



I. POLICY STATEMENT

This policy is written to promote accountability and ensure adherence to the University's ethical principles. It is the policy of Texas Southern University ("University") that all employees conduct themselves with integrity and maintain the highest standards of ethical behavior in the performance of their duties. Employees shall act fairly and honestly in the performance of their duties and avoid even the appearance of impropriety. To support this standard, any potential ethics violations or conflicts of interest shall be promptly reported and reviewed by the appropriate University officials in accordance with this policy.

II. PURPOSE AND SCOPE

As public servants, University employees owe a responsibility to the people of Texas in the performance of their official duties. The University's Ethics Policy sets out the laws and guidelines that govern each employee's conduct as a public servant, and is written to promote principled and ethical conduct, including the ethical handling of actual or apparent conflicts between the employee's private interests and the University's and/or the public's interest. As a research institution, the University requires adherence to federal financial conflict of interest (FCOI) regulations. Faculty and staff engaged in sponsored activities must comply with 42 CFR Part 50 Subpart F (for PHS-funded research) and all applicable National Science Foundation (NSF and National Institutes of Health (NIH) conflict of interest rules to ensure the integrity of the University's research enterprise.

This policy aligns with state and federal mandates. All employees and individuals acting on behalf of the University must adhere to the vendor disclosure requirements outlined in Texas Local Government Code Chapter 176 and comply with all Historically Underutilized Business (HUB) policies as defined by state law, and all vendor ethics standards. In accordance with Texas Government Code Chapter 554, the University provides whistleblower protections, ensuring that employees who report potential violations in good faith are protected from retaliation.

This policy applies to all University employees, including faculty, staff, administrators, and any individuals acting on behalf of the University, regardless of rank or position. This policy is intended to supplement, and not replace or supersede, other applicable University policies. Related policies include MAPP 02.05.03, Discipline and Termination; MAPP 02.05.16, Training; and MAPP 02.05.06, Fraud Policy.

III. DEFINITIONS

A. Benefit: In accordance with applicable state law, a benefit is defined as anything reasonably regarded as providing monetary gain or advantage. For purposes of this policy, such a benefit includes any gift, favor, service, or other item of value including individual



invitations to meals, entertainment, or similar offerings.

B. Conflict of interest: A situation in which there is a divergence between the employee's private interests and the employee's professional obligations to the university (i.e., the public interest) such that an independent observer might reasonably question whether the employee's actions or decisions are determined by considerations of private gain, financial or otherwise.

- C. Financial relationship:** Includes paid employment, consulting or other contract work, ownership or investment such that the relationship accrues a financial benefit to the employee or family member. This directive concerns benefits to the employee or family member that are direct and substantial.
- D. Consulting and other outside employment relationship:** Activities undertaken for remuneration from a third party within the scope of activities, functions, or expertise for which the individual is compensated by Texas Southern University.
- E. Department Head:** In the case of a principal investigator, his/her academic department head. In the case of a staff employee, it is the employee's immediate supervisor.
- F. Immediate Family:** Includes spouse and dependent children. Dependent children, for this document, include adopted, step, and foster children and natural sons and daughters.
- G. Procurement or Purchasing Activities:** Include approvals, disapprovals, or recommendations concerning a procurement transaction; preparation of any part of procurement actions; influencing the content of any specification or procurement standard; and acting in any advisory capacity, including rendering advice, conducting investigations, or performing auditing in any procurement activity.
- H. Financial Interest:** As defined by Texas Government Code § 2261.252, a financial interest exists if an employee or official: (a) Owns or controls, directly or indirectly, an ownership interest of at least one percent (1%) in a business entity, including the right to share in profits, proceeds, or capital gains; or (b) Could reasonably foresee that a contract with the person or business entity could result in a financial benefit to the employee or official. This does not include retirement plans, blind trusts, insurance coverage, or ownership of less than 1% in a corporation.
- I. Conflict of Interest:** A situation in which an employee's personal, financial, or other



interests may interfere with, influence, or appear to interfere with the employee's ability to perform official duties in the best interests of Texas Southern University. A conflict of interest includes, but is not limited to, the use of one's position with the University to obtain unauthorized privileges, benefits, exemptions, or things of value for oneself or others, or any circumstance in which an independent observer could reasonably question whether the employee's actions are influenced by considerations of private gain rather than the interests of the University or the public.

