

Compliance: It's not optional

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- General Compliance Principles
- Compliance at UB
 - Allowable Use of Funds Policy
 - Gifts Prizes and Awards Policy
 - Approval Authority Policy
 - Procurement and Contracting
- Compliance Challenges and Culture
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What is Compliance?

Definition

- to comply
- to act in accordance with the rules
- to adhere to

With What?

- University Policies and Guidelines
 - Including departmental/unit policies
 - Internal Procedures
- SUNY Policies and Guidelines
- State Policies and Regulations
- General Social and Professional Expectations



Compliance is a Business Enabler

Compliance Reduces Risk Of:

- Human Injury
- Property Damage
- Financial Loss
- Damaged Reputation
- Information Security Mishaps

Improves Overall Operations:

- Knowledge Sharing
- Leveraging of Common Systems
- Drives Synergies



Compliance at UB

Compliance efforts at UB support a culture that promotes prevention, detection and resolution of non-compliance.

Prevention

- System Integration
- Business Day/Training
- Centralized Functions
- Communication

Detection

- Reconciliations
- Internal Audits
- EthicsPoint

Resolution

- New Policies/Procedures
- One on One Training
- Action Plans
- Accountability

University Policy Library

Policy

► [UB Policy Library](#)

[Develop and Maintain a UB Policy](#)

[Glossary of Terms Used in UB Policies](#)

[Modify a UB Policy](#)

Related Links

- [SUNY University-wide Policies and Procedures](#) ↗
- [Research Foundation \(RF\) Policies](#) ↗
- [SUNY Board of Trustees \(Select Policies\)](#) ↗



Allowable Use of Funds Policy

Governs the spending of State, UBF and RF funds to ensure that expenses are for legitimate university business and comply with allowability criteria.

Hosted Business Meals

- External Beneficiaries
- Community Engagement
- Recruitment
- Outreach

Student Meals

- Student Beneficiaries
- Academic Mission
- Support Programming
- Retention

Internal Business Meals

- Employee Beneficiaries
- Per-Diem Rates
- Business Purposes
- Occasional
- Equitable to all

Sponsored Meals

- Support sponsored projects
- Human subjects
- Research
- Allowable per sponsor agreement

Allowable Use of Funds Policy- cont'd



Alcohol is restricted to the lesser of 2 drinks or \$15 per person.



Gratuity is limited to 20% of the pre-tax total. Delivery + Gratuity must be within the per diem rate for internal business meals.



Exceptions must support the intent of the policy and require additional approval.

Gifts Prizes and Awards

Governs how State, UBF and RF funds are used to purchase gifts, prizes and awards to recognize members of the university community in support of our mission.

Employee as Recipient

- No Cash
- De Minimis Value
- Retirement Gifts
- Treated as non-employee if not acting in role.

Non-Employee as Recipient

- Taxable if cumulative total exceeds \$600.
- Tangible items encourage.
- Gift cards less than \$100 no tax info collected

Nonresident Alien as Recipient

- 30% tax withholding on all

Approval Authority

Defines the authority to approve transactions and provides guidance on delegation of that authority.

Human Resources

- President and Provost requirements documented
- All other- chain of decision making

Purchasing

- All procurement and revenue contracts, leases and permits must be signed by Procurement

Facilities

- UB Funded Construction projects
- Facilities Transactions

All Other

- Service Center Fees
- Travel and Expense Reimbursements
- Policies

Purchasing and Contracting

Each funding source has its own policies, guidelines, and regulations.

State

- The most heavily regulated and restricted

Research

- Defined by both rules of the grant and policies of the Research Foundation

UB Foundation

- UBF follows general business practices and IRS law – not “free” money

Purchasing and Contracting

Some basic rules to be aware of:

Signing

- Unless formally delegated, you do not have authority to sign anything related to the release or intake of funds (purchases or revenues)

Ordering

- It is against policy to order and/or receive something prior to a Purchase Order being approved and processed by the Purchasing Dept

Quoting

- Often we are required to receive multiple quotes; stating that a vendor is the only one when there are others may be illegal

Purchasing and Contracting

You may be held personally liable if you do not follow University requirements.

What does this mean
for you?

