

Ethics & Compliance Program at Augusta University



Ethics & Compliance Manual

Augusta University

Ethics & Compliance

The Ethics Program

The Ethics Program at Augusta University is comprised of standards for behavior which ensure that research, patient care, and education are provided with the highest levels of integrity, respect, and quality. As members of the Augusta University community, each of us is held accountable for our conduct as we align with the mission of Augusta University.

Standards for Behavior

Augusta University requires all employees to maintain satisfactory work performance and adhere to standards of good conduct. While not every possible behavior can be listed, discipline may be imposed for actions that are unprofessional or inappropriate, even if they are not explicitly covered by the Code of Conduct (Board of Regents Policy Manual §8.2.20.5) or Work Rules.

The Progressive Discipline process applies to all employees and is intended to be constructive, corrective, and supportive of success. It clarifies which aspects of performance, attendance, or behavior are unacceptable, outlines the improvements expected, and provides employees with the opportunity to demonstrate those improvements.

Employees are accountable for their own behavior. Work Rules establish the consequences for failing to meet these standards, as governed by the Augusta University Disciplinary Procedures for Employees Policy.

Exclusion Screening for Employees

Augusta University takes steps to ensure that employees are screened and verified against state, federal, and international exclusion databases. To assist in this process, AU utilizes a third-party vendor that checks employee lists against exclusion records. Our process is outlined in the “3rd Party Clearance Process & Exclusion Reporting via LWeNS” Standard Operating Procedure.

Research Principles and Standards

Augusta University is committed to the highest standards of professional conduct and integrity in research. These standards include honesty, trustworthiness, objectivity, accountability, openness, respect and fairness when dealing with other people, a sense of responsibility towards others and loyalty to the ethical principles espoused by our institution.

The University expects these standards to be maintained by all academic, research and relevant support staff, students and their supervisors and other individuals conducting

research or involved in the peer review process within or on behalf of the University. Prompt reporting to the appropriate institutional administrative committees of violations of human subjects' protection, laboratory safety, or humane treatment of animals is expected.

We understand that academic freedom is essential to creating an atmosphere in which scholarship flourishes. Promotion of intellectual freedom is consistent with assuring a climate of integrity and the University has the right and the obligation to inquire into all instances of alleged or apparent misconduct in scholarly activities. [Research Ethics & Compliance webpage](#)

Ethics Training

Ethics training provides important insights into standards and expectations at Augusta University and the University System of Georgia (USG) as a whole. All employees are required to complete Ethics training at the time of hire and periodically going forward, as a condition of their employment.

Some of the primary activities that ACERM facilitates in this area include:

1. **Values Week.** For a designated week each year, Augusta University joins with the entire USG to remind ourselves of our commitment to foster an ethical culture and to highlight our shared institutional values. During our annual [Values Week](#), AU hosts activities that highlight our institutional core values of collegiality, compassion, excellence, inclusion, leadership and integrity.
2. **Ethics Training.** As part of our training and education outreach, AU departments and units regularly request training that touches on ethical best practices.
3. **Monitoring.** The Ethics & Compliance Reporting Hotline is an available reporting mechanism for unethical conduct. It is operated by a third-party vendor and available 24/7.
4. **Oversight and Committee Participation**

Ethics Policy

The [Ethics Policy](#) provides a broad overview of compliance areas that employees need to be familiar with, including expectations for ethical decision-making as employees navigate our individual roles and responsibilities. Since AU is committed to the highest standards of ethics and integrity in pursuit of its mission, it is vital that our policy lays a foundation for compliance with state and federal laws, rules, and regulations.

Hotline

The Ethics & Compliance Reporting Hotline allows concerns to be reported confidentially by phone or online. The hotline does not replace the existing reporting mechanisms, including reporting concerns to an employee's supervisor, but rather serves as an additional reporting option.

While Augusta University has many systems of checks and balances to guard against inappropriate actions by its employees and students, no system can guard against all wrongdoing. Therefore, in cooperation with the Board of Regents, Augusta University has established a hotline using a third-party vendor as a way for members of our university community to report apparent incidents of wrongdoing that need to be addressed.