- J. Family Member (Second Degree):** For purposes of contract prohibitions involving key officials, this includes relatives within the second degree of affinity (marriage) or consanguinity (blood). This includes a spouse, parents, children, siblings, grandparents, and grandchildren.
- K. Regular Employee:** A Texas Southern University employee who is regularly employed at least 20 hours per week for a period of at least four and a half months, excluding students in positions where student status is a condition of employment.

IV. POLICY PROVISIONS

A. In addition to the principles and guidelines established in this policy, all Executive Level employees and all employees who are authorized to execute contracts on behalf of the University or who exercise discretion with regard to the investment or management of the University's funds, shall adhere to the University's "Disclosure of Interest for Senior Officials and Conflict of Interest Statement" ("Statement"), and shall sign the Statement by September 30th of each year and return it to the Office of Institutional Compliance ("Compliance").

B. All University employees shall abide by the provisions set forth in Chapter 572 of the Texas Government Code pertaining to conflict of interest.

C. In the event of a conflict between the terms of this policy and any existing policy, this policy will control. If a topic has also been addressed in other policy statements or manuals, the procedures and statements contained therein are hereby reaffirmed and made a part hereof for all purposes.



D. University employees shall participate in the Business Ethics Training and Conflict of Interest Certification annually at the beginning of each fiscal year (between August 1 and September 30). Business ethics is a mandatory training required by the University; and non-compliance with mandatory training and certification requirements may be subject to employee disciplinary action up to and including dismissal from employment.

E. No personnel of a state agency controlled by gubernatorially appointed heads, or of public institutions of higher education, shall accept any gift, regardless of value, from an entity associated with or travel to, for professional purposes, a country on the U.S. Department of Commerce's foreign and adversaries list under 15 C.F.R 791.4. All agencies and public institutions of public higher education affected by this order shall include this prohibition in their ethics policies and create a mechanism by which their employees can report being approached by groups representing these countries that offer gifts or travels, or alleged violations of this ethics policy.

F. Any personnel that receives an offer of a gift from an individual or entity based in an impacted country, including an offer for travel reimbursement, should contact the Office of Human Resources.

V. STANDARDS OF ETHICAL CONDUCT

- a. Employees shall put forth honest effort in the performance of their duties.
- b. Employees shall not use their public offices for private gain.
- c. Employees shall adhere to all laws, regulations, and policies that provide equal opportunity for all persons regardless of race, color, religion, sex, national origin, age, disability, or military status.
- d. Employees shall act impartially and not give preferential treatment to any private or public organization or individual.
- e. Employees shall protect and conserve public property and shall not use it for other than authorized activities.
- f. Employees shall not make unauthorized commitments or promises of any kind in an attempt or intent to bind the University.



- g. Employees shall avoid any actions that violate or would create the appearance that they are violating the law or the ethical standards of Texas Southern University.
- h. Employees shall not disclose confidential information, information that is excepted from public disclosure under the Texas Public Information Act (Tex. Gov't Ann. Ch. 552), or information that has been ordered sealed by a court, that was acquired by reason of the employee's official position.

VI. CONFLICTS OF INTEREST

For purposes of this policy, the following activities, relationships, and conduct may create, contribute to, or constitute a conflict of interest and are prohibited or restricted as set forth below:

A. Legal Compliance: All employees are expected to obey federal, state, and local laws and are subject to disciplinary action for a violation of those laws.

B. Statutory Disclosures and Certain Contracts Prohibited: In accordance with Texas Government Code § 2261.252, the following regulations apply to University procurement and contract management:

1. Disclosure Requirement: Every University employee or official involved in procurement or contract management must disclose any potential conflict of interest specified by state law or University policy. This disclosure must be made as soon as the conflict is known and remains an ongoing obligation throughout the procurement process and the full term of any resulting contract.

2. Contract Prohibition for Key Officials: For any contract or purchase order exceeding \$25,000, the University is prohibited from entering into an agreement with a private vendor if a financial interest is held by any of the following University officials, or their family members within the second degree of affinity or consanguinity:

- (i) The University President;
- (ii) The General Counsel;
- (iii) The Chief Procurement Officer; or
- (iv) The Procurement Director.

C. Procurement Disclosure: All employees involved in procurement or contract management must disclose any potential conflict of interest with respect to any contract



with a private vendor or bid for the purchase of goods or services from a private vendor with the University.

D. Primary Responsibility: The primary responsibility of all employees is to accomplish the duties and responsibilities assigned to their position. All employees are prohibited from engaging in activities outside the University that interfere with their duties and responsibilities to the University.

