

Management Standards

MANAGING FOR THE MISSION

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Purpose

The Management Standards Handbook emphasizes important university policies and standards, and continues to serve as the university's reference point for ways to properly manage university business. Budget managers are responsible for adhering to the policies and standards outlined in the handbook.

All university policies can be found at policies.depaul.edu.

1. Financial Responsibilities

A budget manager, as defined by DePaul, is anyone named as the responsible individual for an active department. Departments, often referred to as DeptIds, include operating accounts, agency accounts, capital projects, gift/endowment accounts, grants, and any unit that has access to financial resources. Budget managers may have responsibility for more than one department. The following sections outline some of the responsibilities of a budget manager.

Delegation of Approval Authority

Budget managers who delegate their approval authority must ensure the designee understands the approval requirements and uses sound judgment in utilizing DePaul's resources. While a budget manager may delegate tasks and duties to a designee, the budget manager retains ultimate accountability for how university financial resources are utilized.

Approving a transaction, either electronically or with a signature, indicates the budget manager or designee:

- Has reviewed/read the document
- Understands the document
- Has had any questions answered
- Agrees with the transaction
- Is accountable for the transaction

The individual who delegates authority is responsible for ensuring the designee understands the approval requirements and exercises judgment in protecting the best interests of the university. If said designee is terminated or has a change of status it is the responsibility of the individual over that area to remove, and if appropriate reassign, that authorization using the Budget Manager Delegation page in Campus Solutions.

Managers can delegate transactional work to staff members. However, the named budget manager always retains the responsibility to review the Financial Activity reports on a monthly basis to ensure that all transactions were incurred for a valid business purpose and are substantiated by appropriate documentation.

Two Sets of Eyes

When approval authority is delegated, the budget manager is responsible for ensuring that **two sets of eyes** review each transaction.

A budget manager's monthly review of departmental financial activity reports (see further discussion below) ensures that a delegate's work is being reviewed and that there are two sets of eyes on each transaction. Additionally, certain transactions initiated by a budget manager, such as employee expense reimbursements and ProCard transactions, require approval from his/her supervisor to satisfy the two sets of eyes requirements.

Remember: You retain accountability for tasks and duties that are delegated, and you must ensure that two sets of eyes have reviewed each transaction.

Additional information can be found in the **Authorized Signatures and Delegation of Transaction Approval/ Authority** and the **Financial Accounting System and Reporting** policies.

Budget Process

Budget managers are accountable for the financial integrity of their department by adherence to the unit's budgets within the university's financial reporting system. Any alterations to Board approved original budgets require the budget manager to submit a Budget Request Form, Capital Budget Change Request Form, or a Position Data Request to Financial Affairs. Budget managers should refer to the Budget Changes policy to determine appropriate approvals, and obtain all necessary approvals from their functional area before submitting the request for processing.

Additional information can be found in the **University Budget Planning Process** and **Budget Changes** policies.

Account Reconciliation and Oversight

Budget managers have access to Financial Activity reports which provide a record of receipts and expenditures. It is the budget managers' responsibility to review these reports on a monthly basis within 10 business days following the availability of the month-end reports. Budget managers should ensure the best use of university resources in accordance with all applicable university policies and procedures.

Budget managers can obtain training in the reading of Financial Activity reports. The Financial Affairs

website (financial affairs.depaul.edu) contains training material, Web-based training sessions, and in-class training schedules for budget managers. In addition to Financial Activity reports, budget managers may have access to various supplementary reports providing additional detail for salary, gift and scholarship transactions. Summary level reports are provided to senior management.

Remember: You must review your Financial Activity reports monthly and make sure all transactions recorded in your reports are valid and appropriate expenditures of university funds.

Additional information can be found in the **Financial Accounting System and Reporting** policy.

Segregation of Duties

Budget managers are responsible for maintaining an adequate segregation of duties (custody, approval, accounting and reconciliation) so that no person initiates and approves any one transaction, which is a critical component of the university's internal financial controls. An example of a proper segregation of duties might include different staff members opening mail, preparing deposits and reconciling Financial Activity reports. When purchasing goods or services, receiving items and authorizing payment should generally be performed by different individuals.

Managers of small departments where it may not be practical to fully segregate duties should contact Compliance & Risk Management, the Controller's Office, Internal Audit or the appropriate school administrator for guidance.

Remember: The more people these duties are distributed among, the stronger your checks and balances.

Cash Management

Segregation of duties is the most important control in the cash (including checks) management process. Generally, a different person should be assigned responsibility and accountability for each step: 1) collecting and receipting, 2) balancing, depositing and recording if applicable, and 3) reconciliation.

The person collecting and receipting cash should issue receipts using a pre-numbered receipt book and record the receipt in a cash receipts journal. Checks received should be immediately restrictively endorsed, "For Deposit Only to DePaul University."

Cash should be secured in a locked drawer or safe, to which access is limited to the person collecting the cash and that person's supervisor.

The person balancing and depositing cash should compare the pre-numbered receipts issued to the cash receipts journal and to the actual amount of cash in the locked drawer or safe prior to making a deposit. Any discrepancies should be investigated and resolved and the cash receipts journal should be signed and dated to document the process. The cash should be deposited within 24 hours of receipt. If applicable, this person should also be responsible for applying the cash payment in the system (e.g. PeopleSoft, Continuity, Advance).

The person reconciling should compare the cash posted to the Financial Activity Report to the cash receipts log, at minimum, on a monthly basis. Any discrepancies should be investigated and resolved and the Financial Activity Report and cash receipts journal should be signed and dated.

Additional information can be found in the **Cash Receipts and Departmental Deposits** policy.

Petty cash poses a significant financial risk. Managers should eliminate the petty cash fund unless a compelling reason to retain the fund exists. Many petty cash transactions can be eliminated by using a ProCard or the appropriate reimbursement form. For assistance, contact Accounts Payable.

Gifts or Donations from the University

The university does not generally provide donations to outside organizations. However, it may make such a donation when it will benefit the university and furthers the university's business purpose and its mission and role as a good community citizen. In addition, consideration must also be given to the recipient entity and the alignment of its values to the university's values.

All donations must be approved by at least the Administrative/Academic Officer level; however, some donations require additional approvals.

Grant funds may not be used for charitable contributions unless the contribution is specifically allowed by the grantor.

Contact Restricted Accounting for additional information or visit the Gifts or Donations from the University to External Parties policy.

Gift Acceptance and Processing

All private donations (gifts) received by any area of the university must be sent to the Office of Advancement for processing within one working day of receipt of the donation, to ensure the donor receives legal credit and proper acknowledgement.

If a donor has expressed an intent to give a gift of real or personal property, securities, a planned gift, or a gift of \$250 or more, the Office of Advancement must be contacted. Advancement will coordinate an internal review to determine if the university can accept the gift and to arrange for proper transmission of any accepted gifts to the university.

Additional information can be found in the **Gift Acceptance and Processing** policy.

Gifts to Employees

In most cases, university funds are not to be used to purchase a gift for an employee or group of employees. "Gifts" include, but are not limited to flowers, holiday or wedding presents and gift certificates. Any such gifts must be purchased with personal funds. Departments may take up voluntary collections for such purposes.

Cash gifts or cash equivalents such as gift cards and gift certificates are always taxable income to the employee. Authorization from Accounts Payable is required before a unit/department can purchase cash equivalents for distribution as gifts or tokens of appreciation to employees.

The following gifts **may** be purchased by a unit/department with the approval of the appropriate dean/ vice president:

- A modest retirement gift to an employee in recognition of years of service to the university (cannot exceed \$400 per year)
- Flowers upon the death of an employee, or an immediate family member of an employee (not to exceed \$200)

Employees **may not solicit personal gifts** in connection with their employment under any circumstances. University employees are generally permitted to accept non-cash business courtesies and personal tokens of appreciation of nominal value (less than or equal to \$150) offered by outside parties.

The term "Gift" **shall** include, but is not limited to:

- Promotional items
- Complimentary event tickets
- Holiday gifts

The term "Gift" **shall not include**:

- Payment for an employee's meals
- Any compensation, discount, or other benefit offered to an employee in exchange for services performed by that employee
- Tickets for admission to DePaul sponsored events

Individual employees **may not accept at any time**, from outside parties, any of the following:

- Securities
- Real property
- Cash (including gift cards and gift certificates)
- An unsolicited offer of a single gift of more than nominal value (\$150) or multiple gifts from the same source totaling more than \$300 in value during a single fiscal year

University business units **may not** accept gifts exceeding \$500 in value from a single source during a single fiscal year including, but not limited to:

- Payment for departmental outings
- Holiday gift baskets

Gifts of securities, real property, personal property or money that are offered to a university business unit are subject to the university's Gift Acceptance and Processing policy and must be reported to the Office of Advancement. Exceptions to this policy must be requested using the Gift Policy Exception Form. Once approved, the form must be sent to the Controller's Office. Gifts approved as exceptions must also be disclosed by the employee pursuant to the university's Conflict of Interest policy.

Additional information can be found in the **Gifts to Employees** policy.

Fundraising Events

All DePaul University faculty and staff members, and in some instances student groups, must obtain approval from the Office of Advancement prior to planning, publicly announcing and/or conducting fundraising events aimed at generating charitable contributions for the university, its schools, colleges, programs and/or student groups. In addition, a clearance form documenting the cost of the event, the list of invitees and the Fair Market Value of all benefits returned to attendees in exchange for the entrance fee must be submitted to the Office of Advancement prior to sending invitations.

Additional information can be found in the **Fundraising Events and Activities** policy.

