

**NEW & UPDATED POLICIES IN THE 2009 MANAGEMENT STANDARDS HANDBOOK**

POLICY	SECTION/PAGE	SUMMARY
<b>Records Management</b>	Information Responsibilities pg. 37	This policy provides a framework for managing, retaining, and disposing of Official Records. It also identifies records to be transferred to the University Archives.
<b>Gifts to Employees</b>	Financial Responsibilities pg. 9	This policy explains the basic guidelines and restrictions associated with (A) the purchase of gifts for employees using university funds, and (B) the acceptance of gifts offered by third parties to university employees and business units.
<b>Legal Hold &amp; Record Preservation</b>	Information Responsibilities pg. 37	This policy provides information on the university's duty to preserve documents and information that may be potentially relevant to legal matters, including litigation or reasonably anticipated litigation. Individuals who have been notified by the Office of the General Counsel of a Legal Hold may not alter, dispose of, or transfer or destroy any document or information that falls within the scope of the Legal Hold.
<b>Drug Free Work Place and Legal Drinking Age Compliance</b>	Human Resource Responsibilities pg. 30	This policy states DePaul's commitment to maintain a drug free workplace and restrict the consumption of alcohol on property owned or controlled by the university to persons 21 years or older in accordance with federal law.
<b>Fundraising Events</b>	Financial Responsibilities pg. 10	This policy mandates that faculty, staff and in some instances student groups, obtain approval from the Office of Advancement prior to planning, publically announcing and/or conducting fundraising events aimed at generating charitable contributions for DePaul University, its schools, colleges, programs, and/or student groups.

**Also new in the Handbook:**

**\*DePaul University's Guiding Principles on Speech and 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.

## **Purpose:**

In its sixth year, DePaul University's Office of Institutional Compliance continues to update its resources and training to keep members of the university community apprised of any new policies or procedural changes that impact DePaul.

This year's Management Standards Training sessions will provide updates on policies affecting employees with budget and/or management responsibility. Sessions will also address several topics suitable for both new and experienced managers that are designed to enhance understanding of their responsibilities.

In addition to Management Standards Training, the Office of Institutional Compliance can help with other internal training needs. Managers may seek assistance on any subject matter related to the Management Standards Handbook.

The Office of Institutional Compliance provides other resources for the entire DePaul community and is an avenue for employees with concerns of wrongdoing or suspected violations of DePaul policies or laws. For example, members of the DePaul community are encouraged to report any suspected fraud, theft or other misconduct to their supervisors. However, in situations when this would not resolve the problem, employees are encouraged to contact the Office of Institutional Compliance, Internal Audit, Human Resources or the Office of Institutional Diversity and Equity, as appropriate.

In addition to the reporting mechanisms listed above, an anonymous hotline is 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.

Misconduct Reporting Anonymous Hotline: (877) 236-8390

For more information on DePaul's management standards or other compliance issues or resources, contact the Office of Institutional Compliance at (312) 362-6880, or e-mail [compliance@depaul.edu](mailto:compliance@depaul.edu).

## **Table of contents:**

1. Financial responsibilities
  - Delegation of Approval Authority
  - Budget Process
  - Account Reconciliation and Oversight
  - Segregation of Duties
  - Cash Management
  - Gifts or Donations from the University
  - Gift Acceptance & Processing
  - Gifts to Employees
  - Fundraising Events
  - Employee & Guest Reimbursements
  - Administration of External Grants & Contracts
  - Contracts Requirements & Procedures
  - Purchase Requisitions/Orders/Change Orders
  - Procurement Card
  - Requests for Proposals (RFPs)
  - Equipment & Asset Disposal
  - Technology Purchases
  - Vendor Selection
  
2. Human Resources responsibilities
  - Recruitment
  - Employment of Relatives
  - Form I-9
  - Introductory Period
  - Time Reporting
  - Benefits
  - Student Employees
  - Drug Free Workplace and Legal Drinking Age Compliance
  - Performance Appraisals
  - Termination Process
  - Americans with Disabilities Act
  - Consultants
  - University Sponsorship of Foreign Nationals
  
3. Information responsibilities
  - Information Security Policy
  - Passwords
  - Access to and Responsible Use of Data
  - Securing Privacy
  - Business Continuity
  - Records Management
  - Legal Hold and Record Preservation
  - External Communications

Copyright  
Establishing a University Policy  
University Endorsements

4. Community responsibilities
  - Professional Conduct
  - Equal Employment Opportunity
  - Anti Discrimination/Harassment Policy & Procedure
  - Sexual Harassment
  - Reporting Misconduct
  - Non-Retaliation
  - Conflict of Interest
  - Contact with Public Officials
  - Guiding Principles on Speech and Expression
  
5. Workplace Safety responsibilities
  - Emergency Response
  - Laboratory Safety and Hazards Communication
  
6. Compliance Responsibilities
  
7. Manager Control Self-Assessment Checklist

## 1. FINANCIAL RESPONSIBILITIES

A budget manager, as defined by DePaul, is anyone named on an active department. Budget managers may have budget responsibility for more than one active department. The following sections outline the responsibilities and financial duties of a budget manager named on a department, agency account, center, grant or any other unit that has a budget.

### Delegation of Approval Authority

Individuals who delegate their approval authority must ensure the designee understands the approval requirements and uses sound judgment to protect DePaul's resources. While it is acceptable to delegate tasks, a budget manager is ultimately accountable for how a budget is managed.

Your approval signature means:

- You read it
- You understand it
- Your questions were answered
- You agree with it
- You are accountable for it

The responsibility and authorization for account activity is controlled via a formal authorization process in the university's PeopleSoft Student Administration/Human Resources (SAHR) System. If a designee is terminated or has a change of status, it is the responsibility of the individual who assigned the designee to remove, and if appropriate reassign, that authorization using the Budget Manager Delegation page in SAHR.

The delegation of approval authority procedures ensure that **two sets of eyes** review each transaction, so that no one person initiates and approves any one transaction.

Managers can delegate transactional work to staff members. However, the manager must review the financial statements monthly for the departments on which he or she is named to ensure that expenditures are appropriate.

