7.0

ADMINISTRATIVE AND FINANCIAL POLICIES AND PROCEDURES
7.1 PROCEDURE FOR CLOSING OFFICES BECAUSE OF SEVERE SNOW OR ICE STORMS OR OTHER EMERGENCY

All offices will be closed and classes may be canceled when extreme weather conditions exist and the New York State Police inform the University that no unnecessary travel is advisable, or when the President determines there is an emergency situation that could endanger employees.

The Director of Campus Safety will secure travel information from the State Police and inform the Director of Human Resources (or in his or her absence the Assistant Director of Human Resources).

The Director of Human Resources will then inform the President, who will make the decision whether or not to close University offices. If the President is not on campus, the Director of Human Resources will contact the Vice President for Academic Affairs or, in turn, the Sr. Vice President of Finance & Administration, the Vice President for University Outreach & Student Affairs, the Vice President for Institutional Advancement or the Vice President for Enrollment Management.

If a decision is made to close University offices, the Director of Human Resources will then contact the Director of News Services and/or the Director of Public Relations to disseminate the information to local radio and television stations. The announcement will be made on WSLU FM, WPDM-AM/WSNN-FM, WMSA-AM/WVLF-FM, WSLB-AM/WPAC-FM, WYBG-AM, WTNY/WCIZ-FM, WWNY TV 7, and WWTI TV 50.

If offices are being closed during the course of the workday, the Director of News Services will e-mail the message to all employees and the Director of Human Resources will implement a telephone chain to contact all University offices.

Essential and emergency employees may be asked to remain on campus to maintain safe and healthy conditions.

NOTE: HUMAN RESOURCES WILL ONLY NOTIFY OFFICES WHEN THE UNIVERSITY IS OFFICIALLY CLOSED.
7.2 USE OF RESTRICTED FUNDS

For many years the University has received solicited and unsolicited grants of a restricted nature. University practice and intention has been to honor the restrictive requests of donors. Each year the University receives several grants that are restricted to use by specified individual departments, but unrestricted as to specific use within the department. In order to clarify the control and assure the optimum use of such funds to achieve the objectives of the departments and schools involved, the following are the procedures for handling restricted grants of this nature.

1. The grant will be placed in a reserve account and restricted in use to the department specified by the donor.

2. Expenditures from the account for a purchase or project that requires more than $1,000 should have the approval of the dean of the school as well as the department chair.
7.3 DISTRIBUTION OF INFORMATION TO THE UNIVERSITY COMMUNITY

1. To provide for the timely and orderly dissemination of information relating to the University, the following provisions are in effect:

   A. **Clarkson Calendar.** Items for distribution to the entire campus community should be placed in online in the Clarkson Calendar at www.clarkson.edu/calendar.

   B. **E-mail Distribution.** If the Director of News Services or the Director of Media Relations judges an item to be of immediate importance to all or a majority of employees, and the form of the item lends itself to e-mail, Marketing & External Relations will e-mail the message to all employees. E-mails for distribution should be e-mailed to the Director of News Services. The Office of the Vice President for University Outreach and Student Affairs must approve e-mail distributions to students, but the Director of News Services may also approve these distributions if necessary. E-mail distributions for students should be e-mailed to the Assistant to the Vice President for University Outreach and Student Affairs.

   C. **Paper Distribution.** If the Director of News Services or the Director of Media Relations judges an item to be of immediate importance to all or a majority of employees or students, and the form of the item does not lend itself to e-mail (large schedules, etc.), a paper distribution will be implemented. Distributions should be sent via campus mail or delivered to the Director of News Services. The Office of the Vice President for University Outreach and Student Affairs must approve distributions to students, but the Director of News Services may also approve these distributions if necessary. Distributions for students should be sent via campus mail or delivered to the Assistant to the Vice President for University Outreach and Student Affairs.

A paper distribution is defined as unaddressed, multiple and identical copies of a document disseminated via interoffice mail to a targeted group. Personally addressed envelopes to multiple individuals do not need approval.

All items for paper distribution through the interoffice mail, should bear on the lower right-hand corner of the first page, the word “Distribution” followed by the appropriate Roman numeral as indicated below:

I. Faculty
II. Administration
V. Technicians, supervisory, clerical, campus safety, and facilities personnel.
VIII. All persons on University payroll.
IX. All undergraduate student mailboxes (primary approval should come from Dean of Students, but may also be approved by the Director of Media Relations or Director of News Services).

Sufficient copies will be included in the interoffice mail to effect the distribution requested. The department secretaries will see that copies reach those for whom they are intended.

2. **Questionnaires and surveys generated by students or students organizations and directed to the Clarkson community.**

All proposed questionnaires, surveys, or requests for information generated by students or student organizations, that are to be issued to Clarkson faculty, students, administrators, alumni or trustees through e-mail, the campus mail, or other means must be approved by the Office of the Vice President for University Outreach and Student Affairs subsequent to review and signatory approval by the faculty advisor or course instructor.

Each survey prepared as part of a course requirement **must** open with the following disclaimer:

“This questionnaire is part of a study to fulfill a course requirement for COURSE NAME, COURSE NUMBER, and is for instructional purposes only. It has no official University sponsorship or affiliation. If part or the whole of this questionnaire seems inappropriate, inaccurate or undesirable to you, you may refuse to participate in this study, or offer corrective a constructive comments as you wish.”

Questionnaires, surveys, or requests for information that are not student generated or directed at students must be approved by the Assistant to the President for Strategic Advancement. Surveys related to sponsored research should be directed to the Director of Research & Technology Transfer for consideration by the Institutional Review Board.

If the Office of the Vice President for University Outreach and Student Affairs or the Assistant to the President for Strategic Advancement questions the approval of the survey, questionnaire, or request for information based on ethical concerns, the survey will be referred to the Institutional Review Board for consideration and further recommendations.
It is therefore important for students, faculty and others to submit such materials to appropriate offices in a timely manner, allowing several days for consideration as described above.
7.4 PUBLICATIONS AND PRINTING

The preparation of all University publications is to be handled through University Communications.

It is the responsibility of each University officer who is responsible for any publication to bring the requirement to the attention of University Communications in sufficient time to allow the material to be ready when needed. Both copy preparation and proofreading are responsibilities of the officer requesting the publication.

University Communications will provide assistance with publications that are funded by an academic or administrative account. During especially busy periods, priority must be given to the following major University-wide publications: Catalog and Course Descriptions, Clarkson Closeup, President’s Report, Viewbook, and other admissions projects.

Most publications require six to eight weeks in production after the typed manuscript and illustrative materials are submitted.
7.5  HEALTH AND SAFETY

1.  Safety

It is the policy of the University to promote a positive program to make all employees aware of the need to practice proper health and safety measures. Employees should be conscious of, and concerned with, the health and safety of themselves, their fellow employees, students, and visitors to the campus. They should be alert in performing their duties so as to prevent the unexpected accident. Reasonable care and common sense will eliminate many hazards and potential danger areas.

The University is also committed to compliance with the OSHA Hazard Communication Standard relating to each employee's "Right-to-Know" regarding actual or potential hazardous substances in the workplace.

It is the mutual responsibility of department heads, supervisors, and employees to keep the University a safe and healthy workplace. Department heads and supervisors are requested to instruct their employees in the safe way to do their particular jobs, to provide "Right-to-Know" information regarding hazardous substances (Hazard Communication), and not to assume that each person is skilled and safety conscious.

Dangerous or potentially hazardous conditions should be reported at once to the person responsible for the department or section, or the Physical Plant office.

2.  Fire Drills

Under New York State Education Law and the Village Code Enforcement Officer, fire drills will be conducted in every University building used by students.

The Director of Campus Safety will conduct such drills at least three times each year. All students, employees and visitors will vacate the building during such drills.

Failure to comply with this policy is in violation of Article 17, Section 807, Sub Paragraph 3 of New York State Education Law and is a misdemeanor.

July 1987
Revised July 1989
Revised September 1993
7.6 USE OF UNIVERSITY PROPERTY

University property is intended solely for use that promotes and enhances education and scholarship, and for activities supporting these missions, such as housing, feeding, and recreation of students, staff, faculty members, conference participants, and guests.

I. University Property

University property includes, but shall not be limited to, the following:

A. The name Clarkson University, all derivations thereof, and all letterheads, stationery, logos, trademarks, and trade names incident to the business and activities of Clarkson University;

B. All campus buildings and facilities, fixtures, utilities, and real estate;

C. All University equipment, vehicles, furnishings, artworks, supplies, and inventory;

D. All University computing resources, library holdings, telephone and communication systems, keys, and campus mail.

II. Unauthorized and Improper Use of University Property

Unauthorized and/or improper use of University property by any persons shall constitute cause for dismissal of and financial restitution by such persons.

Improper use of University property shall include, but not be limited to, the following:

A. Use for any illegal or immoral purpose;

B. Use that is personal in nature and/or incident to or connected with an institutional mission for which the user has not received authorization from the University;

C. Use for which the specific property is not intended or designed, or which could result in damage to University property;

D. Any use which creates a hazardous or dangerous condition posing a threat to persons or property;

E. Use infringing the rights or freedoms of members of the academic community, or which disrupts or obstructs the institutional mission;
F. Use which promotes the interests of business, political, or religious organizations to the exclusion of the interests of others, similar organizations, or organizations with other points of view;

G. Any unauthorized loan or rental of University property.

III. Loan of University Equipment

University equipment may not be loaned to individuals. Occasionally, at the discretion of the vice presidents or deans, or an authorized designee, it may be desirable to loan equipment to institutions or industrial companies in the interest of good public relations. In all such cases where such equipment is removed from the University premises, the vice president or dean or authorized designee must secure a signed receipt for the equipment embodying a guarantee of its return by a specific date in good condition. It is the responsibility of the vice president or dean to see that the terms of the receipt are carried out.
7.7 USE OF UNIVERSITY FACILITIES

1. **Scheduling of Facilities**

Facilities for regularly scheduled classes during the academic year and summer sessions are scheduled through the Student Administrative Services Center and given priority.

Campus facilities, i.e., classrooms, auditoria, etc., used for meetings or events are reserved through the Cheel Information Center. Certain types of reservations may require prior approval before confirmation is given, depending upon the location and time of year requested.

All arrangements by scheduling officers shall be forwarded to the Physical Plant Office and Office of Campus Safety.

It is expected that all events held in University facilities will be conducted in a manner appropriate to an academic community. All events must meet the other conditions found in Section 7.6 before a reservation will be finalized.

2. **Student Organizations**

Student organizations recognized by the Student Senate may schedule campus facilities for normal academic or extra-curricular activities. In instances where these student groups wish to sponsor activities with off-campus groups having related interests, they are expected to take on full sponsorship of the activities in order to avoid situations where their endorsement simply is used to enable outside groups to secure campus facilities, or where they find themselves shouldering the responsibility for events which they have not run.

Student organizations are usually not charged for the use of facilities except for unusual activities entailing special expenses or University services. See paragraph 7 of this section for exceptions regarding political clubs.

3. **Clarkson Affiliates**

Clarkson affiliates scheduling space for external organizations will be governed by the policy related to use by non-University groups.
4. **Non-University Groups**

The University recognizes its responsibility to the community and makes many of its facilities available to non-University, politically nonpartisan, nonprofit groups offering the community services. These groups may use the facilities on an occasional, non-continuing basis. Charges may be incurred for use of University facilities.

Requests for use of facilities by such groups should be addressed to the director of Cheel Campus Center. A certificate of insurance must be filed with the office of Budgeting, Planning and Insurance.

5. **Security Arrangements**

In the case of programs where a security problem may be involved, the organization in question has the responsibility for making security arrangements. However, if the University feels that the security arrangements are inadequate, it reserves the right to cancel the scheduled event.

6. **Admission Charge**

In order to protect the University's tax-exempt status, spectators may be charged admission only when the proceeds accrue to the support of a recognized University organization or a University-approved charitable group.

7. **Political Clubs**

The University traditionally has recognized and provided facilities on an impartial basis to various on-campus activities that have a partisan political bent, such as the Democratic, the Republican, and other political clubs. This represents no problem. However, to the extent that such organizations extend their activities beyond the campus and intervene or participate in campaigns on behalf of candidates for public office, or permit nonmembers of the University community to avail themselves of University facilities or services, the University must make certain that proper and appropriate charges are made and collected for all facilities and services provided.