Employee and Guest Reimbursements

The university will reimburse reasonable business expenses incurred by employees and university guests while conducting authorized university business or performing services for the benefit of the university. Employees are encouraged to use ProCards for expenses incurred while traveling and conducting university business. However, the university will also reimburse for expenses, as long as they are approved by the department's budget manager/delegate and supervisor.

IRS regulations require that reimbursement requests for all expenses be submitted to Accounts Payable within 60 days of the date the expenses were paid or incurred. If the university chooses to provide advanced funds, excess amounts related to those advanced funds MUST be returned to the university within 120 days of the date expenses were paid or incurred. Failure to comply with these time frames may require the university to include the reimbursement or the excess funds in the recipient's taxable income.

The university requires original receipts for all transactions, except meals of \$25 and under. Exceptions may be approved in limited cases by the Manager of Accounts Payable with adequate alternative documentation. In order to meet IRS requirements, appropriate documentation must accompany all requests for reimbursement.

Substantiating information should include the following:

- Clearly stated business purpose
- Amount of each separate expenditure (e.g. itemized receipt)
- Date of expenditure
- Location expenditure was incurred
- Documentary evidence (receipts)

Reimbursable expenses include:

Transportation Expenses

Local travel – travel that does not require overnight lodging; this normally includes trips to non-routine destinations for business purposes that are not part of the normal and usual position requirements. Local travel does not include normal commuting costs. DePaul does not reimburse for normal commuting costs.

- Air travel
- Automobile travel (private) – reimbursed on a per-mile basis, based on IRS standard mileage rates
- Car Rental – with proper documentation, expenses for fuel, parking and tolls will be reimbursed for rented vehicles. Contact the Procurement Office for a list of rental agencies that accept DePaul University discount codes.

Other Expenses

- Hotel/motel accommodations
- Meals – including meals for extended work hours-original receipts required for all meals over \$25
- Entertainment – In addition to the documentation referenced above, include name, title and organization affiliation for each attendee (Exception: For larger events where catering is involved, a flyer or brochure describing the event or a prepared guest list may be submitted as substantiating information in lieu of listing the names, titles, and organizations of all attendees.)
- Registration/seminar fees
- Communication expenses (e.g. phone, internet)

International Travel

Reimbursement of expenses incurred in foreign currency must be submitted on an Employee and Guest Reimbursement Form in U.S. dollars with an explanation and translation of the foreign receipts. Travelers must use the currency rates that were in effect at the time the costs were incurred. With prior approval of the accounts payable manager, travelers may use the per diem method of expense reimbursement for international travel.

Travel Reimbursement to Domestic and International University Guests

Reimbursement of expenses made to university guests, including visiting lecturers, scholars and speakers, are not taxable as long as the reimbursement pertains to services performed for the benefit of the university, and is made under the accountable plan. Proper tax and immigration documentation is required prior to payment.

Grant-Funded Travel

Special restrictions may apply to grant funded travel. Contact **Restricted Accounting** or the **Office of Research Services** for more information.

All federal grants, and some municipal and state grants, require adherence to the Fly America Act. The act requires international airfare to be purchased, with few exceptions, on a U.S. flag carrier airline, or an airline with headquarters in the United States. Failure to do so may result in the ticket not being approved for purchase or other penalties.

In addition to the Fly America Act, grant expenditures may be subject to special restrictions. For example, per the federal Office of Management and Budget, federal grant funds may not be used to purchase alcohol. ORS can assist managers and Principal Investigators (PIs) in determining what is allowable for travel and entertainment expenses. It is strongly recommended that managers and PIs contact ORS about such expenses ahead of time.

Reimbursement Forms

The Employee and Guest Reimbursement Form and Employee and Guest Reimbursement Form instructions covering all types of reimbursements can be found on the **Financial Affairs** website. Additional information is available in the **Employee and University Guests Reimbursement (Travel and Other Reimbursements)** policy.

Administration of Externally Funded Grants and Contracts

The submission of a grant or contract proposal for external funding constitutes a formal transaction between DePaul and the funding organization or agency. Therefore, it is very important that proposal submissions are handled by the appropriate departments.

Remember: Anyone that applies for a grant or other external funding is acting on behalf of the university and must work with ORS and/or Development prior to submitting a proposal or contacting a private funder.

Additional information can be found in the **Administration of Externally Funded Grants and Contracts** policy.

Contract Requirements and Procedures

All contracts entered into on behalf of DePaul must be in writing. A formal written contract (that is, a document with agreed-on terms signed by both parties) is required for all non-goods contracts, unless the contract value is less than \$1,000, and for all contracts involving “Special Risk” (as defined below). For contracts to purchase goods, Procurement

Services’ policies and procedures should be followed.

Additionally, a signed contract is required before contractual services may begin. Likewise, a department shall not purchase goods unless the seller has accepted a purchase order (PO) issued by Procurement Services or the purchase otherwise complies with Procurement’s policies and procedures.

Departments that seek to enter into a contract on behalf of DePaul are responsible for carefully reading and reviewing the proposed contract to ensure it makes good business sense for DePaul, and reviewing and approving the contract’s business terms (e.g., dates, pricing, quantities, payment terms, scope of work).

DePaul’s executive officers, academic officers and administrative officers (officers) generally may delegate authority to negotiate contracts to any employee within the officer’s areas of responsibility. Officers and their specific designees may sign contracts in accordance with the chart below.

Value of Contract		Ability to Sign	Legal Review
Greater than or equal to	But less than		
\$0	\$50,000	Executive Officers Academic Officers Administrative Officers Specific Designees	Not Required Except for Special Risk Contracts (defined below)
\$50,000	\$250,000	Executive Officers Academic Officers Administrative Officers Specific Designees	
\$250,000	and above	Executive Officers	Required

The following contracts may be approved and signed only by an executive officer: contracts that: (a) govern activities in more than one officer’s area of competence and responsibility, (b) last more than three years, (c) establish an exclusive relationship, or (d) renew automatically.

Contracts signed by individuals acting beyond the scope of their authority may be void and can result in personal liability.

The following Special Risk contracts, regardless of the dollar value, require a formal written contract and the legal terms must be reviewed and approved by the Office of the General Counsel (OGC):

- Contracts involving a third party's use of DePaul's intellectual property (such as university logos, marks, artwork, symbols or copyrighted materials),
- Contracts involving the lease or purchase of real estate,
- Contracts requiring the university to indemnify or insure an outside party,
- Contracts involving off-campus educational programs or activities (excluding (i) domestic hotel/lodging, catering, meeting space, and individual car rental contracts regardless of whether such contracts fall within another Special Risk category, and (ii) certain contracts related to international programs managed by the International Programs Office),
- Contracts that will give any provider of goods or services access to private or confidential information,
- Contracts that may expose DePaul to significant risk or liability,
- Contracts involving the authority to open or maintain banking accounts for the university.

Pre-approved standard contracts are available on the OGC's website. These contracts may be used without additional review and approval by the OGC, provided that no alterations are made.

Two sets of procedures govern contracts that require Procurement and/or the OGC review and filing.

- For contracts requiring a PO, the department enters a requisition into the PeopleSoft Financials system and submits the proposed contract along with any exhibits, a Contract Review Submission Form, and any needed backup to Procurement Services. Procurement Services then routes the proposed contracts to additional offices for review, including the OGC, if necessary.
- For all other contracts, the requesting department is responsible for obtaining review from other offices and for submitting the contract, a Contract Review Submission Form, and any needed back up to the OGC if legal review is required. Fully signed copies of the final contract must be sent to either Procurement or the OGC.

For all other contracts that do not require a PO or OGC review, departments shall file, maintain and protect the original signed contracts in their respective areas in accordance with DePaul's **Records Management** policy.

Additional details can be found in the **Contract Requirements and Procedures** policy.

Making Purchases

Making purchases for goods or services up to \$3,500 can be handled at the department level. In some cases, a contract or contract review may be required (e.g. non-goods purchases over \$1,000, Special Risk items).

Purchases over \$3,500 require a requisition and approval from Procurement Services prior to placing the order or signing the contract (this includes verbally authorizing orders, duly-signed contracts, accepted proposals, etc.). Once a budget manager has entered a requisition into PeopleSoft, Procurement will review the request for reasonableness, pricing and vendor selection, as well as compliance with other policies (e.g. the OGC, Information Services) if other approvals are needed.

Procurement requires backup documentation for all POs to support the purchase. This can include a contract, quote, proposal or other support. Once approved by all levels, a PO is generated and sent to the vendor for fulfillment. Purchases over \$25,000 are subject to additional requirements. Some types of purchases have special requirements (e.g. technology, catering, gift cards, international vendors, DePaul purchases, stationary, used equipment), regardless of the dollar value. See the **Procurement Services** website for additional information.

For more information, visit the **Purchasing and Bidding Requirements** policy.

Procurement Card

The university ProCard is available to employees to provide them with the flexibility to quickly and easily obtain goods and services while allowing departments to maintain control over these purchases. The program streamlines small-dollar purchases to improve efficiency and reduce administrative costs.

The ProCard typically has a limit of \$3,500 per transaction and should be utilized to make small-dollar purchases whenever possible.

ProCards can be used to charge general expenses as well as travel and other entertainment expenses. There are, however, restrictions for ProCard use including:

- The ProCard is only authorized for legitimate business expenses and cannot be used for personal expenses.
- The card, and its number, cannot be shared with others.
- Cardholders cannot purchase items for their approving official's individual use (e.g. airfare) without written approval by that approving official's supervisor.

