Throughout its 50-year history, UAB has maintained a strong tradition of global engagement. Our shared values of collaboration, integrity, stewardship, and accountability power our world-changing research enterprise and lead us to critical international partnerships that enrich our work and our campus.

To address concerns raised by federal law enforcement and funding agencies over the past year about foreign interference in U.S. research, the University has formed a Productive International Partnerships Taskforce representing many cross-functional areas of campus. Taskforce members from the Faculty Senate, Research Administration, Human Resources, University Relations, Information Security, International Student and Scholar Services and the Offices of the Provost, Compliance & Risk Assurance, Sponsored Programs, International Sponsored Programs, Counsel, and Diversity, Equity and Inclusion have forged an action plan to ensure international collaborations - imperative to reaching UAB’s research goals - are established and managed in a manner consistent with sound award decisions are made.

Researchers are required to file Other Support documentation to federal funding agencies at just-in-time and progress report intervals and must carefully review it to ensure it includes all required information, including active and pending awards, institutional support, relevant affiliations, support for lab members, and...

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Four Areas for Greater Transparency
As identified by UAB’s Productive International Partnerships Taskforce

- Academic appointments outside UAB
- Research funding sources
- Support for laboratory personnel
- High-value resources

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Faculty Appointments at Outside Institutions

Different from incidental speaking, lecturing, or presenting at other institutions of higher education, which may qualify as professional public service activities under the UAB Enterprise Conflict of Interest and Conflict of Commitment Policy, faculty appointments outside UAB – whether visiting, honorary, or adjunct – must be approved in advance by department and school leadership and documented with a Request for External Activity Approval form. For questions, please see the UAB Transparency in Research website.

Promoting Productive International Partnerships  Continued from page 1

Faculty and staff need not wait until the PIP team has finalized and implemented its multi-faceted action plan to ensure compliance with UAB and funding agency policies and requirements and to protect U.S. security concerns. Here are five things you can do right now:

1. Obtain advance approval for all external activities with foreign entities. See the UAB Enterprise Conflict of Interest and Conflict of Commitment Policy and Request for External Activity Approval Form.
2. Ensure Other Support pages, Foreign Components, and Biosketches in grant proposals, just-in-time submissions, and progress reports appropriately reflect all affiliations and/or resources made available to you in support of and/or related to your research endeavors. (See article, “Other Support”, on page 1.)
3. Before traveling outside the U.S. or Canada on UAB business -- regardless of what entity is paying for the travel -- complete the UAB-related International Travel Registration form.
4. Contact the Office of Compliance & Risk Assurance if your work involves shipment, transfer, or transmission of export-controlled items or information. See UAB’s Export Control website.
5. Visit the UAB Transparency in Research website for the most up-to-date information.

Financial Conflict of Interest Retraining Will Be Required in 2020

For many UAB faculty staff and students, financial conflict of interest retraining will be required in the summer of 2020. Detailed instructions will be emailed to all personnel required to retrain. If you have any questions about this upcoming retraining please contact the OCIRB at cirb@uab.edu or (205) 975-9690.
other resources. Other Support documentation is used by agencies to:

- Ensure there is no duplication of funding for scientific aims, specific budgetary items, or an over-commitment of the individual’s total level of professional effort; and
- Provide opportunity for full transparency of domestic and international partnerships and third party contributions including material and technology resources and financial support.

Therefore, Other Support should include all resources available in direct support of all of an individual’s research endeavors, whether monetary or non-monetary, federal or non-federal, commercial or institutional, domestic or foreign. Examples of Other Support include, but are not limited to, the following:

- Domestic and foreign grants and contracts from any entity (both direct and pass-through);
- Institutional start-up funds, retention funds, or pilot grants to support one’s research;
- Financial support for laboratory personnel, e.g., students or scholars working in a researcher’s lab at UAB, including those supported in whole or in part by another entity through salary, stipend, or receipt of living or travel expenses;
- Involvement of visiting or volunteer faculty, scholars, or scientists supported from third-party sources who are participating in research at UAB;
- Provision of lab or office space at another institution, foreign or domestic;
- Domestic or international appointments or positions held by the individual;
- Provision of scientific materials, e.g., biologics, chemical, model systems, technology, equipment, etc.;
- Travel or living expenses directly paid or reimbursed by a non outside entity; and
- Affiliations with foreign entities or governments, including talent programs, even if the affiliation is honorary, visiting, or adjunct.

For comprehensive NIH Other Support information, see NIH’s Other Support webpage and NIH Notice OD-19-114. For NSF current and pending support, all sources of support and commitments of time, even if not receiving salary support, must be included.

To assist researchers in completing this information, a UAB faculty-led effort has developed a new UAB Other Support form. There will be a broad communication to announce its full, UAB-wide implementation.