Administrators, faculty and staff who know or suspect that someone may be engaged in theft, fraud, embezzlement, employee malfeasance, fiscal misconduct, or violation of university financial policies have a responsibility to report it to their supervisor and the Office of Internal Audit at 706-721-2661 or to the Ethics Reporting Hotline:

[Compliance & Ethics Reporting Hotline](#)

Augusta University, in alignment with University System of Georgia (USG) Ethics and Compliance Hotline guidance, is committed to safeguarding individuals from retaliation when they, in good faith, report unlawful, fraudulent, or unethical conduct affecting the University. In support of this commitment, Augusta University maintains a confidential, 24-hour Ethics Reporting Hotline operated by a third-party vendor, accessible by phone or online. The University also provides direct access to the Ethics & Compliance Office, which promotes a culture of integrity and transparency through training, policy development, and collaborative resolution of concerns. Reports may be submitted anonymously, and all disclosures are handled with care to protect the identity and rights of those involved.

[Non-Retaliation Policy](#)

Management and staff should not confront the individual under suspicion or initiate investigations, as such actions could compromise any ensuing investigation. All employees must cooperate fully with those performing an investigation pursuant to this policy or will be subject to disciplinary action pursuant to Board of Regents' Policy on Cooperation in Internal Investigations [Internal Audit | University System of Georgia \(usg.edu\)](https://www.usg.edu/internal-audit).

If you wish to make a report through the University hotline, you can call 800-576-6623 or click on the link [Compliance & Ethics Reporting Hotline](#) for additional information. **The University hotline allows for anonymous reporting as it is independently operated and is available 24 hours a day, 7 days a week.** This is not a 911 or emergency service. If you require immediate assistance, please contact your local authorities.

Conflict of Interest (Institutional Policy, Individual Policy)

Conflict of interest exists whenever personal, professional, commercial, or financial interests, or activities outside of the University, have the actual or the appearance of influencing a University Employee's decision or behavior. There are three main policies that govern conflicts of interest for AU personnel.

1. **Individual Conflict of Interest:** This is the applicable policy for most cases. AU employees have an ongoing responsibility to annually report and fully disclose any personal, professional, or financial interest, relationship or activity that has the potential to create a conflict of interest or commitment. Once disclosed, if there is an actual or apparent conflict, a written plan (COI Management Plan) may be necessary to reduce or eliminate the conflict.
2. **Institutional Conflict of Interest:** This policy governs situations where the financial interests of AU or an institutional official may create a conflict of interest. Certain institutional interests may affect or appear to affect the research, education, clinical care, business transactions, or other activities of the institution. As such, a COI Management Plan may be necessary to reduce or eliminate the conflict.
3. **Outside Activities and Off-Campus Duty:** While separate, this policy provides the procedures for disclosing and obtaining official approval for outside activities. Since outside activities and duties can interfere with regular job duties, management needs to be involved in reviewing and approving. Employees shall not engage in any occupation, pursuit, or endeavor that interferes with the regular and punctual discharge of official duties, aka their primary work commitment to AU.

Institutional Review Board

The Institutional Review Board (IRB) Office ensures the research goals of the Augusta University enterprise are met, while protecting human subjects involved in research and verifying the enterprise meets compliance standards. The IRB Office also serves as the central contact for facilitating the goals of the Enterprise Human Research Protection Program (HRPP). University Ethics and Compliance collaborates with the IRB Office by providing consultations on subjects related to institutional level policies, privacy issues and all matters of general ethics and compliance. [IRB webpage](#)

Institutional Animal Care and Use Committee

The Institutional Animal Care and Use Committee (IACUC) is dedicated to the task of facilitating and assisting faculty in the conduct of research, teaching, and other activities involving the use of laboratory animals. The IACUC is responsible for assuring that all animal use complies with the Animal Welfare Act, Public Health Service (PHS) Policy on

