress
7	Purchasing	Reporting in progress
8	Business Operations in Auxiliaries or Student Services	Fieldwork in progress
9	Payment Card Industry Compliance	Planning has begun
10	Data Integrity, Definition, Governance, and Ownership – Top Three Systems/Applications (Information Technology)	Deferred
11	Hazardous and Universal Waste	Not started
12	Regent Policies 14-2 Sexual Violence and Sexual Harassment and 14-8 Consensual Relationships Follow-up	Planning has begun
13	Information Technology Procurement	Not started
14	Tax Cuts and Jobs Act of 2017 (The "Tax Act")	Planning has begun
15	DoIT System Services Group	Not started
16	NCAA Athletics Division I, II	Fieldwork in progress
17	Institutional Relationships with Foundations (FY 2019)	Not started
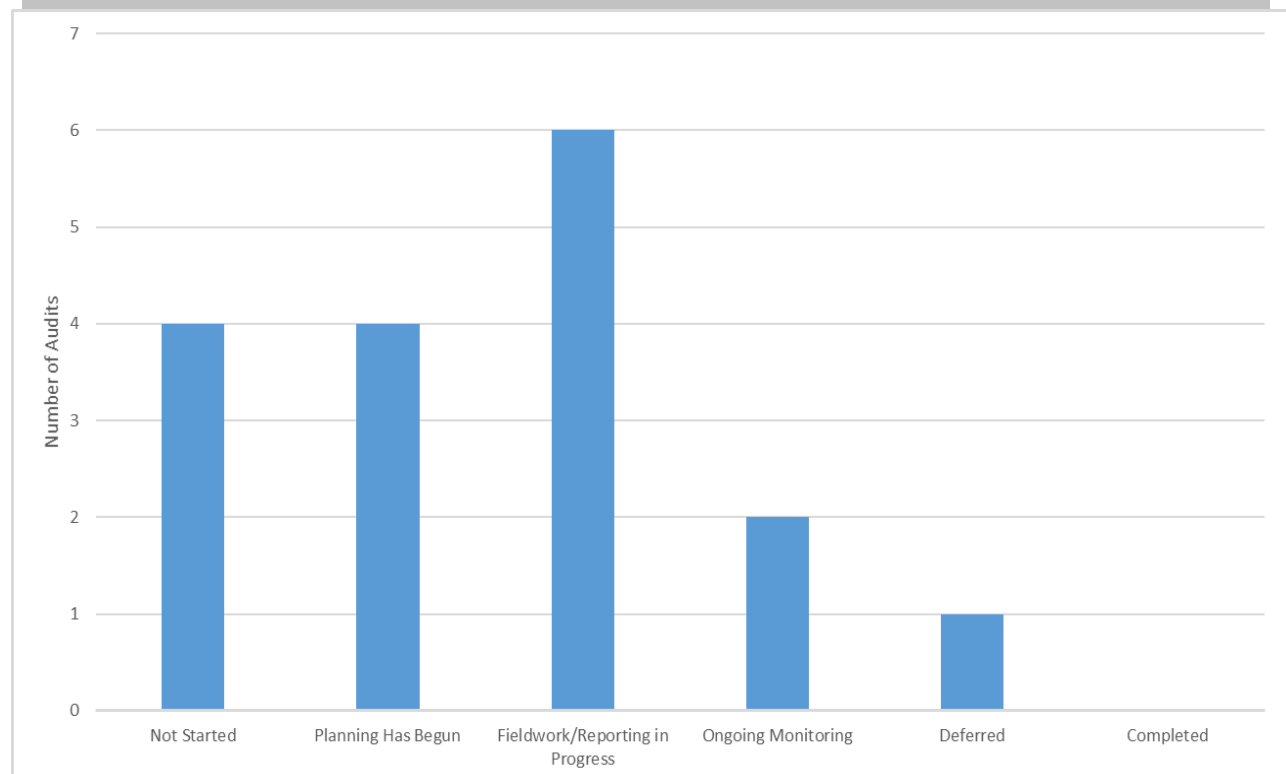
UW SYSTEM ADMINISTRATION
OFFICE OF INTERNAL AUDIT
MANAGEMENT RESPONSE PROGRESS

BACKGROUND

One of the responsibilities of the Office of Internal Audit as outlined in the charter is to establish a follow-up process to monitor and identify whether corrective actions have been effectively implemented, or whether senior management has accepted the risk of not taking action. The Audit Committee has requested regular progress reports on this monitoring.