For certain types of expenditures, a budget manager may not approve his own or her own transactions. In such instances, two sets of eyes means that approval from a supervisor must be received. Those special transactions are:

- Employee expenditure reimbursements
- ProCard transactions
- Petty cash
- Travel and entertainment

To request an exception to this policy, please contact the Assistant Controller overseeing Accounts Payable to assist in creating an accommodation that maintains the accountability of a second level of review and approval.

The approval for ProCard transactions refers to the supervisor's monthly review and approval of the budget manager's ProCard transactions after the manager has completed the monthly ProCard edits.

Approval levels for expenditure reimbursements, ProCard transactions, petty cash and travel & entertainment are as follows:

**President's Expenditures:**

Review of Employee Expenditure Reimbursements, ProCard expenses and Travel & Entertainment for the President will be approved by either the Provost or the Executive Vice President. The Audit Committee will periodically review summary level detail of the President's approved expenses.

**EVP & Provost Expenditures:**

Review of Employee Expenditure Reimbursements, ProCard expenses, and Travel & Entertainment for the Provost and Executive Vice President will be approved by the President. In the President's absence, the Provost and Executive Vice President may approve the other's expenditure.

**University Officers, Vice President & Dean Expenditures:**

Review of Employee Expenditure Reimbursements, Petty Cash, ProCard expenses, and Travel & Entertainment for the Vice Presidents and Deans will be approved by the Provost or the Executive Vice President of their respective areas or their designee, as determined by the reporting structure. The President will approve expenses for his/her direct reports.

**All Other Management or Budget Managers:**

Review of Employee Expenditure reimbursements, Pro Card transactions, Petty Cash and Travel & Entertainment for all other levels of management or budget managers will receive approval from their supervisor. In the case of a direct report to a Dean, a designee may be in place to facilitate the review and approval process. Check within specific areas for further guidance.

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

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=7>

Budget Process

A budget manager is accountable for the financial integrity of his or her academic department or administrative office. Financial integrity is maintained by careful

attention and adherence to the unit's budgets within the university's financial reporting system. Any alterations to original budgets, previously approved by the Board of Trustees, requires the budget manager to submit an approved Budget Change Form, Capital Budget Change Form, or a Position Data Request to the Controller's Office. Budget managers should refer to the Budget Change policy for appropriate approval levels.

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=169>

### Account Reconciliation and Oversight

Budget managers are responsible for requesting budget changes and financial report adjustments, approving transactions, requesting payments, and managing labor costs. All transactions must be processed in compliance with the university's policies and procedures.

A budget manager's monthly review of Mobius reports is a critical component of the university's internal financial controls. Reports available to budget managers include, but are not limited to, a statement of financial activity for all revenues and expenses controlled by the budget manager, various detailed reports on personnel and other expenses, and summary level reports for senior management.

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

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=12>

### Segregation of Duties

Budget managers are responsible for maintaining an adequate segregation of duties (custody, approval, accounting, and reconciliation), which is a critical component of the university's internal financial controls. An example of proper segregation of duties might include different staff members opening mail, preparing deposits, and reconciling Mobius reports. Other tasks that should be separated among staff members include billing and collection functions and purchasing duties such as ordering goods or services, receiving items and authorizing payment.

Managers of small departments having difficulty with segregation of duties are responsible for contacting the Office of Institutional Compliance, 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

Each department receiving payments of any sort should keep a cash receipts journal and provide a receipt to those from whom payments are collected. To provide a strong system of internal controls, one person in the department should collect the payments, and another person should prepare the deposit. A supervisor in the department should regularly compare the cash receipts journal to the Mobius reports to ensure that collections are being deposited on a timely basis and accurately recorded.

At the end of each month, the person in the department who has budget responsibility should review the Mobius reports and the general ledger or revenue document as applicable to confirm each deposit has been credited correctly. This person should also check the detailed reports against the department's cash receipts journal.

*Remember: Make sure someone in your department records checks in a log, then compares the log to the deposit slips and Mobius report monthly ensuring that revenue is accounted for and deposited in a timely manner.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=100>

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

### Gifts or Donations from the University

As the university is a not-for-profit corporation that is supported, in part, by gifts and donations, it is generally inappropriate for any member of the faculty or staff to make gifts or donations in the name of the university to any individuals, groups, or organizations.

In certain circumstances, however, it may be in the university's interest to make such gifts, or the university may take part in a benefit or civic function which requires the purchase of tickets. Approvals from the Provost, Executive Vice President, Vice President or Dean for exceptions to the general policy must be secured prior to making the donation.

Grant funds may not be used for charitable contributions unless the contribution is specifically allowed by the grantor. Contact Restricted Accounting for additional information.

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=45>

### Gift Acceptance and Processing

All private donations (gifts) received by any area of the university must be sent to the Office of Development 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 Development must be contacted. Development 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.

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=229>

### 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 their 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 \$150)

Employees **may not solicit** 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 “Gift(s)” 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

Individual employees **may not accept at any time:**

- 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.

- For additional policy information, please go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=44>

### 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.

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=255>

### 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.

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.

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:

- Clearly stated business purpose
- Amount of each separate expenditure
- Date of expenditure
- Place
  - For travel, destination or location of travel by name of city or similar designation
  - For entertainment, names, if any, address or location, destination and type of entertainment if such information is not apparent from the designation or place
- 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 rental agencies with DePaul University discount codes.

#### Living and Other Expenses

- Hotel/Motel Accommodations

- Meals – original receipts required for all meals over \$25
- Meal Reimbursement for extended hours
- 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
- Phone Expenses

#### International Travel:

Reimbursement of international travel expenses must be submitted on an Employee 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.

Travelers may use the per diem method of expense reimbursement for international travel with the approval of the Accounts Payable Manager. Additional approval is needed from both Restricted Accounting and OSPR for per diem reimbursement related to grant-funded travel.

#### Travel Reimbursement to Domestic and International University Guests:

Reimbursement of expenses made to guests of the university, for services performed for the benefit of the university, are generally not taxable. However, the university requires proper tax and immigration documentation prior to payment.

#### Grant Funded Travel:

Special restrictions may apply to grant funded travel. Contact Restricted Accounting or OSPR for more information.