**KNOW
THE
RULES!!!**



And if you don't
know:



To have an effective compliance program, we must establish and maintain
a culture that

*encourages ethical conduct and a commitment to
compliance.*

Compliance Challenges at UB



Accountability



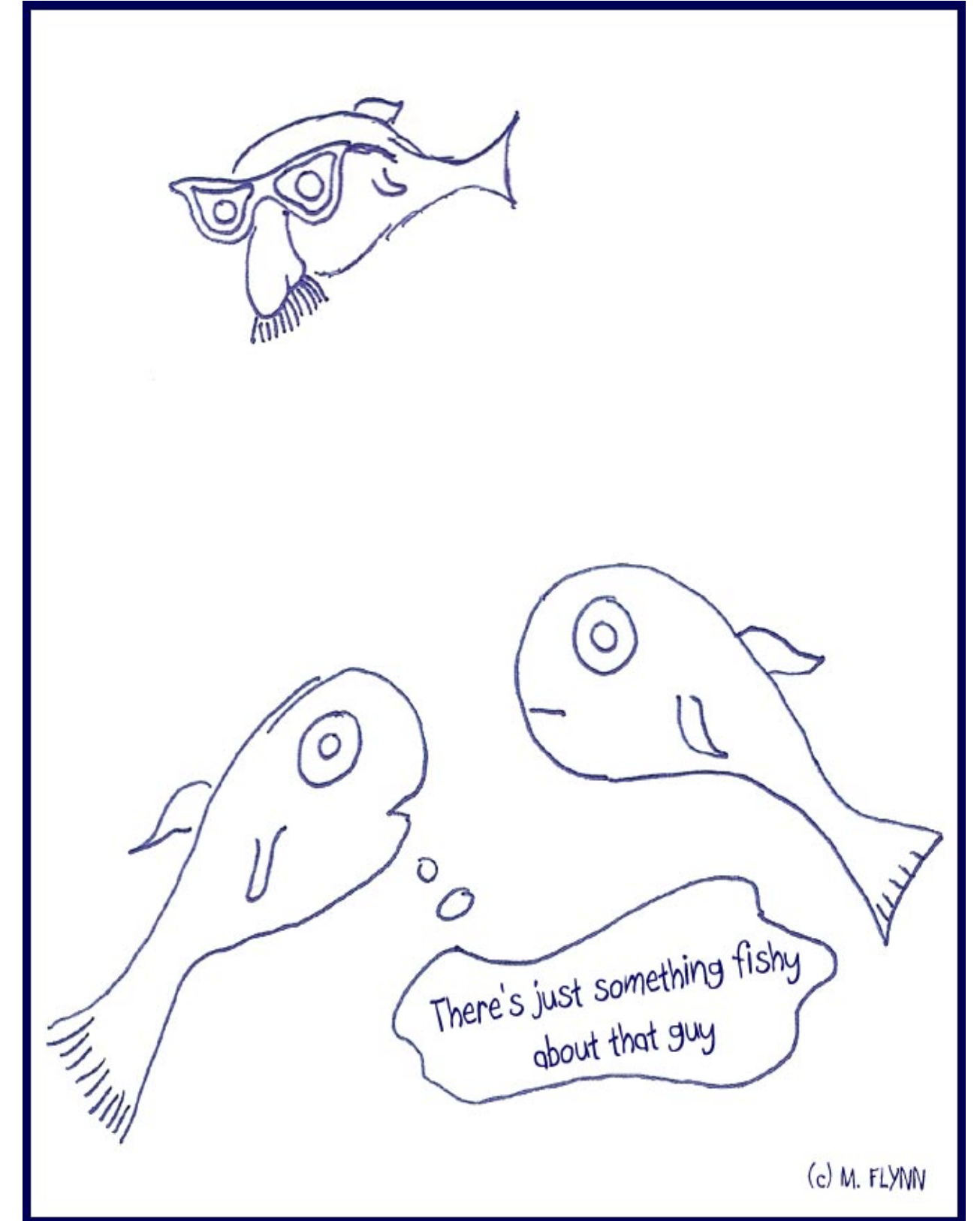
Ethical Conduct

UB is committed to the highest level of integrity and ethical conduct.

Speak Up!

As a component of our compliance program UB supports an environment where employees are encouraged to report potential problems.

[EthicsPoint webpage](#)



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