If you are unsure if you should include something in your Other Support pages, consult with the Office of Sponsored Programs as appropriate. Additional information is available from the UAB Office of Research. These FAQs on Other Support and Foreign Components can also help.
UAB is committed to ensuring that all extramurally funded projects, including clinical trials, are classified appropriately and seek reimbursement of facilities and administrative costs at the applicable federally negotiated rate or an institutionally established rate. The December 1999 Indirect Cost Reimbursement Policy established the responsible and equitable reimbursement of indirect costs and overhead for extramurally sponsored projects. It has now been revised to provide detailed definitions of the specific rates that determine such reimbursement. Renamed the Facilities & Administrative Rate Policy, it codifies all rate types in one place and expands upon the circumstances under which they are to be applied. Responsibility for implementation of the Facilities & Administrative Rate Policy will be held dually by the Offices of the Senior Vice President for Finance & Administration and the Vice President for Research through the Office of Sponsored Programs. The policy took effect on October 2 and applies to all requests for extramurally funded projects by faculty, staff, and trainees of UAB.

**Data security requirements for travelers** are outlined in UAB Information Technology’s webpage, Guidelines for International Travel. These data security requirements for those traveling fall into three categories with increasingly protective measures depending on the level of risk. This webpage details what travelers must do before, during, and after travel to secure UAB data.

If you are traveling with restricted data to extremely sensitive/restricted destinations, including Iran, Sudan, Syria, North Korea, and Cuba, an Information Security Exception Request must be completed and approved by your unit’s Data Steward, the Office of Compliance & Risk Assurance, and Information Security prior to travel. Other important resources are:

- UAB’s Data Protection and Security Policy
- Data Classification Rule
- Data Protection Rule
- Minimum Security for Computing Devices Rule
Approach to Revisions
Beginning in early 2019, a Division of Student Affairs workgroup, consisting of representatives from Student Conduct & Outreach, Student Housing & Residence Life, and Student Involvement & Leadership, reviewed the current UAB Student Conduct Code (Code) to recommend appropriate revisions to the document and its related processes. The goals of the workgroup were to:

- Make the Code more user-friendly, transparent, and efficient, using developmental language;
- Incorporate provisions to address misconduct by student organizations;
- Integrate the conduct process administered by Residence Life into the general student conduct procedures; and
- Ensure compliance with federal and state laws.

Through the revision process, the workgroup incorporated best practices from several peer institutions; University of Alabama System sister institutions; and model codes/policies created by Stoner and Lowery and the National Center for Higher Education Risk Management (NCHERM)/Association of Title IX Administrators (ATIXA). The policy review process was conducted consistent with provisions of University of Alabama System Board Rule 108, seeking stakeholder input and consistency with other policies as practicable, with the final draft approved by the Chancellor’s Designee.

Purpose of the Student Conduct Code
The Student Conduct Code describes standards of behavior for all students and student organizations and outlines students’ rights in processes for adjudicating alleged violations. It also sets forth in writing general notice of prohibited non-academic conduct. The Code should be read broadly and is not designed to define misconduct in exhaustive terms. All students and student organizations are expected to conduct themselves in accordance with the Code.

The revisions to the UAB conduct adjudication process support the vision, mission, and shared values of the University and the tenets of UAB creed, The Blazer Way. Established through a focus on students and learning, the process strives to uphold individual and community standards, foster an environment of personal accountability, promote personal growth and development of life skills, and care for the well-being, health, safety, and property of all members of the University community.

The current version of the Code is available online here. The revised Code, available from the Office of Student Conduct & Outreach, takes effect January 2, 2020.

The next issue of Compliance 411 will publish an interview with Jonathan Adams, Director of UAB Student Conduct & Outreach, discussing some of the substantive changes to the Student Conduct Code. The Office of Student Conduct & Outreach operates within the Division of Student Affairs.

1 Stoner & Lowery; Navigating Past the Spirit of Insubordination: A 21st Century Model Student Conduct Code with a Model Hearing Script.
2 NCHERM/ATIXA; Deliberately Indifferent: Crafting Equitable and Effective Remedial Processes to Address Campus Sexual Violence.

UAB community members are creators and custodians of various types of confidential, proprietary, and private information. Each UAB community member is required to comply with federal and state laws and regulations agreements with third parties, and UAB policies pertaining to the use, protections, and disclosure of such information. UAB community members are expected to:

- Learn and follow all laws, UAB policies, and agreements with third parties regarding access, use, protection, disclosure, retention, and disposal of public, private, and confidential information;
- Respect the privacy of all information records, whether student, employee, or patient;
- Follow document retention and disposal policies;
- Maintain information security using appropriate electronic and physical safeguards; and
- Fulfill any applicable requirements when one’s relationship to UAB is terminated (see article below).

Are You New to UAB? IP Disclosure Assistance is Available

Are you new to UAB? Do you have existing intellectual property that is licensed, optioned, or generating income? If so, in accordance with UAB policy and federal regulations, such IP must be disclosed to the Office of the Conflict of Interest Review Board (OCIRB). For more information and assistance call the OCIRB at (205) 975-9691 or email cirb@uab.edu.