For the General Reimbursement form & instructions go to:

<http://condor.depaul.edu/~faffairs/procurement/forms/frmEmployeeReim.html>

- For the travel expense form & instructions go to:

<http://condor.depaul.edu/~faffairs/procurement/forms/frmTravelReimbursement.html>

- For policy details go to:

<http://policies.depaul.edu/policy/policy.aspx?pid=103>

## 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.

The Office of Development is responsible for providing clearance to DePaul faculty and staff to formally cultivate and solicit private funders. The Office of Sponsored Programs and Research (OSPR) coordinates the proposal review and approval for all grant and contract proposals, regardless of their funding source.

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

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=122>

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 U.S. Failure to do so may result in the ticket not being approved for purchase or other penalties.

- For more information on the Fly America Act go to:  
[http://ospr.depaul.edu/html/award/fly\\_america.html](http://ospr.depaul.edu/html/award/fly_america.html)

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 (OMB circular A-21), federal grant funds may not be used to purchase alcohol. The Office of Sponsored Programs & Research (OSPR) 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 OSPR about such expenses ahead of time.

## Contract Requirements and Procedures

All contracts entered into on behalf of DePaul must be in writing. A formal written contract (that is, a contract signed by both parties) is required for all non-goods contracts and contracts involving “Special Risk” (as defined below). For contracts for goods, Procurement Services’ policies and procedures should be followed. Additionally, a signed contract is required before goods are purchased or contractual services begin.

The Officer and/or Specific Designee negotiating and signing the contract is responsible for (a) reviewing and approving a contract’s business terms (e.g., dates, pricing, quantities, payment terms, scope of work), and (b) obtaining review and approvals from other DePaul offices and departments (e.g., Procurement Services for goods or services requiring requisitions and purchase orders, Risk Management for insurance related matters, Controller’s Office for accounting, international and tax-related matters, and OSPR for sponsored research).

DePaul’s Executive Officers, Academic Officers, Administrative Officers, or their Specific Designees, are generally authorized to negotiate and sign contracts and agreements within their areas of responsibility in accordance with the following chart:

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

The following contracts and agreements may be approved and signed ***only*** by an Executive Officer’s Specific Designee (for contracts with a value of less than \$50,000) or 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 and agreements 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 must be reviewed and approved by the Office of the General Counsel (OGC):

- Contracts involving DePaul’s intellectual property (such as university logos, marks, artwork, symbols, or copyrighted material)

- 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
- Independent contractor and consulting agreements
- 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

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

- [http://generalcounsel.depaul.edu/Services/Contracts\\_and\\_Waivers/Standard\\_Forms/index.html](http://generalcounsel.depaul.edu/Services/Contracts_and_Waivers/Standard_Forms/index.html)

All contracts, regardless of dollar amount, must be sent to the OGC for permanent storage.

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=81>

#### Purchase requisitions, purchase orders and change orders

DePaul University requires a purchase order for all goods and services over \$2,500 or for technology purchases (desktops, laptops, printers, networking equipment, software and related accessories) over \$500. If the cost of an item is below these amounts, it can generally be purchased with the Procurement Card.

#### Definitions

- **Purchase Requisitions** – A purchase requisition is an internal process for departments to request the ordering of a product or service from a vendor. Once approved by Procurement Services, the purchase requisition becomes a purchase order.
- **Purchase Orders (PO)** – A purchase order is a contractual offer to buy goods or services from a vendor. Procurement Services transmits the PO and its terms & conditions to the vendor, who then fulfills the order.
- **Change Orders** – A change order is a correction to the original purchase order. Common changes include quantity, price, additional hours worked, etc. A change order can be requested by contacting Procurement Services.

#### **Process:**

Once a department determines the need for a product or service, it should determine the vendor that can best meet its requirements. See the Vendor Selection topic for more information on choosing a vendor.

Once a vendor is found, determine the ordering method. If a purchase requisition is required, it should be put in early in the process and before work is started or goods are ordered. Purchase requisitions are entered through the PeopleSoft eProcurement system.

Once a purchase requisition is received by Procurement Services, it will be reviewed for accuracy, appropriateness, and compliance. Vendors that have not previously been used by the university will be required to fill out a Vendor Information Form (VIF). See the Vendor Selection topic for additional information on this process. Additionally, when the purchase requisition is entered into the financial system, the funds will be encumbered in the Financial Activity reports.

Procurement Services requires backup documentation for all purchase requisitions to support the purchase. This can include a contract, quote, proposal or other support. Additionally, some types of orders require additional approvals, such as:

Type of Purchase	Required Approval
<b><i>Approval occurs via requisition routing</i></b>	
Fund 5xx	Office of Sponsored Programs & Research
Greater than \$25,000	Director of Procurement Services
Greater than \$75,000	Office of the Treasurer
Greater than \$5,000 and fund 700	Financial Accounting
Category MS201	Student Centers
Technology purchases	Information Services Office of the EVP and/or Provost
<b><i>Departments responsible for approval</i></b>	
Greater than \$50,000 and/or “special risk” purchase	Office of the General Counsel
Leases (non-PC)	Financial Accounting Office of the Treasurer
Trademark orders	Athletic Department

For any purchases of goods or services over \$25,000, a competitive bid must be obtained and the basis for the vendor selection documented. The \$25,000 amount encompasses all costs that may occur during the term of the contract (e.g. not a smaller subset of the contract). See the Requests for Proposal section for more information.

Some purchases have additional guidelines to keep in mind, which include:

- **Cell Phones & Services**  
 Before purchasing or upgrading cell devices and services please review the [Cell Phone Buying Guide](#) on the Procurement Services website.
- **Computer Hardware**  
 Purchases of desktops and laptops must conform to university standards. For detailed information see the [Technology Buying Guide](#) on the Procurement Services website.
- **Computer Software**  
 All software purchases should be made through CDW-G, except in special cases. For information on CDW-G, visit their [preferred vendor page](#) on the Procurement Services website.
- **Conflict of Interest**  
 Any perceived or real conflict of interest must be disclosed in accordance with the [Conflict of Interest](#) policy and [form](#).
- **Consulting**  
 Consultants require special consideration due to tax issues. Contact the Tax Manager with any questions.
- **Facilities**  
 Any purchases made in regards to university facilities (e.g. remodeling, painting, etc) should be done in conjunction with the [Facility Operations](#) office. Contact the campus manager for additional details.
- **Gift purchases (e.g. gift cards, parking passes, other taxable income)**  
 Due to IRS requirements, these types of purchases may be taxable to the recipient. Contact [Accounts Payable](#) beforehand to discuss reporting and other options.
- **Grant Purchases**  
 For grant-related purchases, the requisitioner should check with the [Office of Sponsored Programs](#) or [Restricted Accounting](#) in Financial Affairs for additional requirements.
- **International Vendors**  
 International purchases may have specific tax or other laws governing the purchase. Vendors based in some countries may not be legally paid depending on the current regulations. Contact [Accounts Payable](#) early in the process to discuss any international payments.
- **Technology Purchases**  
 Technology purchases (desktops, laptops, printers, networking equipment, software and related accessories) are limited to \$500. Items above \$500 require a requisition and approval by Procurement Services.