Specific processes or other payment methods may be more appropriate or required. Details of these other processes and policies that users should be aware of can be found in the **Prohibited and Special Purchasing Processes** policy.

Examples include, but are not limited to:

- Catering
- Computer and tablet purchases
- Gifts and gift card purchases
- Sales taxes
- Software licensing
- Stationery
- Transactions between University departments (internal to DePaul)
- Used equipment

All transactions on the ProCard must be properly documented within the system in order to comply with DePaul policy and IRS rules. This includes documenting any credits/refunds and transaction fees. Some specific guidelines for documentation include the following:

- All transactions require a clearly stated business purpose (i.e. why the expense was needed to further DePaul's business).
- Travel expenses (including hotel stays, car rentals, transportation and conference registrations) also require the dates of the trip or event.
- Meals and entertainment expenses also require the names/titles/company/DePaul affiliations for all attendees.

Approving officials should review transactions to ensure they understand the nature of the cardholder's transactions, that they are for a valid university business purpose, and represent an appropriate use of university resources. As part of the review process, they should review receipts, transaction data, cardholder notes or any other relevant information as appropriate.

ProCard purchases must be approved online within 45 days of the transaction. Financial Activity reports must also be reviewed on a monthly basis to ensure posted ProCard transactions are correct. Itemized receipts are required to be scanned and stored in the online ProCard system for all transactions. The hard copy receipt may be disposed of once the transaction has been fully approved in the online ProCard system.

Cardholders may be held personally responsible for any inappropriate or unsubstantiated expenses and may be required to pay back the university. Expenses determined to be inappropriate and not reimbursed to the university will be considered taxable wages and are subject to appropriate withholding and reporting requirements. Misappropriation of university funds may also result in further disciplinary action, up to and including termination of employment.

Additional information can be found in the **Procurement Card (ProCard) Requirements** policy.

Vendor Selection and Competitive Bidding

Departments should take care when choosing a vendor to ensure that they are selecting one who is able to provide the best possible product or service for the university. Procurement Services maintains relationships with a variety of preferred vendors who have an agreement in place to provide lower costs, higher quality or other benefits over competitors and highly recommends utilizing these providers whenever possible.

When a preferred vendor is not able to meet needs, the department may select another provider. Factors that should be taken into account include: quality, price, services, delivery times, billing, ownership structure, stability, location and compatibility with the university's Vendor Selection Philosophy. Procurement is available to assist as needed in this process.

All new vendors must be authorized by Procurement or Accounts Payable prior to use. New vendors are required to fill out paperwork that is required by the IRS and other tax entities to determine their payment eligibility.

Purchases over \$25,000

If the total purchase or contract is over \$25,000, a competitive bid must be conducted and the basis for the vendor selection documented. This can be accomplished through either obtaining written quotes from multiple companies or through a formal process.

Purchases made from preferred vendors and approved purchasing cooperatives, as listed on the Procurement Services website, are exempt from the competitive bid process. Exceptions may also be given by Procurement Services, where the exemption would be in the best interest of the university.

Procurement is available to assist departments with the bid process. Procurement staff have expertise in running bid processes and various industries that can help to ensure the bid is properly conducted and able to stand up to scrutiny.

When conducting a bid, the following must be taken into account:

- No employee may participate in the selection or award if a real or apparent conflict of interest would be involved unless the Conflict of Interest policy is followed.
- Where feasible, vendors that assist DePaul with developing specifications, requirements, statements of work, or requests for proposals should be excluded from competing for the contracts to which the specifications, etc. pertain as they have insight that is not available to other bidders.
- Responses and other non-public information, including pricing, from bidders must be considered confidential and may not be disclosed to other bidders or vendors.
- Vendors participating in the competitive bid should be of comparable functional and technical levels in terms of ability to provide the required goods or services.
- The competitive bid must be distributed to an appropriate number of potential bidders, generally a minimum of three.
- All bidders and respondents must be given equal treatment. No one (including any incumbent vendors) should receive information that is not shared with all parties
- Evaluation criteria must be consistent for all vendors.

All bid documents for purchase must be kept on file as these records are subject to audit. For competitive bids that result in a purchase order or master agreement, documentation is required to be shared with Procurement Services.

For more information, visit the **Purchasing & Bidding Requirements** policies.

Equipment and Asset Disposal

The Salvage Program provides a way for university departments to safely and efficiently dispose of unneeded equipment. All assets purchased with university funds or obtained by a department because of its connection to DePaul (e.g. donations or grants), are the property of DePaul University and the university holds responsibility for their disposal.

All assets being disposed of must be authorized by Procurement Services. Departments are not authorized to dispose of their own equipment. Examples of assets that go through the salvage program include:

- Artwork
- Audio/visual equipment
- Phones
- Computers (desktops, laptops, tablets, monitors, printers, etc.)
- Furniture and appliances
- Vehicles

Small office supplies (e.g. binders, staplers, pens) can be disposed of per department procedures.

To dispose of equipment or assets no longer needed, a department must fill out an asset disposal form, available on the Procurement website. Procurement will then evaluate the items and determine if they should be re-deployed, discarded or sold.

Remember: You may not give away or donate university equipment or assets to either employees or non-university parties. You must go through Procurement to dispose of assets.

For more information, visit the **Salvage of University-Owned Equipment** policy.

Fixed Asset Management

A fixed asset is a tangible piece of property owned or leased by DePaul that will be used for the duration of more than one year. Fixed assets include, but are not limited to, buildings, building renovations, office furniture, computers and cell phones. Restricted Accounting should be contacted prior to purchasing fixed assets with grant funds as specific record keeping and approval may be required by the government or private sponsor.

Faculty and staff are responsible for stewardship of the fixed assets purchased or utilized by the departments/units they oversee. These responsibilities may include maintenance, safeguarding, inventorying, and

reporting on fixed assets that are disposed of, lost, damaged or transferred.

Procedures for determining appropriate fixed asset maintenance, safeguarding, and inventorying are outlined in detail in the Fixed Asset Management Policy. Faculty and staff should use reasonable judgment to determine whether fixed asset inventory procedures are necessary. Inventorying procedures are only necessary when the benefit of designing, implementing, performing, and documenting the procedures exceeds the associated costs. Fixed assets which are more essential, valuable, and/or easy to move are more likely to necessitate inventorying procedures. Inventorying procedures, when necessary, should consider the dollar value, type and use of fixed assets, and may include physical verifications, in-place verifications, or visual inspections.

Faculty and staff should contact the **Controller's Office** with department/unit specific questions related to fixed asset maintenance, safeguarding and inventorying procedures.

Additional information can be found in the **Fixed Asset Management** policy.

2. Human Resources (HR) Responsibilities

Recruitment

Job descriptions are required for all full-time and part-time positions within each area. New and replacement positions must be approved by the vice president or provost and then posted through the Human Resources Career website to begin the recruitment process.

When looking to hire a candidate for a full-time or part-time staff position, Human Resources (HR) has guidelines to assist with the recruitment process. Follow these guidelines to ensure compliance with the university's recruitment procedures.

At every step in the recruitment process, it is important that hiring managers work with their assigned talent acquisition consultant. A criminal background check, reference check and educational verification will be performed on all finalists. Hiring managers wishing to conduct reference checks are to

follow the procedures outlined in the Pre-employment Reference Checks and Educational Verification policy. Once a candidate has been selected for employment, only Human Resources can make the official job offer.

When looking to hire a candidate for a faculty position, the provost has a list of guidelines to assist in the process. Consultation with the faculty of the academic unit is required for the appointment of all full-time faculty and departmental chairs.

Remember: Regardless of what position you're hiring for, the university's equal employment policy and nondiscrimination standards must be followed.

Additional information can be found in the **Staffing and Selection of Full-Time and Part-Time Staff Positions** and the **Reference Checks and Educational Verifications** policies.

Employment of Relatives

Relatives of DePaul employees do not receive preferential consideration for employment at the university. Relatives may work in the same departments, though no individual will be employed in a department under the immediate supervision of a relative. Relatives are persons related by blood, marriage or legal procedure.

If a conflict occurs, attempts will be made to find a suitable position within the department or university where one of the employees may transfer. If no accommodations can be made, one of the employees may be asked to resign.

*Remember: Consult with **Human Resources** to ensure that a relative is not supervising or giving preferential treatment to another relative in your area.*

For additional information, visit the **Employment of Relatives** policy.

Form I-9

Human Resources sends all newly hired and rehired full-time staff (College Offices for full and part-time faculty) a Form I-9 to fill out prior to or on their first day of employment. A Form I-9 is required by the federal government. It verifies an individual's employment eligibility to work in the U.S. and must be completed within three business days of the date of employment.

To complete the Form I-9, employees must present original documents, not photocopies. The only

exception is a certified copy of a birth certificate. Either HR or the designated agent must review the employment eligibility and identity documents presented by the employee and record the document information on the form.

An employee who fails to produce the required document(s), or a receipt for a replacement document(s) (in the case of lost, stolen or destroyed documents), within three business days of the date employment begins, can be terminated. An employee who shows a receipt has ninety days to present the original documents.

The **Office of Student Employment** is responsible for ensuring that student employees complete the form prior to or on their first day of employment.

Introductory Period

All newly hired, rehired and part-time staff members who move to full-time positions, student employees, and student employees who move to part-time/full-time staff positions are required to serve six months of continuous employment in an introductory period. Employees are not subject to progressive discipline during the introductory period. An introductory period is not required for promoted or transferred staff members. Managers are required to utilize the introductory period to train and evaluate an employee's effective adjustment to work task, conduct, procedures, attendance and job responsibilities.