REQUESTED ACTION

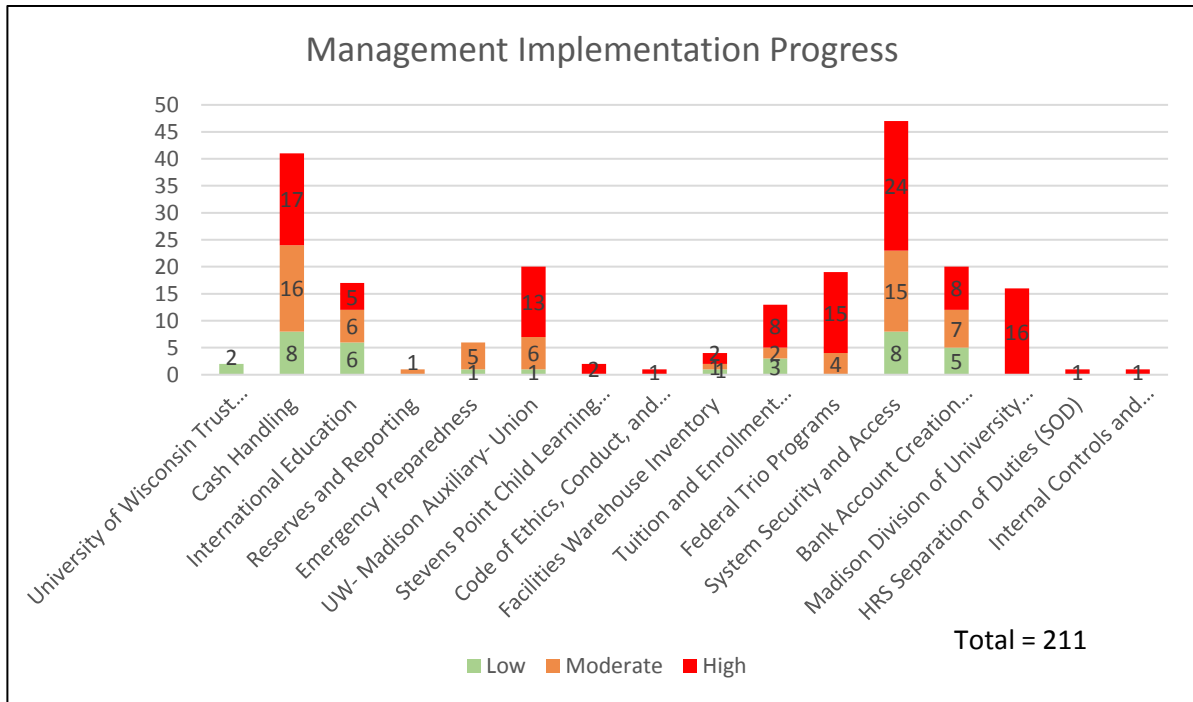No action requested. Item for information and discussion only.

DISCUSSION

The following charts present audits issued during fiscal 2016 through fiscal 2019 and the progress management has made toward resolving the comments and recommendations included in the audit reports. Management's corrective action plans were audited by the Office of Internal Audit to determine if they were implemented.
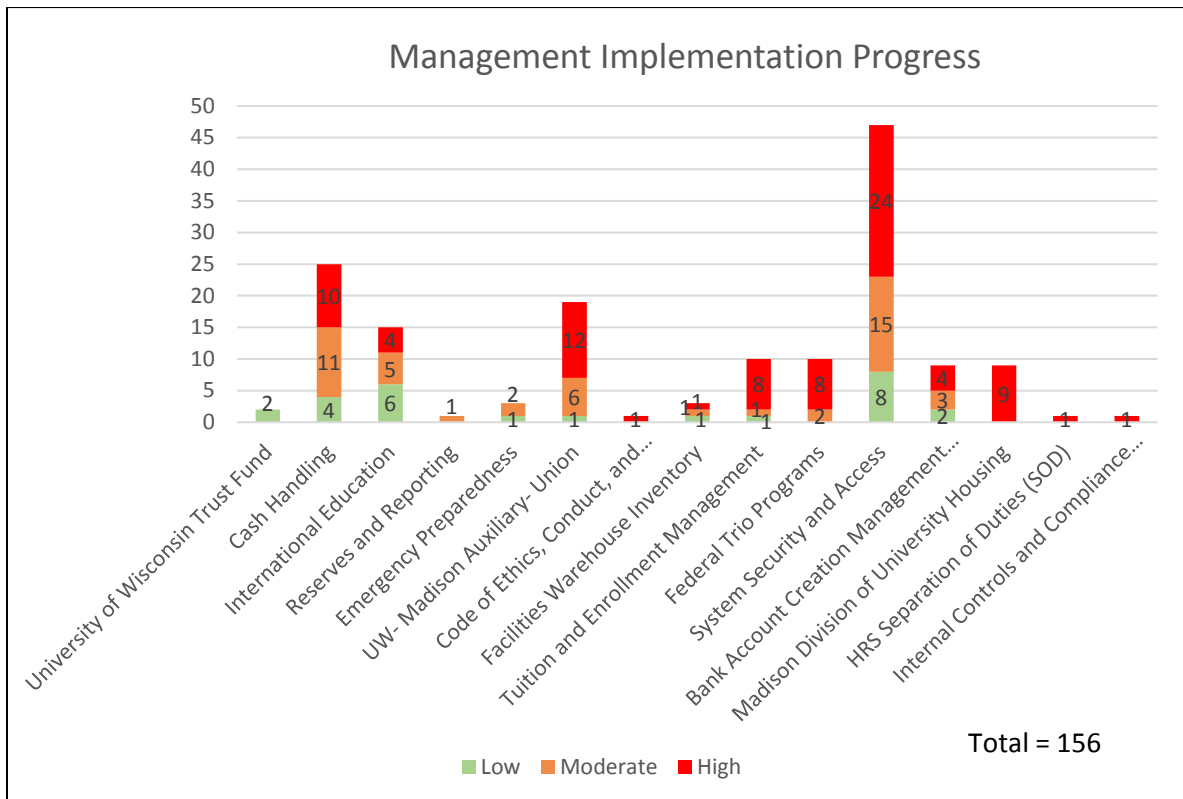
**RELATED BOARD OF REGENTS POLICIES**