- **Travel**  
Guidelines for university paid travel assistance is [available online](#) as are [guidelines for tipping](#).
- **Vehicles**  
Please contact [Procurement Services](#) early in the vehicle review process to ensure that appropriate title/registration/insurance is taken care of prior to taking possession of the vehicle.

For more information visit: <http://financialaffairs.depaul.edu/procurement>

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=80>

### Procurement Card

The university expects purchases under \$2,500 to be made using DePaul's Procurement Card (ProCard). Generally speaking, most departments have ProCard limits of \$2,500, although budget managers can have lower limits if they choose.

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 DePaul expenses and cannot be used for personal expenses
- Card sharing is not allowed
- Technology purchases (desktops, laptops, printers, networking equipment, software and related accessories) are limited to \$500 (Items above \$500 require a purchase requisition.)
- Gift cards or other taxable expenses (e.g. parking passes, club memberships, etc) cannot be purchased via the ProCard unless pre-approved by Accounts Payable
- Splitting purchases to circumvent transaction limits is not allowed
- Sales tax generally should not be applied to ProCard transactions as DePaul is a not-for-profit institution
- ProCards cannot be used for consulting services
- ProCards cannot be used for leasing expenses
- Cardholders may not purchase travel/entertainment items for their approving official's individual use
- Purchases that cross fiscal years must be reported to Financial Accounting via the ProCard Prepaid form available online
- Cardholders are not to use the ProCard to purchase items that will be charged against a sponsored program unless they are in accordance with the terms of that specific grant or contract

All transactions on the ProCard must be properly documented within the Pathway 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:

- All transactions require a business purpose
- Travel, hotel stays 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

Misappropriation of university funds will result in the immediate forfeiture of the card and cardholders may be required to reimburse the university. Further disciplinary action may occur, up to and including termination of employment.

ProCard purchases are approved online and must be checked monthly. ProCard statements must also be reconciled with Mobius reports on a monthly basis. This documentation, along with original receipts, must be maintained by the department for a minimum of seven years, per IRS requirements.

Full-time faculty and staff are eligible to apply for a ProCard. Employees must fill out an application, obtain departmental approval, have a current criminal background check on file and complete ProCard training.

For more information visit <http://financialaffairs.depaul.edu/procurement>

*Remember: Make sure you pay special attention to ProCard transactions when viewing monthly card statements and reconciling Mobius reports. Match all transactions to original receipts and appropriate supporting documents.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=69>

### Requests for Proposals (RFPs)

Competitive bids are required for purchases over \$25,000. If a bid is not obtained, documentation detailing the basis for vendor or contractor selection and justification for the purchase price and lack of competitive bidding is required. The Procurement Services office can provide guidance on the bid process and content.

*Remember: Keep all bid documents (or rationale for lack of competitive bidding) on file, as these records may be audited.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=21>

### Equipment and Asset Disposal

To dispose of equipment or assets no longer needed, a department must fill out an asset disposal form. Typical items that may be disposed of through this program include:

- **Artwork**  
All artwork must be disposed of in accordance with the [University Art Museum Deaccession](#) policy. Artwork not maintained by the University Art Museum may be submitted through an Asset Disposal form and Procurement will assist to ensure it is properly handled.
- **Audio/Video Equipment**  
Audio/video equipment (e.g. televisions, DVD players, cameras) must be disposed of through the Salvage Program.
- **Cell Phones**  
All cell phones (e.g. cell phones, smart phones, PDA's) must be disposed of through the Salvage Program. Desk phones (e.g. Meridian, Nortel land-line phones) should be salvaged through Information Services
- **Computers and other technology**  
All technology purchases (e.g. computers, printers) must be put through the salvage program. Procurement will ensure that any sensitive data is erased prior to disposal. Note that all leased equipment must be returned to the leasing company and should not be salvaged.
- **Furniture and Appliances**  
Departments with unneeded furniture items should contact Facility Operations first to see if it can be reallocated. If there is no need for the furniture within the university, an Asset Disposal form can be filled out and the furniture disposed of through Procurement Services.  
  
Regardless of the above, Facility Operations is authorized to reallocate, store, or dispose of unneeded furniture.
- **Vehicles**  
All vehicles must be disposed of through the Salvage Program.
- **Other Equipment**  
If you are unsure about how to properly dispose of equipment, contact Procurement Services.

Small office supplies (e.g. binders, staplers, pens) can be disposed of per department procedures. They are not required to go through the Salvage Program.

Procurement Services will evaluate items and determine if they should be re-deployed, discarded or sold. The Asset Disposal form to salvage equipment is located online at:

- <http://procurement.universitysalvage.com/salvageform/index.php>

If an asset was purchased using grant money, follow the specifications outlined in the grant or by the funding agency for asset or equipment disposal. For information about assets purchased using grant money, contact the Office of Sponsored Programs and Research (OSPR) at [ospr@depaul.edu](mailto:ospr@depaul.edu). If no specifications are provided, the university policy regarding equipment disposal must be followed.

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

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=27>

### Technology Purchases

Requisitions for information technology, including software, hardware and consulting services totaling more than \$10,000, must go through the approval process outlined below. Once all the approvals are received, Procurement Services will create and issue a purchase order.

This policy applies to all areas of the university except the School of Computer Science, Telecommunications and Information Systems.