April 1968
Items I and IV revised and approved by Administrative Council May 1979
Approved by President May 1979;
Editorial Revision December 1986, September 1993
Editorial Revision September 1996, January 2004

Ops Manual – release date 7/17
7.8 POLICY STATEMENT AND GUIDELINES ON EDUCATIONAL BUSINESS ACTIVITIES OF CLARKSON UNIVERSITY

I. Education-Related Activities

The primary mission of Clarkson University is the creation and dissemination of knowledge. To carry out this mission, it is often desirable for the institution and its affiliated units to charge fees for providing goods and services that enhance, promote or support its instructional, research, public service, and all other educational and support functions in order to meet the needs of the students, faculty, staff, and members of the public participating in University events.

Educational business activities shall be established and carried on only when pursuant to, and in accordance with, an authorization and statement of purpose approved by the University's governing board and/or chief executive officer.

Each educational business activity shall meet the following three conditions:

A. The activity is deemed to be an integral part in the fulfillment of the University's educational, research, public service, and campus support functions, and other educational and support activities, without regard to profit.

B. The activity is needed to provide an integral good or service at a reasonable price, on reasonable terms, and at a convenient location and time.

C. The activity is carried out for the primary benefit of the campus community but with sensitivity to its impact on the total community.

II. Unrelated Activities

The University should comply with applicable laws and regulations pertaining to such activities, and educational business activities not falling within the guidelines established above may be unrelated business income activities.

July 1987
7.9 EXPENSES

It is the policy of Clarkson University to reimburse necessary and reasonable expenses incurred in the conduct of official University activities. Both the person who incurs expenses and the person who approves reimbursement of expenses are responsible for achieving maximum economy in the expenditure of funds.

Reimbursement of expense is requested, substantiated, and approved on an Expense Account Form, or a Disbursement Order Form. The amounts reimbursed are charged to departmental and project accounts.

Within the framework of the general policy and procedure below, specific guidelines and procedures have been formulated. These are available at www.clarkson.edu/finance.

I. Travel Authorization

A. Individuals who expect reimbursement for their expenses of travel, entertainment, or other similar expenses incurred in the conduct of official University activities, must obtain prior authorization for such expenditures. Authorization is granted by the head of the department, dean, or other person authorized to approve such travel authorizations.

B. Travel authorization requests should be submitted by the individual on University Travel Authorization Form.

II. Accountability for Expenses

A. Individuals ordinarily will not be required to substantiate expense account information on their own income tax returns if a statement of expenses is made to their employer. The University provides the Expense Account Form or Disbursement Order Form for this purpose.

B. According to current Internal Revenue regulations, amounts reimbursed would be reportable by the University at the end of the year as income to the individual for tax purposes only if there is insufficient detail or substantiation of expenditures, excessive amounts or rates, or where the expense report is not approved by someone other than the person being reimbursed. If it is necessary for the University to report reimbursed amounts as income, it becomes the responsibility of the individuals to account for such expenses on their own income tax returns.
III. Approval of Reimbursements

A. An Expense Account Form or a Disbursement Order Form must have two signatures: the signature of the person who incurred the expenses, and an approval signature by the head of the department, dean, or other person authorized to review expenses and approve requests for reimbursement.

B. Reimbursement may be limited to something less than the full amount of expenses because of budget limitations or other reasons.

IV. Reimbursable Expenses

A. Reasonable and necessary expenses incurred by the individual in the conduct of official University activities may be approved for reimbursement, provided the expenses are detailed and substantiated properly on the Expense Account Form or the Disbursement Order Form.

B. Travel costs, entertainment, and other related expenses may be approved for reimbursement if common practice and the limitations established by the University are followed. To account for the changing nature of travel and entertainment costs, the rules for allowable expenses are found at www.clarkson.edu/finance. These rules will be updated periodically as needed. Significant changes will be provided to the Faculty Senate and Administrative Council for review and comment.

C. Moving Expenses

In the course of negotiating some employment agreements, the university offers to pay relocation expenses for incoming faculty and administrators.

These expenses can be paid in two ways:

1) reimbursement to the new employee. He/she must provide original itemized receipts for the qualifying expenses. The reimbursement is made through payroll. Consequently, payment to the new employee cannot occur until the contract period begins and the first paycheck is due; and/or

2) direct payment to a third-party vendor who is providing relocation services, such as a moving company. A university purchase order is to be issued to the vendor in advance of the services.
Following is a list of qualifying and non-qualifying moving expenses:

**Qualifying expenses:**
- moving household goods and personal effects (including packing, crating, and transporting, as well as in-transit storage for up to 30 consecutive days); and
- travel to the new home, including lodging but not including meals.

If travel to the new residence is by car, cost may be figured either (1) as actual expense (e.g., for gas and oil) if accurate records are kept; or (2) at the deemed substantiation rate per IRS code. Parking fees and tolls are also qualified expenses.

If goods and effects are moved from a place other than the former residence (e.g. from a summer home), the deduction may not exceed the cost of shipping from the former residence. Reasonable expenses also include the cost of connecting or disconnecting utilities required because of moving household goods, appliance, or personal effects.

Reimbursable traveling expenses cover the cost of one trip for the employee and family from the old home to the new one by direct route via conventional means. The trip for each family member can occur at a separate time. Car rental expense can qualify, if reasonable, for this trip. Lodging qualifies as an excludable expense, but meals do not. Extra costs for side trips or stopovers (e.g., visits or sight-seeing) are not covered if they involve delay and/or detour.

**Non-Qualifying expenses:**
- meal expenses incurred while moving from the old residence to the new;
- travel expenses, meals, and lodging for pre-move house hunting trips;
- meals and lodging incurred while occupying temporary quarters in the area of the new job; and
- expenses involving buying or selling a home.

1971
Editorial Revision August 1973
(Item IV-B) November 1983; (Item IV-B) January 1984, October 1985, July 1989
Revised December 1992
Revised April 2007
Revised November 2010
Ops Manual – release date 7/17
7.10 LAND USE POLICY

Clarkson University is fortunate to have many acres of land available for its use. These lands, grounds, forests, roads, walks, streams, ponds, and other geographical areas owned and operated by the University are to be used primarily for the academic enrichment and the recreational enjoyment of the University community. The land use policy provides for proper planning, care, and administration of these land areas to encourage and develop their responsible use.

I. Planning and Development

Planning and development of the University lands shall be the responsibility of the Physical Plant Department. The master land use plan shall be maintained and updated as necessary to accommodate the University long-range plan requirements. All requests for ground use changes and/or construction will be directed to the Physical Plant Department.

II. General Maintenance and Upkeep

General responsibility for the maintenance and upkeep of the University lands is with the Physical Plant Department. In those instances where University land is assigned and used primarily by an academic or recreational department, and it is felt to be the best operating procedure, the general maintenance and upkeep may be delegated to the pertinent operating department. The safety, security, and proper use and care of the land are also under its delegated assignment.

Any unsafe, unsightly, and improperly cared for land areas should be reported to the Physical Plant Department.

III. Delegated Areas of Responsibility

The following major areas of delegated operating responsibility have been established within the land use policy:

A. **Athletic.** Certain areas of the University lands are delegated to the Athletic Department and are to be used specifically for athletic purposes. Uses of these areas for other than athletic functions must be approved by and scheduled with the Chair of the Athletic Department.

These areas are designated on the land use map as **Zone A** areas.
7.10(2)

B. **Athletic-Recreation.** Certain areas of the University lands are delegated to the Athletic Department and are primarily available for athletic purposes. These same areas are less intensively used for athletic functions and are available more frequently for recreational purposes. Uses of these areas for other than athletic functions must be approved by and scheduled with the Chair of the Athletic Department.

These areas are designated on the land use map as **Zone A-R** areas.

C. **Recreation-General.** Many sections of the University lands are available for the general and unscheduled recreational use and enjoyment of the University community.

These are the responsibility of the Physical Plant Department and are subject to the general land use policies outlined herein.

Such areas are designated on the land use map as **Zone R-G** areas.

D. **Recreation-Specific.** Certain areas of the University lands are delegated to the Recreation Office for specific recreational uses. These areas may, at times, be used for other than their primary purposes. Such other uses will be approved by and scheduled with the Recreation Office.

These areas are designated on the land use map as **Zone R-S** areas.

E. **Housing.** Those University lands in the immediate vicinity of University student housing are delegated to the Housing Department and are available for the unscheduled light recreational, aesthetic, and quiet enjoyment of the University residents. Use of these areas for other purposes must be approved and scheduled with Student Life.

These areas are designated on the land use map as **Zone H** areas.

F. **Academic.** University lands adjacent to the academic facilities are reserved for the general academic uses of the University and the necessary traffic to accomplish these purposes. Use of these areas for other than academic purposes must be approved and scheduled by the director of the Cheel Campus Center with the concurrence of the Physical Plant Department.

These areas are designated on the land use map as **Zone A-C** areas.
G. **Roads & Parking Lots.** These areas are to be used for the moving and storage of all mechanized traffic. A separate policy concerning traffic and use of roads and parking lots exists and is included as part of Clarkson University traffic regulations.

H. **Walks.** The University walks are intended and reserved for foot traffic only.

### IV. Prohibited Uses of Land

A. **Hunting and the Discharge of Arms.** Hunting on any University owned and/or operated land is strictly prohibited. The discharge of arms, including bow and arrow, rifles, and pistols, etc. is not permitted. The use of certain approved areas for this purpose under competent supervision and strictly enforced safety conditions is permitted (ROTC, Rifle Range, etc.).

B. **Motorized Vehicles.** The use of motorized vehicles on any area not paved or surfaced and specifically designated for that purpose is prohibited.

Recreational Vehicles (snowmobiles, ATV’s, unregistered dirt bikes, etc.) are not allowed on Clarkson University's property at any time. Use of mechanized vehicles on University ski trails is prohibited.

C. **Grounds Disruption.** No cutting, digging, planting, transplanting, excavating, or other disruption of any nature on any grounds owned by Clarkson University is allowed without the written permission of or accomplishment by the Physical Plant Department.

D. **Unauthorized Construction.** No construction or destruction of walls, fences, walks, paths, ponds, roads, or structures of any type is permitted without the written permission and approval of the Physical Plant Department. Such work, if approved, will be performed only under the direction and supervision of the Physical Plant Department.

E. **Wood Cutting.** Permission to cut and remove fallen timber by other than University grounds crews for University use can be obtained only from the Physical Plant Department. A signed permit must be obtained from the Physical Plant office in order to cut and/or remove timber or forest products of any kind from University owned and/or operated properties and grounds.

Pages 7.10(4) through 7.10(6) are maps of Clarkson.

June 1978
Revised September 1993
LAND USE
CLARKSON UNIVERSITY

JANUARY 1968, R.T.
REVISED 1974, R.T.; 1978, R.T.
1982, W.B.; 1987, W.B.
1991, W.B.
1997 SC

LEGEND

A- Athletic Area
AC- Academic Area
H- Housing Area
RG- Recreation - General
AR- Athletic - Recreation
RE- Real Estate
RS- Recreation - Specific
PP Physical Plant & Facilities

Not Shown:
1. President's House - Zone RE
2. Seven Springs - Zone RS
### 7.11 USE OF UNIVERSITY NAME AND LETTERHEAD

Each member of the staff is obligated to see that the name of the University is not used in advertising or promotional activities of outside organizations, or misused in consulting work, public addresses, or sponsored research activities. Individual faculty members should be careful to distinguish their individual statements from those that might be interpreted as official statements of University policy. It particularly should be understood that opinions expressed by faculty members in making an industrial report are their opinions and not those of the University.

August 1962
7.12 DEALING WITH THE NEWS MEDIA

The Vice President for External Relations and the Director of News & Digital Content Services are the official spokespersons to the news media.

All University faculty and staff who wish to release any information to the media should contact Marketing & External Relations; they should not contact the news media on their own.

Marketing & External Relations has worked very hard to build a relationship with the media, and can usually get a receptive response.

This enables Clarkson to insure: 1) that information going to the public is both accurate and complete; 2) that news is written to meet journalistic requirements; and 3) that news is released in a coordinated manner so as to avoid several Clarkson stories competing for a journalist's attention.

Anyone contacted by the news media should politely tell the caller that they must first contact the Vice President for External Relations or the Director of News & Digital Content Services. The employee should then contact Marketing & External Relations.

This allows the office to advise employees on such important matters as: 1) how to insure that main points are not overlooked by the reporter; 2) how to minimize the chance of being misquoted; and 3) how to avoid breaking etiquette with the media.

This policy applies to social media (i.e. Facebook, LinkedIn, Twitter, etc.), as well. Employees should not engage the news media via social media, but should instead direct any questions or inquiries to those listed above.

