

Ethical Conduct Standards: Guidance for University Members



Office of Compliance, Investigations and Ethics



University of
Pittsburgh

Office of Compliance, Investigations and Ethics

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I. INTRODUCTION AND APPLICABILITY

Furthering the University of Pittsburgh's [mission](#) calls for its community members to adhere to professional standards, cultivating a culture of integrity, accountability, and trust. It is with that pursuit in mind that the University annually publishes its ethical standards and expects all university members including faculty, staff, and third-party vendors to adhere to them.

II. PURPOSE

These standards have been compiled in conjunction with established University Policies and Procedures, as well as staff and faculty handbooks, and are to be used as a resource by all university members. With respect to government contracting regulations, the University sets forth these ethical standards as the University's Standards for Business Ethics.

These standards set the University's expectations with respect to how to ethically contribute to our community. Individuals looking for more specific guidance on how to adhere to the below standards should consult either the example policies listed below each standard, or the [University Policy Development and Management website](#), where an exhaustive list of University Policies and Procedures can be found.

III. STANDARDS OF CONDUCT

1. **Ethical and Professional Behavior:** Standards relating to ethical decision making, collaboration, and relationships.
 - a. We act in good faith with due regard for the best interests of the institution.
 - b. We uphold academic freedom.
 - c. We avoid both actual conflicts of interest and the appearance of such conflicts and devote our primary professional allegiance to the University and its mission of teaching, research, and public service.
 - d. We are good stewards of university resources and ensure that they are used properly on behalf of the university.
 - i. We ensure that university resources are used appropriately and in compliance with applicable laws, regulations, policies, and procedures.
 - ii. We record, allocate and document/report transaction data such as revenue, expenditures, time, effort, and other information related to accurately and completely.
 - iii. We adhere to record retention rules and keep accurate entries in university books and records, including

- transactions related to departmental accounts and individual expense reports.
- iv. We report concerns related to fraud, fraudulent billing, false statements, or misrepresentation in contracts to the University promptly for investigation.
 - e. We do not use our positions with the university for our own private gain or to give the appearance of University sanction.
 - f. We do not make offers of or accept offers of bribery.
 - g. We do not make offers of gratuities, gifts, or entertainment or accept gratuities, kickbacks, gifts, or entertainment the intent of obtaining a contract or favorable treatment.
 - i. We report concerns related to bribery, gratuities, gifts, and entertainment to the University promptly for investigation.
 - h. We do not use our titles or positions for personal promotion.
 - i. We do not use university funds, facilities, or services to participate in political campaigns or make political contributions.
 - j. We ensure that if our personal social media activity references our university affiliation, that we will be responsible for content and use appropriate disclaimers.
 - k. We ensure that certifications and disclosures are accurately and honestly made.
 - i. We ensure that violations of federal law including fraud, conflict of interest, bribery, or gratuity violations are disclosed in a timely manner to appropriate government offices.

Related University Policies and Guidelines:

[AC 03 – Academic Responsibilities and Professional Conduct](#)

[AC 39 – Guidelines on Academic Integrity – Student and Faculty Obligations and Hearing Procedures](#)

[AO 02 – Abandoned and Unclaimed Tangible Property](#)

[AO 06 – Authority for Management of Procurement](#)

[AO 10 – Access to and Use of University Computing Resources](#)

[AO 25 – Non-Cash Gifts](#)

[AO 45 – Gift Acceptance and Naming](#)

[AO 46 – Gifts that Support Projects](#)

[CS 10 – Participation in Political Campaigns](#)

[CS 11 – Personal Use of University Resources](#)

[CS 12 – Political Contributions](#)

[ER 02 – Conflict of Interest for Designated Administrators and Staff](#)

[ER 03 – Conflict of Interest for University of Pittsburgh Employees](#)

[FN 01 – Abandoned and Unclaimed Intangible Property](#)

[FN 02 – Capital Asset Accounting](#)

[FN 03 – Cash Reports](#)

[FN 04 – Code of Ethics](#)
[FN 06 – Conflict of Interest and Procurement Relationships](#)
[FN 07 – Department Purchasing Authority and Responsibilities](#)
[FN 08 – Directed or Sole Source Purchase Justification](#)
[FN 09 – Disbursement Requests](#)
[FN 11 – Internal Accounting Transactions](#)
[FN 12 – Internal Control Framework](#)
[FN 17 – Payment of Invoices](#)
[FN 18 – Petty Cash](#)
[FN 20 – Procurement Card](#)
[FN 22 – Supplier Code of Conduct](#)
[FN 28 – University Travel, Business Entertainment, Honoraria, and Miscellaneous Reimbursable Expenses](#)
[RI 01 – Conflict of Interest Policy for Research](#)
[RI 02 – Consultant Conflict of Interest](#)
[RI 04 – Organizational Conflict of Interest](#)
[RI 06 – Research Allocations](#)
[RI 07 – Research Integrity](#)
[RI 08 – Responsibilities of Sponsored Research Investigators](#)
[RI 09 – Sponsored Projects – Effort Reporting/Certification](#)
[RI 10 – Intellectual Property](#)
[RI 11 – Institutional Conflict of Interest](#)
[RI 12 – Use of Human Cadavers and Recognizable Human Body Parts](#)
[RI 13 - Drones](#)
[RI 14 – Research Data Management](#)
[Financial Guidelines: Cost Transfers](#)
[Financial Guidelines: Allowability of Costs](#)
[University Records Management Guidance](#)
[Statement of Trustee Commitment and Responsibilities](#)

2. **Responsible and Conscientious Behavior:** Standards relating to university citizenship, health, and safety.
- a. We abide by federal, state, and local laws.
 - b. We abide by university and departmental policies and procedures that affect our campus roles.
 - c. We promote and maintain a drug-free workplace.
 - d. We work to actively prevent and report violent, threatening, or intimidating behavior.
 - e. We promptly report all crimes occurring on campus to the University of Pittsburgh Police Department.
 - f. We make immediate report of suspected child abuse to both Childline and to the University of Pittsburgh Police Department or the Office of University Counsel.
 - g. We promptly report incidents of suspected hazing to the University for investigation.