Department	Role	Routing Order
Procurement Services	<ul style="list-style-type: none"> <li>• Financial authorization</li> <li>• Sourcing/pricing approval</li> <li>• Application of basic systems architectural standards (as articulated by Information Systems and the Enterprise Architecture Planning department)</li> <li>• Incorporation of standard contract provisions and guidelines for contracts as provided by the Office of the General Counsel</li> </ul>	1
Enterprise Architecture Planning	<ul style="list-style-type: none"> <li>• Ensure consistency with Enterprise</li> </ul>	2

	Architecture Planning principles	
The Office of the General Counsel	<ul style="list-style-type: none"> <li>Legal review of contracts shall be in accordance with the Approval of Contracts policy</li> </ul>	3
The office of appropriate executive	<ul style="list-style-type: none"> <li>Executive authorization</li> </ul>	4

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=47>

### Vendor Selection

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. There are several methods available for selecting a vendor:

#### **Preferred Vendors**

Procurement Services maintains a list of [preferred vendors](#) who have negotiated contracts with the university and generally provide lower costs, higher quality or other benefits over competitors.

#### **Minority and Women Owned Vendors**

Procurement also maintains a listing of minority and women owned businesses that have been used by the university in the past. Instructions on how to find these companies can be found on the Procurement Services website

#### **Other and New Vendors**

For items that are not sold by a preferred vendor, departments may select their own vendor. When doing so, departments should evaluate the quality, cost, delivery methods and services provided.

All new vendors must be authorized by Procurement Services 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 (e.g. vendor, consultant, employee, etc.)

For more information visit: <http://financialaffairs.depaul.edu/procurement>

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=95>

## **HUMAN RESOURCES (HR) RESPONSIBILITIES**

### Recruitment

Job descriptions are required for all full-time positions within each area. New and re-evaluated positions must be approved by the Executive Vice President or Provost and then posted through the Human Resources Career Website prior to a hire being made.

When looking to hire a candidate for a full-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 Human Resources Recruiter. A criminal background check, reference check, and educational verification will be performed on all external 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.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=139>
- For the reference checks policy and form go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=189>
- For the Faculty Handbook go to:  
<http://www.depaul.edu/faculty/facultyhandbook.asp>

### 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 policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=197>

### Form I-9

Human Resources sends all newly hired full-time staff (Academic Affairs for full-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 manager must verify 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.

Managers are responsible for ensuring that part-time faculty and staff and student employees are sent a Form I-9 and that employees complete the form prior to or on their first day of employment.

### Introductory Period

All newly hired, rehired, promoted or transferred staff members are required to serve six months of continuous employment in an introductory period, which serves as an extension of the selection process. One time extensions of the introductory period up to a maximum of three months may be granted. Introductory extensions must be approved by Employee Relations.

Managers are to utilize the introductory period to train and evaluate an employee's adaptability to work tasks, conduct, procedures, attendance, and job responsibilities.

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=190>

### Time Reporting

Managers are responsible for accurate time reporting. All non-exempt (hourly) employees, including non-exempt full-time staff, part-time staff and student

employees, must record all of the hours they work in the time keeping system so they are paid in accordance with the Fair Labor Standards Act. Non-exempt (hourly) staff cannot be asked to volunteer their time to do DePaul work, nor can they be offered compensatory time or gift certificates in lieu of pay. Adding hours to “reward” an employee is prohibited and considered falsification of the time reporting system report.

Exempt employees are responsible for entering their own vacation time in the time reporting system.

*Remember: All hours your non-exempt staff worked must be recorded in the time reporting system and there is no “comp” time at DePaul.*

- For more information go to:  
<http://condor.depaul.edu/~faffairs/payroll/TimeManager.doc>
- <http://policies.depaul.edu/policy/policy.aspx?pid=18>

## 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.

- For more information go to:

Paid Holidays: <http://policies.depaul.edu/policy/policy.aspx?pid=203>

Vacation: <http://policies.depaul.edu/policy/policy.aspx?pid=204>

#### 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.

- For more information go to:

Paid Absences:

<http://policies.depaul.edu/policy/policy.aspx?pid=202>

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 more information go to:

Sick pay, short & long-term disability:

<http://policies.depaul.edu/policy/policy.aspx?pid=280>

For work related illness or injury, please contact the Risk Management Environmental, Health & Safety Department at 312-362-6531 or by email at [InsuranceClaim@depaul.edu](mailto: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

- For more information go to:

Family and Medical Leave Act:

<http://policies.depaul.edu/policy/policy.aspx?pid=187>

Sick Pay, Short and Long-term Disability:

<http://policies.depaul.edu/policy/policy.aspx?pid=280>

HR leaves of absence Web page:

[https://hr.depaul.edu/Benefits/Health\\_Welfare/Leave/index.html](https://hr.depaul.edu/Benefits/Health_Welfare/Leave/index.html)

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](#) at:

<http://www.depaul.edu/faculty/facultyhandbook.asp>

- For more information on go to:

Personal Leaves:

<http://policies.depaul.edu/policy/policy.aspx?pid=201>

Military Leaves:

<http://policies.depaul.edu/policy/policy.aspx?pid=226>

Personal Leave Request Form:

<https://hr.depaul.edu/ContributionFolder/Documents/2008%20personal%20leaves%20of%20absence%20form.pdf>

### **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.

- For more information go to:
- Flexible Work Arrangements:  
<http://policies.depaul.edu/policy/policy.aspx?pid=208>
- Voluntary Reduced Work Time:  
<http://policies.depaul.edu/policy/policy.aspx?pid=209>

### **Faculty and Staff Assistance Program (FSAP):**

The FSAP provides information and resources to deal with many issues of daily living. Services include short term counseling in person or by telephone. The program includes:

- the Legal/Financial Connection to assist with legal issues
- the Family Resource Link, a searchable data base of information and resources to assist with childcare and eldercare needs

Perspectives Online, [www.perspectivesltd.com](http://www.perspectivesltd.com), provides information, online seminars, financial calculators and many resources on a wide variety of topics. This site requires a User ID and password:

- User ID: DEP500
- Password: perspectives

### Student Employees

The Student Employment staff in the Career Center should be consulted about questions regarding on-campus student employment (including work study, international students, and graduate students). 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) with a non-immigrant F-1 or J-1 student visa status are limited to working **20 hours or less a week** during the school term. These students are eligible to work more than 20 hours a week during holidays and annual vacation periods, provided they have not completed degree requirements. International students who work in excess of the allowable hours a week may lose their lawful status and risk potential deportation. Managers should confirm with the International Student Office (ISO) that a student is taking his or her annual break prior to authorizing more than 20 hours during an academic term.

