UNITED ACADEMICS POLICIES
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United Academics Anti-Fraud Policy

General Statement

United Academics and its Executive Council, employees, and volunteers must, at all times, comply with all ethical principles and policies of the organization and all laws and regulations governing the activities of the organization. The council accepts its responsibility to undertake all appropriate actions to prevent and detect fraud against the organization or that may be perpetrated by anyone associated with the organization.

Fundamental Concepts

The Executive Council, with the assistance of the Executive Director (when one is in place) when appropriate, is charged with the responsibility for the following:

- Creating, demonstrating, and maintaining a culture of honesty and high ethics by setting the tone at the top. This includes preparing a code of conduct that expresses zero tolerance for unethical behavior and communicating it to all employees and leaders of the organization. Management should also train employees regularly regarding the organization's values and document their understanding and compliance therewith at least annually.
- Regularly assessing fraud risks (including management fraud) and related risks that may occur within the organization. This includes establishing and monitoring appropriate policies, procedures, and controls designed to mitigate or eliminate the risk of fraud and abuse. A report regarding such fraud risks and actions taken must be made to the Executive Council at least annually.
- Creating, implementing, and monitoring a strong system of controls, including continually seeking ways to increase security in the organization's computer, recordkeeping, and payment systems.
- Training employees and leaders to be alert to warning signs of fraud and unethical behavior and providing a system for reporting such matters. Reporting irregularities by creating a system for employees and leaders to anonymously report (to the designated Executive Council representative or EC, if management is involved) illegal or unethical actions they have witnessed or that they suspect. This system should promote transparency with the external auditors.
- Conducting regular (at least annual) audits of the organization's financial records, including evaluating the organization's antifraud policies and procedures, internal controls systems and other relevant matters. These audits will be performed by an external auditing firm. The results of such audits are to be communicated to the Executive Council and other authorized parties.

Summary

The Executive Council and Executive Director (when one exists) are responsible for preventing and detecting fraud and abuse within the organization. They are also charged with establishing, implementing, and monitoring policies and procedures that address the fundamental responsibilities noted above.

United Academics Documentation Retention and Destruction Policy

PURPOSE OF THIS TOOL: Certain federal laws prohibit the destruction of certain documents. Not-for-profit organizations should have a written, mandatory document retention and periodic destruction policy. Policies such as this will eliminate accidental or innocent destruction. In addition, it is important for administrative personnel to know the length of time records should be retained to be in compliance.

Document Destruction

The Document Retention and Destruction Policy identifies the record retention responsibilities of staff, volunteers, Executive Council members, and outsiders for maintaining and documenting the organization's records.

The organization's staff, volunteers, officers, Executive Council members, members and outsiders (independent contractors via agreements with them) is required to honor the following rules:

- Paper or electronic documents indicated under the terms for retention in the following section will be transferred and maintained by the Executive Director when one is in place.
- No paper or electronic documents will be destroyed or deleted if pertinent to any ongoing or anticipated government investigation or proceeding or private litigation; and
- No paper or electronic documents will be destroyed or deleted as required to comply with government auditing standards (Single Audit Act).

Record Retention

The following table* indicates the minimum requirements and is provided as guidance to customize in determining the organization's document retention policy. Because statutes of limitations and state and government agency requirements vary from state to state, the organization should carefully consider its requirements and consult with legal counsel before adopting a Document Retention and Destruction Policy. In addition, federal awards and others government grants may provide for a longer period than is required by other statutory requirements.

Type of Document	Minimum Requirement
Accounts payable ledgers and schedules	7 years
Audit reports	Permanently
Bank reconciliations	2 years
Bank statements	3 years
Checks (for important payments and purchases)	Permanently
Contracts, mortgages, notes, and leases (expired)	7 years
Contracts (still in effect)	Contract period
Correspondence (general)	2 years
Correspondence (legal and important matters)	Permanently
Correspondence (with customers and vendors)	2 years
Deeds, mortgages, and bills of sale	Permanently
Depreciation schedules	Permanently
Duplicate deposit slips	2 years
Employment applications	3 years
Expense analyses/expense distribution schedules	7 years
Year-end financial statements	Permanently
Insurance records, current accident reports, claims, policies, and so on (active and expired)	Permanently
Internal audit reports	3 years
Inventory records for products, materials, and supplies	3 years
Invoices (to customers, from vendors)	7 years
Minute books, bylaws, and charter	Permanently
Patents and related papers	Permanently
Payroll records and summaries	7 years
Personnel files (terminated employees)	7 years
Retirement and pension records	Permanently
Tax returns and worksheets	Permanently
Timesheets	7 years
Trademark registrations and copyrights	Permanently
Withholding tax statements	7 years

United Academics Whistleblower Protection Policy

The Sarbanes-Oxley Act of 2002 prohibits a company or organization from retaliating against "any person" who reports an actual or possible violation of federal law or regulation to federal law enforcement agencies. Accordingly, United Academics of the University of Oregon ("United Academics") hereby implements the following whistleblower protection policy, which is intended to encourage and enable Executive Council members, officers, employees, and volunteers of United Academics (hereinafter, "United Academics representatives") to raise serious concerns within the organization prior to seeking resolution outside United Academics.

