

Instructions: The following is a proposed timeline for completion of the Report of Outside Activities and Interests for Faculty, Academic Staff and Limited Appointees with half-time appointments or more. The process outlines a series of notifications with sample language institutions may use as a guide to communicate with employees and an escalation process to ensure compliance and accountability.

I. SAMPLE COMMUNICATION PLAN

| Date | Process | Owner | Notes |
|--------------------------|---|---|--|
| Between March 1 - 15 | First Notification: All employees required to complete the form: Continuing faculty, academic staff and limited appointees notified of the requirement and annual due date of April 30. | Human Resources* or designee | Memorandum with forms attached. |
| Between April 1 - 15 | Second Notification: ONLY to employees who haven't completed forms. This notification should be sent 30 days after the first notification. | Human Resources* or designee | Complete the form as soon as possible. |
| April 20 th | Third Notification: ONLY to employees who haven't completed forms. <i>Employee has not completed OAR.</i> | Human Resources* or designee Supervisor | Complete the form as soon as possible. |
| (On or about) April 25th | Escalation #1: Written notification to employee, immediate supervisor, and chancellor. <i>Employee has not completed and will be non-compliant if not completed by April 30th</i> . | Human Resources* or designee Supervisor | Employee must complete the form within 5 days. |



| May 1 st | Escalation #2: HR documents employee's non-compliance with note to file and the employee's performance rating is adversely affected. Written notification states that "Non-compliance with the reporting requirement has placed the employee "not-in-good standing" status. Appeals may be made to Chancellor after the requirement is met. When an employee is not in good standing with an ethics requirement, s/he is not eligible for any base, lump sum or pay plan salary adjustments. (Extenuating circumstances or leaves of absences will be taken into consideration.) | Supervisor Chancellor Human Resources | Letter to file. |
|---------------------|--|---|-----------------|
| May 15th | Supervisors complete the review of late OAR forms and/ or perform due diligence on OAR forms with potential conflicts of interest | Supervisor/ Designee | |

^{*}Human Resources is not the designated owner at every UWS institution.

II. NOTIFICATION AND ESCALATION PROCESS

In order to ensure accountability and compliance, a notification and escalation process is recommended. If the employee fails to complete the OAR on or about April 25, 2020 the employee's supervisor and the Chancellor are notified through the first escalation. The escalation occurs if no action is taken by the employee.



<u>First Notification</u> is the same sent to all employees – Send between March 1 - 15, 2020 (See Memo from Katie Ignatowski)

Use the memo to communicate the code of ethics applicable to their employment status.

<u>Second Notification</u> – SAMPLE Language – Send between April 1 - 15, 2020 – to Employees who have not completed the form.

This email serves as a reminder that pursuant to <u>Chapter UWS 8</u>, Outside Activity Reporting (OAR), all UW System faculty, academic staff, and limited appointees with half-time appointments or more, are required to report annually outside activities and interests related to their areas of professional responsibility and for which they receive remuneration. This report must be filed by April 30, 2020.

Our records indicate that as of today's date, your form has not been received. Please visit the UW System Office of Compliance and Integrity website for <u>OAR training and guidance</u> prior to completing the form. After reviewing the Outside Activities guidelines, complete the OAR and submit to your [insert HR or designated receiver of forms] no later than April 30, 2020. Please note that individuals with no reportable activities are required to complete the form and certify that no reportable activities exist.

If a potential conflict of interest is identified, your supervisor will contact you to discuss further.

Please contact us at X-XXXX if we may be of further assistance to you.

Third Notification - SAMPLE Language - Send April 20, 2020 - to Employees who have not completed the form.

This email serves as a reminder that pursuant to <u>Chapter UWS 8</u>, Outside Activity Reporting (OAR), all UW System faculty, academic staff, and limited appointees with half-time appointments or more, are required to report annually outside activities and interests related to their areas of professional responsibility and for which they receive remuneration. This report must be filed by April 30, 2020.



Our records indicate that as of today's date, your form has not been received. Please visit the UW System Office of Compliance and Integrity website for <u>OAR training and guidance</u> prior to completing the form. After reviewing the Outside Activities guidelines, complete the OAR and submit to your [insert HR or designated receiver of forms] no later than April 30, 2020. Please note that individuals with no reportable activities are required to complete the form and certify that no reportable activities exist.

If a potential conflict of interest is identified, your supervisor will contact you to discuss further.

Employees who do not complete the OAR by April 30, 2020 will be considered non-compliant with reporting requirements and will be placed in "not-good-standing" status. When an employee is not in good standing with an ethics requirement, s/he is not eligible for any base, lump sum or pay plan salary adjustments. (Extenuating circumstances or leaves of absences will be taken into consideration.)

Please contact us at X-XXXX if we may be of further assistance to you.

<u>First Escalation</u> - SAMPLE Language - Notification to Employee, Supervisor and Chancellor - Sent April 25, 2020

To: Employee

This email serves as a reminder that pursuant to <u>Chapter UWS 8</u>, Outside Activity Reporting (OAR), all UW System faculty, academic staff, and limited appointees with half-time appointments or more, are required to report annually outside activities and interests related to their areas of professional responsibility and for which they receive remuneration. This report must be filed by April 30, 2020.

Our records indicate that as of today's date, your form has not been received. Please visit the UW System Office of Compliance and Integrity website for <u>OAR training and guidance</u> prior to completing the form. After reviewing the Outside Activities guidelines, complete the OAR and submit to your [insert HR or designated receiver of forms]. no later than April 30, 2020. Please note that individuals with no reportable activities are required to complete the form and certify that no reportable activities exist.

If a potential conflict of interest is identified, your supervisor will contact you to discuss further.



Employees who do not complete the OAR by April 30, 2020 will be considered non-compliant with reporting requirements and will be placed in "not-good-standing" status. When an employee is not in good standing with an ethics requirement, s/he is not eligible for any base, lump sum or pay plan salary adjustments. (Extenuating circumstances or leaves of absences will be taken into consideration.)

To: Supervisor & Chancellor

Our records indicate that as of today's date, the following individuals have not completed the of Outside Activities Report as required by and pursuant to <u>Chapter UWS 8</u>. Please ensure that employees complete the forms and return them to [insert HR or designated receiver of forms]. If forms are not received by April 30, 2020, the employee is considered non-compliant and not in good standing. An employee not in good standing with Ethics requirements is not eligible for performance rating of satisfactory and may not be eligible for base, lump sum or pay plan adjustments.

<u>Second Escalation</u> – SAMPLE Language - Notification to Employees who have not completed the form, copy to Supervisor and Chancellor – Sent May 1, 2020

Pursuant to <u>Chapter UWS 8</u>, Outside Activity Reporting (OAR), all UW System faculty, academic staff, and limited appointees with half-time appointments or more are required to report annually (by April 30 of each year) outside activities and interests related to their areas of professional responsibility and for which they receive remuneration.

Our records indicate that as of today's date, your form has not been received. As a result of your failure to comply with the Ethics Requirement, you are not in good standing and as a result, your performance rating is defaulted to "unsatisfactory". Employees with unsatisfactory ratings are not eligible for base, lump sum or pay plan adjustments.

You may appeal this status with your supervisor or Chancellor once the form has been completed and turned in.

Sincerely,

Human Resources* or other designated department