NA

Prior Reporting Period

Management Implementation Progress

Categories (x-axis): University of Wisconsin Trust..., Cash Handling, International Education, Reserves and Reporting, Emergency Preparedness, UW- Madison Auxiliary- Union, Stevens Point Child Learning..., Code of Ethics, Conduct, and..., Facilities Warehouse Inventory, Tuition and Enrollment..., Federal Trio Programs, System Security and Access, Bank Account Creation..., Madison Division of University..., HRS Separation of Duties (SOD), Internal Controls and...

Legend: Low, Moderate, High

Total = 211

Current Reporting Period

Management Implementation Progress

Categories (x-axis): University of Wisconsin Trust Fund, Cash Handling, International Education, Reserves and Reporting, Emergency Preparedness, UW- Madison Auxiliary- Union, Code of Ethics, Conduct, and..., Facilities Warehouse Inventory, Tuition and Enrollment Management, Federal Trio Programs, System Security and Access, Bank Account Creation Management..., Madison Division of University Housing, HRS Separation of Duties (SOD), Internal Controls and Compliance...

Legend: Low, Moderate, High

Total = 156

Roll-forward from Prior Reporting Period to Current Reporting Period

Audit	Previously Reported Open Comments	Comments Issued	Comments Closed	Current Open Comments
Cash Handling	41	0	16	25
International Education	17	0	2	15
Reserves and Reporting	1	0	0	1
Emergency Preparedness	6	0	3	3
UW- Madison Auxiliary- Union	20	0	1	19
Stevens Point Child Learning Center	2	0	2	0
Code of Ethics, Conduct, and Governance	1	0	0	1
Facilities Warehouse Inventory	4	0	1	3
Tuition and Enrollment Management	13	0	3	10
Federal TRIO Programs	19	0	9	10
System Security and Access	47	0	0	47
Bank Account Creation Mgmt. and Oversight	20	0	11	9
Madison Division of University Housing	16	0	7	9
HRS Separation of Duties (SOD)	1	0	0	1
Internal Controls and Compliance Structure	1	0	0	1
University of Wisconsin Trust Fund	2	0	0	2
Total	211	0	55	156