Employees Leaving UAB Must Ensure Accessibility to Data, Files

Under University of Alabama Board of Trustees Rule 105, Preservation and Ownership of Records, all files and records created, held, or received by UAB employees or others in the scope of their work for and on behalf of UAB are the property of UAB. In the event any research records custodian leaves UAB employment, it is incumbent upon the employee’s department and that individual to work out a written plan or agreement to comply with Board Rule 105 and ensure that the files, data, and/or information are accessible by UAB. To determine if a Data Use, confidentiality, collaboration, or other agreement is necessary, consult with the Office of Sponsored Programs.
Several form types within the UAB Electronic Forms system at www.uab.edu/uabforms were recently redesigned and will be launched before month’s end. Though questions and required fields remain largely the same, submitters will notice a new look and easier-to-follow instructions. Automated e-mails on the status of the forms will be generated in the same way and will still contain notes from reviewers and recommended links to helpful information.

Automated workflows also remain the same, and reviewers will be able to click on the link in the e-mail notification to go straight to the submitted form. Forms submitted after their launch dates (November 15 for International Travel Registrations, November 22 for Faculty Data Forms, and November 27 for UAB Conflict of Interest forms) will appear in a newly designed dashboard with enhanced features, including graphical workflow display, streamlined approval page, and search-and-sort within the display grids. Forms submitted prior to those launch dates will need to be reviewed and acted on before December 20 in the legacy dashboard or be re-entered using the new form.

Questions about employee travel may be directed to the Office of Sponsored International Programs at white-side@uab.edu or (205) 975-2438. Questions about student travel may be directed to the Office of Education Abroad at educationabroad@uab.edu or (205) 975-6611. Questions about the Faculty Data Form may be directed to Faculty Affairs at facultyaffairs@uab.edu or 205-934-0513. Questions about UAB Conflict of Interest forms can be directed to the Office of Compliance & Risk Assurance at compliance@uab.edu or (205) 996-6540 or the Office of the Conflict of Interest Review Board at cirb@uab.edu or (205) 975-9590.

Congratulations to Compliance Challenge Winners!

By participating in last issue’s Compliance Challenge, Donna Williamson and Alexandria Elliott entered and won a drawing for two $10.00 Publix gift certificates. To participate in this issue’s Challenge and enter a drawing for one of two $10.00 Newk’s gift certificates, see the Compliance Challenge on page 4. This issue’s Challenge topic is data security while traveling internationally.

Research Safety Committee
Director Donna Williamson of Occupational Medicine & Research Safety stopped by the Office of Compliance & Risk Assurance to accept her gift certificate. See Donna’s article on page 9 regarding Holiday Lab Safety!

Administrative Associate
Alexandria Elliott of the Department of Emergency Medicine also won a gift certificate for participating in the Compliance Challenge.

Thanks to all who participated!
Special Notices for the Season...

Alabama Ethics Law & Receipt of Gifts

Throughout the year and especially during the holidays, UAB employees should be mindful that Alabama law restricts items they may receive from vendors. Under Alabama Ethics Law, UAB employees may not use their position for private gain or receive special benefits as a result of purchasing decisions. This includes gifts, entertainment, and personal use of promotional rebates on purchases.

However, items of de minimis value—such as greeting cards, plaques or other items intended solely for presentation, promotional items commonly distributed to the general public, and items that have no resale value or value to others—are generally permissible. The statute defines de minimis as a value of $25 or less per occasion with an aggregate of $50 or less in a calendar year from a single provider.

If a gift is not permissible, it should be declined and returned to the donor, the donor should be paid the gift’s market value, or it should be given to charity through the UAB Development Office. Within reason, consumable items that may be shared among co-workers, like a tin of cookies or popcorn, may also be placed in a common break room to minimize any personal benefit.

For more information, visit the Office of Compliance & Risk Assurance’s Alabama Ethics Law webpage.

Lab Safety Measures for the Holidays

The UAB campus will be closed for Christmas December 23-25, and for New Year’s December 31 and January 1. While the Hospital, the Police Department, and Animal Resources will continue normal operations, other units will have reduced staff available to deal with critical areas and emergencies. As you plan for time away during these closing periods, please consider the following:

- If you need to be on campus, remember to bring your UAB One Card to gain access. Lock labs and offices.
- Review emergency phone numbers and update after-hour contact information for your group. Update notification lists on lab doors and add temporary contact information if staying in a different location during the closing.
- Since external vendors may also have reduced work schedules, order supplies and other materials and arrange for delivery in advance. If you expect a delivery directly from an external vendor(s) during a UAB closing, please make arrangements with the vendor for how to accept the delivery, since UAB buildings will be locked.
- Fill Dewar’s and cryogen reservoirs.
- Securely store valuable research samples, radioactive isotopes, biohazardous agents, recombinant materials and hazardous chemicals.
- Back-up computer files.
- Plug refrigerators and freezers into emergency power where available. Red outlets are typically connected to emergency power.
- Turn off all heating devices (e.g., water baths and heat blocks) and water faucets before you leave.
- Turn off and unplug computers, printers, and other electrical equipment that will not be used during the closures.