Managers may consider requesting an extension to the introductory period for employees whose performance is unsatisfactory during the initial introductory period, to allow additional time to satisfactorily meet conduct and/or performance expectations. One-time extensions of the introductory period are approved by **Employee Relations & Engagement** and are granted up to a maximum of three months.

Additional information can be found in the **Introductory Period** policy.

Time Reporting

Budget Managers have the following responsibilities with respect to time reporting:

- Reviewing available departmental reports on a monthly basis to ensure department staff have accurately reported all hours worked, paid time off, and paid absences

Additional responsibilities for budget managers with non-exempt direct reports include:

- Ensuring that each of their direct reports

understands and complies with the Time Reporting policy, including provisions that non-exempt employees seek advance approval prior to working off university premises (e.g. working remotely) and before working overtime

- Reviewing reported time of their non-exempt direct reports to ensure accuracy and approving timesheets in a timely manner according to payroll processing deadlines.

All hours worked by non-exempt employees (full-time staff, part-time staff, and student employees) must be reported and paid. Non-exempt employees may not receive compensatory time off (receive time off with pay in lieu of overtime pay), nor forfeit their unpaid, required lunch period in order to work a shorter work day. Supervisors may not falsify timesheets by adding hours to reward employees.

Non-exempt and exempt staff are required to report all paid time off and paid absences for which they are eligible, including sick time, using the appropriate time reporting code

Additional information can be found in the **Time Reporting** policy.

Benefits

Time-off Benefits

These benefits include the following types of permitted time off:

- Holidays and vacation time
- Time off to help employees meet personal and civic responsibilities
- Time off for personal health reasons and family care-giving

Holidays and Vacation Time

All full-time staff employees accrue vacation time each calendar year that can be used for taking time off from work. The university also observes several holidays providing additional time off for employees.

Time Off to Help Employees Meet Personal and Civic Responsibilities

The university's **Paid Absence** policy allows employees time off for civic responsibilities, death or serious illness in the family, and for other personal emergencies. Management notification and approval is required for certain types of paid time off.

Time Off for Periodic Personal Health Reasons and Family Care-giving

The university provides employees with time off for

periodic as well as long-term health and family care-giving needs.

For work related illness or injury, please contact Compliance & Risk Management by email at InsuranceClaim@depaul.edu.

Family Medical Leave Act and Short-term Disability

All eligible employees are provided with job protection for periods of absence (continuous or intermittent) of up to twelve weeks per rolling twelve month period for the following situations:

- A serious health condition of an employee
- A serious health condition of an immediate family member of an employee (child, spouse or parent)
- The birth and care of a child or the placement of a child with an employee for adoption or foster care

Other Leaves: Personal, Military and Faculty Research

At the university's discretion, personal leaves of absence may be granted for unusual or extreme circumstances for up to a maximum of three months. Examples include personal or family needs of a serious and urgent nature, educational opportunities and professional development.

Faculty who are interested in a leave of absence should consult the **DePaul University Faculty Handbook**.

Work-Life Balance

DePaul University offers a range of policies and programs such as flexible work scheduling and voluntary reduced work time to help eligible faculty and staff effectively balance the responsibilities of work with personal and family commitments and activities.

Employee Assistance Program (EAP)

The university employee assistance program provides convenient, confidential access to counseling, online educational resources and information. Call center and short term counseling experts can help employees and/or their immediate family members.

Employees may speak with a counselor or schedule an appointment by calling 1-800-621-4124 anytime. Wellness and educational materials are available at: www.guidanceresources.com

The Organization Web ID is **EAP4DPU**.

Additional information can be found in the following policies:

- Time-Off Benefits: Paid Holidays and Absences, Vacation, Personal Leave of Absence, Military Leaves
- Work-Life Balance: Flexible Work Arrangements, Voluntary Reduced Work Time (V-Time)

Student Employees

The Office of Student Employment should be consulted about questions regarding on-campus student employment. Student Employment handles student employment policies and procedures governing job postings/descriptions, hiring, employment paperwork, supervision, retention, disciplinary issues and terminations of student employees on campus.

Student employees must meet and maintain specific requirements concerning university enrollment and work hours. During the school year, student employees are restricted by both DePaul policies and federal government regulations. Managers must be familiar with and ensure compliance with the various classifications of student employees and the applicable university policies.

Work Hour Requirements for On-Campus Student Employment

U.S. citizens/permanent residents

U.S. citizens and permanent residents are eligible to work no more than **25 hours a week** during the school terms. These students are eligible to work up to full time during the school breaks.

Non-U.S. citizens/non-permanent residents

(International students in F-1 and J-1 non-immigrant visa status)

International students (non-U.S. citizens/non-permanent residents) holding lawful a non-immigrant F-1 or J-1 student visa status are limited to working **20 hours or less per week** on-campus during the regular academic year (i.e. fall, winter and spring quarters; fall and spring semesters). These students are eligible to work more than 20 hours per week on-campus during breaks between regular academic year quarters or semesters and during annual vacation periods, provided they have not yet completed their degree program requirements, will continue full-time enrollment during the next available academic quarter or semester, and have received confirmation from International Student and Scholar Services (ISS).

International students who work in excess of the allowable hours per week on-campus may lose lawful non-immigrant student visa status and risk serious long-term immigration consequences.

Managers should confirm with the ISS that a student is taking his or her period of annual vacation prior to authorizing more than 20 hours per week of on-campus employment.

Enrollment Requirements for On-Campus Student Employment

U.S. citizens/permanent residents

U.S. citizens and permanent residents must be enrolled at least half-time for a minimum of six undergraduate credit hours a quarter (six hours a semester for College of Law, and four hours for graduate students) to be employed by the university as a student employee.

Non-U.S. citizens/non-permanent residents

(International students in F-1 and J-1 non-immigrant visa status)

International students (non-U.S. citizens/non-permanent residents) with a non-immigrant F-1 or J-1 student visa status must be enrolled full-time. Full-time enrollment (see table below) is mandated by United States Citizenship and Immigration Services (USCIS).

Non-U.S. citizens/non-permanent residents

(students with other visa status)

Other international students' employment eligibility will be pre-determined by their visa status in accordance with federal regulations. Contact the **Office of Student Employment** for guidance regarding student employment eligibility.

Remember: Managers should verify student schedules every quarter to ensure compliance with enrollment requirements.

Enrollment Requirement	Students (U.S. Citizen)	International Students
	Half-time	Full-time
Undergraduate	6 credit hours	12 credit hours
Graduate	4 credit hours	8 credit hours
Law	12 credit hours	6 credit hours

Taxes

Certain tax rules apply to student employees as well. In general, while classes are in session, students do not have to pay FICA (Social Security and Medicare) taxes. However, during breaks, the tax exemptions do not apply. The tax treatment of international students can also vary.

Remember: If students have questions about their tax treatment, direct them to the Payroll Office at (312) 362-8692.

Hiring Procedures

1. A Student Employment Action Form (SEAF) must be completed for any student employment change (i.e. new hire, salary change or position transfer).
2. The student must deliver the SEAF in person to the OSE.
3. The student must report to the OSE on or before the first day of employment. If the student is not currently working on campus in another student employment position, the student must complete section 1 of the Form I-9 and other appropriate hiring paperwork (including federal & state tax forms).
4. The student must be able to present document(s) from the List of Acceptable Documents on the Federal Form I-9 (www.uscis.gov/files/form/I-9.pdf) that verify identity and eligibility to work in the U.S. within three days of the date employment begins. Only original documents are acceptable, with the exception of a certified copy of a birth certificate. If the Form I-9 has not been completed, the student employee may not work.
5. Completed hiring paperwork will be submitted to Human Resources for processing.
6. For payment dates, consult the payroll processing calendars on the Financials Affairs website.

Troubleshooting

The student must stop working if the Form I-9 is not completed within 3 business days of the date employment begins. The student may not resume working until the Form I-9 is completed.

Additional information can be found in the **Student Employee Eligibility - Enrollment Status** and the **Student Employment Eligibility - Work Hours** policies.

Drug-Free Workplace and Legal Drinking Age Compliance

As an institution receiving federal financial assistance, DePaul University distributes to faculty, staff, students, and others this public policy statement certifying its compliance with the Drug Free Workplace Act and the **Drug Free Schools and Communities Act**.

The State of Illinois prohibits the sale, use, or possession, of alcoholic beverages by persons who are under 21 years of age. Alcohol may be served to those of legal age at university events, including classes. Event sponsors are responsible for having adequate control measures in place to ensure that:

- persons under 21 years of age are not served alcohol and
- persons who are obviously intoxicated are not served alcohol.

The responsibility for compliance with these requirements and all requirements in any other relevant policies related to serving alcohol at university events rests with the event sponsors.

The following actions are prohibited on any premises owned or controlled by DePaul University:

- Unlawful possession, use, distribution, dispensation, sale or manufacture of any controlled substances prohibited by State law, federal law, or other applicable law
- Unlawful possession, use, distribution, dispensation, sale or manufacture of any related drug paraphernalia in violation of State law, federal law, or other applicable law
- Unlawful possession, use, distribution, dispensation, sale or manufacture of alcohol by or to minors

Compliance with this policy is a condition of continued employment. Violation of this policy may subject employees to disciplinary action, up to and including termination.