Revised August 1969
Editorial revisions August 1974, 1977
Revised April 1979, October 1991
Editorial Revision (position titles), July 2017
7.13 CHARITABLE FUND DRIVES

Clarkson University encourages the principle of charitable contributions by its members to eleemosynary organizations of each individual's choice. Organized fund drives within the University should meet these three criteria:

1. A volunteer organizer who is a member of the faculty, staff, or administration of the University will take personal responsibility for the fund raising effort;

2. The fund raising effort will be carried out without cost to the University (i.e., no University funds, materials, or duplicating machines will be used unless the University is reimbursed) except that internal use of University mail distribution is permitted;

3. The organizations involved will have qualified for I.R.S. income tax deduction.

CHARITABLE CONTRIBUTIONS

The President's Office has the sole authority to authorize charitable cash contributions from University funds. Individual departments/managers may not authorize charitable contributions from the University without the express permission from the President's Office.

March 1974
Revised July 2006
Campus aesthetics includes the image of the University portrayed in publications, and the appearance of the building and grounds.

In order that there be a single focus of responsibility for campus aesthetics, the vice president for Institutional Advancement is charged with approving all changes which affect our image. This includes, but is not limited to, the following:

1. All publications and stationery that carry the Clarkson name;
2. The exterior and interior (public areas) of all buildings;
3. Permanent signs, whether inside or outside of buildings;
4. Alterations of paths, plantings, and outside lighting that will make significant changes in the appearance of the campus.

October 1977
Revised September 1991
7.15  FIREARMS ON CAMPUS

Subdivision 10 of Section 265.01 of the penal law of New York State has the following provision:

    Persons who knowingly have in their possession a rifle, shotgun or firearm in or upon a building or the grounds used for educational purposes of any school, college, or university without the written authorization of such educational institution, are guilty of a class A misdemeanor, and are guilty of a class D felony if they have previously been convicted of a crime.

April 1969
7.16 PROCEDURE WHEN THERE IS A DEATH IN THE CLARKSON COMMUNITY

The University wishes the campus community to be able to express its sympathy for the death of an employee or former employee, someone close to an employee or friend of the University.

Anyone who hears of a death in the Clarkson community, i.e., trustee, former trustee, former president, faculty, professor emeritus/a, honorary degree recipient, staff, retired staff, student, current or former officer of the Alumni Association, special "friend" of the University, and the spouses and children of any of these individuals, should notify the President’s Office immediately.

The President's Office will see that a note of sympathy goes to the family.

The President's Office will arrange for the flags in front of Downtown Snell Hall, Woodstock Lodge and the Cheel Campus Center to be lowered to half-staff if the deceased is a trustee, former trustee, former president, current employee or student of the University, or a professor emeritus. If the funeral is in Potsdam, the flag will remain lowered until the funeral. If the funeral is out of town, the flag will be lowered for a day. In the case of spouses and children of the above individuals, the flag will not be lowered.

The President’s Office will also notify Marketing/Communications, Development, Alumni Relations, Human Resources, and Advancement Services.

In the case of trustees, former trustees, former presidents, and their spouses, the President's Office will decide on the appropriate expression of sympathy. If flowers are to be sent to places of worship or funeral homes, the President’s Office will order a University spray (gold and dark green). In the case of alumni, the Alumni Relations Office will order a similar spray.

It is the University's intention and practice to distribute via campus e-mail notices of death for all employees and former employees automatically, and to distribute notices of death for non-employees, including employee family members, upon request. Employee and department assistance is requested in notifying Marketing/Communications (Director of News Services or Director of Media Relations) of death notices to pay proper respects, as follows:

1. Death of an Employee or Former Employee

Announcements of the death of an employee or former employee are made by e-mail to the campus automatically, unless the family wishes otherwise. The employee’s department, Human Resources or the President’s Office will supply (via e-mail) basic information: the employee’s full name, title, where they were living at time of death, when they worked at Clarkson (if former employee), and the department they worked in to Marketing/Communications. Marketing/Communications will gather information on funeral home, calling hours, funeral and memorial contributions, and will write and distribute the campus announcement.
2. Death of a non-employee, including a family member of an employee or former employee, or other people close to an employee or the University.

Announcements of the death of a non-employee are made by e-mail on request of an employee or department. The employee or department will supply (via e-mail) to Marketing/Communications the name of the deceased and his or her relationship to an employee (or to the University), plus the details on the funeral home, calling hours, funeral and memorial contributions. Marketing Communications will then write and distribute the campus announcement.
7.17 RELATIONS WITH EXTERNAL AUDITORS

Scope

The University is subject to audits by various agencies of the government for either financial accountability or regulatory compliance audits. In addition, the University may subject itself to audits by external organizations for its own purpose. This policy is intended to establish a central control and liaison for all audits being performed regardless of the type of persons performing the audit.

Designation

The vice president for Business and Financial Affairs or his designated representative is the central contact for all audits being performed on the campus.

If contacted directly by any auditor that is not being directed by the Office of the Comptroller, the auditor should be directed to contact the vice president for Business and Financial Affairs. This will insure that the auditor is being properly assisted and provided with all support necessary to complete the assigned tasks with a minimum of disruption to operations and insure continuity with regard to information.

Entrance Conference

Normally an entrance conference will be held to establish the purpose, scope, and timing of the audit. This will enable the vice president for Business and Financial Affairs to determine the physical facilities needed and arrange for contact with other departments on campus for availability of information and/or knowledgeable personnel affected by the audit.

Contact During Ongoing Audits

After the audit commences and until conclusion, it is important for the vice president for Business and Financial Affairs to maintain contact with the auditor-in-charge. As requested, the vice president for Business and Financial Affairs will arrange additional interviews, secure additional required documents, answer questions, and supplement interviewee statements. The purpose of such contact is to expedite the audit and to correct any erroneous information that may have been given inadvertently.
Availability of University Records

Auditors should request from the chief accountant or comptroller the records required. The chief accountant or comptroller will inform the auditor as to the best place, time and method of securing records. University personnel will furnish the auditors with all records or data requested. Auditors should not have access to any records or data except those provided by University personnel.

University personnel will inform auditors where to return records. All refiling will be done by University personnel.

In cases where it is necessary to remove records from an office, the auditor will secure the approval of the supervisor. The auditor will comply with the office procedures for identifying records removed from the files, including listing and signing for records removed.

Any problems should be referred to the vice president for Business and Financial Affairs.

Use of University Computer Facilities

There may be instances where the auditors require the use of University computer resources to facilitate an audit. In such cases, the auditor-in-charge should transmit a request through the vice president for Business and Financial Affairs describing the need for programming, system analysis, and computer time in the most specific terms possible. The request should be made sufficiently in advance of need for the services so that arrangements can be made.

Availability of Findings and Exit Conferences

The purpose of the exit conference is to inform University representatives of the audit findings, to clarify possible misunderstandings, and to identify the issues that are unresolved.

In some circumstances, the University may be asked to make preliminary comments on findings concerning specific transactions. In such cases, auditors are expected to provide sufficient information, including reference to specific sponsor policy, to enable the University to adequately review the question(s) and provide a meaningful response.

When audits are of limited scope and a formal exit conference involving several people is not practical or justified, the auditors should notify the vice president for Business and Financial Affairs when the fieldwork is complete.

Scheduling of exit conferences will be the responsibility of the vice president for Business and Financial Affairs.
Audit Reports and Responses

A copy of the audit report will normally be sent by the auditors to the vice president for Business and Financial Affairs whose office will then secure comments, coordinate or prepare the University response and maintain a central file of all audit reports, responses, and related correspondence.

February 1992
7.18 INFORMATION TECHNOLOGY USE POLICY

All information technology resources of the University shall only be used in a lawful manner and in support of instructional, research and service missions sanctioned by the University. Access to these resources is granted to each individual for a specific purpose. Proper use of the resources must be consistent with that purpose. In particular, instructional access is granted for work done by officially registered students in support of a recognized course of study. Research access is granted for work approved by an authorized official of a University department.

Limited personal use of information technology resources is permitted only if all of the following conditions are met:

- There is little or no cost to the University;
- Any use is brief;
- Any use occurs infrequently;
- The use does not interfere with the performance of any other University employees’ official duties; and
- The use does not compromise the security or integrity of University property, information or software.

By using University-supplied information technology resources and associated facilities, individuals and other entities agree to abide by all policies and procedures adopted by Clarkson University as well as all current federal state and local laws. These include University policies and procedures against harassment, plagiarism, and unethical conduct; as well as local, state, and federal laws prohibiting theft, intellectual property and copyright infringement.

The University reserves the right to restrict the use of its information resources and facilities, and to limit access to its computers systems and networks when faced with evidence of violations of University policies or standards, of contractual obligations or of federal or state laws. The University also reserves the right to remove or limit access to material posted on or transmitted by its computers and network facilities.

1 Information technology resources — all University owned and operated computers, software, hardware, and infrastructure. It further includes all University services and programs such as email, course management systems, and web pages. It also includes:
- Data and other files, including electronic mail, stored in or located or residing on (temporarily or otherwise) University-owned centrally-maintained systems, departmentally-maintained systems, and University-owned systems or computers.
- University data and other files stored off campus in systems owned or operated by other entities. These systems may be subject to their own terms and conditions related to privacy and other matters.
- Data communicated over University networks.
Acceptable Use Guidelines for Computer and Network Facilities

The University strives to provide fair and distributed access to information technology resources for a large number of users. The acceptable use guidelines which follow apply equally to all types of information technology resources. Everyone using University information technology resources is responsible for following guidelines which characterize acceptable use.

1. Clarkson supports the principles of academic freedom and free inquiry and expression in the online environment as well as in the classroom. This freedom must however be balanced with the responsibility not to infringe on other rights of individuals.

2. Acceptable use of shared information technology facilities follows the same standards of common sense, courtesy, and restraint that govern the use of other public facilities. Acceptable use requires users to be ethical and respectful of the rights of others and of the diversity of the University community, and to maintain a climate which does not interfere with the studies, work or living environment of any members of the Clarkson community.

3. Acceptable use of information facilities respects individuals' rights to privacy and to freedom from threats, intimidation, harassment and unwarranted annoyance.

4. Acceptable use includes the right of individuals to access and save any legal files on the internet. However, material which is potentially offensive to others should not be publicly displayed without an academic reason.

5. Acceptable use standards require everyone to take prudent and reasonable steps to prevent unauthorized access. Access authorization relies on user identification and password for each user. The user-ID forms the basis for mechanisms which are designed to establish ownership and responsibility for computing resources and use. Acceptable use respects these identification and security mechanisms.

6. Acceptable use requires that all users refrain from any illegal and improper intrusions into the accounts of others and/or into any University information technology resources and systems.

7. Acceptable use requires that all users recognize and honor the intellectual property rights of others.

8. Acceptable use of information technology resources requires that all users refrain from acts that waste resources and prevent others from having broad access to University computers and resources.

March 1996
April 2016
7.19 COMPUTER SOFTWARE POLICY

This section formerly addressed intellectual property issues regarding the development of computer software and its documentation by Clarkson University faculty, staff, and students. These issues are now addressed in Section 6.6 of this Operations Manual, Clarkson University Intellectual Property Policy. Therefore, Section 7.19 was deleted by action of the Administrative Council in May 2005.
7.20 CONFLICT OF INTEREST POLICY

I. Introduction and Definition
Trustees, executive officers, deans, directors, faculty, and staff (hereafter “Members”) all have an obligation to make decisions in a way that promote the best interests of the institution. This policy recognizes that all of the Members of the University community will conduct their relationships with each other and the University with honesty and integrity.

At the same time, it is also understood that Members retain their rights to interests and activities of a personal or economic nature. Members will make every effort to recognize and avoid possible perceptions of or actual adverse effects of their external activities on the best interests of the institution.

This statement confirms the University policy that faculty and other employees who accept full-time appointments have a primary commitment to the University and that they will be sensitive to the possible adverse effects of their external activities. It is recognized, however, that the quality of teaching, research, extension service, and the administration of University programs may be enhanced when members participate in extramural activities that enhance their value to the University, so long as their commitments to the University are not adversely affected.

Potential conflicts of interest exist when commitments and obligations to the University are likely to be (or may appear to be) compromised by the Member’s other interests or commitments, especially economic, particularly if those interests or commitments are not disclosed. A potential for conflict may also exist when a Member’s independence and objectivity of judgment in the discharge of duties to the University may be (or may appear to be) affected, or if the Member may receive financial or material benefit from knowledge of information confidential to the University.