### **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 or for a minimum of six undergraduate credit hours a quarter (six hours a semester, four hours for graduate students) to be employed by the university as a student service employee, a federal work study participant or a graduate assistant.

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 Career Center for guidance regarding student employment eligibility.

<b>Enrollment requirements for student employment</b>	<b>U.S. citizens/permanent residents</b>	<b>Non-U.S. citizens (F-1 and J-1 visa status)</b>
<b>Undergraduate</b>	6 quarter hours	12 quarter hours
<b>Graduate</b>	4 quarter hours 6 semester hours	8 quarter hours 12 semester hours
<b>English Language Academy</b>	2 courses	4 courses

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

**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.
2. New Hires: Must deliver the SEAF in person to the Career Center.
3. New Hires: Must come to the Career Center ON or BEFORE the first day of employment. The new hire must fill out section 1 of the Form I-9 and all other appropriate hiring paperwork (including federal & state tax forms).
4. New Hires: Must be able to present document(s) from the List of Acceptable Documents on the Federal Form I-9 (<http://www.uscis.gov/files/form/I-9.pdf>) that verify identity and eligibility to work in the U.S. within 3 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 hiring paperwork deadlines and payment dates, consult the [payroll processing calendar](#) on the Financial Affairs website.

Note: “New Hires” refers to students who have never worked for the university or have not worked for the university within the past 6 months.

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.

- For more information, contact the Career Center at (312) 362-8437, or visit <http://www.careercenter.depaul.edu>,
- or the International Student Office at (312) 362-8376,
- or visit <http://studentaffairs.depaul.edu/iso.html>
- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=112>  
<http://policies.depaul.edu/policy/policy.aspx?pid=113>

## 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
- that 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 controlled substances
- unlawful possession, use, distribution, dispensation, sale, or manufacture of any related drug paraphernalia in violation of 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 illegal drugs. 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 may also 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 may also 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 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 (5) days of the conviction:

- **Staff members:** his/her supervisor and either a Employee Relations Representative or the Vice President of Human Resources
- **Faculty members:** his/her supervisor (appropriate department chair or dean) and either a Employee Relations Representative or the Vice President for Human Resources
- **Student employees:** his/her supervisor and Career Center Associate Director for Student Employment

For policy details, go to: <http://policies.depaul.edu/policy/policy.aspx?pid=259>

### Performance Appraisals

It is strongly recommended that managers complete a performance review prior to the conclusion of an employee's first six months at DePaul. The same form is used for the introductory period review and the university's annual review.

Managers must complete performance reviews annually for all employees within their reporting line. Additionally, managers are responsible for goal setting. By working with direct reports, managers can help employees establish goals that support:

- DePaul's mission
- The strategic direction of the area
- Compliance with appropriate laws and regulations

*Remember: Employee performance reviews are due to Human Resources in May. Consult with your area's Dean or VP for any earlier internal deadlines.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=192>

Managers must follow Human Resources' Progressive Discipline guidelines to address an employee's poor performance.

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=193>

### Termination Process

Managers are responsible for completing termination requests in a timely manner for full-time staff, part-time staff and student employees. Timely processing ensures coordination of benefits, final paycheck, security and other details described in the Termination Checklist.

A voluntary resignation, when an employee chooses to leave his/her employment with DePaul, is initiated through the Termination Request application in Manager Self

Service. A manager submits a request that is reviewed and approved by Human Resources for processing.

Involuntary termination occurs when a manager decides to release an employee of his/her duties. Managers must work with Employee Relations for staff and Student Employment for student employees.

- For guidelines on voluntary and involuntary terminations go to:  
<http://hr.depaul.edu/Employee%20Relations/Terminations/index.html>
- For the Termination Checklist go to:  
[http://hr.depaul.edu/ContributionFolder/Documents/Employee\\_relations/Termination\\_Checklist\\_v4.pdf](http://hr.depaul.edu/ContributionFolder/Documents/Employee_relations/Termination_Checklist_v4.pdf)
- For information on Manager Self Service and the Termination Request application go to:  
<http://hr.depaul.edu/Workplace%20Learning/Training/SelfServiceForManagers/index.html>

Termination procedures for faculty are addressed by the Provost's Office. Part-time faculty terminations are addressed by 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.

Managers should regularly review their department job descriptions to ensure that all physical or mental job requirements are job-related, consistent with business necessity and necessary for safe job performance. Managers are also the point of contact when an employee requests reasonable accommodation for a disability. Human Resources can advise on matters of reasonable accommodation and should be notified within three days of any requests.

*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.*

- For more information go to:
- <http://policies.depaul.edu/policy/policy.aspx?pid=221>

## Consultants

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

For additional issues on hiring consultants outside the U.S., contact the Tax Manager, Accounts Payable Manager or the Director of Payroll.

For additional requirements for use of independent contractors or consultants for grants, contact the Director of Restricted Accounting and the Office of Sponsored Programs and Research.

Independent contractor and consulting agreements must be reviewed and approved by the Office of the General Counsel, regardless of the dollar value.

*Remember: You must work with the Tax Manager, Accounts Payable Manager, or the Director of Payroll to determine if someone can be paid as a consultant or independent contractor.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=94>  
For contract policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=81>

## 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 U.S.

*Remember: This policy does not apply to the non-immigrant student visas (F-1) or exchange visitor visa (J-1); these visas are administered by the International Student Office (ISO).*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=138>

### 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 the Director of Information Security at: [security@depaul.edu](mailto:security@depaul.edu)
- To report potential abuses, e-mail: [abuse@depaul.edu](mailto:abuse@depaul.edu)
- If health-related information is involved, DePaul's Health Information Privacy policy must also be followed,

<http://policies.depaul.edu/policy/policy.aspx?pid=84>

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.*

For policy details go to:

<http://policies.depaul.edu/policy/policy.aspx?pid=132>

#### 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. Managers who violate security policies by sharing their passwords will be held accountable for actions taken under their User ID.

*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.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=85>

### 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.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=85>

### Securing Privacy

Since DePaul is a higher education institution, it operates under the Family Educational Rights and Privacy Act (FERPA). This act protects the privacy of student education records and applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

Managers are responsible for observing any legal or ethical restrictions that may apply to data accessible to everyone in his or her area, and for abiding by applicable federal, state or local laws governing the access, use or disclosure of information.