Employees are expected to report to work fit for duty free of any adverse effects of alcohol or any drugs prohibited by State law, federal law, or other applicable law. Illegal drug use or alcohol use in violation of this policy or which could jeopardize the safety of other employees, the public or university property may subject employees to disciplinary action, up to and including termination. The university will assist and support employees who voluntarily seek help for alcohol or drug related problems before

becoming subject to discipline and/or termination. University employees who violate this policy also may be required to participate in and complete an alcohol or drug abuse assistance/rehabilitation program as a condition for continued employment. DePaul University encourages any employee who has a drug or alcohol problem or a related difficulty, either on or off campus, to seek help through the university's **Employee Assistance Program (EAP)**. The EAP provides confidential referrals to drug or alcohol treatment programs and counseling. Employees also may be allowed to use accrued paid time off, be placed on a leave of absence, or be otherwise accommodated as required by law.

This policy does not prohibit employees from the lawful use and possession of prescribed medications, but only to the extent that it does not otherwise violate this policy and does not impair job performance or threaten safety, health, security or property.

State and federal law prohibit the manufacture, possession, use, or distribution, of illegal drugs. Use of alcohol by persons under 21 years of age is illegal under state law. Violations of state or federal law may result in arrest and conviction on charges of misdemeanor or felony offense. An employee must notify the following people of any criminal drug statute conviction for a violation occurring in the workplace within five days of the conviction:

- Staff members – his/her supervisor and either an employee relations & engagement representative or the vice president of Human Resources
- Faculty members–his/her supervisor (appropriate department chair or dean) and either an employee relations & engagement representative or the vice president for Human Resources
- Student employees – his/her supervisor and career center associate director for Student Employment

Additional details can be found in the **Drug-Free Workplace and Legal Drinking Age Compliance** policy.

Performance Appraisals

Staff performance appraisals must be conducted annually by DePaul staff who supervise part-time and full-time employees. An introductory performance appraisal is required for all full-time and part-time staff prior to the completion of six months of service.

Performance appraisals for full and part time staff consist of a review of results on goals, results on job responsibilities, and demonstration of DePaul's core employee and managerial behaviors. At the beginning of the performance cycle, supervisors and employees should agree upon the employee's goals, clarify expectations of employee job responsibilities, and review DePaul's core employee and/or managerial behaviors. Supervisors and employees should discuss elements of performance (i.e. progress toward goals, performance of job responsibilities and employee behavior) regularly over the performance cycle so both develop a shared understanding of expectations and, if necessary, take corrective action. At the conclusion of the performance cycle, supervisors and employees participate in a formal performance appraisal process available at **Campus Connect/Self Service/ Performance Management**.

Managers who supervise full and part time employees are required to participate in the Human Resources Management Performance training series: 1) Getting Off to the Right Start, 2) Getting Better Every Day, and 3) Making the Most of Annual Reviews.

Information on all three courses can be found at: hr.depaul.edu/performance/index.html. This series prepares managers to support employees in enhancing their performance and encouraging development in ways that reflect DePaul's values.

For more information about performance appraisals at DePaul, visit the **Performance Management and Appraisal** policy.

Incentive Compensation Restrictions

The university desires to attract, retain and motivate faculty and staff through its total compensation system that includes merit increases for overall performance assessments on employee annual performance appraisals that meet or exceed expectations. It also has established mechanisms to identify and reward distinctive and exceptional achievements by university employees that significantly contribute to university or departmental initiatives, exceptional customer service, or ideas that improve operational efficiency.

The **Higher Education Act** (HEA) prohibits payments (i.e. commission, bonus or other incentive payment) based in any part, directly or indirectly, upon success in securing enrollments or the award of financial aid, to any person or entity who is engaged in any student recruitment or admission activity, or in

making decisions regarding the award of Title IV HEA program funds. This includes merit increases, Staff Recognition Awards, Discretionary Staff Awards and Additional Pay (one-time payments for short-term projects) that are based, directly or indirectly, on factors prohibited by the HEA. Violations of this rule can result in penalties, fines and the loss of federal financial aid.

Managers with questions regarding whether a payment falls within the HEA's definition of a prohibited payment should contact **Human Resources**.

Personnel Records Access

Personnel records are confidential and access is limited. Current employees may review aspects of their personnel records in accordance with the Illinois Personnel Record Review Act twice per calendar year. An employee who wants to review his/her personnel record must complete the Request to Inspect Personnel Records Form and submit to Employee Relations & Engagement for approval.

Managers must complete the Request to Inspect Personnel Records form and submit to Employee Relations & Engagement for approval to view personnel record information of employees they supervise as the business needs warrant.

Additional information can be found in the **Personnel Records Access** policy.

Termination Process

When an employee voluntarily chooses to leave his/her employment with DePaul, managers are responsible for submitting a timely termination request to ensure the coordination of benefit, final paycheck, security and additional details as described in the Manager Termination Checklist. Termination requests are submitted through Manager Self Service > Terminate Employee in PeopleSoft.

An involuntary staff termination occurs when a manager decides to release an employee of his/her duties and in all cases has consulted with an Employee Relations & Engagement representative. Student employment involuntary terminations are managed through the Office of Student Employment. Faculty involuntary terminations are addressed by the Provost's Office and part-time faculty terminations are addressed by their respective colleges/schools.

Americans with Disabilities Act

The **Americans with Disabilities Act (ADA)** prohibits discrimination against qualified persons with disabilities in employment practices such as hiring, promotion, termination, compensation, training, benefits and all other terms and conditions of employment. It also requires reasonable accommodation in employment to qualified individuals with disabilities.

A reasonable accommodation is a change or adjustment to a job or work environment that permits a qualified individual with a disability to perform the essential functions of a job or to enjoy the benefits and privileges of employment equal to those enjoyed by individuals without disabilities.

Requests for reasonable accommodations should be directed to the **Office of Human Resources**. An Employee Relations & Engagement representative, the manager and the individual requesting the accommodation will work in partnership to determine an appropriate and effective reasonable accommodation.

Remember: Any information regarding an employee's physical or mental disability must be kept confidential, except to inform managers and others on a need-to-know basis regarding work restrictions and safety concerns.

Additional information is available in the **Accommodation Policy; Disability and Pregnancy** policy.

Consultants

To the extent possible, university activities should be carried out using current DePaul employees. When consultants or independent contractors are necessary, contact **University Tax Services** or the **Accounts Payable** department for assistance in determining if a service provider should be paid as an employee or independent contractor based on **Internal Revenue Service (IRS)** guidelines. University Tax Services or the Accounts Payable department should be contacted before the individual begins performing services.

For additional issues on hiring consultants outside the U.S., contact University Tax Services, the Accounts Payable Department or the **Payroll Department**, and visit the Accounts Payable website, Understanding Regulatory, Tax, and Compliance Requirements, and Payments to Non-US Persons.

For additional requirements for use of independent contractors or consultants for grants, contact the **Restricted Accounting Department** and the **Office Research Services**.

A formal written contract, signed by both parties, must be in place for all independent contractor and consulting agreements, unless the agreement is for less than \$1,000 and is not a Special Risk Contract (as defined in the Contract Requirements and Procedures Policy). Standard pre-approved contracts are available. If a standard, pre-approved contract template is used, formal written contracts for independent contractors under \$50,000 and not a Special Risk Contract, do not require OGC review.

Remember: University Tax Services or the Accounts Payable Department can help in determining if someone can be paid as a consultant or independent contractor before work begins.

Additional information is available in the **Use of Independent Contractors/Consultants** and the **Contract Requirements and Procedures** policies.

University Sponsorship of Foreign Nationals

DePaul, under certain circumstances, sponsors foreign nationals for temporary employment-based visas and/or for lawful permanent residency. Consideration for such sponsorship requires an initial request by the appropriate department chair or department supervisor, and must be seconded by the dean or the appropriate vice president. Approval of sponsorship requests are made by the university's immigration attorney, acting under the authority of the **General Counsel**. The university, however, is not legally obligated to sponsor or otherwise financially assist any foreign national for employment authorization in the United States.

Additional information is available in the **University Sponsorship of Foreign National Employees** policy.

3. Information Responsibilities

Information Security Policy

The Information Security Policy helps ensure the security, availability, privacy and integrity of DePaul's information systems, networks and data. It also outlines the procedures for reporting breaches of information security and ensuring compliance with various federal and state laws.

Every member of the DePaul community must report all information security breaches and any loss or improper use of DePaul data, systems or devices.

- To report such breaches or losses, managers should contact Information Security at: securityabuse@depaul.edu
- If health-related information is involved, DePaul's Health Information Security and Privacy policy must also be followed.

Managers must also ensure proper oversight of outside service providers with access to confidential DePaul data. DePaul's contracts with these outside service providers must be reviewed by the Office of the General Counsel, regardless of dollar amount or contract duration. Before releasing data to a service provider, managers must work with the director of Information Security to confirm that the service provider can maintain protective data safeguards.

Remember: Regardless of the dollar amount involved, before sharing any DePaul data with an outside party, a contract must be entered into and reviewed by the Office of the General Counsel and the director of Information Security must be consulted.

Additional information is available in the **Information Security** and **Health Information Security and Privacy** policies.

Passwords

Every employee is responsible for maintaining the confidentiality of his or her own password. Passwords are one of the main mechanisms guarding confidential and critical information on the university's systems. Do not share passwords with others or write them down. To ensure security, it is recommended that employees change their passwords every 90 days. It is recommended that users with access to confidential data change their passwords

at least once every 60 days. Managers who violate security policies by sharing their passwords will be held accountable for actions taken under their User ID. DePaul passwords should not be used for external accounts, as this could put DePaul systems at risk.

Remember: Passwords must be a minimum of eight characters in length. They must contain at least one numeric and one special character. To ensure it cannot easily be guessed, avoid using passwords close to your name, family members' names or other obvious choices.