Human Care and Use of Laboratory Animals, and the Guide for the Care and Use of Laboratory Animals, and all other applicable regulations, policies and procedures. Any use of animals at Augusta University must have approval from IACUC per policy and federal law. University Ethics and Compliance collaborates with IACUC to provide consultations and awareness of regulatory environments. [IACUC webpage](#)

Fraud, Waste, and Abuse

Augusta University recognizes that an ethical culture is essential to accomplish our mission and goals. Workforce members have an affirmative responsibility to report wrongdoing. Examples of such wrongdoing include, but are not limited to, violations of federal or state law, USG policies, AU policies, misuse of university or state resources or assets, conflicts of interest or conflicts of commitments, and any behavior that erodes an ethical culture.

A reasonable belief or actual knowledge of the following should be reported:

Fraud – An intentional deception that violates a law or the public trust for personal benefit or the benefit of others.

Waste – The act of using or expending resources carelessly, extravagantly, or to no purpose.

Abuse – Behavior that is improper compared with behavior that a prudent person would consider reasonable given the facts and circumstances. This includes the misuse of authority or position for personal gain or for the benefit of another.

The [Policy on Reporting a Compliance or Ethics Concern](#) ensures that everyone has the opportunity to report efficiently any matter that could compromise this ethical environment.

Compliance Program Elements

Compliance Policies

The Audit, Compliance, Ethics and Risk Management Office is directly responsible for the oversight and management of the following policies:

[Sexual Misconduct Policy for Students and Employees](#)

AU prohibits sex-based discrimination and sexual misconduct, mandates campus-wide prevention and training under Title IX, Title VII, Clery, and VAWA, and enforces uniform reporting procedures for all community members.

[Programs Serving Minors Policy](#)

AU hosts educational programs for non-student minors—including camps, classes, and research activities—and is committed to best practices that ensure a safe, enriching environment for all participants, staff, and volunteers.

[Non-Retaliation](#)

AU prohibits retaliation against individuals who report misconduct in good faith and enforces disciplinary action for both retaliation and knowingly false allegations.

[Ethics Policy](#)

AU upholds the highest standards of ethics and holds all workforce members personally accountable to its Code of Ethics.

[Privacy of Health Information](#)

AU designates specific units as Health Care Components under USG's HIPAA Hybrid Entity framework, requiring those units and individuals to protect patient and research subject privacy in compliance with federal law.

[Policy on Reporting a Compliance or Ethics Concern](#)

AU and its health entities promote an ethical culture by encouraging confidential reporting of concerns via a 24/7 external hotline, supplementing existing reporting channels.

[Institutional Conflicts of Interest Policy](#)

AU's institutional conflict of interest policy ensures that financial and commercial activities align with its mission to advance health through research, education, and service.

[Third-Party External Audit Policy](#)

AU requires advance notice to ACERM for external audits and ensures full cooperation while adhering to record access, evaluation and tracking of all audit-related activity including corrective action plans where needed.

[Use and Disclosure of Protected Health Information](#)

AU designates specific units as Health Care Components under USG's HIPAA Hybrid Entity policy, requiring those units and individuals to safeguard patients and research subject privacy in compliance with federal standards.

[Sanctions for Privacy and Cybersecurity Violations Policy](#)

AU HCC enforces HIPAA compliance by applying sanctions for privacy and cybersecurity violations, aligning with federal rules and USG's Hybrid Entity designation.

The Office of University Ethics and Compliance specializes in these subjects:

Ethics, Non-Retaliation, Non-Research and Institutional Conflicts of Interest, Privacy, Values Week, Program Serving Minors, and Title IX.

While we have policies and areas of focus in our department, as an enterprise-level office, we have oversight responsibilities that affect all our campuses, faculty, staff and students.

Oversight

The Office of University Ethics and Compliance oversees many committees and provides representation on committees with related subject matters. The following committees highlighted in bold are led by our office, while the others are committees where we have representation.

