

BOARD OF REGENTS OF THE UNIVERSITY OF WISCONSIN SYSTEM

Audit, Risk, and Compliance Committee

By Videoconference

Thursday, September 17, 2026

Time: 9:15 a.m. – 10:15 a.m.

- A. Calling of the Roll
- B. Declaration of Conflicts
- C. Proposed Consent Agenda:
 - 1. Approval of the Minutes of the August 20, 2026, Audit, Risk, and Compliance Committee Meeting
- D. Office of Human Resources
 - 1. Regent Policy Document Review: RPD 20-19, "UW System Criminal Background Check Policy" (First Reading)
 - 2. Regent Policy Document Review: RPD 20-22, "Code of Ethics" (First Reading)

**REGENT POLICY DOCUMENT REVIEW:
RPD 20-19, "UW SYSTEM CRIMINAL BACKGROUND CHECK POLICY"
(FIRST READING)**

REQUESTED ACTION

First reading and discussion of proposed revisions.

SUMMARY

The proposed revisions to Regent Policy Document (RPD) 20-19 are designed to expand the definition of Vulnerable Populations under Positions of Trust to include incarcerated students participating in the Prison-Eligible Pell program and standardize the criminal background check process by clarifying the required databases and adding a required global sanctions check for all applicants for employment, current employees, and volunteers.

Presenter

- Jason Beier, Associate Vice President and Chief Human Resource Officer, Universities of Wisconsin

BACKGROUND

Regent Policy Document (RPD) 20-19 was adopted on December 8, 2006 and was amended on December 7, 2012. The policy requires each institution to perform a criminal background check on each new hire for a UW System position, as well as on current employees and volunteers holding a "position of trust." Each institution is also required to develop an institutional criminal background check policy to operationalize the requirements in RPD 20-19.

Expanding Definition of Vulnerable Populations

The Memorandum of Understanding (MOU) between the Wisconsin Department of Corrections (DOC) and University of Wisconsin System Administration defines their partnership to deliver UW courses and programs in DOC facilities, including Pell grant-

funded Prison Education Programs. The MOU requires policies and procedures to be in place to obtain and review criminal histories on prospective staff, to establish the frequency of background checks for existing staff, and to require self-disclosure of arrests, charges, or convictions. These requirements are all established in RPD 20-19 for employees and volunteers in Positions of Trust with access to Vulnerable Populations; therefore, adding “incarcerated individuals” to the definition of Vulnerable Populations meets the obligations under the MOU.

Clarifying Required Databases

The *Youth Protection and Compliance* internal audit revealed discrepancies between the databases that were used in criminal background checks for some volunteers participating in covered activities with youth participants. In response to this observation, Universities of Wisconsin completed an analysis of Department of Justice requirements, background check offerings provided by the vendor, and operational concerns to minimize additional burden being placed on the universities. The proposed revisions streamline processes by centralizing background check activities with the chosen criminal background check vendor while meeting the Universities of Wisconsin’s compliance requirements and obligations. The revisions also add flexibility by clarifying that institutions have the discretion to require additional checks as are appropriate to the duties and risk profile of the position.

Requiring Global Sanctions and Enforcement Check

RPD 20-19 currently requires foreign nationals to be subject to a criminal background check in the individual’s prior country(ies) of residence if the country(ies) of residence provides a criminal background check for the time period during which the individual was a resident. This creates operational challenges and potential inconsistencies, including high cost and inconsistency in available information from specific countries.

The Global Sanctions and Enforcement Check (GSEC) from HireRight identifies restricted, sanctioned, and prohibited individuals by searching a database comprised of information from nearly 1,800 U.S. and international government and regulatory enforcement organizations. Applicable primary public record source searches are conducted on any potential records identified, and only records validated with the primary source are reported. GSEC is a relatively inexpensive addition to the standard background check package offered by the CBC vendor and requiring its inclusion as part of all checks creates a consistent process and cohesive check for all candidates, employees, and volunteers. Institutions have the discretion to require additional checks appropriate to the duties and risk profile of the position, including foreign country criminal background checks.

ATTACHMENTS

- A) Regent Policy Document 20-19 (Proposed with Tracked Changes)
- B) Regent Policy Document 20-19 (Proposed - Clean Copy)

Regent Policy Document 20-19 *(formerly 06-4)*

University of Wisconsin System Criminal Background Check Policy

Scope

This policy describes the Board of Regents' expectations of University of Wisconsin System institutions and the University of Wisconsin System Administration in performing criminal background checks on applicants for employment, current employees, and volunteers.

Purpose

The University of Wisconsin System prioritizes safety and strives to provide a safe learning and working environment. This policy establishes consistent standards for criminal background checks.

Policy Statement

Except as otherwise provided in this policy, a criminal background check shall be performed on each new hire for a UW System position. Criminal background checks shall be conducted on candidates recommended for hire, either prior to the extension of an offer of employment, or as part of an offer of employment that is made contingent upon a successful criminal background check. A criminal background check shall also be conducted on current employees and volunteers holding a "position of trust with access to vulnerable populations" as defined in paragraph 1(a) of this policy who have not previously been subject to such a criminal background check by the University. Employees and volunteers holding a position of trust with access to vulnerable populations shall be subject to a criminal background check every four years, and shall be required to self-disclose certain criminal offenses.