This policy requires that all Members identify, evaluate, and disclose potential conflicts of interest that may appear to compromise their obligation to the University. Disclosure is required at the time the appearance or potential for conflict is first identified. This policy covers Members of the University community (Board of Trustees, executive officers, deans, directors, faculty and staff), their spouses, and dependent children.

Once potential conflicts are disclosed, the University will evaluate such disclosures in order to determine if an actual conflict of interest exists, and will determine what conditions or restrictions should be in place to resolve or manage any potential or actual conflict of interest.

In addition, Members should recognize that the manner in which they conduct their external activities may reflect on the University. This association may be enhanced when the Member occupies a senior or high profile University position, and/or by use of the University’s name and/or his/her University title. Members are expected to take any steps necessary, in light of the
nature of their external activities and the nature of their position with the University, to avoid unauthorized association of those activities with the University and/or any unauthorized implication that their beliefs or positions represent those of the University.

II. Scope of the Conflict of Interest Policy

A. Trustees

Trustees owe special care and loyalty to the University and must maintain the best interests of the University in all Board-related deliberations and decisions. This includes disclosing actual or perceived conflicts of interest at the earliest possible point of awareness. Trustees shall not make use of information relating to the University’s business for personal gain of any nature by the Trustee or his/her immediate family.

B. Administrators (Includes Vice Presidents, Deans, Department Chairs and Executive Officers, Executive Directors and Directors)

Administrators of the University owe special care and loyalty to the University and must exercise care in maintaining the best interests of the University in all University-related decisions by disclosing actual or perceived conflicts of interest. Since these officers will be involved in such decisions practically on a daily basis, the opportunity for creation of conflicts (as well as the appearance thereof) is greatest and must be avoided.

C. Faculty

Faculty who hold full time appointments have a primary commitment to the University. The University Operations Manual Sections 5.2 (Duties of a Faculty Member) and 6.4 (Consulting) define the faculty members’ obligations to the University.

D. Staff

The University expects that staff members will recognize the possibility that their external activities, commitments, and interests may have adverse effects on the performance of their University obligations. This policy applies to both exempt and non-exempt staff.

E. Part-time Appointments

Part-time employees may have a high potential for conflict of interest because of multiple demands of their time. It is expected that part-time employees will disclose potential conflicts and fulfill their obligations.
III. Categories of Conflicts

The University thrives when its faculty and staff pursue sponsored research activities with vigor. Their activities include interactions with many external agencies. Predictably, some external relationships will have the potential to create conflicts of interest or commitment, or the appearance thereof. In many situations these conflicts will be apparent only and can be resolved by disclosure. Actual or potential conflicts fall into two categories.

A1. Conflict of Interest- General Statement

A Conflict of Interest may arise when a member has the opportunity to influence the University’s business, administrative, academic or other decisions in ways that could lead to personal gain or advantage of any kind. Or, a Conflict of Interest may arise when the financial interest or personal considerations of a member may compromise the member’s judgment or ability to perform his/her obligations to the University.

A2. Significant Financial Interest for Faculty and Staff of Instruction and Research

For members of the Faculty and Staff of Instruction and Research, a Conflict of Interest exists when a Significant Financial Interest, as defined below, could directly and significantly affect the design, conduct, or reporting of sponsor funded research activities.

Each member of the Faculty and Staff of Instruction and Research is required to disclose to designated official(s) a listing of his/her known Significant Financial Interests (and those of his/her spouse and dependent children), related to participation in any sponsor funded research activities. This disclosure is in addition to any other disclosures that may be required by this policy.

Solely for purposes of the reporting requirement described above, the term Significant Financial Interest means:

- salary or other payments for services (e.g. consulting, honoraria, or gifts);
- equity interests (e.g. stocks, stock options or other ownership interests); or
- intellectual property rights (e.g. patents, trademarks, copyrights, royalty income and future royalties from such rights).

The term does not include:
- Salary, royalties, or other remuneration from the University;
- Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities;
• Income from service on advisory committees or review panels for public or nonprofit entities;
• An equity interest that when aggregated for the Investigator and the Investigator's spouse and dependent children, meets both of the following tests: (1) Does not exceed $10,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and (2) does not represent more than a five percent ownership interest in any single entity; or
• Salary, royalties or other payments that when aggregated for the Investigator and the Investigator's spouse and dependent children over the next twelve months, are not expected to exceed $10,000.

B. Conflict of Commitment

A conflict of commitment arises when a member undertakes external commitments which interfere with the member’s obligations and commitments to Clarkson.

C. Examples of Potential or Actual Conflicts

In this example, an investigator is defined as a principal investigator, or co-principal investigator, and any other person at the University who is responsible for the design, conduct, or reporting of research or educational activities funded, or proposed for funding by an external sponsor.

1. A member may not directly or indirectly lease, rent, trade or sell real or personal property to the University without full disclosure of the relevant facts.

2. A member may not possess a substantial interest in or participate in the profits of any organization that deals or seeks to deal with the University without full disclosure of the relevant facts. Participation through mutual funds and similar vehicles is not a conflict if the member does not direct or control the investments of the mutual fund or similar vehicle.

3. Giving well-paid lectures or consulting for companies or organizations whose economic interests are affected by the investigator’s work that are supported by the sponsored funds.

4. Undertaking evaluative research with sponsored funds when the investigator or the investigator’s dependents or spouse have a financial, managerial, or ownership interest in the sponsoring company or in the company producing the product tested.
5. Providing privileged access to information developed with University resources or supported by sponsored funds to an entity in which the principal investigator has a financial interest.

6. Purchasing equipment, instruments, or supplies from sponsored funds for research from a firm in which the principal investigator has a financial interest.

7. Commitments that involve frequent or prolonged absence from the University on non-University business.

8. Commitments that engage a substantial portion of the time a member is expected to spend in University related activities and which thereby dilutes the amount or quality of participation in the instructional, scholarly or administrative work of the University.

IV. Conflict Disclosure, Avoidance and Resolution

Members are expected to evaluate and arrange their external interest and commitments in order to avoid compromising their ability to carry out their primary obligations to the University. In the first instance, conflicts should be avoided or resolved through the exercise of individual judgment or discretion.

Full disclosure of the circumstances surrounding an actual or potential conflict should be made prior to initiating the activity that poses the possible conflict.

It is the institution’s responsibility for determining whether a conflict exists and conditions or restriction placed to resolve or manage any perceived or actual conflict of interest. The policy is administered as defined below.

A. Trustees, President and Chief Financial Officer

Trustees, the President, and Chief Financial Officer (who might also have a vice-presidential title, but hereafter is referred to solely as “chief financial officer”) shall file an annual disclosure with the Chair of the Trustee Audit Committee. In the event of a reported conflict the Chair shall consult with the members for the Audit Committee and will provide the person disclosing the conflict with a memorandum outlining the disposition of the matter with a copy to the Chair of the Board.

If a conflict should arise between annual disclosure statements, each Trustee has the obligation to inform the Chair of the Audit Committee. In the event that an unforeseen conflict should arise at a Board meeting, a Trustee perceiving a conflict must recuse him/herself from discussion and voting on the matter. In such situations the Trustee will
be excused from the meeting by the Chair who will direct that it be duly noted in the minutes.

If at any time a Trustee, the President, or the Chief Financial Officer may have a question about the interpretation of this policy, they are encouraged to ask for the opinion of the Audit Committee Chair.

B. Members of the Faculty and Staff of Instruction and Research

All disclosure of the Faculty and Staff of Instruction and Research (hereinafter referred to as Principal Investigator) must be in writing and must fully disclose all information relevant for a complete understanding of the disclosure at the beginning of each fiscal year to meet the Federal rules (DHHS and NSF conflict of interest policies effective October 1, 1995 which will be maintained in the office of Division of Research. The Director of Research (or other person designated by the President, but hereafter referred to as “director of research”) reviews each disclosure and may do the following:

1. Review the disclosure with the Principal Investigator to determine if a potential for conflict exists, and to resolve any potential conflict with the Principal Investigator.

2. Refer the disclosure to a Conflict of Interest Committee who will review the disclosure and determine if a conflict of interest exists, and recommend resolutions to any potential conflict of interest to the Director of Research. The Committee consists of five members appointed by the Director of Research. The membership includes at least three faculty members who conduct research with external funds, one administrative member from the financial affairs staff of the University, and one additional staff member to be appointed in consultation with the investigator. The Director of Research serves as an ex-officio member.

Principal investigators may appeal a decision in #1 above, by requesting a review of their disclosure by the committee #2.

Principal investigators submitting research proposals must certify that there are no changes since the annual disclosure was submitted. If there are changes, the disclosure must be updated prior to submission of a proposal to an external agency, and during evaluation period of the award. Members are expected to evaluate and arrange their external interest and commitments in order to avoid compromising their ability to carry out their primary obligations to the University.
Examples of conditions or restrictions that may occur in the management of any potential conflict of interest may include, but are not limited to the following:

1. Disclosure of significant financial interests to the funding agency.
2. Monitoring research by an independent reviewer.
3. Modification of the research plan.
4. Disqualification from participation in the portion of research affected by the financial interests.
5. Divestiture of financial interests.
6. Severance of relationships that create the conflict.
7. The institution may notify the external agency that the University is unable to manage an actual or potential conflict of interest.

All financial disclosure records will be retained until three years after termination or completion of the award to which they relate, or the resolution of any government action involving those records.

C. All Other Members of the Staff

The Chief Financial Officer (or other person designated by the President, but hereafter referred to as “chief financial officer”), on an annual basis, will review each disclosure to determine if a potential for conflict exists. Members involved in the following duties must be particularly conscious of the potential for conflict: the procurement, exchange or sale of goods, services or other assets; the negotiation or formation of contracts or other commitments affecting the assets or interests of the institution; and the handling of confidential information and the rendition of professional advice to the University. Members involved in such activities shall render a disclosure statement at the request of the appropriate Vice President/Dean of an organizational unit or on an annual basis if so directed by the Chief Financial Officer.

Disclosure statements are filed at the beginning of each fiscal year (July 1) and are maintained in the employee’s personnel file in the Office of Human Resources. All disclosures shall be sufficiently detailed to permit an accurate and objective evaluation. Each member is obliged to cooperate fully in the review of the pertinent facts and circumstances.

If the Member discloses any information in which an appearance of or actual conflict exists, the Chief Financial Officer will do either of the following:

1. Review the disclosure with the Member to determine if a potential for conflict exists, and to resolve any potential conflict with the Member. If a potential or actual conflict exists; the Chief Financial Officer and the Member will execute a Memorandum of Understanding defining the resolution of the potential or actual conflict. The
Memorandum of Understanding will be filed with the conflict of interest disclosure form in the Office of Human Resources.

2. Refer to the disclosure to a Conflict of Interest Committee who will review the disclosure and determine if a conflict of interest exists, and recommend resolutions to any potential conflict of interest to the Chief Financial Officer. The Committee will consist of five members appointed by the Chief Financial Officer. The Membership includes at least two faculty members, two administrative members, and one additional staff member to be mutually agreed upon and selected from the 25 members of the University Grievance Committee.

Members may appeal a decision in #1 above, by requesting a review of their disclosure by the committee in #2.

As an example, a Member may not review, approve, or administratively control contracts when the contract is between the University and a company in which the Member has a substantial financial interest, or when the contract is with the member’s spouse or dependent child, or when a Member’s spouse or dependent child is an employee of the contract and directly involved with activities included under the contract. Resolution of the conflict of interest in this example may involve a written Memorandum of Understanding in which the Member agrees to remove him/herself from any discussions regarding such contracts, and to place responsibility for review and approval of such contracts with a Member who is not in a reporting relationship with him/her.

V. Disclosure Statement Forms

The Conflict of Interest Disclosure form will be administered by the Chief Financial Officer in collaboration with the Division of Research and the Office of Human Resources.

June 1996
Editorial Revision January 2009
Revised December 2011
UNIVERSITY FACULTY AND STAFF
OF INSTRUCTION & RESEARCH
CONFLICT OF INTEREST DISCLOSURE FORM

Completed forms should be returned to Human Resources P.O. Box 5542.

Name:
Position:
Department:

The Conflict of Interest Policy covers members of the University community (Board of Trustees, vice presidents, executive officers, directors, faculty and staff), their spouses and children.

(Please check applicable boxes below. You must check at least one box in each part.)