E. Improper Influence: No employee shall solicit, accept, or agree to accept any gift, favor, or service that could unreasonably influence the employee's conduct or the performance of their employment function.

F. Confidential Information: No employee shall accept other employment or engage in a business or professional activity that the employee might reasonably expect would require or persuade the employee to disclose confidential information obtained through the employee's official position.

G. Impairment of Judgment: No employee shall accept other employment or compensation that could reasonably be expected to impair the employee's independent judgment in the performance of their official job duties.

H. Personal Investments: No employee shall make personal investments that could reasonably be expected to create a substantial conflict between the employee's personal interests and the University's and/or the public's interests.

I. Abuse of Power: No employee shall intentionally or knowingly solicit, accept, or agree to accept any unauthorized benefit for having exercised official power or having performed the employee's official job duties.

J. Substantial Conflict: No employee shall have a direct or indirect financial or other interest, shall engage in a business transaction or professional activity, or shall incur any obligation that is in substantial conflict with the employee's duties and responsibilities to the University.

K. Special Privileges: No employee shall use the employee's position to secure special privileges or exemptions for the employee or for others.

L. Business Transactions and Recusal Protocol: No employee shall transact business for the



University with any entity of which the employee is an officer, agent, employee, or member, or in which the employee has a direct or indirect financial or other interest prior to fully disclosing the interest. The employee shall immediately follow the recusal protocol identified within this policy.

M. Recusal Protocol: Upon disclosure of a potential conflict, the following steps must be taken:

1. **Abstention**, the employee shall not participate in any discussions, negotiations, or decision-making processes related to the transaction.
2. **Removal**, the employee must be absent from any portion of a meeting where the transaction is discussed or voted upon.
3. **University Discretion**, the University retains the right and sole discretion to prohibit an employee's participation in a transaction, or the transaction itself, irrespective of recusal.

N. Prohibited Benefits in Financial Transactions: An employee, on behalf of the University, may not solicit, accept, or agree to accept any benefit in connection with payments, claims, or other financial transactions from any person the employee knows, or reasonably should know, has an interest, actual or prospective, in any contract, purchase, payment, claim, or transaction over which the employee exercises discretion. This prohibition applies regardless of whether the benefit is offered in exchange for official action, except as permitted under Section VIII (Benefits, Gifts, and Honoraria).

O. Agency Prohibitions: No employee shall act as an agent for another person in the negotiation of the terms of an agreement relating to the provision of money, services, or property to the University.

P. Resource Management: The resources of the University shall be used only in accordance with University policies and applicable law.

VII. TRANSPORTATION, MEALS, AND LODGING

- A. Official Business for Purpose of Travel:** To qualify for travel reimbursements and use of university vehicles, the purpose of a trip must be university "state business" or "official business." State or official business is the performance of duties entrusted to the University by the legislature, including the reasonably necessary means and methods to accomplish that function.



- B. Per Diem for Employees Traveling Under Contracts and Grants:** Employees traveling under contracts and grants (federal, state, private) shall be reimbursed for travel expenses and allowances on the same basis as other university employees, except in those instances where the terms of the contract or grant specify travel guidelines and reimbursement rates which differ from State of Texas reimbursement rates.
- C. Travel Bonus (Frequent Flyer) Awards:** Employees who earn credit with airlines, hotels, car rental companies, etc., for official travel are not required to account for such credit or to use it only for official travel.
- D. State Credit Cards:** You may not use state credit cards for personal expenses. State credit cards may only be used for legitimate University business expenses. Payment of charges on individual cards is your sole responsibility; the University is not responsible for the charges, regardless of the type of charge. You may not use state credit cards to charge items that, while they qualify as official business, are not fully reimbursable under State and/or University guidelines for reimbursement.
- E. Improper Travel Reimbursement:** If you receive compensation for job-related travel from any source other than University funds, you shall not submit a claim under the provisions of the university's travel regulations. An employee who receives an overpayment for a travel expense shall reimburse the university for the overpayment.