Each UW System institution shall develop a policy that addresses the following:

1. Position of Trust

"Position of trust" is defined as a paid or volunteer position with one or more of the following responsibilities:

A. ACCESS TO VULNERABLE POPULATIONS

Responsibilities require unsupervised or significant access to vulnerable populations, defined as minors, ~~and~~ medical patients, ~~and incarcerated students~~. For purposes of this policy, a minor is a person under the age of eighteen (18) who is not enrolled or accepted for enrollment at a UW System institution. Examples of settings with vulnerable populations include child care centers, summer camps for minors, precollege or enrichment programs, and health care facilities. This category also includes employees who are not directly working in those units, but

have unsupervised access to the unit when the vulnerable population is present. This category does not include faculty or instructional academic staff performing regular teaching, service, and research responsibilities unless these responsibilities include unsupervised or significant access to vulnerable populations.

B. PROPERTY ACCESS

Responsibilities require the use of master keys/card access and pertains to employees with key access to offices, facilities, or worksites other than their own worksite, including UW residential housing facilities.

C. FINANCIAL/FIDUCIARY DUTY

Principal responsibilities (50% or more) require handling, receiving, or having custody of money, checks or securities, or accounting for supplies or other property; authorizing (or making appropriations for) expenditures; approving, certifying, signing or countersigning checks, drafts, warrants, vouchers, orders or other documents providing for the paying over or delivery of money, securities, supplies or other property, or service of process; maintaining or auditing accounts of money, checks, securities, time records, supplies, or other property, or taking physical inventories of money, checks, securities, supplies, or other property.

D. EXECUTIVE POSITIONS

Responsibilities involve top-level management functions throughout the institution including roles as Chancellor, Provost, and Dean. Executive positions are defined as all limited appointments and include any movement from a limited appointment to a different limited appointment.

2. Coverage of Prospective Hires and Employees

Criminal background checks must be conducted on prospective hires who are not University of Wisconsin employees, and on employees currently not in a position of trust who are seeking to move to a position of trust within the University through promotion or otherwise. Criminal background checks must be conducted on current employees holding a position of trust with access to vulnerable populations, as defined in paragraph 1(a) of this policy, who have not previously been subject to a criminal background check by the University. Each institution must ensure that a criminal background check is performed every four years on employees in positions of trust with access to vulnerable populations.

Notwithstanding the preceding paragraph, unless otherwise required by law to perform background checks for specified positions or unless the position involved has been designated as a "position of trust," institutions may determine whether a criminal background check must be conducted on prospective hires for the following employee groups: (1) temporary or limited term employees; (2) hourly student employees; and (3) interns. In making this determination, institutions should consider the level of direct supervision and guidance provided to employees in these categories and the nature of the duties of the job.

3. Coverage of Vendors and Contractors

To the maximum extent feasible, any agreement with a vendor or contractor whose employees, affiliates, or volunteers will have routine or unsupervised access to vulnerable populations (minors or medical patients) in the course of the contract must include a representation from the vendor or contractor stating that these employees, affiliates, or volunteers have satisfied a criminal background check conducted by a criminal background check vendor selected by the contractor that includes a check of the vendor's proprietary national criminal background check database.

4. Coverage of Volunteers

UW institutions shall perform criminal background checks on prospective volunteers when the volunteer position involved is a position of trust, or when required by law to perform criminal background checks for specified volunteer positions. Otherwise, UW institutions may determine whether a criminal background check should be conducted on prospective volunteers. In making this determination, institutions should consider the level of direct supervision and guidance provided to volunteers and the nature of the duties of the volunteer position. Criminal background checks must be conducted on current volunteers holding a position of trust with access to vulnerable populations, as defined in paragraph 1(a) of this policy, who have not previously been subject to a criminal background check by the University. Each institution must ensure that a criminal background check is performed every four years on volunteers in a position of trust with access to vulnerable populations.

5. Coverage of Certain Users and Lessees of University Lands and Facilities

Facilities use agreements or leases with outside organizations that use or lease University lands and facilities to operate multi-day programs for minors, or programs for minors that involve an overnight stay, must include a representation from the organization that its employees, affiliates, or volunteers have satisfied a criminal background check conducted by a criminal background check vendor selected by the organization that includes a check of the vendor's proprietary national criminal background check database.

6. Conducting Criminal Background Checks

Finalists for employment must complete and sign a criminal background check authorization form. An applicant's failure to consent to a criminal background check, [failure to list requested information](#) or falsification of any related information is grounds for the rejection of the applicant. Similar procedures must be implemented for current employees, volunteers and prospective volunteers who are subject to criminal background checks. A criminal background check on prospective hires, employees and volunteers must ~~include a check of the Wisconsin Department of Justice, Crime Information Bureau electronic database, and a check provided be~~ [conducted](#) by a criminal background check vendor that includes the following components:

- Social Security Number Trace – authenticates the individual's information and generates a list of addresses the individual has lived at for the last seven years; as part of the trace, the University may verify that the social security number is valid and appropriately assigned to the individual.
- [Statewide Search – A statewide criminal records search covering Criminal Felony/ and Misdemeanor information for each state by County of Residence – superior and municipal court records search in any county in the U.S.](#) in which the individual has resided in the last seven years.
- Sex Offender Registry – sex offender search by state.
- [National Criminal Background Database – search of the vendor's proprietary national criminal background check database.](#)
- [Global Sanctions and Enforcement Check – search of a database comprised of information from nearly 1,800 U.S. and international government and regulatory enforcement organizations. Applicable primary public record source searches are conducted on any potential records identified, and only records validated with the primary source are reported.](#)

University officials will have certain additional duties under the federal Fair Credit Reporting Act when retaining a vendor to perform criminal background checks.

[Institutions have the discretion to require additional checks appropriate to the duties and risk profile of the position.](#) Additional criminal and non-criminal checks (e.g., [foreign country](#), motor vehicle, etc.) may be run when appropriate in relation to the position.