PART I:

1. □ I do not have any actual or potential Conflict(s) of Interest or Conflict(s) of Commitment, as defined by Clarkson University’s Conflict of Interest Disclosure Policy.

2. □ I am disclosing the following actual or potential Conflict(s) of Interest, as defined by Clarkson University’s Conflict of Interest Disclosure Policy. (Explain below and/or attach supporting documentation in an envelope marked confidential.)

3. □ I am disclosing the following actual or potential Conflict(s) of Commitment, as defined by Clarkson University’s Conflict of Interest Disclosure Policy. (Explain below and/or attach supporting documentation in an envelope marked confidential.)

PART II:

4. □ I do not have any Significant Financial Interest(s), as defined by Clarkson University’s Conflict of Interest Disclosure Policy.

5. □ I am disclosing the following Significant Financial Interest(s), as defined by Clarkson University’s Conflict of Interest Disclosure Policy, that relate to my participation in any sponsor funded research activities.

Last Revised: 12/08/11
(Check applicable boxes below and attach supporting documentation (in an envelope marked confidential) that identifies the business enterprise or entity involved and the nature and amount of the interest.)

___ Salary or other payment for services (e.g. consulting fees or honoraria),
___ Equity interests (e.g. stocks, stock options, or other ownership interests),
___ Intellectual property rights (e.g., patents, copyrights and royalties from such rights),
___ Other significant financial interests (describe):

Further, I agree:

• To update this disclosure between annual disclosures at the time the potential for a conflict is first identified.
• To cooperate in the development of a Management Plan, should one be necessary to manage, reduce, or eliminate actual, potential, or perceived conflicts of interest.
• To comply with any conditions or restrictions imposed by the University to manage, reduce, or eliminate actual, potential, or perceived conflicts of interest or to forfeit the award.

I acknowledge that I have read, understood, and will comply with the Clarkson University Conflict of Interest Disclosure Policy.

\[
\text{Clarkson University Conflict of Interest}
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Disclosure Reviewed By: ___________________________ Date: ___________________________
UNIVERSITY STAFF
CONFLICT OF INTEREST DISCLOSURE FORM

Completed forms should be returned to Human Resources PO Box 5542.

Name:
Position:
Department:

The Conflict of Interest Policy covers members of the University community (Board of Trustees, vice presidents, executive officers, directors, faculty and staff), their spouses and children.

(PLEASE CHECK APPLICABLE BOXES BELOW. YOU MUST CHECK AT LEAST ONE BOX.)

1. □ I do not have any actual or potential Conflict(s) of Interest or Conflict(s) of Commitment, as defined by Clarkson University’s Conflict of Interest Disclosure Policy.

2. □ I am disclosing the following actual or potential Conflict(s) of Interest, as defined by Clarkson University’s Conflict of Interest Disclosure Policy. (Explain below and/or attach supporting documentation in an envelope marked confidential.)

3. □ I am disclosing the following actual or potential Conflict(s) of Commitment, as defined by Clarkson University’s Conflict of Interest Disclosure Policy. (Explain below and/or attach supporting documentation in an envelope marked confidential.)

Further, I agree:

• To update this disclosure between annual disclosures at the time the potential for a conflict is first identified.
• To cooperate in the development of a Management Plan, should one be necessary to manage, reduce, or eliminate actual, potential, or perceived conflicts of interest.
• To comply with any conditions or restrictions imposed by the University to manage, reduce, or eliminate actual, potential, or perceived conflicts of interest.

I acknowledge that I have read, understood, and will comply with the Clarkson University Conflict of Interest Disclosure Policy.

Signed: _____________________________ Date: _____________________________

(Original signature only - "per" signature is not acceptable)

Disclosure Reviewed By: _____________________________ Date: ______________
7.21 CLARKSON UNIVERSITY CODE OF BUSINESS CONDUCT

PREAMBLE

Fair, legal and ethical business practices have been part of Clarkson University’s operating philosophy since its inception. Clarkson was founded in 1896 as a memorial to Thomas S. Clarkson, who saw individual conduct and community citizenship as interconnected and crucial components of a successful life. Today the University continues to be guided and strengthened by its historic commitment to the highest standards of individual character and institutional culture.

The statement of Clarkson’s values commits the University’s faculty, staff and students to teamwork, caring, integrity, vision, diversity, service, growth and diligence. Within the sphere of business conduct, these values demand compliance with the highest ethical standards and with all applicable laws, regulations and rules. These include Clarkson’s policies and regulations as stated in this Code of Business Conduct, codes of professional or business conduct of the organizations to which members of the University’s community belong, and Federal, State, and local laws, regulations and rules.

In cases where different policies, laws, regulations or rules conflict with each other, the most stringent should be followed, and in all cases business practice must comply with the law. The President or the University’s chief financial officer, acting as the agent for the President, are the only persons who can waive compliance with any provision of this Code by any University employee, agent, consultant or representative. The Chair of the Board is the only person who can waive compliance with any provision of this code by the President.

Every employee, individual or entity employed to represent the University must read, understand and consent to this Code before undertaking any work on behalf of the University.

New Employees must be made aware and consent to the Code as part of their Clarkson orientation.

POLICY VIOLATION

All University, faculty, staff, agents, consultants and representatives must understand, consent, and comply with the University’s Code. Violation of the Code will not be tolerated and will result in disciplinary action for employees and other appropriate consequences for non-employees. If you have any questions about the Code, see the section “Seeking Advice”. Each employee, agent, consultant and representative is responsible for adhering to the University’s policy in all matters related to University business/financial operations. If you know or have good grounds for suspecting that any illegal or unethical conduct has occurred or is planned by
any employee, you must report it to the Privacy Officer. The Privacy Officer can also be contacted to report a violation of the Code of Business Conduct. The University has designated the Vice President for University Outreach and Student Affairs as its Privacy Officer. Your report may be anonymous. Reports of Code violations will be promptly investigated by the Privacy Officer. Following the investigation, appropriate corrective measures will be taken. These actions may be as severe as termination and/or prosecution. The resolution of each investigation will be communicated back to the reporting individual if requested. It is expected that representatives of the University Compliance Committee report all issues and resolutions to the Board of Trustees and that these will be discussed in the executive session of the Board of Trustees at each regular Trustees’ meeting.

All University Administrators are responsible for ensuring that all employees reporting to them are aware of this Code of Business Conduct, are fully aware of the importance of compliance, and understand the procedure for reporting violations. Further, administrators are responsible for monitoring employee conduct through oversight of their department/unit business processes. The education, monitoring and reporting functions are a critical responsibility of all University administrators and are an essential component of every administrator’s managerial duties.

**NON-RETALIATION**

Anyone who in good faith raises an issue regarding a possible violation of law, regulation, rule or University policy will be protected from retaliation by the University. It is a violation of the Code for anyone to be discriminated against or harassed for making a good faith report to the University of a suspected violation of law or policy. If you believe that you are being retaliated against in violation of this policy, follow the General Grievance Procedures contained in section 3.1.13 of the Clarkson University Operation Manual.

**FULL, FAIR, ACCURATE, TIMELY AND UNDERSTANDABLE DISCLOSURE**

The University is committed to providing full, fair, accurate, timely and understandable disclosures in all reports and documents as well as in all other public communications made by the University. In furtherance of this commitment, the chief financial officer and the Comptroller will design, implement and amend as necessary disclosure controls and procedures and internal controls for financial reporting (collectively “Controls and Procedures”). All University employees will comply with the Controls and Procedures to promote full, fair, accurate, timely and understandable disclosure by the University.

Employees can express any complaints or concerns they may have regarding any University disclosure, particularly those concerning the University’s accounting, internal accounting controls or auditing matters, to the Compliance Committee, Privacy Officer, a Compliance Committee member, or a high ranking member of the faculty or administration. Individuals
falling into these categories may include but not be exclusive to Deans, the Provost, Vice Presidents or tenured faculty. Expression of complaints or concerns can be done in a confidential or anonymous basis by reporting their complaints to the Privacy Officer, by phoning 315-268-6737. The caller may leave a verbal message on this dedicated, private phone accessible only by the Privacy Officer.

**VOLUNTARY DISCLOSURE OF IRREGULARITIES**

The University is committed to operating in accordance with the highest principles of integrity and ethical standards. Should an improper practice or irregularity occur, the University is committed to making all necessary corrections, taking remedial action to prevent recurrence, and making timely and appropriate disclosure of the improper practices or irregularities to the proper authorities where warranted.

**WHEN IN DOUBT**

If you are in doubt about a business conduct situation, ask yourself the following questions:
- Is it legal?
- Does it violate University policy?
- Is it consistent with the University’s values?
- Is it fair and just?
- How does it make me feel about myself?
- What would my family think about it?
- How would it look in a newspaper article?
- Will I sleep soundly tonight?
- What would I tell my child to do?

If you are unsure about what to do, ask questions of your supervisor and keep asking until you are certain you are doing the right thing.

**SEEKING ADVICE**

The University is committed to operating its business in accordance with the highest level of integrity and ethical standards and all applicable laws, regulations and rules. The University wants to make sure that everyone who does business on behalf of the University fully understands what this Code requires and is able to ask questions if advice is needed. Should an improper practice or irregularity occur within the University, we are committed to correcting the problem and taking appropriate steps to make sure it will not happen again.

If you are unsure of what a policy requires of you, are concerned that the University may be in violation of the law or believe that a University policy is being violated, you may seek advice from your supervisor, Human Resources Officer, Privacy Officer, a Compliance Committee
member, or high ranking member of the faculty or administration (as used in this Code, the term “high ranking member of the faculty or administration” includes, but is not exclusive to, Deans, Provost, Vice President and tenured faculty). The names of individuals serving on the University’s Compliance Committee will be posted on the University’s website. If you have questions about the Code or if you are seeking advice about compliance with the Code you may:

Call: Chief Financial Officer at 1-315-268-3859

Or

Write to: Clarkson University
CU Box 5540
306 Science Center
Potsdam, NY 13699-5540
Attn: Chief Financial Officer

APPLICABLE SECTIONS OF THE CLARKSON UNIVERSITY OPERATIONS MANUAL:
- Conflict of Interest Policy, Section 7.20
- Clarkson University Intellectual Property Policy, Section 6.6
- Response to Inquiries and Requests for Information, Section 7.12
- Equal Employment Opportunity, Section 3.13
- Anti-Harassment and Anti-Discrimination Guidelines, Sections 3.13 and 3.1.11
- Nepotism-Employment of Relatives, Section 3.1.4
- Alcohol, Drugs and Firearms, Section 3.1.7 and 7.15
- Protection and Proper Use of University Assets, Section 7.6
- Acceptable Use Policy, Section 7.18
- Electronic Mail and Internet Use, Under development
- Scientific Misconduct Policy, Section 7.22
- Government Relations Policies, Section 7.25

APPLICABLE SECTIONS OF THE CLARKSON UNIVERSITY BUSINESS AND FINANCE MANUAL:
- Travel and Entertainment, Section 6

APPLICABLE CLARKSON UNIVERSITY POLICIES:
- FAIR DEALING
The University employees must deal fairly with the University’s customers, suppliers, and staff. No unfair advantage should be taken of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material fact or any other unfair practice.
• **GIFTS AND GRATUITIES**

No University employee, agent or representative will directly or indirectly give, offer, ask for, or accept for personal use any gift or gratuity, in cash or in kind, from an employee or other representative of any current or potential customer or supplier, or of a regulatory authority, in connection with a transaction, proceeding or relationship between the University and the other organization. Gifts and gratuities that arise in connection with an employee’s, agent’s or representative’s private relationships or business dealings and that are not connected with a transaction, proceeding or relationship between the University and the other organization are not prohibited by this policy. “Personal use” prohibited by this policy includes use by a University employee, agent or representative, any member of his or her family, or any organization with respect to which he or she has a pecuniary interest or relationship.

• **BRIBERY, KICKBACK AND PAYOFFS**

Bribery, kickback and payoffs are unacceptable. It is absolutely imperative that each and every person who does business with the University understands that the University will not, under any circumstances, give or accept bribes, kickbacks or payoffs.

• **CONTRIBUTIONS**

The University will not make any contribution, directly or indirectly, to any candidate for public office, political parties or other political organizations. In addition, employees may not be given time off with pay for political activity, although time off without pay may be possible if consistent with local policies and laws. Under no circumstance will the University support or permit contributions on behalf of the University to any group or association which is subversive to the interests of the University or which directly or indirectly supports terrorism.