Current Reporting Period

Implementation Percent Toward Completion

Legend: Low, Moderate, High, N/A
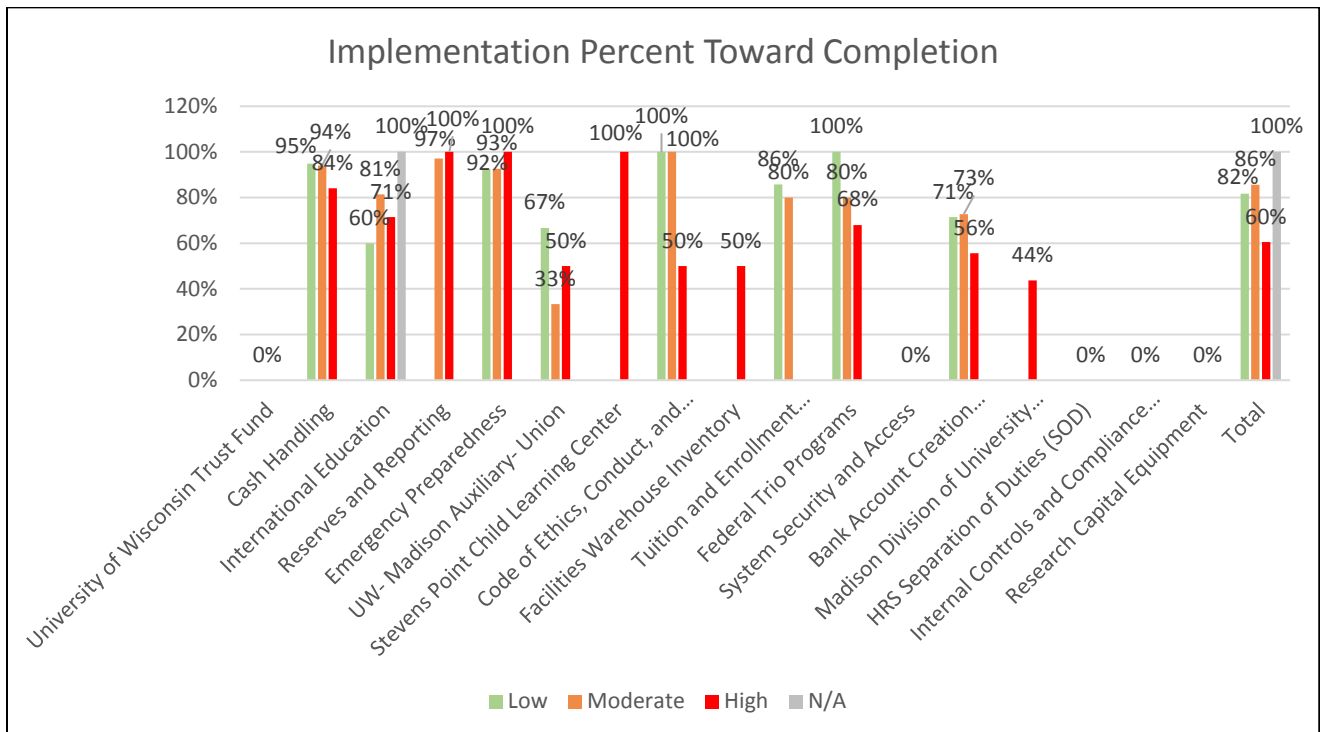
The above charts and graphs do not necessarily represent all audit comments outstanding due to timing issues

UW SYSTEM ENTERPRISE RISK MANAGEMENT

BACKGROUND

Enterprise Risk Management (ERM) is a framework to systematically identify, evaluate and manage risks to the organization and its business goals and operations.

The UW System is developing an ERM program based on the Committee on Sponsoring Organizations of the Treadway Commission (COSO) ERM principles, lessons learned from other universities and the original UW System ERM pilot program.

UW System is a $6 billion organization with a complex set of risks. With a primary purpose of teaching and learning, UW institutions also manage many employees, house and feed students, manage athletic teams, conduct cutting edge research and have employees and students who travel internationally. All of these operations bring risks to the system.

While there are many risks, there are also many employees who manage risks within their operations. The UW System also has systems in place to manage risks including: internal controls, standardized policies, risk transfer through insurance or through the use of suppliers, and health and safety programs. However, an ERM program would create a process to systematically identify and prioritize the many risks across the operation.

REQUESTED ACTION

This item is for information only.

DISCUSSION AND RECOMMENDATIONS

The UW System Board of Regents Audit Committee is responsible for ERM in the UW System. As ERM is developed, plans and reports would go to the Audit Committee for their analysis and oversight.

UW System management would establish a systemwide Risk Committee. The Risk Committee would identify critical risks and work with risk owners to establish risk management plans and allocate resources to address critical risks in the system.

The goal of an ERM program in the UW System is for:

1) All levels of the organization to consider risks to operations, plans, goals and projects
2) Senior Leadership to be aware of the critical risks to the organization
3) Ensure critical risks are being managed

The ERM program would focus on identifying critical risks and risk management plans, where there are gaps at the System level. The UW System will start developing an ERM program with a System Level review of risks.

Management would provide periodic updates to the Audit Committee on the ERM program and its implementation.

UW System Enterprise Risk Management

Ruth Anderson,
Associate Vice President,
Administrative Services
August 2018

UNIVERSITY OF WISCONSIN SYSTEM

UW System's Risk Environment

- 180,000 students
- 38,000 faculty and staff that teach and conduct research in Wisconsin and around the world
- Broad array of academic programs and research
- UW System owns, manages or partners in
  - 26 campuses
  - Agriculture stations/farms
  - Camps and Research Stations

Is UW System Focusing on the Right Risks?

- ERM provides a systematic process and framework to:
  - Identify risks
  - Evaluate risks
  - Rank risks based on likelihood of occurrence and impact
- The ERM framework includes a UW System Risk Committee that would identify a few high priority risks to Senior Leadership each year.
- The UWS Risk Committee would determine how priority risks are being managed and determine if additional plans and resources are needed to address them.