~~UW institutions must conduct an appropriate U.S. criminal background check on an applicant for employment, current employee, or volunteer who is a foreign national and subject to this policy. A criminal background check in the individual's prior country(ies) of residence will be also conducted if his/her country(ies) of residence provides a criminal background check for the time period during which the individual was a resident.~~ A media search is not considered an appropriate criminal background check and, therefore, institutions are not required to conduct media searches.

7. Application of the “Substantial Relationship” Test under the Wisconsin Fair Employment Act

Wisconsin law prohibits an employer from discriminating against an applicant or employee on the basis of arrest or conviction record unless the pending criminal charge or conviction substantially relates to the circumstances of the position. Applicants with a criminal history will not be automatically disqualified from UW System employment, and a UW System employee's criminal history will not result in automatic disciplinary action or dismissal. If an applicant's or employee's criminal background check reveals a pending criminal charge or criminal conviction, the UW institution must engage in an individual analysis to determine whether a substantial

relationship exists between the pending charge or criminal conviction and the [functions](#) [circumstances](#) of the position.

8. Self-Disclosure of Arrests, Charges, or Convictions

UW System institutions must require employees [and volunteers](#) who hold positions of trust with access to vulnerable populations, as defined in paragraph 1(a) of this policy, to report any criminal arrests, charges, or convictions (excluding misdemeanor traffic offenses punishable only by fine) to human resources, or to whomever the institution designates as the appropriate individual to receive a report, within twenty-four (24) hours or at the earliest possible opportunity. Failure to make the required report may constitute a violation and may result in disciplinary action, up to and including dismissal. The same procedures must be implemented for volunteers who hold a position of trust with access to vulnerable populations.

9. Statutorily Mandated Background Checks

Notwithstanding anything in this policy, institutions shall continue to perform criminal background checks for certain, specified positions in the form and manner required by state or federal law. Laws mandating criminal background checks for certain positions include: the Wisconsin Caregiver law (covering prospective caregivers for vulnerable populations such as minors, as well as those licensed by the state to provide direct health care services and treatment to clients); the Wisconsin Fiduciary law (covering positions that involve accounting, auditing, financial management, accounts receivable, accounts payable, procurement, retail operations, tax and fee collections, payroll, and handling of cash and checks); and the federal Public Health Security and Bioterrorism Preparedness and Response Act of 2002 and the Agricultural Protection Act of 2002 (covering employees who handle and work with hazardous agents or materials in campus labs, buildings or storage facilities).

10. Other Criminal Background Checks

Nothing in this policy shall be construed to prevent a UW System institution with a reasonable basis from obtaining, at any time, criminal background check information on any current employee or volunteer.

Oversight, Roles, and Responsibilities

Each UW System institution will submit its criminal background check policy to the UW System Office of Human Resources for review and approval to ensure consistency of practice in the UW System. Any subsequent changes to an institution's policy should be submitted to the same UW System office for review and approval.

Related Regent Policies and Applicable Laws

Wis. Stat. § 111.335

History: Res. 9276, adopted 12/08/2006, created Regent Policy Document 06-4, subsequently renumbered 20-19. Res. 10149, adopted 12/07/2012, amended Regent Policy Document 20-19.

Regent Policy Document 20-19 *(formerly 06-4)*

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unsupervised access to the unit when the vulnerable population is present. This category does not include faculty or instructional academic staff performing regular teaching, service, and research responsibilities unless these responsibilities include unsupervised or significant access to vulnerable populations.

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- Social Security Number Trace – authenticates the individual's information and generates a list of addresses the individual has lived at for the last seven years; as part of the trace,

the University may verify that the social security number is valid and appropriately assigned to the individual.

- Statewide Search – A statewide criminal records search covering felony and misdemeanor information for each state in which the individual has resided in the last seven years.
- Sex Offender Registry – sex offender search by state.
- National Criminal Background Database – search of the vendor’s proprietary national criminal background check database.
- Global Sanctions and Enforcement Check – search of a database comprised of information from nearly 1,800 U.S. and international government and regulatory enforcement organizations. Applicable primary public record source searches are conducted on any potential records identified, and only records validated with the primary source are reported.

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Institutions have the discretion to require additional checks appropriate to the duties and risk profile of the position. Additional criminal and non-criminal checks (e.g., foreign country, motor vehicle, etc.) may be run when appropriate in relation to the position.

A media search is not considered an appropriate criminal background check and, therefore, institutions are not required to conduct media searches.

7. Application of the “Substantial Relationship” Test under the Wisconsin Fair Employment Act

Wisconsin law prohibits an employer from discriminating against an applicant or employee on the basis of arrest or conviction record unless the pending criminal charge or conviction substantially relates to the circumstances of the position. Applicants with a criminal history will not be automatically disqualified from UW System employment, and a UW System employee’s criminal history will not result in automatic disciplinary action or dismissal. If an applicant’s or employee’s criminal background check reveals a pending criminal charge or criminal conviction, the UW institution must engage in an individual analysis to determine whether a substantial relationship exists between the pending charge or criminal conviction and the circumstances of the position.

8. Self-Disclosure of Arrests, Charges, or Convictions

UW System institutions must require employees and volunteers who hold positions of trust with access to vulnerable populations, as defined in paragraph 1(a) of this policy, to report any criminal arrests, charges, or convictions (excluding misdemeanor traffic offenses punishable only by fine) to human resources, or to whomever the institution designates as the appropriate individual to receive a report, within twenty-four (24) hours or at the earliest possible

opportunity. Failure to make the required report may constitute a violation and may result in disciplinary action, up to and including dismissal. The same procedures must be implemented for volunteers who hold a position of trust with access to vulnerable populations.