- **Compliance Advisory Committee**
- **Values Week Committee**
- **Programs Serving Minors Advisory Group**
- **Clery Committee**
- **Sexual Assault Awareness Month Committee (SAAM)**
- **AU's Sexual Assault Response Team (SART)**
- ACERM Executive Committee
- Conflict of Interest Committee
- Policy Advisory Group
- Special Events Subcommittee
- Study Abroad Committee
- Clinical Research Billing
- Internal Controls
- Enterprise Risk Management Committee
- Continuity of Operations (COOP)
- Record Retention Committee
- Augusta Judicial SART
- Council of Excellence Leaders (CEL)
- DCG Committee

Along with several committee representations, our office also has oversight of some external regulations at AU. Specifically, we assist management in evaluating and responding to external audit requests as stated in the [Third-Party External Audit Policy](#). AU may engage an external audit/consulting firm and/or may be the subject of an external audit, review or other special engagement.

Education and Training

Augusta University offers education and training services to all members of our university community, and certain sessions can be tailored to meet the needs of specific participants. If you are interested in requesting training in the areas of Privacy, Title IX (Sexual Harassment Prevention, Ethics & Compliance, or Programs Serving Minors, please use this form: [Training Request](#). Please feel free to call the Office of Ethics & Compliance at 706-721-0900 or send an email to compliance@augusta.edu if we can assist you in any way.

Auditing and Monitoring

Office of University Ethics and Compliance

We ensure an effective compliance program through research, investigation, monitoring and reporting. By monitoring regulatory changes and analyzing trends, we support informed decision-making across daily operations.

Our internal evaluations - spanning Ethics, Policy Oversight, Privacy, Programs Serving Minors (PSM), Title IX and other areas—reinforce stakeholder confidence and institutional integrity as well as meet regulatory requirements.

Auditing & Monitoring Activities

- 1. Periodic Internal Assessments and Evaluations:** We conduct regular self-assessments to identify gaps in service, efficiency, or compliance. Collaborating with Internal Audit helps validate program performance and maintain high-quality standards across university operations.
- 2. Program Effectiveness Reviews and Inspections:** Compliance programs are periodically evaluated for effectiveness, considering emerging risks, regulatory updates, and audit findings. Privacy and PSM conduct regular site visits and walk-throughs to ensure adherence to policies and program guidelines. Title IX and Clery also evaluate various areas of the university to maintain safety and fair treatment.
- 3. Annual Compliance Assessments:** Focused evaluations of key departments and administrative areas aim to ensure consistent policy application and risk mitigation through enforcement, education and training. Annual compliance assessments foster ongoing program improvement and strengthen cross-campus partnerships.
- 4. Allegation Reporting Mechanism:** We offer confidential reporting channels—including an anonymous hotline—for employees and students alike to raise misconduct concerns or compliance inquiries.

These efforts ensure our compliance framework remains robust, transparent, and adaptable to evolving challenges while building relationships, providing support, and awareness of compliance programs and policies.

Reporting Mechanisms

Augusta University takes all matters of unethical conduct or policy violation seriously. Individuals are strongly encouraged to report any incident or concerns you may have. This could include, but is not limited to conflicts of interest, patient health information, receiving something of value in exchange for purchasing a service or product, time and expense abuse, misconduct, reporting external audits, and student/employee privacy issues.

Options to file a complaint or for inquiries:

Phone – 706-721-0900.

Email

compliance@augusta.edu (ethics and compliance concerns)

privacy@augusta.edu (privacy concerns)

Toll Free – Ethics Hotline 1-800-576-6623

Online – <https://www.augusta.edu/compliance/hotline.php>

To research a concern, some basic information is needed:

- A description of the concern
- Who is involved
- Where and when the incident took place
- Your name and contact number

We have a strict **non-retaliation policy**, and you may remain anonymous. Every effort will be made to maintain confidentiality.

Any person found to be in violation of any policy, or the Code of Ethics will be referred to Student Affairs and/or Human Resources.