UNIVERSITY OF WISCONSIN SYSTEM

UW System Risk Committee

- Vice President of Administration
- Vice President of Academic Affairs
- Vice President of Finance
- Vice President of University Relations
- General Counsel
- Associate Vice President of Information Security
- Associate Vice President of Information Technology
- Associate Vice President of Administrative Services
- Director of Risk Management

UNIVERSITY OF WISCONSIN SYSTEM

ERM Process

Interview Senior UWS Leaders and Survey Department Heads → Integrate Higher Education Risk Lists → Create Consolidated UWS Risk List → Risk Committee Evaluates Risk and Creates UWS Risk Heat Map

UNIVERSITY OF WISCONSIN SYSTEM

Example: University of Minnesota's ERM Heatmap

	Low	Moderate	High
High	**G** • Campus Safety & Security	**D** • Athletics: Program Integrity & Success of Business Model • IT Infrastructure & Costs • Managing Brand & Reputation	**A** • Autonomy • Attracting & Retaining Talent • Data Privacy/Security • Student Demographics & Enrollment Strategies
Moderate	**H**	**E** • Maximizing Value of Multiple Campuses • Meeting Expectations on Workforce Development • Preparedness of Students • Public Perception of the Value of Higher Education	**B** • Facilities: Strategic Needs & Aging Infrastructure • Federal Research Funding • Higher Education Operating Model • Human Subjects Research • Implementation of Strategic Plans • Prioritization: Balancing Breadth & Quality of Offerings • State Funding • UM Health Success
Low	**I**	**F** • Commercialization of Intellectual Property	**C** • Effective Communication

Impact

UNIVERSITY OF WISCONSIN SYSTEM

ERM Timeline

Fall 2018
First Survey to identify UWS Risks

Winter 2018
Identify Top Risks to manage in 2019

Spring 2019
Confirm or develop new management plans for priority Risks

UW UNIVERSITY OF WISCONSIN SYSTEM

UW SYSTEM MANAGEMENT'S RESPONSE TO THE RECOMMENDATIONS IN THE LEGISLATIVE AUDIT BUREAU'S AUDIT REPORT 18-4

BACKGROUND

On June 21, 2018, UW System updated the Joint Legislative Audit Committee on its progress to address the Legislative Audit Bureau's (LAB) recommendations in Audit Report 18-4, *Relationships Between the University of Wisconsin and Certain Affiliated Organizations.* Several recommendations have been completed and others are in progress. The Board of Regents and the Audit Committee play a critical role in providing oversight, consultation, and action to ensure LAB's recommendations are effectively implemented.

REQUESTED ACTION

No action requested. Item for information and discussion only.

DISCUSSION

The attached document and table provide the official response submitted to the Joint Legislative Audit Committee by the UW System in response to the LAB's recommendations in Audit Report 18-4, *Relationships Between the University of Wisconsin and Certain Affiliated Organizations.*

RELATED BOARD OF REGENTS POLICIES

Regent Policy Document 21-9, Institutional Relationships with Foundations

UNIVERSITY OF WISCONSIN SYSTEM
UW

June 21, 2018

Senator Robert Cowles
Co-Chair, Joint Legislative Audit Committee
Room 118 South, State Capitol
Madison, WI 53707

Representative Samantha Kerkman
Co-Chair, Joint Legislative Audit Committee
Room 315 North, State Capitol
Madison, WI 53708

RE: Audit Report 18-4 Follow-up

Dear Senator Cowles and Representative Kerkman:

Thank you for the opportunity to update the Joint Legislative Audit Committee on progress made by the University of Wisconsin System Administration ("UW System") to address the Legislative Audit Bureau's ("LAB") recommendations in Audit Report 18-4, *Relationships Between the University of Wisconsin and Certain Affiliated Organizations.*

Improving the management and transparency of these foundations and affiliated organizations is an ongoing effort that the UW System and Board of Regents takes seriously, and it does not start or end with this audit. In fact, many actions were taken prior to the LAB's issuance of Audit Report 18-4 and used as a standard in the audit, such as requiring new Memoranda of Understanding to be signed with primary foundations and codifying new accountability standards in Regent Policy 21-9. This is a clear sign that the Board of Regents, my administration, and our institutional leaders takes this matter seriously and acted in a proactive manner to address concerns identified both prior to and during the audit process.

LAB Audit Report 18-4 includes six recommendations for the UW System to consider and two recommendations for your committee to consider. As always, we appreciate and welcome the LAB's recommendations to enhance efficiency of our operations. To provide clarity and full transparency of our response to these recommendations, UW System leadership and staff, in consultation with members of the Board of Regents, divided the recommendations into 12 identifiable action steps. This action plan provides an update on the status of each action step as it relates to the LAB's recommendations.

