

2009 Compliance Briefing Rollout: Frequently Asked Questions

1. What ethics and compliance training is required, who is required to take the training, and how frequent is the training?

One of the following trainings (or equivalent) is required to be taken by each University of California employee on an annual basis.

- All non-research University employees will complete the briefing outlined below in A.
- Researchers in specific title codes who have received extramural research funding in FY08-09, will be automatically enrolled in the briefing marked B listed below.
 - For a list of the class title outline codes used in making the researcher determination, please contact Luanna Putney at Luanna.putney@ucop.edu.

A. Compliance Briefing: UC Ethical Values and Conduct

This briefing will take approximately 30 minutes to complete. The purpose of the briefing is to reinforce the Statement of Ethical Values and Standards of Ethical Conduct and provide information about reporting instances of non-compliance. This briefing will be delivered to approximately 192,000 University non-research employees (faculty, staff, postdoctoral scholars, students).

B. Compliance Briefing: UC Ethical Values and Conduct, and Conflict of Interest for Researchers

This briefing will take approximately 40 – 60 minutes to complete. The purpose of the briefing is to reinforce the Statement of Ethical Values and Standards of Ethical Conduct and provide information about reporting instances of non-compliance. In addition, this briefing will satisfy funding agency requirements to train researchers on conflict of interest in the research setting. This briefing will be delivered to approximately 19,000 University research employees (faculty, staff, and postdoctoral scholars).

2. By what authority are these briefings considered mandatory?

The Regental Office of Ethics, Compliance and Audit Services (ECAS) is the office responsible for requiring and developing the above-referenced trainings. President Yudof also supports these briefings as mandatory (outlined in 7/17/09 policy memo http://www.ucop.edu/ucophome/coordrev/ucpolicies/documents/mandatory_trainin_g.pdf)

3. When will the briefings be rolled out to University employees, and how quickly must they be taken?

Emails (with a link to the training) will be sent to individual learners in October/November 2009. Learners will be expected to complete the courses no later than ninety (90) days from the initial email notification of the training requirement.

4. Whose responsibility is it to make sure employees take the appropriate training?

It is the responsibility of campus leadership to ensure that mandatory training is completed within the required timeframe. Campuses/locations should utilize internal systems to ensure compliance with these mandated trainings. To assist the campuses/locations, the Office of Ethics, Compliance and Audit Services will work with the Learning Management System team to obtain quarterly compliance rates for each campus/location and provide those rates to the [Campus Ethics and Compliance Officers](#) (CECOs) for review and action.

The Learning Management System is a tool used to deploy online training to employees. It relies on accurate and complete data from the Payroll Personnel System (PPS) and the campus' Telecom Interface to correctly identify employees who must take the training. When email addresses are provided in the Telecom Interface, it will then be able to send employees an email with a link to the appropriate training, reminder emails, and a completion email.

5. How will the briefings be delivered to non-English speaking employees?

Due to the diversity of our campuses/locations, we will rely upon each campus to translate the briefing (maintaining substantially equivalent content) for their non-English speaking employees, as necessary. The Office of Ethics, Compliance and Audit Services will provide an electronic copy of the briefing in English, as requested, for translation purposes

6. How will the briefings be delivered to University employees with no computer access?

As with mandated computer-based trainings or other computer-required initiatives, it is the responsibility of each campus to make these mandatory trainings available, either in-person or via online, to those that do not have work-based computer access.

7. Will “without-salary” employees be required to take the training (i.e., emeriti faculty, adjunct faculty, vendors, volunteers, etc.)?

“Without-salary” employees are not required to take the Compliance Briefing at this time. However, if a location/campus chooses to be more inclusive and to require these individuals to take the course, that is acceptable and can be accomplished by working with the campus LMS administrator. Under such circumstances, campuses should work with the Office of Ethics, Compliance and Audit Services to discuss how compliance rates will be generated.

Comment [LH1]: Sheryl should chime in – this isn’t a big number as I remember, right? Not sure

8. Will student employees be required to complete the training?

Yes. All student employees are required to take the Compliance Briefing for non-researchers.

9. For represented employees, have the unions been notified?

We are working with the OGC and Human Resources Department in determining the correct protocol for union notification to ensure participation by all UC employees. We will make that determination known as soon as we are notified.

10. What if we want to provide instructor-led training (ILT) in lieu of the online training?

It is encouraged to provide ILTs as it provides a venue for face to face discussion of potential questions or concerns. The content delivered should remain “substantially equivalent” to the online compliance briefings, and the ILT should be recorded in the LMS and communicated to Linda Buffett linda.buffett@ucop.edu in the Office of Ethics, Compliance and Audit Services to ensure accurate recording of compliance rates.

“Substantially equivalent” content means the following for each Compliance Briefing. For additional guidance, please contact Linda Buffett linda.buffett@ucop.edu in the Office of Ethics and Compliance Services.

Compliance Briefing: UC Ethical Values and Conduct

Needs to include training on the Statement of Ethical Values and Standards of Ethical Conduct, including case studies/scenarios that illustrate the Values/Conduct, and information about how to report instances of non-compliance.

Compliance Briefing: UC Ethical Values and Conduct, and Conflict of Interest for Researchers

Needs to include training on the Statement of Ethical Values and Standards of Ethical Conduct, including case studies/scenarios that illustrate the Values/Conduct, and information about how to report instances of non-compliance.

Additionally, content regarding Conflict of Interest rules for researchers (including coverage of state and federal laws, and illustrative cases/scenarios) is required to be included.

11. What if we want to incorporate the content of the briefings into other online training?

It is permissible to incorporate the content of the Compliance Briefings into other online training that is, or will be, delivered to the appropriate University employees within the approved timeline.

Each campus will be provided access to the PowerPoint slide deck for both Compliance Briefings so that modifications may be made if desired. The basic content for satisfying the training requirement must be “substantially equivalent” to that found in the Compliance Briefings (see above). If you are considering modifying the training and/or including it in other trainings, please contact Linda Buffett linda.buffett@ucop.edu in the Office of Ethics, Compliance and Audit Services for additional guidance.

12. What if we want to modify the training to incorporate our local contact/resource information?

Yes, general modification/addition of slides to the training is acceptable as long as the content is “substantially equivalent” to that of the Compliance Briefings. If modification is desired, each campus/location will be responsible for the cost of programming to make the changes LMS-compatible.

13. Will each campus be able to customize the email notifications that go out to their employees?

Yes. The briefings will be set up within each campus/location Learning Management System domain. What this means is that, if desired, each campus/location will be able to customize the email notifications and reminders that are sent to the learner. Campuses may want to include local resources and/or contact information in these communications.

The systemwide LMS group will work with the campus/location Training Directors to customize these communications, if desired.

14. How will non-compliance with these mandatory trainings be enforced?

In a recent July 17, 2009 policy memo from President Yudof, he outlines several enforcement options that may be available to campus leadership (http://www.ucop.edu/ucophome/coordrev/ucpolicies/documents/mandatory_training.pdf)