Response and Discipline

The Ethics and Compliance program promotes and enforces policies and standards through well-publicized and accessible disciplinary guidelines. We respond promptly to detected offenses or reported concerns through standard investigation methods, documentation and reporting. This could lead to a corrective action plan or an appropriate

level of remediation depending on the circumstances. Activities are often in partnership with related department heads/managers, Human Resources, Legal, etc. to deliver recommendations for appropriate disciplinary actions in line with our [Work Rules](#) and the [Disciplinary Procedures Policy](#).

Investigations and Remediation

At Augusta University, every employee plays a vital role in maintaining an ethical and compliant workplace. If you see something that raises an ethical or compliance concern, it's your responsibility to report it. Our office is here to ensure those concerns are taken seriously, investigated thoroughly, and resolved appropriately.

While there are several ways to report concerns, University Ethics and Compliance provides leadership and guidance for formal investigations in the following areas:

1. Retaliation
2. Conflicts of Interest (non-research and institutional)
3. Compliance policy violations
4. Privacy
5. Title IX and Sexual Misconduct
6. Programs Serving Minors (policy violations)

Our investigators receive continuous training to ensure every investigation meets the standards set by the University System of Georgia and reflects the highest ethical principles.

When an investigation uncovers policy violations or process gaps, we work closely with the affected areas to create and implement corrective action plans. When necessary, we also collaborate with Human Resources to ensure appropriate actions are taken.

Together, we can foster a culture of integrity and accountability. If you have questions or need guidance, our team is here to help.

Programs

Title IX

Policy and Process

Title IX prohibits discrimination based on sex in any education program or activity that receives federal financial assistance. This includes sexual harassment, sexual violence, dating and domestic violence, stalking, and all other gender-based forms of discrimination. Augusta University addresses sex discrimination and sexual misconduct pursuant to Title

IX, Title VII, the Violence Against Women Act (VAWA), the Clery Act, applicable Board of Regents policies, and institutional policy.

Augusta University is committed to fostering a community that supports complainants, victims, and respondents to ensure proper response to sexual misconduct allegations, prompt, fair and impartial investigations.

The **Title IX Coordinator** or designee coordinates outreach, explains rights and resources, discusses supportive measures, reviews reporting options, and assesses whether the matter falls within applicable policy and procedures.

A trained **Title IX investigator** will conduct a prompt, fair, thorough, and impartial investigation by gathering relevant evidence, conducting interviews, reviewing documentation, and preparing an investigative report. Through standards set forth in the Sexual Misconduct policy, Student Code of Conduct and the Anti-Harassment and Non-Discrimination policy and protocol; a fair, unbiased and fact-finding investigation will provide a report for subsequent decision making through to a Hearing process.

Where required by applicable policy or regulation, matters may proceed to an adjudicative or hearing process. If the respondent is found responsible for a policy violation, based upon the evidence and facts, sanctions are outlined in a decision letter to both parties. As outlined in the Sexual Misconduct Policy, both parties may appeal a final decision.

Both parties are provided equitable rights and opportunities throughout the process and have a right to review the information, the right to an advisor, the right to provide witnesses, documents and appeal procedures.

Outreach and Education

The Title IX team collaborates with many organizations and programs throughout the institution and the community to bring about awareness and education on topics including:

- Bystander Intervention
- Healthy Relationships
- Sexual Assault Awareness Month
- Domestic and Dating Violence Awareness Months
- Stalking, Sexual Harassment and Social Media
- Sexual Harassment Prevention in the Workplace
- Pregnancy Rights

All new students and employees are assigned an interactive online educational training that includes information around nonconsensual sexual contact, domestic violence, dating violence, stalking and sexual harassment.

Clery

The Jeanne Clery Campus Safety Act, commonly known as the [Clery Act](#), is a federal law that requires colleges and universities in the United States to disclose information about crime on and around their campuses. This act aims to provide transparency and accountability regarding campus safety by requiring institutions to collect and disseminate crime statistics, publish annual security reports, and issue timely warnings about crimes that pose a threat to the campus community.