Five of the 12 steps are complete:
- *Recommendation: Assess Memoranda of Understanding (MOUs) for compliance*
- *Recommendation: Resolve inconsistency between policy statement and policy regarding UW employees serving on boards of primary fundraising and real estate foundations*
- *Recommendation: Prohibit all UW employees from serving as voting members of Board of Directors of primary fundraising and real estate foundations*
- *Recommendation: Provide UW institutions with guidance on identifying affiliated organizations*
- *Recommendation: Require Chancellors to certify compliance*

Two additional steps are accepted and will be ongoing:
- *Recommendation: Annually review payments to affiliated organizations*
- *Recommendation: Annually assess relationships with affiliated organizations and determine whether any changes are necessary.*

We want to take this opportunity to provide additional information on the remaining five steps that are in progress as well as address the items for legislative consideration.

Recommendation: Assign unique vendor ID to affiliated organizations

In the summer of 2017, prior to the LAB audit, the UW System began an upgrade of our Shared Financial System. At that time, the UW System decided to include a project to move all institutions to a shared vendor file with unique vendor numbers. This upgrade is scheduled to go live in October of 2018. The transition to unique vendor ID numbers for foundations and affiliated organizations will be completed at that time.

Recommendation: Amend operational agreements to comply with Board of Regent policy

UW System legal staff is supporting institutional leaders working to amend their operational agreements with their foundations. This is a complex process since institutional leaders must coordinate their efforts with their foundation boards and agree on the terms of the operational agreement. We expect it will be fully completed by the end of FY 2019.

Recommendation: Establish policy governing relationship between UW institutions and affiliated organizations that are not primary fundraising or real estate foundations

UW System is currently developing such a policy. We researched how other higher education institutions, particularly the University of Vermont, managed this through policy and are using components of those policies and best practices to draft our policy. We anticipate finalizing the policy by September 2018 and having it fully implemented by the end of FY 2019. UW institutions will need this time to collect the necessary information and coordinate with the boards of those affiliated organizations.

Recommendation: Require UW employees to track the time they work for affiliated organizations, and provide guidance and training

Transparency and accountability to the public are necessary when university officials also work for affiliated organizations or when the university provides affiliated organizations with administrative support. By the nature of a university employee's work at the university and affiliated organization, that work simultaneously serves the purpose of both organizations and therefore cannot be decoupled. To gauge more accurately how resources are used under such scenarios, UW System is drafting a policy to require the institution's management conduct and disclose a return on investment analysis on tangible and intangible values. This is based on the Minnesota State Colleges and Universities' model identified in the audit report. In addition to LAB's recommendation, UW System believes this analysis should also be applied to primary fundraising or real estate foundations, not just affiliated organizations. UW System will include foundations in the analysis when drafting this policy.

This model will provide UW institutions the ability to evaluate if there is appropriate return on the investment. To fully capture the intangible benefits in the analysis, it will include narrative and rationale in addition to monetary estimates of administrative support and gifts to the university. The policy will allow institutions to make strategic decisions to continue or discontinue providing administrative support or employee time to an affiliated organization or foundation based on its tangible and intangible return on investment.

Recommendation: Require UW institutions to annually report information about their relationships with affiliated organizations and determine whether the reported information complies with Board of Regent policy

UW System reviewed the MOUs between institutions and their affiliated organizations. Going forward, UW System Office of Internal Audit will annually audit transactions between the institutions and their foundations and affiliated organizations. The results of the audits will be presented as an annual report to the Board of Regents and provide evidence to allow UW System leadership and the Board of Regents to determine if any changes to policy, MOUs, and operational agreements are warranted.

Legislative Consideration

The LAB included two items for the legislature to consider. UW System believes both considerations can and should be addressed through Board of Regent policy or UW System policy, and thus, we have made progress addressing these items.

Legislative Consideration: Require certain UW employees to annually file statements of economic interests with the Wisconsin Ethics Commission.

UW System agrees with LAB that it would provide added transparency by requiring any UW employee in the role of executive director of an affiliated organization not already designated as a state public official to file the equivalent of a statement of economic interest. These employees are not currently required to file a statement of economic interest, because they do not meet the definition of an "official required to file" as defined under Wis. Stat. s. 19.42(10). In addition to this recommendation, UW System believes additional employees should file outside activities reports. The UW System will resolve this issue by requiring these employees to file the equivalent of a statement of economic interest or an outside activities report through Board of Regent policy/UW System policy. Therefore, statutory change is not required.

Legislative Consideration: Define UW employees who also work for affiliated organizations to be state public officials.

It is first necessary to establish a definition of what constitutes an "affiliated organization." Per LAB's recommendation, the UW System is in the process of adopting a policy that defines and governs affiliated organizations. UW System will address this item by amending existing code of ethics policies that apply to UW employees. Existing policies that UW employees are subject to include Board of Regents Code of Ethics Policy 20-22, UWS-8 of the Wisconsin administrative code, and subchapter III of Wis. Stat. Chapter 19.

I want to thank the LAB for its work. If you have any questions regarding this update, please feel free to contact me.