9. Statutorily Mandated Background Checks

Notwithstanding anything in this policy, institutions shall continue to perform criminal background checks for certain, specified positions in the form and manner required by state or federal law. Laws mandating criminal background checks for certain positions include: the Wisconsin Caregiver law (covering prospective caregivers for vulnerable populations such as minors, as well as those licensed by the state to provide direct health care services and treatment to clients); the Wisconsin Fiduciary law (covering positions that involve accounting, auditing, financial management, accounts receivable, accounts payable, procurement, retail operations, tax and fee collections, payroll, and handling of cash and checks); and the federal Public Health Security and Bioterrorism Preparedness and Response Act of 2002 and the Agricultural Protection Act of 2002 (covering employees who handle and work with hazardous agents or materials in campus labs, buildings or storage facilities).

10. Other Criminal Background Checks

Nothing in this policy shall be construed to prevent a UW System institution with a reasonable basis from obtaining, at any time, criminal background check information on any current employee or volunteer.

Oversight, Roles, and Responsibilities

Each UW System institution will submit its criminal background check policy to the UW System Office of Human Resources for review and approval to ensure consistency of practice in the UW System. Any subsequent changes to an institution's policy should be submitted to the same UW System office for review and approval.

Related Regent Policies and Applicable Laws

Wis. Stat. § 111.335

History: Res. 9276, adopted 12/08/2006, created Regent Policy Document 06-4, subsequently renumbered 20-19. Res. 10149, adopted 12/07/2012, amended Regent Policy Document 20-19.

**REGENT POLICY DOCUMENT REVIEW:
RPD 20-22, "CODE OF ETHICS"
(FIRST READING)**

REQUESTED ACTION

First reading and discussion of proposed revisions.

SUMMARY

The proposed revisions to Regent Policy Document (RPD) 20-22 are designed to align the definition of 'immediate family member' for university staff with the same definition used within Wisconsin Administrative Code UWS 8.02(9) and make consistent the standards for a conflict of interest for university staff with the description in Wisconsin Administrative Code UWS 8.03(1)(a) for faculty, academic staff, and limited employees who are not State Public Officials. They also extend access to consultation and advice from the institutional ethics committee established under Wisconsin Administrative Code UWS 8.035 to university staff.

Presenter

- Jason Beier, Associate Vice President for Human Resources, Universities of Wisconsin

BACKGROUND

RPD 20-22, "Code of Ethics" policy applies to all University of Wisconsin System employees. The policy recognizes that faculty, academic staff, and limited appointees (other than state public officials) are subject to Chapter UWS 8 of the Wisconsin Administrative Code.

Streamlining Reporting Efforts

Aligning the definition of 'immediate family member' in RPD 20-22 with the definition in Wis. Admin. Code UWS 8.02(9) used for faculty, academic staff, and limited appointment types across the UWs will allow for a consistent understanding of what needs to be reported by employees as a conflict of interest. Specifically for the purposes of reporting a conflict that could be nepotistic, standardizing the definition across all appointment types

clarifies to employees what familial relationships could create a material conflict between the personal interests of an employee and their public responsibilities, obligating them to be disclosed.

Aligning Standards for Conflict of Interest

Revising language around standards of conduct for university staff in RPD 20-22 will align the description of conflict of interest with the standards for faculty, academic staff, and limited appointees. By narrowing the situations that constitute a conflict of interest to those to contrary to the interests of the University of Wisconsin System and in which the university staff member uses or attempts to use their public position or state property to gain or attempt to gain anything of value for private benefit, university staff will enjoy the same flexibility as other employee types to engage in other pursuits that do not conflict with the employees obligations to their university.

Access to Institutional Ethics Committee

Extending access to the institutional ethics committee to members of the University Staff will provide them with access to consultation and advice on the application of this policy with the same protections as faculty, academic staff, and limited appointees.

ATTACHMENTS

- A) Regent Policy Document 20-22 (Proposed with Tracked Changes)
- B) Regent Policy Document 20-22 (Proposed – Clean Copy)

Regent Policy Document 20-22

Code of Ethics

Scope

This Board of Regents Code of Ethics policy applies to all University of Wisconsin System (UW System) employees. The policy recognizes that faculty, academic staff, and limited appointees (other than state public officials) are subject to Chapter UWS 8 of the Wisconsin Administrative Code, and that university employees who are state public officials will remain subject to Subchapter III of Wis. Stat. Chapter 19. University Staff are subject to the University Staff Code of Ethics set forth in section III below which was closely modeled after Chapter ER-MRS 24 of the Wisconsin Administrative Code, the Code of Ethics for classified state employees.

Purpose

This code of ethics policy is created under the directive of Wis. Stat. § 19.45(11)(b), for the guidance of all UW System employees, to avoid activities which cause, or tend to cause, conflicts between their personal interests and their public responsibilities, and to improve standards of public service. Under 2011 Wisconsin Act 32, the Board of Regents was required to establish a code of ethics for UW System personnel who are not state public officials subject to Wis. Stat. Chapter 19.

Policy Statement

I. Faculty, academic staff, and limited appointees (other than state public officials) are subject to Chapter UWS 8.

II. State public officials will remain subject to subchapter III of Wis. Stat. Chapter 19.

Individuals holding the following positions are state public officials: chancellors, vice chancellors, UWSA president, senior vice presidents, vice presidents, associate vice presidents, and assistant vice presidents.

III. University Staff Code of Ethics

This code of ethics is created for the guidance of employees designated as University Staff to avoid activities which cause, or tend to cause, conflicts between their personal interests and their public responsibilities as UW System employees.