• **GOVERNMENT RELATIONS**

Policies for contacting and communicating with officials and employees at all levels of government have been established to facilitate a coordinated and effective government relations program and to ensure compliance with federal, state, and local lobbying laws. (See the Clarkson University Operations Manual, Section 7.25.) All employees and especially senior faculty and administrators should be aware of the policies relating to lobbying for the University. No gifts or travel arrangements or anything of value may be given to federal, state, and local officials (with very few limitations). The President and the Director of Government Relations are authorized to lobby for the University; all other employees shall consult with the Director of Government Relations prior to engaging in lobbying for the University, in order to ensure the University’s compliance with applicable reporting obligations.
• **CONFIDENTIALITY OF INFORMATION**

University employees must maintain the confidentiality of information entrusted to them by the University or its students, alumni, employees or others with whom it has a relationship (except when disclosure is authorized or legally mandated), including all non-public information that might be of use to competitors or harmful to the University or the aforementioned parties if disclosed. University employees must protect and restrict the transfer of such confidential information to anyone outside of the University, and must share such information within the University only on a “need-to-know” basis.

• **FRAUD, THEFT OR SIMILAR CONDUCT**

Any act that involves theft, fraud, embezzlement or misappropriation of any property, including the property of the University or any of its employees or suppliers, is prohibited.

• **COPYRIGHT COMPLIANCE**

The University believes strongly in respecting the intellectual property rights of others, including the copyrighted works of authors, publishers and programmers.

Employees are permitted to make copies of any internal documents produced by the University and those works which are not the subject of a third party’s copyright. Works that are not subject to copyright, such as U.S. government works and works already in the public domain, may be freely photocopied. If an employee has a question regarding whether a work is in the public domain, such question should be addressed to the University’s Educational Resource Center.

With regard to newsletters, magazines or other publications, only limited photocopying which constitutes a de minimus or fair use is authorized. Such authorized copying includes the table of contents of copyrighted newsletters, magazines or other publications which are used to allow individuals to determine whether those contents are of interest, where the actual copy of the newsletter, magazine or other publication is made available in the University library or otherwise circulated. The University will be guided at all times by applicable copyright laws.

If an employee does wish to receive multiple copies of copyrighted articles or other publications for internal distribution, options are available. The employee may be able to obtain the specific permissions necessary for such duplication from the copyright holder, which are typically the publisher and/or the author. The employee must obtain this permission in writing.

Computer software is also covered by copyright under U.S. laws. The University has specific licensing agreements with the owners of software copyrights for all
software installed by the OIT Department on University computers. University employees must not copy any software installed on computers for installation on computers at the employee’s homes or elsewhere without obtaining the prior permission of the University’s Office of Information Technology (OIT) Department. Similarly, employees should not install personal software on University computers without obtaining the prior permission of the OIT department.

Under U.S. law, the subject matter of copyright is very broad. Copyright applies to all types of creative works on authorship. This includes, but is not limited to, books, magazines, newspapers, cartoons, e-mail, trade journals, newsletters, instruction manuals, pictures, drawings, maps, sound recordings, television programs and videotapes. If an employee wishes to copy materials such as a videotape or material found on the Internet, the employee must first obtain permission in writing from the copyright holder.

• **MAINTENANCE OF ACCURATE AND COMPLETE RECORDS**
  Every Employee has the responsibility to maintain accurate and complete records regarding their business/financial operations. No false, misleading or artificial entries may be made on the University’s books and records. No funds or assets may be maintained by the University for any illegal or improper purposes. All transactions must be fully and fairly documented and recorded in the University’s accounting records.

• **RESPONSIBLE MANAGEMENT OF GOVERNMENT FUNDS**
  The University will strictly comply with all terms and conditions of funds received from government sources.

• **CONFIDENTIALITY OF STUDENT RECORDS**
  The University will comply at all times with the Family Educational Rights and Privacy Act (FERPA) and the regulations promulgated under FERPA.

• **CONFIDENTIALITY OF EMPLOYMENT RECORDS**
  The University will safeguard the confidentiality of employee records. Only those University employees, agents or representatives having a substantial and legitimate business “need to know” may have access to any employee’s records with the approval of the Human Resources/"Gatekeeper”. An employee given access to such records will safeguard them and will maintain the confidentiality of information acquired to the extent required by law.

• **ENVIRONMENT, HEALTH AND SAFETY**
  The University will establish and manage a safe and healthy work environment and will manage its business/financial operations in ways which are sensitive to the environment and which conserve natural resources. The University will comply
with all applicable environmental, health and safety laws. Questions should be directed to the University’s Environmental Health and Safety officer or the Risk Management Department.

• Employment Sanctions Relating to Drug Abuse in the Workplace

The use, consumption, possession, distribution, or sale of controlled substances and/or unauthorized alcohol in University workplaces is prohibited. Use of alcohol or illegal drugs prior to reporting for work which results in unsafe work performance or erratic conduct in the workplace is also prohibited.

Employees convicted of drug related criminal statute violations in Clarkson workplaces are subject to employment sanctions which may range from reprimand to dismissal as recommended by the departmental supervisor to the Human Resources Office.

Employees convicted of drug related criminal statute violations in Clarkson workplaces may, as an alternative to or in conjunction with employment sanctions, be requested to participate in a drug/alcohol rehabilitation program as deemed appropriate under the circumstances. This option will usually be reserved for first-time offenders only. Refusal to participate in a drug/alcohol rehabilitation program will necessitate the immediate imposition of the appropriate employment sanction.

• Drug and Alcohol Testing

In compliance with The Department of Transportation (DOT) alcohol testing rules, Clarkson University requires employees who hold safety sensitive positions to be tested for drugs and alcohol upon hiring (all offers of employment are conditional on passing a drug or alcohol test).

Employees holding safety sensitive positions will be randomly tested quarterly. Any positive drug or alcohol test is a violation of the University’s drug and alcohol policy.

Adopted by Faculty Senate & Administrative Council January 2007
Revision Approved by Faculty Senate & Administrative Council May 2008
Editorial Revision April 2009
Revised January 2013

Ops Manual – release date 7/17
7.22 CLARKSON UNIVERSITY SCIENTIFIC MISCONDUCT POLICY

PREAMBLE

All Clarkson employees and students are expected to adhere to ethical conduct in the exercise of their duties and studies. Should misconduct arise within the context of scholarly activity, it will be dealt with according to the following general principles:

- Well-founded accusations of scholarly misconduct made in good faith must be given serious consideration;
- An accused person or persons must be assumed innocent until the weight of evidence requires a conclusion to the contrary;
- Every effort should be made to protect the privacy and reputation of both the complainant and the respondent, to provide for due process, and to restore the good name of the unjustly accused individual or individuals.

DEFINITIONS

Scholarly activities: All basic, applied and demonstration research, including scholarship and creative work in non-scientific fields.

Misconduct: Fabrication, falsification, plagiarism, autoplagiarism (claiming one's own previously published work as new work), or aiding or abetting those practices that seriously deviate from those that are commonly accepted within the scientific and humanistic communities for proposing, conducting or reporting research. Misconduct does not refer to honest error or honest differences in interpretations or judgments of data.

Inquiry: Information and fact-finding to determine whether an allegation or apparent instance of misconduct warrants an investigation.

Investigation: The formal examination and evaluation of all relevant facts to determine whether misconduct has occurred.

POLICY

As an institution devoted to the creation and dissemination of new knowledge through research and scholarship, Clarkson University is committed to maintaining the truthfulness and integrity fundamental to these activities through the responsible and ethical conduct of its faculty, academic professionals, staff and students. The University has developed and approved the following procedures for dealing with alleged misconduct. These procedures are also intended to protect innocent researchers and scholars from harassment, to prevent interference with their academic freedom, and to protect from retribution those who report alleged misconduct. Mishandling of allegations of misconduct can have devastating consequences. Clarkson University is dedicated to uniform, centralized and precise procedures for dealing with misconduct. Key to these procedures is the tone set by campus leaders, center directors,
supervisors of laboratories and programs and department heads in communicating Clarkson's policy on misconduct by example, and through regular discussion and review of research, scholarship and creative endeavors.

**REPORTING ALLEGED MISCONDUCT**

Formal allegations of misconduct should be presented in writing in a confidential manner to the University Provost or equivalent chief academic officer. The Provost will first launch an initial inquiry to determine whether the alleged misconduct falls within the purview of this policy. The Provost will refer the inquiry to a faculty task force. The composition and membership of the task force is to be determined by majority vote of Faculty Senate.

The members of the task force may seek a confidential interview with the complainant and will consult with outside administrators and anyone else they deem appropriate to conduct the initial inquiry. During the initial inquiry and, if warranted, subsequent investigation, the Provost and task force will take appropriate steps to keep the identities of the complainant and respondent confidential, to the extent permitted by due process rights, to assure that no complainant acting in good faith will experience retaliation and to ensure that damage to the integrity of the respondents will be minimized.

The task force shall prepare a report to the Provost within no more than 30 calendar days from the date of the first written allegation (required by federal regulation 42 CFR 50, subpart A). If the task force determines that the allegation does fall within the purview of this policy, the Provost shall take the following steps:

- Notify in writing appropriate administrators, the respondent and the complainant.
- Convene a Misconduct in Research & Scholarship (MRS) Committee to consist of members elected by Faculty Senate.
- See that an investigation begins no later than 30 calendar days after an initial inquiry is completed and that the subcommittee completes its investigation and report within 120 calendar days from the beginning of the investigation (required by federal regulation).
- See that an investigation entails examining all pertinent information, including review of records and hearing testimony, if necessary. Written summaries of interviews should be prepared as part of the report and experts from within and without the University should be consulted, as necessary. The respondent must have an opportunity to respond to the allegations and may be assisted, but not represented, by legal counsel, research collaborators, and professional associates.

The written report will include supporting documentation and must include a) a description of the policies and procedures under which the investigation was conducted, b) a summary of the evidence reviewed and interviews conducted, c) the actual text or an accurate summary of the views of any individual(s) found to have engaged in academic misconduct, d) the findings regarding academic misconduct and the basis for these findings, e) recommended administrative
actions to repair any damage the misconduct may have caused, and f) recommended disciplinary actions ranging from reprimand to termination, and submission of the investigative report to the respondent(s) and the complainant(s) for written comments, which comments, if any will become part of the record of the investigation.

FINDINGS

The MRS Committee will report its findings and recommendations to the Provost. The report will include supporting documentation. Based on the findings, the Provost will summarize the report for appropriate administrators, and the respondent. The Provost will take the following actions, depending on the outcome of the investigation:

- **Finding of No Misconduct**
  If the MRS concludes that no misconduct occurred, Clarkson's administration will work diligently to counter any damage to the individual's reputation that the investigation caused. The Provost will retain the MRS report and supporting documentation as confidential, personnel-related material; after three years from report date, the material will be destroyed.

- **Finding of Improper or Malicious Allegations**
  If the MRS finds that the complainant made improper or malicious allegations, the Provost will notify appropriate University administrators, who will initiate appropriate disciplinary action against the complainant under pertinent Clarkson policies.

- **Finding of Misconduct**
  If the MRS investigation concludes that misconduct has occurred, the Provost will impose appropriate sanctions in consultation with the Chair of the respondent's academic unit and the Dean of the appropriate School. Sanctions may range from reprimand to termination. In addition, the Provost will notify any affected funding agencies and editors of affected publications of the results of the investigation.

APPEALS

The respondent will have the opportunity to appeal the decision based on the findings, according to pertinent Clarkson policies and procedures as outlined below:

Faculty members may appeal in writing to the President of Clarkson University no later than thirty (30) days following the date of written finding. The President, at his or her discretion, will appoint an appropriate Appeals Committee, composed so as to minimize conflicts of interest, to investigate the appeal. In consultation with the Appeals Committee, the President will render a written decision no later than thirty (30) days following the date of written appeal. The decision of the President is final.
Staff appellants should follow the policy and procedures as set forth in the Clarkson Employee Manual under Section 3.1.13, General Grievance Procedures.

Student appellants should follow the policy and procedures as set forth in the Clarkson University Student Regulations, Section VII, Grievance Procedures for Students.

Existing Scientific Misconduct Policy Incorporated in the Operations Manual with Faculty Senate and Administrative Council Approval, April 2009
7.23 PARTNER INSTITUTIONS FOR GRADUATE STUDY

Partner Institutions for Graduate Study are established for the purpose of incorporating graduate study at another institution in a Clarkson degree program. For example, a business graduate degree program that emphasizes global issues would be able to require students to do some of their course work at a partner university in another country, and a science or engineering graduate program would be able have degree programs that require students to do some of their work at a partner research laboratory with faculty from another university.