Sincerely,

Ray Cross
President

CC: State Auditor Joe Chrisman
          Chief Audit Executive Lori Stortz
          Board of Regents
          Chancellors
          UW System President's Cabinet

Action Steps		
LAB Recommendation	**UW Action**	**Status**
Assign unique vendor ID to affiliated organizations	Prior to the audit, UW System began upgrading the Shared Financial System. This project includes giving institutions a unique vendor ID and will go live in mid-October.	In Progress
Amend operational agreements to comply with Board of Regent policy	UW System is working with institutions to amend current Operational Agreements and draft new agreements.	In Progress
Require Chancellors to certify compliance	Updated certification language will be included in annual financial-reporting certifications provided by Chancellors and CBOs.	Complete
Assess MOUs for compliance	Agreements reviewed; compliance assessed in scheduled FY 19 audit.	Complete
Establish policy governing relationship between UW institutions and affiliated organizations that are not primary or real estate foundations	Created new definition and identified affiliated organizations on all campuses. A new policy is in drafting.	In Progress
Resolve inconsistency between policy statement and policy regarding UW employees serving on boards of primary fundraising and real estate foundations	April policy statement was guidance superseded by Board of Regent policy passed in December 2017.	Complete
Prohibit all UW employees from serving as voting members of Board of Directors of primary fundraising and real estate foundations	Done for foundations; Language drafted to allow UW System President to grant an exception under limited circumstances.	Complete
Require UW employees to track the time they work for affiliated organizations, and provide guidance and training	Creating metrics to track administrative support given to affiliated organizations and foundations and a policy to analyze the tangible and intangible return on investment.	In Progress
Provide UW institutions with guidance on identifying affiliated organizations	Guidance sent to institutions.	Complete
Require UW institutions to annually report information about their relationships with affiliated organizations and determine whether the reported information complies with Board of Regent policy	Campuses are required to provide changes to MOUs and the relationship is audited annually.	In Progress
Annually review payments to affiliated organizations	Audit of March 2018-April 2018 transactions will begin April 2018 using April 2017 Guidance. Fiscal 19 audit will test compliance of new policies in response to LAB audit.	Ongoing
Annually assess relationships with affiliated organizations and determine whether any changes are necessary.	This will be achieved through the annual audit and disclosure of affiliated organizations as well as the analysis of affiliated organizations' return on investment.	Ongoing

ETHICS TRAINING UPDATE

BACKGROUND

University of Wisconsin System employees are subject to ethics rules covering use of university resources, conflicts of interest, and acceptance of gifts. As a general rule, an employee may not use his or her university position to gain private financial or other benefits for the employee, the employee's immediate family, or organizations with which they are associated. There are a number of statutory, administrative rule, and policy provisions that cover employees at all levels working for University of Wisconsin System institutions.

REQUESTED ACTION

This item is for information only.

DISCUSSION

In the ongoing effort to continue to ensure compliance with these important requirements, the University of Wisconsin System institutions, with assistance from the Office of General Counsel, are providing updated training this August across the state at various campuses.

RELATED REGENT AND UW SYSTEM POLICIES

Chapter UWS 8, Wisconsin Administrative Code, Unclassified Staff Code of Ethics.
Regent Policy Document 20-22: Code of Ethics
UW System UPS Operational Policy: WE 1 (Code of Ethics)

UNIVERSITY OF WISCONSIN SYSTEM
UW

Office of General Counsel

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website: https://www.wisconsin.edu/general-counsel/

Quinn Williams
Noah Brisbin
Wade Harrison
Kristin Johnson
Jennifer Sloan Lattis
Matthew J. Lind
Tomas L. Stafford

To: President Ray Cross

From: Quinn Williams Q.W.
         General Counsel

Date: July 23, 2018

Re: Employee Ethics/Public Records Management Brochure

Please find enclosed a copy of a handout from the Office of General Counsel addressing employee ethics and public records management. This brochure will be distributed electronically to all UW System employees during the current outside activities reporting period. Additionally, copies will be provided to campuses to be included in orientation materials for new employees and during ethics trainings.

If you have any questions about the document, please do not hesitate to contact this office.

Enclosure

Cc: Chancellors
         HR Directors
         CBOs

Universities: Madison, Milwaukee, Eau Claire, Green Bay, La Crosse, Oshkosh, Parkside, Platteville, River Falls, Stevens Point, Stout, Superior, Whitewater,
Colleges: Baraboo/Sauk County, Barron County, Fond du Lac, Fox Valley, Manitowoc, Marathon County, Marinette, Marshfield/Wood County, Richland,
Rock County, Sheboygan, Washington County, Waukesha, Extension: Statewide

Employee Ethics & Public Records Management

EMPLOYEE ETHICS

University of Wisconsin System employees are subject to ethics rules covering use of university resources, conflicts of interest, and acceptance of gifts. As a general rule, an employee may not use his or her university position to gain private financial or other benefits for the employee, the employee's immediate family, or organizations with which they are associated.