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

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=85>  
<http://policies.depaul.edu/policy/policy.aspx?pid=281>

## 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 off-site, and document plans for replacement of any necessary equipment.

- For more information go to Information Services' site:  
[http://is.depaul.edu/security/business\\_continuity/index.asp](http://is.depaul.edu/security/business_continuity/index.asp)

## Records Management

Managers whose jobs include dealing with the handling and retention of university records are responsible for knowing and following local, state or federal guidelines pertaining to records retention for their area. In addition, managers are responsible for following DePaul's Records Management Policy and Records Retention Schedule. This means that managers must know who the Records Coordinator is for their department or college and be in regular contact with that person regarding the retention and destruction of records.

Managers should notify either their department's Record Coordinator or the Records Management Department if they become aware of any changes for their area that need to be reflected on the Records Retention Schedule including any official records that are not accounted for on the Schedule.

Managers are also required to ensure that any records containing covered data as defined in DePaul's Information Security Policy are retained and destroyed in a confidential manner.

- For more information and policy details go to  
<http://policies.depaul.edu/RMIS/main.html>

## 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 that may be relevant to the matter. As soon as the Office of the General Counsel 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 Office of the General Counsel.

Individuals who have been notified of a Legal Hold may not alter, dispose of, or 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 policy information, go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=271>

### External Communications

Unless specifically designated to speak on behalf of DePaul, managers should refer media inquiries to DePaul's media relations staff.

- For referral information go to:  
<http://newsroom.depaul.edu/ContactUs/index.html>

### Copyright

The university's bookstores are the only authorized locations for the sale of copyrighted materials. Before photocopied materials can be sold in the university's bookstores, copyright permission must be obtained, and is available through Distribution Services or directly from the copyright holder.

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=263>

### Establishing a University Policy

Policies and procedures are created by the university to guide the members of DePaul in the conduct of necessary university functions. Some policies and procedures are legally required, while others are developed based on experience and higher education standards.

The Office of the Secretary should be contacted to coordinate the policy development and 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 should 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.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=31>

### 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 Public Relations or the associate vice president for Marketing Communications.

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

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=178>

## 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.

- For DePaul's Mission Statement go to:  
<http://www.depaul.edu/about/mission/index.asp>

### 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.

*Remember: DePaul University is an equal opportunity employer.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=139>

### Anti-discriminatory Harassment Policy and Procedures

No person affiliated with DePaul will be the object of discrimination 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.

Managers at DePaul are responsible for relaying all complaints of discrimination or harassment to the Office of Institutional Diversity and Equity. The Office of Institutional Diversity and Equity is responsible for receiving, processing and resolving complaints of discrimination or harassment.

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.

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=137>

## Sexual Harassment

Supervisors are required to report any incidents of alleged sexual or gender harassment to the Office of Institutional Diversity and Equity, regardless of whether the complainant expects the alleged incident to be reported. 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.

Reporting a sexual or gender harassment incident constitutes a complaint. Complaints will be treated with discretion and will be promptly and thoroughly investigated.

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

- For policy details go to:  
<http://condor.depaul.edu/~harass/policy.htm>

## 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.

- Assistant Vice President for Diversity Investigations: (773) 325-7496
- Internal Audit Office: (312) 362-8392
- Office of Institutional Diversity and Equity: (312) 362-6872
- Human Resources: (312) 362-8500

- o Public Safety Office: (312) 362-8400, (773) 325-7777
- o Misconduct Reporting Hotline: (877) 236-8390

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 to the university of alleged misconduct and does not satisfy an individual's reporting responsibility.

- o Ombudsperson Office: (312) 362-8707
- o For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=232>

### 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.

- o For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=231>

### Conflict of Interest

All employees have a responsibility to protect DePaul's interests, assets and resources. Any employee who has a conflict of interest or the appearance of a conflict of interest 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 conflicts of interest 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.

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: If employees have a conflict of interest, direct them to read the policy and to complete the Certificate of Compliance form.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=23>
- For a copy of the Certificate of Compliance go to:  
<http://condor.depaul.edu/%7Eaffairs/procurement/forms/ConflictInterest.html>

### Contacts with Public Officials

All contacts with public officials made on behalf of DePaul University must first be cleared and coordinated with the Office of Community, Government and International Affairs. 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, Government and International Affairs 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, e-mail, computers, telephones, fax machines, photocopiers, or other DePaul supplies.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=121>

## Guiding Principles on Speech and 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:  
[http://secretary.depaul.edu/protected/Speech\\_andExpression.pdf](http://secretary.depaul.edu/protected/Speech_andExpression.pdf)

## 5. WORKPLACE SAFETY RESPONSIBILITIES

### Emergency Response

It's a manager's responsibility to ensure that everyone in his or her reporting line knows and follows the 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.)

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 issued.

*Remember: Maintaining an awareness of emergency and evacuation procedures, and responding to them effectively, could save your life and the lives of those around you.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=57>

### Laboratory Safety and Hazards Communication

The Risk Management & Environmental Health and Safety Office, in conjunction with department safety representatives, ensures compliance with federal and state regulations related to health and safety. The Risk Management & Environmental Health and Safety Office also conducts training on how to safely use and dispose of hazardous chemicals.

