MEMORANDUM

DATE: February 2020

TO: Chancellors

FROM: Katie Ignatowski
UW System Director of Compliance & Integrity

UW System Administrative Policy 1290: Code of Ethics
Regent Policy Document 20-22: Code of Ethics University Staff

Pursuant to UW System Administrative Policy 1290, chancellors or their designees are to provide each newly hired employee with the code of ethics to which the employee is subject and thereafter, annually provide all employees with the appropriate code of ethics. This memo serves as the annual reminder of (1) the UW System policies and obligations for faculty, academic staff, and limited appointees with half-time appointments or more to report on outside activities, (2) the requirement to advise university staff of their obligation to avoid conflicts of interest, and (3) the obligation to inform all staff of Regent Policy Document 13-4 regarding institutional and employee relationships with educational loan lenders.

Outside Activities Reporting – Faculty, Academic Staff, Limited Appointees

Pursuant to Chapter UWS 8 of the Wisconsin Administrative Code, all UW System faculty, academic staff, and limited appointees with half-time appointments or more are required to report annually outside activities and interests related to their areas of professional responsibility and for which they receive remuneration by April 30 of each year. The President, Chancellor or his/her designee may provide exception to the deadline of completing this form in extenuating circumstances. Notwithstanding the exception, the employee must immediately submit this form upon his/her return to work. These reports are public records which can be viewed by any member of the public and therefore should be maintained in a central location at each institution. While this form gathers information for the prior year, it is important that staff understand that they are required to promptly update any changes in circumstances as they occur throughout the year.
Attached to this letter are:

- *Guidelines for Reporting Outside Activities*: The document provides details on the necessary activities to be reported.
- *OAR Communication Plan and Escalation Process*: An updated recommendation to the timeline and escalation process to address employees who are non-compliant with Outside Activities Reporting based on recommendations from the 2017 Ethics Audit to reduce risks associated with outside activities.

**Conflicts of Interest – University Staff**

The University Staff Code of Ethics is set forth in section III of [Regent Policy Document 20-22: Code of Ethics](#). This policy provides guidance to university staff employees to help avoid activities which cause, or tend to cause, conflicts between their personal interests and their public responsibilities as UW System employees. University staff shall be advised of the Standards of Conduct outlined in section III(C) and, in particular, the explanation of activities that cause a conflict of interest. University staff shall also be advised of their responsibility, as outlined in RPD 20-22 section III(D), to submit a written statement describing the nature of possible conflict to their supervisor or other appropriate administrator.

**Institutional and Employee Relationships with Educational Lenders - All UW System Staff**

Pursuant to [Regent Policy Document 13-4: University of Wisconsin System Policy on Institutional and Employee Relationships with Educational Loan Lenders](#), UW employees should be regularly informed of the provisions of the policy, as well as applicable state code of ethics and related state and federal laws and regulations. To satisfy this provision, please send all staff the link to RPD 13-4, a link to Chapter UWS 8 to faculty, academic staff, and limited appointees, and the link to [Regent Policy Document 20-22: Code of Ethics](#) to university staff.

If you have any questions, please visit the [UW System Compliance & Integrity website](#) or contact me directly.

Thank you.

**Attachments (3)**

- UW System Guidelines for Reporting Outside Activities
- 2020 Outside Activities Report form
- Outside Activities Reporting Communication Plan and Escalation Process

**cc:**

- President Cross
- Provosts
- Chief Business Officers
- CHRO/Human Resource Directors