Access to and Responsible Use of Data

Information resources, including any accessible data, can only be used for legitimate educational or business purposes for the university.

Remember: Access to internal-sensitive data is granted only by the written authorization of the appropriate data steward and upon completion of a request for data access.

Additional information can be found in the **Access to and Responsible Use of Data** policy.

Securing Privacy of the Student Record

DePaul complies with the **Family Educational Rights and Privacy Act (FERPA)**. This act protects the privacy of student education records and is required of all schools that receive funds from the U.S. Department of Education (e.g. student financial aid).

Managers are responsible for ensuring that employees within their area follow the FERPA policy in regards to the access, maintenance, security and disclosure of the students' educational records. In addition, managers are responsible for requesting, signing off on, and monitoring their direct reports' access to student information in all formats, including but not limited to, the student data system, network files, paper files, etc. and ensuring it is appropriate to their professional responsibilities. Once a person is no longer employed in a position that requires access to student data, the manager should take necessary steps to ensure the prompt removal of access.

The unauthorized access of and inappropriate release of information from the student educational record is a violation of FERPA and university policy.

FERPA violations must be reported to one or more of the following areas:

- Associate Vice-President, Enrollment Services: pluff@depaul.edu
- Compliance and Risk Management: compliance@depaul.edu
- Anonymous hotline: (877) 236-8390 or www.depaul.ethicspoint.com

Remember: You are responsible for ensuring the confidentiality of data and the privacy of individuals at all times.

Additional information is available in the **FERPA** and **Access to and Responsible Use of Data** policies.

Business Continuity

Managers should ensure that their mission-critical information is backed up on a regular basis and recovery procedures for that information are established. If an area has department-specific servers, software or databases housed within their department, IS advises creating a plan to recover these services in the event of a disaster. For example, keep a copy of the software and databases offsite, and document plans for replacement of any necessary equipment.

Records Management

In order to keep DePaul University's records information secure and in alignment with local, state, or federal guidelines, the Department of Records Management works with managers to assist in complying with the Records Management policy. Managers are responsible for understanding the policy and applying the Records Retention Schedule, a matrix that details retention and disposition of official records.

Managers must regularly communicate with the records coordinator for their area. Records Coordinators serve as a liaison between the Department of Records Management and a particular area, working together to effectively implement the Records Management policy. Managers must notify either their department's records coordinator or the Department of Records Management if changes or additions are necessary for their area on the Records Retention Schedule. Managers are also required to ensure that any records or information containing covered data as defined in DePaul's Information Security policy are retained and destroyed in a confidential manner as outlined in the policy. Finally, managers are responsible for following established protocols for the destruction of records as detailed in the Records Management policy.

Additional information can be found in the **Records Management** policy.

Legal Hold and Record Preservation

Under certain circumstances, including when legal action involving the university is commenced or reasonably anticipated, the university must preserve all documents and information, including electronically stored information, that may be relevant to the matter.

As soon as the **Office of the General Counsel (OGC)** is made aware of circumstances giving rise to this obligation, a "Legal Hold" directive will be issued to the key record custodians.

The Legal Hold directive overrides any records retention or destruction cycle that may have otherwise required or allowed for the transfer, alteration, disposal or destruction of documents and information. Once a Legal Hold directive has been issued, documents and information subject to the Legal Hold may not be transferred, altered, disposed, or destroyed until the Legal Hold is removed by the OGC.

Individuals who have been notified of a Legal Hold may not alter, dispose of, transfer or destroy any document or information that falls within the scope of the Legal Hold. Violation of the Legal Hold may subject the individual to disciplinary action, up to and including dismissal for employees, as well as potential legal sanction by the applicable court or law enforcement agency.

For more information, visit the **Legal Hold and Record Preservation** policy.

External Communications

Unless specifically designated to speak on behalf of DePaul, managers should refer media Inquiries to DePaul's Office of Public Relations and Communications: (312) 362-8591.

Copyright

Copyright permission must be obtained before copyrighted material can be reproduced and disseminated by any DePaul faculty/staff member or DePaul affiliated bookstore. It is recommended that DePaul Print and Mailing Services be used to obtain copyright permissions. The university bookstores are the only authorized locations for the sale of copyrighted materials.

Additional information can be found in the **Copyright and Fair Use** policy.

Establishing a University Policy

Policies and procedures are created and regularly reviewed by the university to guide members of the DePaul community in the conduct of university business. Some policies and procedures are legally mandated, while others are developed based on experience and higher education standards. The **Office of the Secretary** must be contacted to coordinate the policy approval process.

Individual schools, colleges and departments may also establish unit-specific policies and procedures as long as they do not conflict with any university policies and procedures. These policies and procedures must always be made public to the members of the unit.

Faculty Council has responsibility for the university's academic policies, and the Student Affairs Division has responsibility for policies affecting student life.

Remember: Contact the Office of the Secretary if a new policy is needed, or if an existing policy is in need of revision.

More information can be found in the **Establishing a University Policy** policy.

University Endorsements

Using the DePaul name in conjunction with an event, project or publication implies a close connection with the university, such as sponsorship or an endorsement. Before using the DePaul name, approval should be obtained from the associate vice president for Marketing Communications.

Remember: Members of the DePaul University community have a responsibility to protect its name.

Additional information can be found in the **Endorsements** policy.

4. Community Responsibilities

Professional Conduct

Managers are responsible for carrying out their duties and responsibilities in accordance with DePaul's mission, which includes conducting business in an ethical and professional manner, safeguarding DePaul's resources and treating others with dignity and respect.

DePaul's Mission Statement can be found on the **Office of Mission and Values** website.

Equal Employment Opportunity (EEO)

DePaul provides equal employment opportunities through the recruitment and selection of new employees, promotions, transfers, compensation, training, benefits, terminations and other terms and conditions of employment. Every university employee must carry out this policy within the scope of his or her position.

For additional information, see the **Staffing and Selection of Full-Time and Part-Time Staff Positions** policy.

Anti-Discriminatory and Anti-Harassment Policy and Procedures

No person affiliated with DePaul will be the object of discrimination or harassment on the basis of race, color, ethnicity, religion, sex, gender, sexual orientation, national origin, age, marital status, parental status, family relationship status, physical or mental disability, military status or other status protected by local, state or federal law, in its employment or its educational settings.

Supervisors at DePaul are responsible for relaying all complaints of alleged discrimination or harassment to the **Office of Institutional Diversity and Equity**, regardless of whether the complainant expects the alleged incident to be reported. The Office of Institutional Diversity and Equity is responsible for receiving, processing and resolving complaints of discrimination or harassment. Complaints will be treated with discretion and will be promptly and thoroughly investigated.

If a student alleges harassment against another student, the complaint must be reported to the

associate vice president of Advocacy and Community Relations in the **Division of Student Affairs**.

Complaints of discrimination and harassment are taken seriously by the university. Anyone who knowingly makes false allegations may be subject to disciplinary actions, including, but not limited to reprimand, suspension and/or termination.

Remember: As a manager, you are required to report any sexual harassment complaints to the Office of Institutional Diversity and Equity.

Additional information can be found in the **Anti-Discrimination and Anti-Harassment Policy and Procedures** policy.

Reporting Misconduct

Employees with supervisory or fiscal responsibility have a responsibility to report conduct related to university activities or business that violates civil laws, university policies or DePaul's Code of Conduct. Community members who do not have supervisory or fiscal responsibilities are strongly encouraged to also report such conduct.

Individuals who knowingly make intentionally false or purposefully misleading allegations of misconduct will be subject to appropriate disciplinary action, which may include termination of employment.

Depending on the nature of the misconduct, there are a variety of reporting avenues available to community members. An anonymous hotline is also available as a means of reporting misconduct in situations where a member of the university community fears reprisal, embarrassment, or for other reasons does not feel comfortable utilizing normal reporting channels.

Individuals seeking to report misconduct can direct their concerns to the appropriate office below or utilize the anonymous hotline.

- Compliance & Risk Management:
(312) 362-6880
- Internal Audit Office:
(312) 362-8392
- Office of Institutional Diversity and Equity:
(312) 362-6872
- Human Resources: (312) 362-8500
- Public Safety Office: (312) 362-8400,
(773) 325-7777
- Misconduct Reporting Hotline:
(877)236-8390
- Web intake site: www.depaul.ethicspoint.com

The university ombudsperson is available for confidential consultation with members of the community about the nature of the misconduct and reporting options. Such confidential consultation, however, does not provide notice of alleged misconduct to the university and does not satisfy an individual's reporting responsibility. The Ombudsperson Office number is (312) 362-8707. Additional information can be found in the **Reporting Misconduct** policy.

Non-Retaliation

In accordance with the university's Reporting Misconduct policy, no person, including parties and witnesses, who, in good faith, reports or participates in a misconduct investigation at DePaul shall be subject to retaliation or threat of retaliation. Any act of retaliation constitutes reportable misconduct and is subject to appropriate disciplinary action, which may include termination of employment.

Additional information can be found in the **Non-Retaliation** policy.

Conflict of Interest

All employees have a responsibility to protect DePaul's interests, assets and resources by properly handling conflicts of interest (COI). A COI, or the appearance of a COI, exists when a university employee has an interest which could influence the employee's ability to act in the best interest of the university. A COI can be present even if no unethical or improper action results from the conflict. In most instances, COIs can exist in the normal course of university business without negative effects, when properly disclosed or managed. Proper disclosure and management of COIs protect the employee and the university from financial and reputational harm.