*Remember: If you are responsible for laboratory safety and hazards communications, make sure everyone in your department knows and follows DePaul's Chemical Hygiene and Hazards Communication policies.*

- For policy details go to:  
<http://policies.depaul.edu/policy/policy.aspx?pid=60>  
[http://rmehs.depaul.edu/Contribution%20Folder/Documents/Chemical%20Hygiene%20Plan\\_pdf.pdf](http://rmehs.depaul.edu/Contribution%20Folder/Documents/Chemical%20Hygiene%20Plan_pdf.pdf)  
<http://rmehs.depaul.edu/Contribution%20Folder/Documents/ArtSafety-08.pdf>

## 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 session. 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 the Office of Institutional Compliance, 1 E. Jackson Blvd., Chicago, IL. 60604, or the letter can be e-mailed to [compliance@depaul.edu](mailto: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
- Assistant Vice President for Diversity Investigations (773) 325-7496, (312) 362-7554
- 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

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 Manager Control Self-Assessment Certification, which requires managers to attest to following the policies and procedures outlined in this handbook.*

- For more information visit: <http://compliance.depaul.edu/>

# Manager Control Self-Assessment Checklist

## Financial Responsibilities

1. Two sets of eyes reviewed each transaction.
2. Mobius reports were reviewed monthly, departments were reconciled and oversight requirements met.
3. Budgetary and administrative tasks were appropriately segregated between different staff members.
4. The cash receipts journal was checked against Mobius reports.
5. Petty cash was eliminated or a need for it was determined.
6. The department did not make any gifts or donations on behalf of DePaul.
7. University funds were not used to purchase gifts for employees. Authorization from Accounts Payable was obtained prior to purchasing cash equivalents for distribution as gifts or tokens of appreciation to department employees. Gifts were not solicited from outside parties.
8. Approval was obtained from the Office of Advancement prior to planning, publicly announcing or conducting any fundraising events.
9. A ProCard or the employee reimbursement form was used for all local travel, entertainment or other reimbursable items, and included original receipts and a description of the expense.
10. A ProCard or the travel expense form was used for all out-of-town travel, entertainment or other reimbursable items, and included original receipts and a description of the expense.
11. The initial clearance process was followed prior to submitting a proposal for external funding. Development was contacted prior to submitting or contacting a private funder. OSPR was contacted for all other proposals.
12. The Fly America Act guidelines were followed when federal grant money was used to fly internationally.
13. Grant funds were not used for charitable contributions.
14. Contract negotiation and execution procedures were met and contracts were reviewed by the appropriate authorities.
15. Purchase requisitions or Requests for Proposals (RFPs) were used to initiate purchases of more than \$2,500 (or financial limit previously determined by Procurement Services) from outside sources, and a purchase order or contract was used for these goods and services. Exceptions were first cleared with the Accounts Payable Manager or the Director of Procurement Services.

16. ProCards were used for purchases less than \$2,500 (or financial limit previously determined by Procurement Services) and the transactions were submitted for approval within one month of the ProCard statement closing date. The ProCard statements were also reconciled with the monthly Mobius reports and receipts were available for review.
17. Bids and written justification were received for Requests for Proposals (RFPs) or purchases totaling more than \$25,000. If a bid was not obtained, documentation detailing the basis for vendor or contractor selection and justification for the purchase price and lack of competitive bidding was provided.
18. Procurement Services was contacted before discarding any university assets, such as equipment or furniture. Confidential or sensitive data was removed before disposing of computer equipment.
19. The appropriate approvals were received for technology purchases more than \$10,000, and Procurement Services helped facilitate the order.

### **Human Resource (HR) Responsibilities**

1. Job descriptions were maintained for all departmental positions.
2. HR recruitment procedures and reference checks were completed for all potential new employees.
3. No preferential consideration was given to relatives of employees, and no employees worked in a supervisory capacity with a relative as a direct report.
4. All new employees filled out a Form I-9 prior to or on their first day of employment at DePaul.
5. During a staff member's first six months, he or she received training and evaluation.
6. Time reporting reports were reviewed and approved for all non-exempt employees, and no compensatory time was added as a "reward", and all time worked was recorded.
7. Employees were directed to follow the procedures on HR's Web site for time off for Family Medical Leave (FMLA).
8. HR was notified when any leaves of absence were requested and a Leave of Absence form was filled out.
9. All employees' floating holidays were recorded by both exempt and non-exempt employees.
10. Student employee hours did not exceed the maximum number of hours the student employee was eligible to work based on their academic and citizenship status.
11. The department maintained a drug-free workplace. The consumption of alcohol on DePaul University property was restricted to persons 21 years of age or older.

12. Performance reviews for all employees were completed by May 15.
13. Progressive discipline procedures were followed when an employee's performance was unsatisfactory.
14. In accordance with the Americans with Disabilities Act, job descriptions were regularly reviewed to ensure that all physical or mental job requirements are job-related, consistent with business necessity and necessary for safe job performance.
15. Prior to hiring a new consultant or independent contractor, the Director of Payroll, the Manager of Accounts Payable, or the Tax Manager helped determine the proper employment classification.
16. Proper procedures were followed when any foreign nationals sought temporary employment visas or applications for permanent residency.

### **Information Responsibilities**

1. Information security breaches, data losses and abuses were properly reported.
2. Contract requirement and review procedures were followed prior to sharing any confidential DePaul data with an outside service provider.
3. Passwords and other sensitive electronic information were not disclosed, and information resources were used for educational and business purposes only.
4. Mission critical information was regularly backed up and recovery processes were in place.
5. Sensitive electronic materials, such as student academic records, were closely guarded in accordance with the Family Education Rights and Privacy Act (FERPA).
6. This department ensured that mission critical information was properly and regularly backed up, and had recovery processes in place.
7. Local, state and federal records retention laws as well as DePaul's Records Management Policy were followed. A Disposal Certificate was filled out when records were disposed of or destroyed.
8. No documents, records or information that fell within the scope of a legal hold were disposed of, transferred or destroyed.
9. All media inquiries were referred to Media Relations.
10. The university's copyright service was used when copyrighted materials were obtained.
11. The university's name and logos received approval for use and were used appropriately.

## **Community Responsibilities**

1. DePaul's mission was adhered to – business was conducted in an ethical and professional manner, the university's resources were safeguarded and others were treated with dignity and respect.
2. DePaul's EEO policy was followed in recruitment and selection of new employees, promotions, transfers, compensation, training, benefits, terminations and other terms and conditions of employment.
3. All complaints of discriminatory harassment were appropriately reported.
4. All complaints of sexual or gender harassment were appropriately reported.
5. Conflicts of interest were avoided or disclosed and evaluated.
6. No political candidates were endorsed or opposed using DePaul as a forum to do so. The appropriate avenue for contacting political officials was used.

## **Workplace Safety Responsibilities**

1. Emergency and evacuation procedures were followed.
2. The Chemical Hygiene and Hazards Communication policies were followed.

## **Compliance Responsibilities**

1. Management Standards Training was completed and the policies and procedures outlined in the Management Standards Handbook were followed.
2. Local, state and federal laws and regulations were followed during the certification period.
3. All direct reports completed General Compliance Training.