United Academics requires Executive Council members, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of United Academics, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that United Academics can address and correct inappropriate conduct and actions. It is the responsibility of all United Academics representatives to report concerns about ethical violations or suspected violations of law or regulations that govern United Academics operations.

No Retaliation

It is contrary to the values of United Academics for anyone to retaliate against a United Academics representative who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of United Academics. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Accounting and Auditing Matters

The United Academics President shall immediately notify the Treasurer of any concerns or complaint regarding accounting practices, internal controls, or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspended violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The United Academics President will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation within one week. The Executive Vice President will work with the President of United Academics to ensure that all reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

United Academics Conflict of Interest Policy

Process

1. Disclosure of Financial Interests. All United Academics Executive Council members and all committee members exercising EC-delegated powers, including standing committee members, must disclose possible conflicts of interest to the committee on which the member serves. A potential conflict of interest is the existence of any financial interest in any entity or matter that is the subject of a transaction or arrangement of which a member knows (or has reason to know) that United Academics (or any organization legally related to it) has or is negotiating. In addition, all material facts related to that interest must be disclosed. Financial interests include any direct or indirect relationship, through business, investment, or family, such as actual or potential ownership or investment interests or compensation arrangements. Family is defined as including grandparents, parents, spouses, siblings, siblings-in-law, children and their spouses, and grandchildren and their spouses. A financial interest is not necessarily a conflict of interest. As explained below, an individual who has a financial interest may have a conflict of interest only if the Executive Council or relevant committee decides that a conflict of interest exists.

2. Determination of Conflicts of Interest. After the person has delivered all relevant information and has recused him- or herself from the discussion, the Executive Council or other committee exercising EC-delegated powers, including standing committees, must use its best judgment in determining whether or not the financial interest creates a conflict of interest that merits recusal of the interested member from consideration of and voting on the matter.

3. Resolution of Conflicts of Interest. If the Executive Council or other committee exercising EC-delegated powers, including standing committees, determines that a conflict of interest exists, it must ensure that the interested member(s) do not participate in discussion and voting with regard to the transaction. The remaining members of the Executive Council or other committee exercising EC-delegated powers, including standing committees, may approve the transaction or arrangement, or some alternative if it determines it to be: a) in the organization's best interests and benefit; b) fair and reasonable to the organization; and c) the most advantageous transaction or arrangement the organization can make under the circumstances.

4. Violation of Conflict-of-Interest Policy. If an Executive Council member or member of a committee with EC-delegated powers, including standing committees, has reasonable cause to believe that a member has failed to disclose actual or possible conflicts of interest, s/he shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose. If, after hearing the response of the member and making such further investigation as may be warranted in the circumstances, the EC or committee determines that the member has in fact failed to disclose an actual or possible conflict of interest, it will take what steps it deems necessary to rectify the situation, which may include, but need not be limited to, cancellation of the transaction or arrangement generating the conflict.

5. Records of Proceedings. The minutes of the Council and of all committees with Council-delegated powers shall contain:

a. the names of any persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Council's or committee's decision as to whether a conflict of interest in fact existed; and

b. the names of any persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection therewith.

6. Distribution of Conflict-of-Interest Policy. All Executive Council members and members of committees with EC-delegated powers, including standing committee members, shall receive a copy of this Financial Conflicts-of- Interest Policy.

Explanation

In 2009, the IRS implemented a new Form 990, the publicly available financial disclosure form that United Academics files annually as a non-profit organization. This new 990 includes a separate governance section with a number of questions about the United Academics governance practices and policies, including the following:

1) Does the organization have a written conflict of interest policy?

2) Are officers, directors or trustees, and key employees required to disclose annually interests that could give rise to conflicts?

3) Does the organization regularly and consistently monitor and enforce compliance with the policy?

Accordingly, Executive Council members will be provided annually with this form and questionnaire, and asked to disclose any matters that might give rise to conflicts under the policy. In addition, Executive Council members are under an ongoing obligation to disclose new interests that may give rise to conflicts.

Conflict of Interest Disclosure Form

Please describe below any relationships, positions, or circumstances in which you are involved that you believe could contribute to a Conflict of Interest arising, as defined in the United Academics Conflicts of Interest Policy above.

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Conflicts of Interest Policy of United Academics that is currently in effect.

Name: ______________________________ Title: _______________________ (printed)

Signature: ____________________________ Date: _______________________