Partner Institutions for Graduate Study are established by a formal partnership and exchange agreement approved by Clarkson’s President. These agreements list the courses at the partner institution that can be used in the given Clarkson degree program. These lists are established through the following procedure:

1. The individual courses that will be used in a given Clarkson degree program are evaluated for possible inclusion on the list by the Clarkson faculty associated with the degree program.
2. These faculty then recommend the list to the appropriate Clarkson academic administrators, and upon their approval the list is included in the partner and exchange agreement submitted to the President for approval.

Once a list is established, the quality of the external courses is monitored by the appropriate Clarkson faculty and academic administrators.

The grades in courses taken at Partner Institutions for Graduate Study are assigned according to Clarkson’s grading standards and policy. These grades will be recorded on a student’s Clarkson transcript, and they may be used in computing the student’s GPA with the approval of the Dean/Director of the student’s Clarkson School/Institute.

The total number of credit hours a graduate student may receive from all external sources (Partner Institutions for Graduate Study plus graduate transfer credit from non-partner institutions) is limited to no more than 50% of the credit hours required for the student’s Clarkson degree program. (Note that graduate transfer credit from non-partner institutions cannot exceed 10 hours for Masters programs and 30 hours for doctoral programs.)

Approved April 2011
7.24 CLARKSON SOCIAL MEDIA POLICY

I. Purpose
Social media encompass a wide variety of Internet networking and communication tools, including but not limited to sites such as Facebook and MySpace (social networking), Twitter (live blogging), LinkedIn (professional networking), YouTube (video), Flickr (photo sharing), AOL Instant Messenger, Yahoo Messenger, etc.

Social media, when used wisely, are a very powerful tool, allowing Clarkson and its community members to engage prospective students, current students, parents, employees, alumni and other interested constituencies in the life of the University. Social media aid our personal connections, our professional networking opportunities and our communication objectives when we are charged with representing Clarkson and its departments, programs and/or units.

It is important for our faculty and staff to follow the same standards while using social media as they do in their face-to-face interactions and other forms of communication with our constituencies. Even more so in our online dialogues, we must recognize that even individually-driven conversations are potentially public for the world to see how we treat and connect with others. We must obey all laws and we must show respect for others, just as we do in other forms of communication.

This policy and the following requirements apply to any situations where an employee is expressly or impliedly representing the University, as an employee of Clarkson in general and/or on behalf of a department, program, unit or the University in part or whole. This includes any activity in which the University is connected to the identity of the employee beyond simple identification of his or her affiliation with Clarkson, and includes any situation in which a reader might reasonably believe that the employee is acting on behalf of the University.

The following points are intended to make deployment of this policy a positive exchange and to help to ensure that all Clarkson employees and departments, programs and units appropriately represent the University in social media.

II. Employee Conduct

A. Using Social Media

1. University employees authorized by their supervisor, by department agreement, or faculty conducting academic inquiry may use social networking media to conduct University business consistent with this policy, the Clarkson University Acceptable Use Policy, the University Operations Manual and any other
applicable University, department, program or unit policies, procedures, rules and/or regulations.

2. The creation of officially recognized sites that represent the University and/or a department, program or unit of the University, that link from Clarkson.Edu, or that appear in published materials sponsored by the institution, have additional governance requirements associated with them as outlined below.

B. Your personal identity online and content you provide

1. In forums recognized by Clarkson (see section C) and when using your Clarkson e-mail address, the University's domain, or your Clarkson title or other University resources in any social media covered by this policy, employees will be held responsible for following all applicable University policies, procedures, rules and regulations, including but not limited to the Acceptable Use Policy (http://www.clarkson.edu/studentaffairs/regulations/ix.html#), copyright policy, procedures for the distribution of official university information and surveys, crisis communications procedures, and EEO/ Affirmative action/ Harassment policies.

2. Employees may not disclose or use confidential or proprietary information of the University or any faculty, staff or student in any form of social networking media. This includes, but is not limited to, information protected under the Family Educational Rights and Privacy Act (FERPA). Sharing this type of information, even unintentionally, can result in legal action against you and/or the University.

3. If an employee conducts University business using personal communications (e.g. personal email or on personal social media sites), then they are nevertheless representing Clarkson in those transactions or situations. In personal posts, an employee may identify their affiliation as a Clarkson faculty or staff member. However, they must be clear that they are sharing their views as a member of the higher education community, not as a formal representative of Clarkson. This is particularly important if you are a department head or administrator.

C. Social Media Account Management on behalf of a unit of the University

1. Starting and Maintaining an Officially Recognized Social Media Site:

   a. Departments, programs or units of the University that would like to create or maintain a social media account that represents the department, program or unit, that link from Clarkson.edu and/or that appear in the University’s published materials must apply for recognition from the Director of News & Digital Content
Services in the Marketing & External Relations office. Together they will discuss the purpose of the account and how they plan to use and maintain it. After receiving approval from the Marketing & External Relations office, the user may create the new account subject to the terms of this policy and any requirements imposed as a condition of approval. The University reserves the right to revoke or limit approval at any time in its sole discretion.

b. Departments, programs or units will be required to have a plan for keeping their social media sites up-to-date, and that considers their message, audience, and goals. It may be in a department, program or unit’s best interest to collaborate with others who are serving similar audiences to maximize reach and maintain fresh content in the social media venue.

c. Other than "official" social media pages maintained by the Marketing & External Relations office, no department, program or unit should consider its social media site as representing, or allow its social media site to be constructed and/or operated in a manner that states or implies that it represents, the University as a whole.

d. A minimum of two (non-student) University employees in good standing must be listed as administrators of the account. (Three are recommended.) If the service does not allow more than one administrator, a copy of the login and password information must be provided to your supervisor and updated if it is changed. If there are not two employees available to serve as account administrators, or if a supervisor requests, a member of the Marketing & External Relations office will serve in that capacity.

e. Should an employee administrator of an account leave the University, be reassigned to a position not having responsibility over the account, have his or her responsibility for the account revoked, or for any reason no longer wish or be authorized to be an account administrator, another employee must be designated as an account administrator, and the password or other access code for the account must be changed immediately.

f. Employees identified as administrators of accounts are responsible for managing and monitoring content, including without limitation ensuring that postings are consistent with other Clarkson published materials on the same topic. They are responsible for removal of any content that violates applicable federal, state or municipal laws, rules or regulations; University policies, procedures, rules or regulations; or the terms of use for the site on which the account is maintained. The University reserves the right to require the alteration or removal of content that it deems to be contrary to (a) any applicable federal, state or municipal law, rule or regulation, (b) any applicable University policy, procedure, rule or regulation, and/or (c) the best interests of the University.
g. The University has adopted a variety of policies, procedures, rules and regulations that specify the manner in which concerns or complaints regarding certain issues are to be reported (e.g., campus safety and security issues, allegations of discrimination, harassment and/or other human resources concerns, allegations of research improprieties, conflicts of interest, environmental health and safety issues, etc.). A University, departmental, program or unit social media site and/or page approved pursuant to this policy is not responsible for receiving and acting on such concerns and/or complaints, and may not state or imply that it is so authorized, unless expressly designated as having such responsibilities. Employees should understand that the posting of such concerns and/or complaints on approved sites or pages does not ensure that they will be received and acted upon by appropriate University personnel, and the University cannot guarantee that posted concerns and/or complaints will be addressed in a timely manner, if at all. Therefore, employees desiring to report such concerns and complaints should instead use the officially designated resources and processes identified in the relevant Clarkson policies, procedures, rules and regulations.

h. Once a department, program or unit social media account has been approved by the University, it will be reviewed periodically by the Marketing & External Relations office to ensure that it is accurately and acceptably representing Clarkson and remains in active usage. Employee administrators of recognized social media sites that are dormant for more than a three-month period will be asked to remove them or the University will require their removal.

i. The words “Clarkson University” and our logos, trademarks and service marks (collectively, the “Clarkson Marks”) are the property of Clarkson University. If you plan to use any Clarkson Marks in a social media account, the logos must first be submitted to the Director of News & Digital Content Services in the Marketing & External Relations office for approval of the proposed use. The Clarkson Marks may only be used on social media officially recognized by Clarkson pursuant to this policy. The Clarkson University “seal” is reserved for special honors and to signify corporate agreements and should not be used online in social media.

2. **Working in a social media platform representing a department, program or unit:** As a representative of Clarkson who wishes to engage in posting in social media forums to engage individuals with your department, program or unit, you are expected to:

   a. **Follow the terms and conditions** set forth by each social media venue and adhere to our own Clarkson University policies, procedures, rules and regulations.
b. **Obey the law.** Follow local, state and federal laws, rules and regulations, including without limitation those pertaining to copyright and other intellectual property rights.

c. **Respect the rights and privacy of others.** Ensure you have permission to name a student, alumnus, fellow employee or other third party in a blog or other posting.

### III. Best Practices to Engage Your Audiences via Social Media

The University expects that all employees utilizing social media covered by this policy will utilize the following best practices:

1. **Overall, be selective and thoughtful** about where you post and how you reply or choose not to reply. It is perfectly acceptable to invite a phone call to discuss something or refer someone to the appropriate office. When in doubt, don’t say it.

2. A common practice among individuals who write about the industry in which they work is to **include a disclaimer on your site**, usually on the “About Me” page. If you discuss higher education issues or matters within your field of expertise on your own social media site in a manner that could reasonably lead readers to believe that you are speaking on behalf of Clarkson, you should include a sentence similar to this: “The views expressed on this [blog, website] are mine alone and do not necessarily reflect the views of Clarkson University.”

3. **When posting to a blog, keep the tone of your comments respectful and informative.** Avoid personal attacks, online fights, and hostile communications. If a blogger or any other online influencer posts a statement with which you disagree, voice your opinion, but do not escalate the conversation to a heated argument.

4. **Write reasonably, factually, and with good humor.** Understand and credit the other person’s point of view and avoid any communications that could result in personal, professional, or credibility attacks.

5. **When lawful, appropriate and possible, provide a link to your supporting documents or your own profile on campus.** This will help raise your online ranking results, too.

6. **Solicit help from the Marketing & External Relations office to respond to someone who questions or impugns the credibility of the University.**
7. **Post frequently.** A small amount of action on a social media page is almost as bad as having no page at all. In order to keep the audience engaged, try to comment or provide an update at least once a week. Leave yourself an “appointment to post” on your calendar to remind you to update the social media site.

8. **Keep your audience in mind.** Remember that many different kinds of people have access to view the social media account when posting. While writing in a style appropriate to the medium, be sure to consider this when displaying information so as to not alienate any of the potential students, alumni, prospective students, parents, etc.

9. **Post accurate information.** Many people will have access to information posted on social media sites. Ensure that the information is correct before it is posted and consistent with other Clarkson published materials on the same topic.

10. **Spelling and grammar check.** We’re in the education business and with that comes a set of expectations. Double check all spelling and grammar before posting.

11. **Fix errors quickly.** When mistakes occur, fix them as soon as possible. Do not wait, or simply leave the error up.

12. **Live the Clarkson Values.**

   a. **Integrity:** Honesty and accountability in our actions and words form the foundation of our relationship with others. Be truthful in all matters, including without limitation your credentials (such as degrees earned, titles held, research published) and facts about the institution, department, program or unit itself.

   b. **Teamwork:** Credit appropriately just as you would in scholarly work or team-based projects: do not violate copyrights or other intellectual property rights and cite/link the materials borrowed from others.


Further questions regarding the Social Media Policy can be directed to the Director of News & Digital Content Services in the Marketing & External Relations office.

Approved October 2011
GOVERNMENT RELATIONS POLICIES

I. Introduction
These policies apply to a range of actions (collectively referred to as government relations) that bring University employees in contact with the electoral process and/or government officials and their staff. They apply to all faculty and staff (University employees) who consider:

a) using University resources and/or property to contact, correspond with, or meet with government officials (at federal, state, and local level) or candidates for public office,
b) inviting government officials or candidates for public office to visit campus,
c) using University resources and/or property to conduct voter education, registration, and get out the vote campaigns,
d) inviting candidates for public office to campus and/or using University resources and/or property to give campaign support (public or financial) to candidates for public office (as described below, actions that are deemed partisan political activity are prohibited),
e) conducting nonpartisan voter education programs as provided for in subsection 8 of these policies,
f) requesting public or financial support from government officials for individual or University programs, legislation, regulation, government policy, executive orders, or ordinances,
g) giving anything of value to government officials (with very limited exceptions, nothing of value may be given to federal, state, and/or local government officials per this Clarkson policy).