Any employee who has a COI or the appearance of a COI must either (1) refrain from involvement in the matter, or (2) disclose the conflict to his or her supervisor so it can be evaluated. Examples of potential COIs include:

- Purchasing decisions — accepting gifts from vendors, or purchasing goods or services from a relative or an organization in which the employee has a financial or management interest
- Outside work — working for another organization that interferes with work at DePaul
- Use of DePaul's resources (such as excessive use of telephones, photocopiers, supplies,

equipment or Internet) for personal use or outside work.

- Receiving compensation or royalties for a publication which the employee authored and used in a DePaul academic course.
- Awarding or disbursing financial aid funds to any student who is personally known to the employee.

Employees seeking governmental grant funding are required to comply with governmental policies on conflict of interest. Employees should review the Conflict of Interest in Externally Sponsored Projects policy and contact the university's Office of Sponsored Programs and Research for guidance on additional requirements and compliance forms. *Remember: All employees should be familiar with the Conflict of Interest policy and any conflict of interest should be reported via the Certificate of Compliance.*

For additional details, go to the **Conflict of Interest** policy.

Contacts with Public Officials

All contacts with public officials made on behalf of DePaul University must first be cleared with **Office of Community and Government Relations**. This applies to contacts with publicly elected officials and most administrative agencies at federal, state and local levels.

"Contacts" is defined as all invitations to attend or participate in DePaul-sponsored events (on or off campus), or requests for appointments, telephone calls or written correspondence with legislative or senior executive officials made on behalf of DePaul regarding legislation, rules, funding or policies.

In addition, student organizations that would like to contact public officials must first contact the Student Life Office, which then works with the Office of Community and Government Relations when appropriate.

Remember: This policy does not apply to personal matters unrelated to an individual's employment or university responsibilities at DePaul. When contacting public offices as a private citizen, however, it is not appropriate to utilize DePaul letterhead, email, computers, telephones, fax machines, photocopiers, or other DePaul supplies.

Additional information is available in the **Contacts with Public Officials** policy.

NCAA Athletics Compliance

As a Division I member of the National Collegiate Athletic Association (NCAA) and the Big EAST Conference, DePaul University is responsible for compliance with the rules both organizations set forth. While the Athletic Department is responsible for compliance with the majority of these rules, it is also responsible for educating university staff on rules regarding enrolled student-athletes and contact with prospective student-athletes.

Student Athletes

- Student-athletes should be treated in the same way as other students and may not receive any "extra benefit" generally not available to all students. Student-athletes should not be provided cash, loans, or gifts of any kind, including birthday or holiday gifts by faculty or staff.
- Student-athlete amateurism rules also come into play with regard to faculty and staff. In the context of the university setting, the use of a student-athlete's name or likeness to promote commercial entities is expressly prohibited, and images of student-athletes may not be used for any university or other publication without the express permission of the Media Relations Office within the Athletics Department.

Prospective Student-Athletes (High School and Junior College Students)

- Off-campus recruitment of prospective student-athletes is limited to coaches and Athletic Department staff. Other DePaul faculty and staff may become involved in the recruitment of prospective student-athletes when the prospect is visiting one of DePaul's campuses. Under NCAA rules, a prospective student-athlete is a person who has begun ninth-grade classes, and in some cases may include students who are even younger.
- Recruiting restrictions also extend to prospective student-athletes' friends, families and coaches. If a faculty or staff member encounters a coach or an Athletic Department staff member with a prospective student-athlete or his/her family member, other than on campus as noted above, he or she should be aware that any communication in excess of a greeting is not permissible per NCAA rules.
- Faculty and staff may not provide free or discounted tickets or transportation to any games or events to prospective student-athletes or their friends, family or coaches.

For more information, visit the **Athletics Department's compliance website**.

Guiding Principles on Speech & Expression

These guiding principles are intended to serve as an overarching guideline to speech and expression at DePaul and to the development of university policies and procedures related to speech and expression. Several current university policies and procedures set forth specific standards for conduct in a variety of circumstances that could involve speech and expression. Community members are encouraged to consult the university policies and procedures website for information concerning specific policies. To view the guiding principles in their entirety please visit the **Office of the Secretary's website**.

5. Workplace Safety Responsibilities

Emergency Response

It is a manager's responsibility to ensure that everyone in his or her reporting line knows and follows DePaul's emergency and evacuation procedures. The emergency response process varies in each building at each of the different campuses. Budget managers or someone within a department or area must research the evacuation procedure of their work area, floor and building, then pass along the information to everyone in that area. However, in the event of a fire alarm in any DePaul building, all individuals must evacuate the entire building. (This does not apply to the 55 E. Jackson building where there are specific procedures in place for evacuating the building or floors involved in an emergency situation.) Always use stairwells in a fire; elevators should never be used.

If an employee or visitor experiences a medical emergency, managers should call 911 and then contact Public Safety. All accidents that occur on university property, whether life threatening or not, must be promptly reported to Public Safety so that an accident report can be completed.

Individuals who have difficulty evacuating the building because of a disability should self-identify to the assistant director of DePaul Public Safety at (773) 325-4414. Those who work at 55 E. Jackson should self-identify with building management.

Remember: Maintaining an awareness of emergency and evacuation procedures, and responding to them around you.

For more information, go to the **Emergency Procedures and Communication** and the **Fire Alarm Response** policies.

Crime Reporting and Clery Act Compliance

The university, through its Public Safety Office and in concurrence with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, will uniformly and consistently report all serious crimes on campus to the proper municipal authority and provide statistics on these crimes in its Annual Safety and Security Information Report and Fire Safety Report.

The Clery Act also identifies and defines Campus Security Authorities (CSA) as university faculty and staff members with significant responsibility for student and campus activities. Some examples of CSAs could include Public Safety Officers, deans, directors, department heads, athletic coaches, student organization advisors, residence hall staff and student affairs staff.

A letter is sent semi-annually to individuals identified as CSAs reminding them of their responsibilities. All crimes reported to CSAs will be reported to Public Safety in a timely manner.

If a crime reported to a CSA is a threat to the community, the CSA must promptly report this information by dialing 911 and then report the crime to Public Safety as soon as possible at ext. 5-7777 at the Lincoln Park Campus and at ext. 2-8400 at the Loop Campus.

Once informed of a crime, DePaul University is committed to assisting the victim to feel safe, secure, and free from further harm. The University will make all attempts to provide a calm and supportive environment for the victim.

Except as noted below, DePaul Public Safety officers will report all felonies and serious misdemeanors, which are reported to them or they observe or view, to the Chicago Police Department ("CPD") via 911 as soon as possible, regardless of whether the victim/complainant wishes to cooperate in the investigation or has a change of mind about reporting the crime. If the victim/complainant leaves the scene and/or refuses to talk to CPD or DePaul Public Safety, the

Public Safety reports should indicate so and Jane and/or John Doe can be substituted if names are not known. The supervising Public Officer will also be notified and report to the scene to assist in the investigation.

In cases involving sexual violence, in general, a survivor may choose whether or not to file a report with local law enforcement. Public Safety will assist a survivor in filing this report if they choose to do so. If they choose not to file a report with local law enforcement, they may still file a report with DePaul Public Safety. As noted above, this report with DePaul Public Safety may be confidentially filed as Jane Doe or John Doe report.

In certain very narrow circumstances involving sexual or relationship violence, Public Safety may be required to contact local law enforcement or other authorities; for example, if a crime is in progress or if minor child is involved in the situation.

If a report includes information about crimes or other behaviors detailed in the Sexual & Relationship Violence Prevention and Response policy, the requirements of that policy will also apply.

For lesser misdemeanors against DePaul University, e.g. minor damage to property, the Public Safety Officer will check with his/her supervisor concerning reporting to CPD.

For lesser misdemeanors perpetrated against a person (student, staff, faculty, visitor), the victim should be encouraged and assisted by Public Safety to report the Crime to CPD. If the victim refuses to notify the police, Public Safety will indicate “victim refuses” in the report and report it to the CPD if warranted or deemed advisable by the Director of Public Safety. Crimes that occur off-campus should be reported to local municipal authorities and Public Safety. DePaul partners with CPD regarding crimes that occur off-campus involving students.

The **Illinois Abused and Neglected Child Reporting Act** (325 ILCS 5) mandates that all university personnel who have reasonable cause to believe that a child under the age of 18 known to them in their professional or official capacity may have been subjected to physical or sexual abuse, may be at risk of physical or sexual abuse, or is being deprived of the proper or necessary care are required by law to immediately report such mistreatment to the **Illinois Department of Children and Family Services**

(“DCFS”) by calling DCFS’ child abuse hotline at **1-800-25-ABUSE**.

As mentioned above, employees who report an incident to DCFS may also be required to report the matter to Public Safety pursuant DePaul’s other crime reporting guidelines. However, mandated reporters are individually responsible for ensuring that certain conduct is reported directly to DCFS and reporting this conduct to DePaul Public Safety alone will not fulfill this legal obligation.

Questions regarding the requirements of being a mandated reporter or whether a particular situation must be reported to DCFS and/or Public Safety should be directed to Public Safety.

The university complies with the Illinois Sex Offender Registration Act (730 ILCS 150), which requires all sex offenders employed by or attending an institution of higher education to register directly with the public safety director or appropriate administrative body of that institution.

For more information, go to the **Crime Reporting and Clery Act Compliance** policy.