◆   Use of University Resources

University resources such as office supplies, letterhead, meeting rooms, and work time may be used only for university purposes. While you may use your university phone and email for minimal personal use consistent with university policies, employees are encouraged to use private accounts for personal matters and limit use of their university email accounts for university business. Personal emails using a university email account may be subject to and/or reviewed in response to subpoenas and public records requests. Please note, that University email or texts sent on personal accounts will be subject to public records requests.

◆   Outside Activities

If you have an opportunity to perform consulting or other activity for an outside organization that is related to your university responsibilities, you must report the opportunity through your institution's outside activity reporting process.

◆   Personal Relationship with Vendors

If you have a personal or familial relationship with a vendor who is doing business with your department or work area, you must disclose that relationship to your supervisor so that steps can be taken if necessary to minimize or remove any potential conflict of interest.

◆   Vendor-Sponsored Conferences

If you wish to attend a vendor-sponsored conference and are in a position to approve or influence the university's decision to award contracts for products or services provided by the vendor, the university should pay all the necessary transportation, lodging and similar costs associated with attending the conference. The conference attendance must primarily benefit the university. Consult your supervisor, dean or director with questions.

◆   Accepting Items of Value

Employees should not accept travel, entertainment (e.g., golf outings, event tickets), or gifts from private individuals or organizations that do business with the university if such gift could be perceived to be given because of your status as a university employee. This rule also applies to members of your immediate family if they receive items of value because of your university employment.

◆   Items of Minimal Value

Employees are generally not prohibited from accepting items of minimal value (e.g. pens, pencils, cups, etc.) from a vendor or similar organization, unless their university position prohibits it (e.g., health care providers).

Employee Ethics & Public Records Management

◆   Contract Signature Authority

Only certain designated individuals have been delegated legal authority to sign contracts on behalf of the university. You should not sign a contract or agreement unless you have been officially delegated by your institution's contracting authority.

◆   Confidential University Information

You may not use or disclose confidential university information for reasons unrelated to your professional responsibilities or to gain anything of value for yourself or a member of your immediate family.

◆   Nepotism

UW employees should not participate in a decision to hire, retain, promote or determine the salary of a member of their immediate family.

◆   Reporting Ethics Violations

If you are aware of a situation involving potential misuse of university resources or other possible ethics violations, you should report this activity to your supervisor or to the audit hotline: https://uwaudithotline.tnwreports.com/ or (855) 827-4950

PUBLIC RECORDS MANAGEMENT

As a university employee, all records that you create or receive in connection with the transaction of public business are public records. Proper management of public records is an important function of your job.

◆   Regent Policy: Public Records Management

The roles and responsibilities of university employees in properly managing public records are set forth in Regent Policy Document 3-2 University of Wisconsin System Public Records Management Policy, available online at: https://www.wisconsin.edu/regents/policies/

◆   Public Records Management

Public records can be destroyed only in accordance with records destruction authorization schedules that have been approved by the State of Wisconsin Public Records Board. The schedules establish the length of time records must be retained before destruction or transfer to UW Archives for permanent storage.

◆   UW General Records Schedules

Each institution has appointed a records and forms officer to assist you with records retention questions. General retention records schedules apply to all UW institutions and are located on the campus records retention web site and on the UW System Office of General Counsel site.

Updated July 2018

Employee Ethics & Public Records Management

◆   Regent Policy: Information Technology Resources

The use of UW information technology resources by employees is governed by Regent Policy Document 25-3 Policy on Use of University Information Technology Resources, available online at: https://www.wisconsin.edu/regents/policies/

◆   Electronic Records

Electronic or digital communications related to university business such as email or texts are considered public records and must be retained in accordance with public records schedules, even if created on personal devices. For this reason, employees are strongly encouraged to use University resources to perform University work.

◆   Confidentiality Required by Law

Several state and federal laws require confidentiality for some public records, such as medical or student records. Ask your supervisor, dean or director whether any confidentiality requirements affect your management of public records.

◆   Supervisors

Supervisors have specific records retention obligations for departing employee records. Please contact your records and forms officer for more information.

◆   Public Access to Records

Most UW records are subject to disclosure upon request, but some records can or must be redacted or withheld under the public records law. All UW institutions have a records custodian who is responsible for responding to public records requests. If you receive an oral or written request for records, do not make determinations about disclosure yourself. Instead, contact your records custodian.

APPLICABLE STATUTES AND RULES

◆   Code of Ethics for Public Officials and Employees: Wis. Stat. Section 19.45

◆   Unclassified Staff Code of Ethics. Chapter UWS 8, Wis. Admin Code

◆   Wisconsin Public Records Law, Wis. Stat. Section 19.31 et seq.

◆   State of Wisconsin Executive Order #189

◆   Electronic Records Management, Standards and Requirements: Chapter ADM 12, Wis. Admin. Code

Updated July 2018