The observance of high moral and ethical standards by University Staff employees is essential. Each employee holds ~~his or her~~their position as a public trust, and any effort to realize personal gain through official conduct is a violation of that trust.

The Board of Regents policy recognizes that:

1. University Staff have personal and economic interests in the decisions and policies of national, state and local government.
2. University Staff retain their rights as citizens to interests of a personal or economic nature.
3. The standards of ethical conduct for University Staff must distinguish between those minor and inconsequential conflicts which are unavoidable in a free society and those conflicts which are substantial and material.
4. University Staff may need to engage in employment other than official duties, or may need to maintain investments, but no employee shall engage in any employment or maintain any investment if the employment or investment conflicts with the specific provisions of this code of ethics.

In adopting the standards of conduct set forth in the University Staff code of ethics, it is the Board's purpose to prohibit only those activities which will result in a conflict between the personal interests of a University Staff member and that employee's public responsibilities to the UW System. It is not the Board's purpose to prohibit University Staff from freely pursuing activities that will not result in such a conflict.

B. DEFINITIONS

1. "Anything of value" means any money or property, favor, service, payment, advance, forbearance, loan, or promise of future employment, but does not include:
 - a. Any salary, expenses or other compensation paid by the state;
 - b. Any compensation or expenses derived from outside activities permitted under this code of ethics;
 - c. Political contributions which are reported under Wis. Stat. Chapter 11; or
 - d. Hospitality (e.g., meals or lodging) extended for a purpose unrelated to university business. When it could be concluded that the hospitality would be extended if the guest or a member of the guest's immediate family was not a UW System employee, that hospitality is extended for a purpose unrelated to university business.
2. "Associated," when used with reference to an organization, means that a person or a member of a person's immediate family is a director, officer or trustee or owns or controls, directly or indirectly, and severally or in the aggregate, at least 10% of the outstanding equity.
3. "Board" means the Board of Regents of the University of Wisconsin System.
4. "Chancellor" means the chief executive officer of a UW System institution.

~~5. "Domestic partner" is a person with whom a University Staff member has a domestic partnership.~~

~~6. "Domestic partnership" means a relationship between two individuals that satisfies all of the following:~~

~~a. Each individual is at least 18 years old and otherwise competent to enter into a contract.~~

~~b. Neither individual is married to, or in a domestic partnership with, another individual.~~

~~c. The two individuals are not related by blood in any way that would prohibit marriage under Wis. Stat. § 765.03.~~

~~d. The two individuals consider themselves to be members of each other's immediate family.~~

~~e. The two individuals agree to be responsible for each other's basic living expenses.~~

~~f. The two individuals share a common residence. Two individuals may share a common residence even if any of the following applies:~~

~~i. Only one of the individuals has legal ownership of the residence.~~

~~ii. One or both of the individuals have one or more additional residences not shared with the other individual.~~

~~iii. One of the individuals leaves the common residence with the intent to return.~~

~~7.5.~~ "University Staff" means members of the university workforce who contribute in a broad array of positions in support of the University's mission and are not exempt (hourly¹) from the overtime provisions of the Fair Labor Standards Act. [1Note: All FLSA exempt employees holding positions in the State of Wisconsin "classified" service as of June 30, 2013 are given the choice to remain in the University Staff for as long as they retain their existing positions, or to move to Academic Staff or Limited Appointment positions].

~~8.6.~~ "Hospitality" includes, but is not limited to, meals, beverages, and lodging which a host other than an organization offers a guest on premises owned or occupied by the host or ~~his or her~~their immediate family as the host's principal or seasonal residence.

~~9.7.~~ "Immediate family" means (a) an employee's spouse ~~or domestic partner; an employee's relatives by marriage, consanguinity or adoption;~~ and (b) any other person who receives, directly or indirectly, more than one half of ~~his or her~~their support from an employee or from whom an employee receives, directly or indirectly, more than one half ~~his or her~~their support.

~~10.8.~~ “Institution” means any university or organizational equivalent designated by the Board of Regents.

~~11.9.~~ “Organization” means any corporation, partnership, proprietorship, firm, enterprise, franchise, association, self-employed individual, trust or any other legal entity other than an individual or body politic.

~~12.10.~~ “President” means the President of the University of Wisconsin System.

~~13.11.~~ “University property” includes, but is not limited to, facilities, vehicles, supplies, equipment, communications equipment and services, information technology equipment and services, stenographic assistance, reproduction services, and research.

C. STANDARDS OF CONDUCT

This code of ethics shall not prevent a University Staff member from accepting outside employment or following a pursuit which in no way interferes with the full and faithful discharge of ~~his or her~~their duties to the UW System, subject to the following:

1. A conflict of interest on the part of the University Staff member exists whenever the University Staff member, in a manner contrary to the interests of the University of Wisconsin System, uses or attempts to use their public position or state property, including property leased by the state, to gain or attempt to gain anything of value for the’s action or failure to act propitiously could reasonably be expected to directly or indirectly produce or assist in producing a private benefit for the University Staff member or the University Staff member’s immediate family or an organization with which the University Staff member is associated.
2. It is the policy of the Board of Regents to prohibit those activities that will cause a conflict of interest. Therefore:
 - a. No University Staff member may, in a manner contrary to the interests of the University of Wisconsin System, use or attempt to use ~~his or her~~their position or University property, or use the prestige or influence of ~~his or her~~their position for financial gain or other benefits, advantages or privileges for the private benefit of the University Staff member, the University Staff member’s immediate family or an organization with which the University Staff member is associated.
 - i. Any UW System salary or other compensation received by the University Staff member from the state for ~~his or her~~their services does not constitute “financial gain” as the term is used in this rule.
 - ii. Incidental personal use of University property within the limits prescribed by UW System and institutional policies and use of University issued or

purchased parking permits for non-work events or activities does not constitute a “private benefit” as the term is used in this policy.