Key Requirements of the Clery Act:

- **Annual Security Report (ASR):**

Institutions must publish an ASR that includes crime statistics for the past three years, policy statements regarding safety and security measures, descriptions of crime prevention programs, and procedures for handling reports of sex offenses.

- **Daily Crime Log:**

A public log must be maintained and accessible that documents all reported crimes within the institution's patrol area.

- **Timely Warnings:**

Institutions must issue timely warnings to the campus community about crimes that pose an ongoing threat to safety.

- **Crime Statistics:**

Specific crime statistics must be reported to the U.S. Department of Education annually.

- **Victim Support:**

The Clery Act also mandates that institutions provide certain rights and support to victims of dating violence, domestic violence, sexual assault, and stalking.

Augusta University coordinates Clery compliance through collaboration among University Police, the Title IX Office, Student Affairs, Housing, Athletics, Human Resources, and designated Campus Security Authorities

Programs Serving Minors

AU offers a variety of programs/activities serving non-student minors to include athletic, science and summer camps, after-school programs, research studies, and many more.

These programs benefit both the institution and the community and provide us with the opportunity to challenge, educate and mentor young people. We are committed to providing a safe and healthy environment for all participants. The [Programs Serving Minors Policy](#) requires that programs implement controls designed to enhance the safety and protection of minors.

The Program Serving Minors (PSM) coordinator is responsible for updating, maintaining, and enforcing the PSM policy. Training is developed and administered for all program staff/volunteers as a requirement prior to their participation in any program or activities. In accordance with AU and USG policies, program staff/volunteers who will have direct contact with minors are required to undergo background checks. The Office of University Ethics and Compliance collaborates with Human Resources to ensure checks are valid for the duration of the program.

At any time, the PSM coordinator provides consultation to interested parties wanting to host minors, which includes those third-party or external groups. Third parties that utilize AU facilities for purposes of hosting minors must comply with the PSM policy. Assessments can be conducted prior to the start of the program (pre-assessments) and during the program (site visit assessments) to ensure expectations are being upheld. Investigations are conducted as needed.

Privacy

The Privacy Program ensures compliance with federal, state, and international regulations, including HIPAA, FERPA, and the EU General Data Protection Regulation (GDPR). This includes information that identifies or describes an individual. The Privacy Program also has oversight of personal information which may be unrestricted/public, sensitive, and/or confidential.

Core Responsibilities

- **Risk Assessments:** Conducts privacy risk assessments, including for on-site health clinics and third-party data sharing.
- **Data Classification & Protection:** Oversees the handling of personal information categorized as unrestricted/public, sensitive, or confidential.
- **Policy Enforcement:** Implements and monitors policies such as the [Use and Disclosure of Protected Health Information Policy](#) and the [Privacy Notices](#).
- **Training & Awareness:** Offers tailored training sessions on privacy best practices and regulatory requirements.

Privacy Rights & Regulations

- **HIPAA:** Ensures the protection of patient health information across clinical and research settings.
- **FERPA:** Safeguards student education records and governs access and disclosure.
- **GPIPA:** Mandates notification procedures in the event of a data breach involving sensitive personal information. **EU GDPR:** Applies to data subjects from the European Union, providing rights such as access, rectification, erasure, and data portability. Augusta University maintains a lawful base for data collection including legitimate interest, contract performance, legal obligations, and consent.

Data Collection & Usage

- Personal data collected includes names, addresses, transcripts, employment history, medical information, and research data.
- Data is used for academic admissions, employment, research participation, and community engagement.
- Refusal to provide required data may limit access to university services.

Security & Confidentiality

- Implements physical, technical, and administrative safeguards to prevent unauthorized access.
- Shares data only:
 - As required by law
 - To protect university interests
 - With approved service providers
 - With consent from the data subject

Reporting & Support

- Individuals can report privacy concerns via:
 - **Email:** privacy@augusta.edu
 - **Phone:** 706-721-4018
 - **Hotline:** 1-800-576-6623
 - **Online Form:** [Submit Privacy Report](#)

Retention & Mobile App Use

- Data is retained per the University System of Georgia Records Retention Schedules.