Threat Assessment and Reporting

A student, faculty, or staff member who receives a threat, witnesses, or has knowledge of threatening, disturbing, or violent behavior involving a member of the DePaul Community, on a DePaul campus or at a DePaul organized/sponsored event, is required to take appropriate action as follows:

- Emergency or crisis – If the threat is imminent or if violent behavior is in progress, **call 911 for police assistance**. Notify Public Safety after 911 is called.
- Non-emergency - Report the incident to Public Safety

Public Safety assesses such reports and initiates a process to investigate the behavior and coordinate an appropriate response. Reports involving behavior of DePaul employees are investigated by Public Safety in coordination with Human Resources, the responsible Vice President or Dean, or the Office of the Provost, as appropriate. Reports involving behavior of DePaul students are investigated by the Dean of Students who serves as Chair of the Student Care Team (SCT), a multi-disciplinary team including representatives from Student Affairs, Public Safety, University Counseling Services, Residential Education and the Center for Students with Disabilities, which is tasked

with addressing aberrant, dangerous, and threatening behavior exhibited by students and providing supportive services as needed.

For additional information, go to the **Threat Assessment and Reporting** policy.

6. Compliance Responsibilities

All DePaul managers are responsible for knowing and complying with the university's policies and procedures, including those highlighted in the Management Standards Handbook and accompanying training sessions. Participation in Management Standards Training and the Manager Control Self-Assessment Certification process is an annual requirement.

DePaul identifies certain university activities as high risk with respect to compliance. Managers are accountable for cooperating with the responsible parties for each high-risk area to ensure that the controls established to mitigate DePaul's risks are followed. In addition, managers are responsible for participating in specialized training as required, to address risks specific to their area.

The prevention, detection and reporting of misconduct is the responsibility of all DePaul employees. Managers are expected to recognize risks and exposures in their area of responsibility, and be aware of indications of fraud or other misconduct. Any concerns regarding compliance or alleged compliance violations should be addressed through typical managerial channels when appropriate. Reporting suspected non-compliance can be done in a number of ways:

- A letter stating an alleged impropriety can be mailed to Compliance & Risk Management, 1 E. Jackson Blvd., Chicago, IL. 60604, or the letter can be emailed to compliance@depaul.edu.
- The compliance department can be called directly regarding any questions or concerns. The department's number is (312) 362-6880.

Other resources exist at the university, depending on the situation:

- The Office of the University Ombudsperson (for confidential discussions or support), (312) 362-8707

- Internal Audit, (312)362-8392
- Office of Institutional Diversity and Equity, (312) 362-6872
- Human Resources, (312) 362-8500
- Public Safety Office, (312) 362-8400, (773)325-7777

An anonymous hotline is also available as a means of reporting misconduct in situations where a member of the university community fears reprisal, embarrassment, or for other reasons does not feel comfortable utilizing other reporting channels.

- Misconduct Reporting Hotline: (877) 236-8390
- Web intake site: www.depaul.ethicspoint.com

Persons, who in good faith, report or participate in a misconduct investigation at DePaul shall not be subject to retaliation or the threat of retaliation. Any act of retaliation constitutes reportable misconduct and is subject to appropriate disciplinary action, which may include termination of employment.

Remember: Managers may be asked to participate in Quality Assurance Reviews and are responsible for completing the annual Manager Control Self-Assessment Certification, which requires managers to attest to following the policies and procedures outlined in this handbook.

For more information, visit the **Compliance & Risk Management** website.

7. Externally Funded Grants & Contracts Administrative Responsibilities

Externally funded grants and contracts raise compliance and business issues that require special handling and approvals. Principal Investigators (PIs) are responsible for following university policies and procedures that apply to proposal and award management.

Proposal Review and Approval Process

PIs seeking privately funded grants (i.e. corporate or

foundation support) must work with Development to obtain initial clearance prior to proposal development. The Office of Research Services (ORS) coordinates the proposal review and approval process for all grant proposals, regardless of the funding source. After conducting an initial review, ORS secures the approval, at minimum, of the PI's dean or VP. All proposals must be signed by an Authorized Organizational Representative and submitted by ORS or Development, depending upon the funding source.

As part of the proposal review and approval process, the PI is required to complete a combined certification and financial conflict of interest screening form that is maintained by ORS. Significant financial interests reported by PIs who complete this form are reviewed by DePaul's Conflict of Interest Committee. In situations where a financial conflict of interest is deemed to exist, a plan for managing the conflict must be developed in consultation with the PI before the grant project begins.

Awards Acceptance and Set-up

PIs who receive award notifications and/or checks are responsible for bringing them to the Office of Development or ORS, depending upon where the proposal originated. PIs may not sign grant agreements or secure signatures for such agreements within their colleges or administrative units.

ORS and Development are both responsible for the review and acceptance of grant awards, depending upon where the proposal originated. This process includes obtaining Office of the General Counsel (OGC) review as required by university policy; negotiating changes with the sponsor, as needed, in consultation with the PI; and obtaining the signature of an Authorized Organizational Representative (AOR).

ORS and Restricted Accounting manage the setup process for all grant awards, regardless of the funding source. This process results in the creation of a restricted account that facilitates the financial management of the grant. Upon activation of the account, ORS sends an internal Notice of Grant Award to the PI that contains key account and award information.

Financial Management of Grant Awards

All external grants are jointly managed by ORS, Restricted Accounting, and the PI, with the

participation of Development in the case of private funders. The PI is responsible for reviewing the monthly financial activity reports to monitor the financial status of the grant. This monitoring should include reconciling expenses on a monthly basis, screening for unallowable costs and accounting errors, initiating any necessary cost reallocations on a timely basis, and determining whether spending is on pace. Award modifications (including budget revisions, no-cost extensions, and changes in work scope), new grant-funded positions, and grant-funded purchases greater than \$2,500 must be approved by ORS. Restricted Accounting is responsible for invoicing and for accounts receivable management, including the deposit of all cash receipts.

Stewardship of Grant Funds

PIs and grants administrators have the responsibility to protect DePaul's interests, assets and resources. To that end, grant funds must be used in a manner that directly benefits the project as described in the proposal, adheres to the approved project budget, and reflects the award agreement as well as the sponsor's policies and guidelines. Detailed guidance on charging costs to grant awards is available on the "Financial Administration of Grant Awards" page of the **ORS** website.

Cost transfers may be used, in a timely manner, to correct accounting errors, but funds may not be transferred across grants for convenience. If third party cost sharing is being provided, the PI or grants administrator should work with Restricted Accounting and the third party to track and document it. If institutional cost sharing is being provided, it should be used at a rate and in a manner consistent with the award budget.

Hiring and Supervision of Grants Staff

Staffing for funded projects should be consistent with the award budget. Personnel actions and redistributions must be approved by ORS. University policies regarding job descriptions, hiring procedures, time reporting, student employee work hour requirements, performance appraisals, and leaves of absence are applicable to grant funded personnel. Additionally, if the grant funding is from a federal source, the PI and other grant staff must complete accurate time and effort reports on a timely basis.

Procurement of Goods and Services

University policy regarding procurement card use, purchase requisitions, and contract requirements

and procedures apply to all grant funded purchases of goods or services. The PI or grant administrator should use DePaul preferred vendors whenever possible to reduce costs. The use of consultants should be consistent with the award budget, and the PI or grant administrator should monitor the delivery of contract deliverables and address any issues in a timely fashion.

Reporting

PIs and grant administrators should be aware of the reporting requirements associated with their grant awards. Restricted Accounting is responsible for the preparation and release of all financial status reports while the PI is responsible for the preparation of and timely submission of all programmatic/technical reports. ORS reminds PIs of approaching report due dates and provides support with the approval and submission of technical reports as needed. Development may submit reports to private funders as needed in the interest of donor relations. The PI is also responsible for meeting deadlines for any additional deliverables beyond the usual financial and technical reports.

Grant Closeout

ORS, Restricted Accounting, and the PI share responsibility for the closeout of grant and contract accounts.

The PI's closeout responsibilities include:

- Accurately tracking and projecting spending to avoid over or under spending the account.
- Initiating the termination of recurring charges to the project.
- Initiating final cost transfers for expenses incorrectly charged to the grant account.
- Preparing final technical/programmatic reports required by the funder.
- Requesting final invoices from providers of goods and services to the grant project.
- Notifying grant funded staff of their termination date.

ORS is responsible for:

- Notifying the PI of an approaching closeout.
- Informing the PI of closeout procedures.
- Working with the PI and other offices, as needed, to address problems that arise during the closeout process.

Restricted Accounting is responsible for:

- Preparing final financial reports.
- Inactivating grant and contract accounts.

- Coordinating the retention of all award documents and records for the time period required by DePaul policy and by funder requirements.

Remember: If a no-cost extension is available and necessary, the PI must request the extension at least 60 days before the end date of the grant award in most cases.

Training

Before beginning their grant projects, all new PIs are required to complete a web-based grants management training program developed and maintained by ORS: <https://offices.depaul.edu/ors/award-management/training/Pages/default.aspx> The program has two strands: Federal Grants Management and Non-Federal Grants Management. PIs complete one strand or the other, depending upon their funding source.

For additional information on the grants process, visit the Office of Research Services website. For further details, visit the **Administration of Externally Funded Grants and Contracts** policy and the **Conflict of Interest in Externally Sponsored Programs** policy.

Remember: If a no-cost extension is available and necessary, the PI must request the extension at least 60 days before the end date of the grant award.

ORS, Development, and Restricted Accounting are responsible for providing training in grants administration to PIs and others in the university community.

For additional information on the grants process, visit the **Office of Research Services** website.

For details, visit the **Administration of Externally Funded Grants and Contracts** policy and the **Conflict of Interest in Externally Sponsored Projects** policy.