- b. No University Staff member may solicit or accept from any person or organization, directly or indirectly, anything of value if it could reasonably be expected to influence such University Staff member’s official actions or judgment, or could reasonably be considered as a reward for any official action or inaction on the part of such University Staff member.
 - i. No University Staff member who is assigned or acts as an official representative of an UW System institution in the presentation of papers, talks, demonstrations or making appearances shall solicit or accept fees, honoraria or reimbursement of expenses for personal gain. Any fees, honoraria, or reimbursement of expenses which may be offered in connection therewith shall be paid to the University Staff member’s institution.
 - ii. Acceptance of fees and honoraria paid for papers, talks, demonstrations or appearances made by a University Staff member on the University Staff member’s own time, and not directly part of official duties, shall not be a violation of this rule. University Staff members shall notify their supervisor or other appropriate administrator prior to accepting fees and honoraria for papers, talks, demonstrations, or appearances to ensure that no conflict of interest exists.
 - iii. When a University Staff member is offered an unsolicited award or reward for an exceptional accomplishment or outstanding performance, the appropriate administrator shall determine whether or not it may be accepted by the University Staff member after considering whether acceptance of the award or reward would conflict with the purposes of this policy. University Staff members shall notify their supervisor or other appropriate administrator prior to accepting unsolicited awards or rewards, who in turn shall seek a determination regarding whether acceptance or refusal of the award or reward is appropriate.
- c. No University Staff member may intentionally use or disclose information gained in the course of or by reason of the University Staff member’s official position or activities in any way that could result in the receipt of anything of value for ~~himself or herself~~themselves, for ~~his or her~~their immediate family, or for any other person or organization, if the information has not been communicated to the public or is not public information. However, no reprisal may be taken against a University Staff member for the lawful disclosure of information which the University Staff member reasonably believes evidences:

- i. A violation of any law, rule, or regulation, or
 - ii. Mismanagement, a gross waste of funds, an abuse of authority, enforcement of unreasonable university work rules, or a substantial and specific danger to public health or safety.
- d. No University Staff member, member of the University Staff's immediate family, nor any organization with which the University Staff member or a member of ~~his or her~~their immediate family is associated may enter into any contract or lease involving payment or payments of more than \$3,000 within a 12-month period, in whole or in part derived from University or state funds unless the University Staff member has first made written disclosure of the nature and extent of such relationship or interest to ~~his or her~~their supervisor or other appropriate administrator and obtained the supervisor's or other administrator's written approval. The University Staff member's supervisor or other appropriate administrator shall approve a University Staff member's interest in a lease or contract unless ~~he or she determines~~it is determined that the University Staff member's personal interest in the agreement will conflict substantially and materially with the University Staff member's discharge of ~~his or her~~their public responsibilities. This paragraph does not affect the application of Wis. Stat. § 946.13, which prohibits private interests in public contracts.
- e. No University Staff member may participate, formally or informally, in the decision to hire, retain, promote or determine the salary of a member of ~~his or her~~their immediate family. No University Staff member may, in the supervision or management of another employee who is a member of ~~his or her~~their immediate family, give preferential or favored treatment.
- e.f. No University Staff may engage in an outside activity if it conflicts with their public responsibilities to the UW System or the institution at which the University Staff member is employed.
- 3. The President or a Chancellor may, upon written request and by action within a reasonable time of receipt thereof, waive any provision of this section whenever its literal application would be adverse to the best interests of the University of Wisconsin System or institution or would work an unreasonable hardship on an employee.
- 4. Nothing in this section prohibits a University Staff member from making decisions concerning salaries, salary-related benefits or reimbursement of actual and necessary expenses when the action does not result in preferential or favored treatment of a member of the University Staff member's immediate family.

D. INSTITUTIONAL ETHICS COMMITTEES

Each institution shall establish a committee, or designate an existing committee, such as the institutional committee established under Wis. Admin. Code s. UWS 8.035, whose function shall be to provide to any member of the university staff consultation and advice on the application of this policy. Committee deliberations and actions upon requests for consultation or advice shall be in meetings not open to the public. Records obtained in connection with requests for consultation or advice shall be considered confidential university information. However, summaries of advice provided by institutional ethics committees, which do not disclose the identities of persons requesting such advice, shall be made public in an annual report.

ED. ACTION TO AVOID POSSIBLE CONFLICT

When it appears that a material conflict may arise between the personal interests of a University Staff member and ~~his or her~~**their** public responsibilities, the University Staff member shall notify ~~his or her~~**their** supervisor or other appropriate administrator by submitting a written statement describing the nature of the possible conflict. Within 15 days after receipt of the statement, the supervisor or other appropriate administrator shall advise the University Staff member in writing that:

1. There is no conflict prohibited by this code of ethics, and the University Staff member may proceed; or
2. There may be a conflict, and further consultation is necessary prior to reaching a determination; or
3. There is a conflict which must be resolved.

If the University Staff member is advised that ~~he or she~~**they** cannot proceed with institutional duties or with personal interests, the employee, within 15 days after notice of the decision of the supervisor or other appropriate administrator, may appeal the decision under the applicable grievance procedures.

FE. SANCTIONS

The President or appropriate Chancellor may investigate possible code of ethics violations whenever the circumstances warrant.

Oversight, Roles & Responsibilities

In addition to oversight by the President and the appropriate Chancellor's Office, compliance with this code of ethics will be monitored periodically.