These policies for contacting and communicating with officials and employees at all levels of government have been established to facilitate a coordinated and effective government relations program and to ensure compliance with federal, state and local lobbying laws. In general, for purposes of these policies, contacts and communications with government officials and employees fall into three categories:

1) Prohibited activities. For example, these policies generally prohibit the giving of gifts to any government official without permission from the President, Provost, or Director of Government Relations.

2) Encouraged activities: For example, investigators are permitted and encouraged to speak with administrative program personnel at funding agencies (e.g. a funding officer at the National Science Foundation or a study panel chair at the National Institutes of Health). Employees should feel free to engage in these activities.

3) Activities that are permitted but must be reported: For example, these policies do not prohibit talking to a military officer of the rank of Brigadier General or higher, or talking to a member of the Senior Executive Service. However, the law requires that the University track, and in some cases report, such activities, and therefore these polices require that they be reported and tracked internally.
The Director, Government Relations has been designated as the University point of contact for governmental relations. The Vice President for External Relations or assigned designee interfaces with government and elected officials on Clarkson’s behalf in advancing community relations, special events and general activities supporting local, regional, state and federal initiatives and provides media relations direction for the director of Government Relations/president in official releases by elected officials and government agencies. University employees should contact the Director, Government Relations when in doubt about whether interactions with government personnel they are considering might constitute government relations subject to this policy, or whether those interactions constitute prohibited, encouraged or reportable activities.

II. First Amendment Freedom Respected.
No University government relations policy limits any action by faculty and staff with respect to engagement with government officials, political campaigns or any aspect of relations with government, provided that individuals clearly identify themselves as acting and speaking for themselves and not as representatives of the University. As such, contacts and communications to government officials, staff members, or agencies in your capacity as an individual citizen are not covered by this policy. However, the following guidelines must be observed to ensure your actions or statements will not be interpreted as representing the University:

- All contacts with elected officials or government agencies for personal or other non-University purposes, whether in person or in writing, should be clearly identified as such.
- University property and resources, as defined in this policy, must not be used in communications to elected officials and staff, or to other governmental departments/agencies, for personal or non-University purposes.

III. Definitions:
In addition to terms defined in specific contexts below, the following definitions apply for purposes of this policy:

University Property. For purposes of this policy, University property includes any office supplies or the use of office equipment including but not limited to University telephone systems, clarkson.edu email accounts, letterhead, offices, bulletin boards, campus mail, computing and duplicating machines, and any other physical and electronic resources not available to the general public.

University Resources. For purposes of this policy, University resources include the normal working hours of all faculty, staff, and students, including but not limited to administrative support of other University employees (whether compensated with University funds or government funds), and University travel or other funds expended for government relations purposes (authorized or unauthorized).
IV. Authorization to Lobby for the University
Federal and state laws regulate and limit the use of University funds that can be spent on lobbying activities. They require the University to register as a lobbying entity and report lobbying activities as well as expenditures. Any violations of these laws could lead to significant penalties for the University and University employees ranging from large fines to criminal prosecution. Compliance with this policy is therefore imperative.

The President and the Director, Government Relations are authorized to lobby for the University regarding matters involving legislation or regulation at the federal, state, and local government levels. All University positions on legislation and regulation must be approved by the University President. The President may limit the number of lobbying actions undertaken by the University.

V. Lobbying Rules and Requirements
The following are summaries of federal, state and local lobbying rules and requirements. Any University employee who intends to engage in any of the following reportable activities must contact the Director, Government Relations prior to doing so, in order to ensure the University’s compliance with applicable reporting obligations.

Federal Lobbying -- General

The University is required to comply with the Federal Lobbying Disclosure Act of 1995 and the Honest Leadership and Open Government Act of 2007. Per statutory requirements, the University has registered to conduct lobbying activities at the federal level, and must report activities of those personnel considered lobbyists under federal law.

A "lobbyist" under federal law is an employee whose services include more than one lobbying contact and whose lobbying activities constitute 20 percent or more of his or her service time on behalf of the University during any three month period.

A “lobbying contact” under federal law is defined as any oral, written, or electronic communication to a “covered executive branch official” or a “covered legislative branch official” regarding (1) the formulation, modification, or adoption of federal legislation (including legislative proposals), federal rules, regulations, Executive Orders or any other program, policy or position of the federal government; (2) the administration or execution of a federal program or policy (including the negotiation, award or administration of a federal contract, grant, loan, permit or license); or (3) the nomination or confirmation of a person for a position subject to confirmation by the United States Senate.

The term “covered executive branch official” includes (1) the President, (2) the Vice President, (3) any officer or employee in the Executive Office of the President, (4) any officer or employee serving in a position in level I, II, III, IV, or V of the Executive Schedule, as
designated by statute or Executive Order, (5) any member of the uniformed services whose pay grade is at or above O-7 under 37 U.S.C. § 201, and (6) any officer or employee serving in a position of a confidential, policy-determining, policy-making, or policy-advocating character described in 5 U.S.C. § 7511(b)(2)(B).

The term “covered legislative branch official” includes (1) a Member of Congress, (2) an elected officer of either House of Congress, (3) any employee of (a) a Member of Congress, (b) a committee of either House of Congress, (c) the leadership staff of either House of Congress, (d) a joint committee of Congress, or (e) a working group or caucus organized to provide legislative services to Members of Congress, and (4) any other legislative branch employee serving in a policy making position.

Federal “lobbying activity” is defined as lobbying contacts and efforts in support of such contacts, including preparation or planning activities, research, and other background work that is intended, at the time of its performance, for use in such contacts or efforts, or coordinating with the lobbying activities of others.

Any University employee participating in or supporting lobbying activities described above shall account for his or her time expended on specific legislative and regulatory issues, and any expenditures incurred in this regard, in such detail as required by forms supplied by the Director, Government Relations. The information to be reported includes, but is not limited to, salaries of employees engaging in or supporting lobbying activities, benefits, travel, printing and other administrative costs. Employees must send the reports to the Office of Government Relations on or before the Wednesday after the week during which the reportable activities occurred.

Federal Grant Lobbying

Under the statutory provisions known as the "Byrd Amendment" [31 U.S.C. § 1352(b)], recipients of federal contracts, grants, and loans, as well as those with cooperative agreements with the federal government, are prohibited from using federal monies to lobby Congress and federal agencies, or their respective employees, with respect to the award, making, entering, extension, renewal or modification of any federal contract, grant, loan, or cooperative agreement.

Any University employee participating in or supporting the University’s lobbying activities to secure federal grants or contracts shall account for his or her time expended on specific grants or contracts, and any expenditures incurred in this regard, in such detail as required by forms supplied by the Director, Government Relations. The information to be reported includes, but is not limited to, salaries of employees engaging in or supporting lobbying activities, benefits, travel, printing and other administrative costs. Employees must send the reports to the Office of Government Relations on or before the Wednesday after the week during which the reportable activities occurred.
New York State and Local Lobbying

Pursuant to the Public Integrity Reform Act of 2011, the New York State Lobbying Act of 1981 (as subsequently amended) and other state law, the University has registered to conduct lobbying activities. These activities are reported to the New York State Joint Commission on Public Ethics for both state and local government levels. For purposes of this policy, local government levels include municipalities with 50,000 or more residents.

Under New York law, the term "lobbyist" includes every person or organization retained, employed or designated by any client to engage in lobbying activities. Under New York law, the University is both a "lobbyist" and "client" because the University lobbies for itself.

The term “lobbying activities” is defined as any attempt to influence (1) the passage or defeat of legislation, including the approval or disapproval of legislation by the Governor; (2) the adoption, issuance, rescission, modification or terms of a gubernatorial Executive Order; (3) the adoption or rejection of any rule or regulation having the force and effect of law by a state agency; (4) the outcome of any rate-making proceeding by a state agency; (5) the passage or defeat of any local law, ordinance, or any regulation by any municipality; (6) the adoption, issuance, rescission, modification or terms of an Executive Order issued by the chief executive officer of a municipality; (7) the adoption or rejection of any rule or regulation having the force and effect of local law, ordinance or regulation; or (8) the outcome of any rate-making procedure by any municipality. The New York Lobbying Act also provides that lobbying on procurement contracts, Executive Orders and Tribal-State agreements is subject to regulatory oversight and enforcement by the New York State Joint Commission on Public Ethics.

The term “attempt to influence” means any activity intended to support, oppose, modify, delay, expedite or otherwise affect any of the above actions, including but not limited to oral, written or electronic communications to the Governor, Lieutenant Governor, Comptroller, Attorney General, Members of the State Legislature and their staffs, state officers and employees, and municipal officers and employees, paid or unpaid.

Any University employee participating in or supporting the University’s lobbying activities described above shall account for his or her time expended on specific legislative and regulatory issues, and any expenditures incurred in this regard, in such detail as required by forms supplied by the Director, Government Relations. The information to be reported includes, but is not limited to, salaries of employees engaging in or supporting lobbying activities, benefits, travel, printing and other administrative costs. Employees must send the reports to the Office of Government Relations on or before the Wednesday after the week during which the reportable activities occurred.
VI. Gifts to Public Officials
Federal law prohibits federal officials and their staff from accepting gifts, including any gratuity, favor, discount, entertainment, hospitality, forbearance, or other item having monetary value. Accordingly, University employees may not offer such gifts to federal officials or their staffs.

State law prohibits lobbyists from offering, and state officers and employees from accepting, gifts in excess of “nominal value,” including but not limited to money, services, loans, travel, lodging, meals, refreshments, entertainment, discounts, forbearances, or promises having a monetary value. Exceptions include political contributions, gifts based on personal relationships that are not intended to influence, as well as certain ceremonial items given at events where the official is appearing in his or her official capacity, promotional items, honorary degrees, and food and beverages valued at $15 or less. The rules for determining whether gifts fall within an available exception are technical and complex; accordingly, University employees may not offer gifts to state officers or employees without the prior approval of the President, Provost or Director, Government Relations. In cases where gifts are permitted, the expenses relating to those gifts must be compiled and reported to the Director, Government Relations on or before the Wednesday after the week during which the gifts were provided.

VII. Partisan Political Activities
Because of the University’s tax-exempt status, the University is legally prohibited from endorsing candidates for political office or making any contribution of money, goods, or services to candidates. It is important, therefore, that no person cause the University to make such an endorsement or contribution.

Without limiting the generality of the preceding paragraph:
(1) No person or group within the University may, on behalf of the University, engage in any political activity in support of or opposition to any candidate for elective public office (including giving or receiving funds or endorsements), nor shall any University property or resources be used for such purpose.

(2) No person or group within the University supporting candidates for public office or engaging in other political activities may use University property or resources or receive University support, except in limited permissible circumstances approved in advance by the Director, Government Relations. This shall not prohibit the use of campus facilities by recognized student political organizations, provided that such facilities are made available without regard to viewpoint and on the same terms as applicable to student organizations generally.

(3) Individuals within the University community endorsing or opposing a candidate for political office, or taking a position on an issue for the purpose of supporting or opposing a candidate, must clearly indicate, by their words and actions, that they are speaking as individuals and are not stating a University position.
VIII. Nonpartisan Voter Education Programs
Faculty and staff may initiate nonpartisan voter education programs that utilize university property and resources and may involve inviting candidates for public office to campus provided these programs give equal opportunities to all candidates on the ballot for a particular office and provided these programs are approved in advance by the Director of Government Relations.

Adopted January 2013
7.26 Clarkson University Naming Gift Policy

The Clarkson University Board of Trustees authorizes the President to make commitments to prospective donors regarding naming designations for proposed and existing buildings, facilities, colleges, schools, scholarships, endowments and campus areas, in a manner consistent with historic practice. The President may, but shall not be obligated to, consult with the Chair of the Development Committee (or successor committee) of the Board of Trustees in determining the terms and conditions of such commitments.

The University reserves the right to remove the name of any building, facility, college, school, scholarship, endowment or campus area established pursuant to a naming commitment to one or more donors in the event that any or all of the donors engage(s) in any act or omission that, as reasonably determined by majority vote of the University’s Board of Trustees, is likely to be offensive to the University’s alumni and/or donor communit(y)(ies) or the community at large, or otherwise injurious to the reputation of the University.

Approved by the Board of Trustees for Inclusion in the Operations Manual, October 2016
Inclusion Endorsed by the Administrative Council, November 2016