Related University Policies and Guidelines:

[AO 07 – Campus Crime Awareness](#)
[CS 04 – Drug-Free Workplace/Drug-Free Schools](#)
[CS 17 – Protection of Children from Abuse](#)
[CS 27 – Title IX](#)
[CS 29 – Vaccinations and Immunizations Requirements](#)
[CS 32 – University Anti-Hazing](#)
[Faculty Handbook](#)
[Staff Handbook](#)
[Student Code of Conduct](#)

3. **Respectful and Dignified Behavior:** Standards relating to cultivating a belonging and welcoming culture, promoting respectful interactions, and maintaining privacy among university members.
- a. We promote the values of equality of opportunity, human dignity, and diversity of thought.
 - b. We maintain a community free from harassment.
 - c. We afford the opportunity to acquire the same information, engage in the same interactions, and enjoy the same services regardless of ability status.
 - d. We respect the privacy of one another and maintain the privacy and confidentiality of personal information and educational records.
 - e. We do not engage in retaliation against any person who speaks up or provides information in good faith about an instance of wrongdoing or conduct inconsistent with these standards.

Related University Policies:

[AC 04 – FERPA: Access to and Release of Education Records](#)
[AO 35 – University Administrative Computer Data Security and Privacy](#)
[AO 48 – University Information Security](#)
[CS 05 – Harassment by Telecommunications](#)
[CS 07 – Nondiscrimination, Equal Opportunity, and Affirmative Action](#)
[CS 20 – Sexual Misconduct](#)
[CS 23 – Use and Management of Social Security Numbers and University Primary ID \(UPI\) Numbers](#)
[CS 26 – Electronic Information and technology Accessibility](#)
[CS 30 – Health Insurance Portability and Accountability Act \(HIPAA\)](#)
[CS 31 – Assistance Animals, Therapy Animals, and Pets](#)
[FN 30 – Identity Theft \(Red Flags\)](#)

IV. IMPLEMENTATION

1. Contracts and Agreements

a. Third-Party Compliance

- i. Third party vendors or subcontractors that enter into contracts or agreements with the University are expected to comply with these ethical standards.
- ii. The University's Purchasing Department and Office of Sponsored Programs, in partnership with the Office of University Counsel, ensure that contract requirements properly flow from any University prime contract to any applicable subcontractors.

b. University Compliance with Agreements

- i. The University regularly enters into agreements, such as contracts, grants, licenses, purchase orders, and other binding obligations with federal, state, and local governments. It is understood, and these Standards make clear, that these create a legal obligation on the part of the University to comply with the terms and conditions of any such agreements, including applicable laws and regulations.
- ii. The University Office of Policy Development and Management maintains guidance regarding [delegations of signature authority](#).
- iii. All University members, including faculty, staff, student-employees, third party vendors or subcontractors are expected to adhere to agreements and other binding obligations undertaken by the university.
- iv. University members whose work is conducted in relation to sponsored research activities must strictly adhere to all contractual obligations related to those activities, including applicable laws and regulations.
- v. University members whose work is conducted in the context of federal awards, grants, or contracts are expected to familiarize themselves with and follow applicable federal, state, and local laws applicable to their activities and conduct themselves in compliance with such laws and regulations.

2. Accountability, Reporting, and Education

a. Accountability

- i. The Office of Compliance, Investigations, and Ethics (CIE Office) maintains these ethical standards and oversees annual distribution and related training.
- ii. The CIE Office is a resource to all University members regarding compliance with or questions about the ethical

- standards.
- iii. The CIE Office collaborates with other University offices and departments, such as the Office of Risk Management, Internal Audit, and the Office of University Counsel to conduct periodic risk assessments of behavior related to these standards.
- b. Reporting
- i. Any concerns or reports regarding potential or suspected violations of the University's ethical standards should be made to the [Pitt Concern Connection](#). Reports can be made anonymously and will be routed to the appropriate university departments for review and timely response.
 - ii. Reporting parties can expect to be protected against retaliation.
- c. Noncompliance
- i. Noncompliance with contractual obligations, laws and regulations, and these ethical standards, even when inadvertent, can have serious consequences for the members involved and the university, including but not limited to civil liability, loss of funding, reputational harm, and, in extreme cases, criminal prosecution or sanctions.
 - ii. Failure to comply with University policies may also result in sanctions in accordance with disciplinary policies or labor agreements applicable to University Members, including termination of employment.
 - iii. Student-employees who fail to comply with University policies may be subject to sanctions in accordance with the Student Code of Conduct and/or Academic Integrity Guidelines, including dismissal from the University.
- d. Training
- i. All new staff and faculty receive training regarding these ethical standards and related policies and will acknowledge completion of training.
 - ii. Thereafter, on an annual basis all university members receive ethics training.