Related Regent Policies and Applicable Laws

- Wis. Stat. § 19.41, et seq., Code of Ethics for Public Officials and Employees
- Wis. Stat. § 36.23, Conflict of Interest
- Chapter UWS 8, Wis. Admin. Code, Code of Ethics

- RPD 13-4, ~~University of Wisconsin System Policy on~~ Institutional and Employee Relationships with Educational Loan Lenders
- ~~RPD 20-7, Outside Activity Reporting~~
- RPD 25-3, Acceptable Use of Information Technology Resources
- U.S. Department of Health and Human Services requirements on reporting conflicts of interest.

History: Res. 10151, adopted 12/07/2012, created Regent Policy Document 20-22. Technical corrections made on 11/15/2018, as authorized by Res. 10835 (adopted 3/9/2017).

SEE ALSO:

SYS 1290, Code of Ethics (formerly WE 1)

[UW System Administrative policies are included for reference and are separate from Regent Policy Documents adopted by the Board.]

Regent Policy Document 20-22

Code of Ethics

Scope

This Board of Regents Code of Ethics policy applies to all University of Wisconsin System (UW System) employees. The policy recognizes that faculty, academic staff, and limited appointees (other than state public officials) are subject to Chapter UWS 8 of the Wisconsin Administrative Code, and that university employees who are state public officials will remain subject to Subchapter III of Wis. Stat. Chapter 19. University Staff are subject to the University Staff Code of Ethics set forth in section III below which was closely modeled after Chapter ER-MRS 24 of the Wisconsin Administrative Code, the Code of Ethics for classified state employees.

Purpose

This code of ethics policy is created under the directive of Wis. Stat. § 19.45(11)(b), for the guidance of all UW System employees, to avoid activities which cause, or tend to cause, conflicts between their personal interests and their public responsibilities, and to improve standards of public service. Under 2011 Wisconsin Act 32, the Board of Regents was required to establish a code of ethics for UW System personnel who are not state public officials subject to Wis. Stat. Chapter 19.

Policy Statement

I. Faculty, academic staff, and limited appointees (other than state public officials) are subject to Chapter UWS 8.

II. State public officials will remain subject to subchapter III of Wis. Stat. Chapter 19.

Individuals holding the following positions are state public officials: chancellors, vice chancellors, UWSA president, senior vice presidents, vice presidents, associate vice presidents, and assistant vice presidents.

III. University Staff Code of Ethics

This code of ethics is created for the guidance of employees designated as University Staff to avoid activities which cause, or tend to cause, conflicts between their personal interests and their public responsibilities as UW System employees.

The observance of high moral and ethical standards by University Staff employees is essential. Each employee holds their position as a public trust, and any effort to realize personal gain through official conduct is a violation of that trust.

The Board of Regents policy recognizes that:

1. University Staff have personal and economic interests in the decisions and policies of national, state and local government.
2. University Staff retain their rights as citizens to interests of a personal or economic nature.
3. The standards of ethical conduct for University Staff must distinguish between those minor and inconsequential conflicts which are unavoidable in a free society and those conflicts which are substantial and material.
4. University Staff may need to engage in employment other than official duties, or may need to maintain investments, but no employee shall engage in any employment or maintain any investment if the employment or investment conflicts with the specific provisions of this code of ethics.

In adopting the standards of conduct set forth in the University Staff code of ethics, it is the Board's purpose to prohibit only those activities which will result in a conflict between the personal interests of a University Staff member and that employee's public responsibilities to the UW System. It is not the Board's purpose to prohibit University Staff from freely pursuing activities that will not result in such a conflict.

B. DEFINITIONS

1. "Anything of value" means any money or property, favor, service, payment, advance, forbearance, loan, or promise of future employment, but does not include:
 - a. Any salary, expenses or other compensation paid by the state;
 - b. Any compensation or expenses derived from outside activities permitted under this code of ethics;
 - c. Political contributions which are reported under Wis. Stat. Chapter 11; or
 - d. Hospitality (e.g., meals or lodging) extended for a purpose unrelated to university business. When it could be concluded that the hospitality would be extended if the guest or a member of the guest's immediate family was not a UW System employee, that hospitality is extended for a purpose unrelated to university business.
2. "Associated," when used with reference to an organization, means that a person or a member of a person's immediate family is a director, officer or trustee or owns or controls, directly or indirectly, and severally or in the aggregate, at least 10% of the outstanding equity.
3. "Board" means the Board of Regents of the University of Wisconsin System.
4. "Chancellor" means the chief executive officer of a UW System institution.

5. "University Staff" means members of the university workforce who contribute in a broad array of positions in support of the University's mission and are not exempt (hourly) from the overtime provisions of the Fair Labor Standards Act. [¹Note: All FLSA exempt employees holding positions in the State of Wisconsin "classified" service as of June 30, 2013 are given the choice to remain in the University Staff for as long as they retain their existing positions, or to move to Academic Staff or Limited Appointment positions].
6. "Hospitality" includes, but is not limited to, meals, beverages, and lodging which a host other than an organization offers a guest on premises owned or occupied by the host or their immediate family as the host's principal or seasonal residence.
7. "Immediate family" means (a) an employee's spouse; and (b) any person who receives, directly or indirectly, more than one half of their support from an employee or from whom an employee receives, directly or indirectly, more than one half their support.
8. "Institution" means any university or organizational equivalent designated by the Board of Regents.
9. "Organization" means any corporation, partnership, proprietorship, firm, enterprise, franchise, association, self-employed individual, trust or any other legal entity other than an individual or body politic.
10. "President" means the President of the University of Wisconsin System.
11. "University property" includes, but is not limited to, facilities, vehicles, supplies, equipment, communications equipment and services, information technology equipment and services, stenographic assistance, reproduction services, and research.

C. STANDARDS OF CONDUCT

This code of ethics shall not prevent a University Staff member from accepting outside employment or following a pursuit which in no way interferes with the full and faithful discharge of their duties to the UW System, subject to the following:

1. A conflict of interest on the part of the University Staff member exists whenever the University Staff member, in a manner contrary to the interests of the University of Wisconsin System, uses or attempts to use their public position or state property, including property leased by the state, to gain or attempt to gain anything of value for the private benefit for the University Staff member or the University Staff member's immediate family or an organization with which the University Staff member is associated.
2. It is the policy of the Board of Regents to prohibit those activities that will cause a conflict of interest. Therefore:

- a. No University Staff member may, in a manner contrary to the interests of the University of Wisconsin System, use or attempt to use their position or University property, or use the prestige or influence of their position for financial gain or other benefits, advantages or privileges for the private benefit of the University Staff member, the University Staff member's immediate family or an organization with which the University Staff member is associated.
 - i. Any UW System salary or other compensation received by the University Staff member from the state for their services does not constitute "financial gain" as the term is used in this rule.
 - ii. Incidental personal use of University property within the limits prescribed by UW System and institutional policies and use of University issued or purchased parking permits for non-work events or activities does not constitute a "private benefit" as the term is used in this policy.
- b. No University Staff member may solicit or accept from any person or organization, directly or indirectly, anything of value if it could reasonably be expected to influence such University Staff member's official actions or judgment, or could reasonably be considered as a reward for any official action or inaction on the part of such University Staff member.
 - i. No University Staff member who is assigned or acts as an official representative of an institution in the presentation of papers, talks, demonstrations or making appearances shall solicit or accept fees, honoraria or reimbursement of expenses for personal gain. Any fees, honoraria, or reimbursement of expenses which may be offered in connection therewith shall be paid to the University Staff member's institution.
 - ii. Acceptance of fees and honoraria paid for papers, talks, demonstrations or appearances made by a University Staff member on the University Staff member's own time, and not directly part of official duties, shall not be a violation of this rule. University Staff members shall notify their supervisor or other appropriate administrator prior to accepting fees and honoraria for papers, talks, demonstrations, or appearances to ensure that no conflict of interest exists.
 - iii. When a University Staff member is offered an unsolicited award or reward for an exceptional accomplishment or outstanding performance, the appropriate administrator shall determine whether or not it may be accepted by the University Staff member after considering whether acceptance of the award or reward would conflict with the purposes of

this policy. University Staff members shall notify their supervisor or other appropriate administrator prior to accepting unsolicited awards or rewards, who in turn shall seek a determination regarding whether acceptance or refusal of the award or reward is appropriate.

- c. No University Staff member may intentionally use or disclose information gained in the course of or by reason of the University Staff member's official position or activities in any way that could result in the receipt of anything of value for themselves, for their immediate family, or for any other person or organization, if the information has not been communicated to the public or is not public information. However, no reprisal may be taken against a University Staff member for the lawful disclosure of information which the University Staff member reasonably believes evidences:
 - i. A violation of any law, rule, or regulation, or
 - ii. Mismanagement, a gross waste of funds, an abuse of authority, enforcement of unreasonable university work rules, or a substantial and specific danger to public health or safety.
- d. No University Staff member, member of the University Staff's immediate family, nor any organization with which the University Staff member or a member of their immediate family is associated may enter into any contract or lease involving payment or payments of more than \$3,000 within a 12-month period, in whole or in part derived from University or state funds unless the University Staff member has first made written disclosure of the nature and extent of such relationship or interest to their supervisor or other appropriate administrator and obtained the supervisor's or other administrator's written approval. The University Staff member's supervisor or other appropriate administrator shall approve a University Staff member's interest in a lease or contract unless it is determined that the University Staff member's personal interest in the agreement will conflict substantially and materially with the University Staff member's discharge of their public responsibilities. This paragraph does not affect the application of Wis. Stat. § 946.13, which prohibits private interests in public contracts.
- e. No University Staff member may participate, formally or informally, in the decision to hire, retain, promote or determine the salary of a member of their immediate family. No University Staff member may, in the supervision or management of another employee who is a member of their immediate family, give preferential or favored treatment.

- f. No University Staff may engage in an outside activity if it conflicts with their public responsibilities to the UW System or the institution at which the University Staff member is employed.
3. The President or a Chancellor may, upon written request and by action within a reasonable time of receipt thereof, waive any provision of this section whenever its literal application would be adverse to the best interests of the University of Wisconsin System or institution or would work an unreasonable hardship on an employee.
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F. SANCTIONS

The President or appropriate Chancellor may investigate possible code of ethics violations whenever the circumstances warrant.

Oversight, Roles & Responsibilities

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- Wis. Stat. § 36.23, Conflict of Interest
- Chapter UWS 8, Wis. Admin. Code, Code of Ethics
- RPD 13-4, Institutional and Employee Relationships with Educational Loan Lenders
- RPD 25-3, Acceptable Use of Information Technology Resources
- U.S. Department of Health and Human Services requirements on reporting conflicts of interest.

History: Res. 10151, adopted 12/07/2012, created Regent Policy Document 20-22. Technical corrections made on 11/15/2018, as authorized by Res. 10835 (adopted 3/9/2017).

SEE ALSO:

[SYS 1290. Code of Ethics](#) (formerly WE 1)

[UW System Administrative policies are included for reference and are separate from Regent Policy Documents adopted by the Board.]