VIII. BENEFITS, GIFTS, AND HONORARIA

- A. Prohibited Solicitations and Acceptance:** Employees who exercise discretion in connection with contracts, purchases, payments, claims, and other financial transactions of the University may not solicit, accept, or agree to accept any benefit from any person the employee knows is interested in or is likely to become interested in any contract, purchase, payment, claim, or transaction involving the employee's discretion. This prohibition applies regardless of the value of the benefit if it is offered in exchange for official action.
- B. Prohibited Cash:** Employees may never accept cash or negotiable instruments (e.g., checks, gift cards) from vendors or those seeking to do business with the University.
- C. Exceptions:** This prohibition does not apply to:
 - 1. **Personal Relationships:** Benefits received from personal friends, relatives, or business associates with whom the employee has a relationship independent of their official status



are not subject to disclosure, provided the benefit is not offered in exchange for official action and is not connected to the employee's official duties.

2. **Legal Entitlements:** A fee prescribed by law to be received by the employee or any other benefit to which the employee is lawfully entitled in a non-University capacity.
3. **Lobbyist Mementos:** A gift, award, or memento that is received from a lobbyist who is required to make reports under Chapter 305 of the Government Code; and
4. **Nominal Items:** For the purposes of this policy, non-cash items with a value of \$100.00 or less are not considered prohibited benefits and do not require disclosure to the employee's supervisor. This includes occasional hospitality or promotional items received in the course of official business, provided they are not intended to influence, and do not reasonably appear to influence, the performance of official duties.

D. Disclosure and Reporting:

1. **Employee Disclosure:** The following disclosures shall be made to supervisors. Employees shall disclose to their respective supervisors any benefit received in the course of official business having a value of more than \$100.00, excluding cash or negotiable instruments.
2. **Executive Disclosure:** The President shall make such disclosures directly to the Board of Regents.

E. Disposition of Prohibited Benefits: An employee who receives an unsolicited benefit that he or she is prohibited from accepting by law may donate the benefit to a governmental entity that has the authority to accept the gift or may donate the benefit to a recognized tax-exempt charitable organization formed for educational, religious, or scientific purposes.

F. Awards, Honoraria, and Institutional Resources: The following provisions govern the acceptance of awards and honoraria, interactions with public officials, and the appropriate use of University funds and property:

1. **Awards:** Employees may accept plaques and similar recognition awards, including achievement and recognition awards from the University.
2. **Honoraria:** Employees may not solicit, accept, or agree to accept an honorarium in consideration for services they would not have been asked to provide but for their official



position or duties. This prohibition includes a request for or acceptance of a payment made to a third party if made in exchange for such services. However, employees may accept the direct provision of or reimbursement for expenses for transportation, lodging, and meals incurred in connection with a speaking engagement at a conference or similar event, provided their participation is more than merely perfunctory.

3. Entertainment: An employee who provides tickets to a public official to allow the official and/or his guests to attend an event must serve as host to the official and must attend the event.

4. Perishable Food Items: Employees may provide public officials with small, infrequent gifts of perishable food items delivered to their offices. These are not considered to be "benefits" for purposes of the provisions of the Penal Code prohibiting such.

5. Expenses for Public Officials: Employees may pay expenses in order to furnish information to state officials relevant to their official position, including presentations about the university's programs and services.

6. Use of University Funds or Property: No employee shall expend or authorize the expenditure of any university funds, services, or supplies for the purpose of influencing the outcome of any election, or the passage or defeat of any legislative measure. No University funds may be expended for the payment of full or partial salary of any employee who is also the paid lobbyist of any individual, firm, association, or corporation. University facilities may be used as polling places for local, state, and national elections.

IX. PUBLIC OFFICIALS AND POLITICAL ACTIVITY

- a. **Voting and Political Participation:** As employees of the State of Texas, employees have the rights of freedom of association and political participation guaranteed by the state and federal constitutions, except as limited by valid state laws. Employees shall be allowed sufficient time off to vote in public elections without a deduction from pay or from accrued leave time.
- b. **Political Campaign Events on University Property:** The President shall be responsible for implementing rules for the regulation of political campaign meetings or speeches and other activities relating to political campaigns on property under university control. Such rules shall be implemented by the President after approval by the Board of Regents.



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- c. **Employees as Candidates and Officeholders:** Employees may run for election and serve as members of the governing bodies of school districts, cities, towns, or other local governmental districts. No campaign activities may be conducted during official business hours unless the employee has requested and received permission to use leave time for such purpose. Any employee elected to such a position may not receive any salary for serving as a member of such governing bodies. If an employee wishes to announce as a candidate and seek election to a position other than a local office, the employee must seek approval to be granted an unpaid leave of absence until the final election is over. If the employee is elected, a resignation from employment is deemed to be automatic, and the employment ends when the person assumes office. If the President is not willing to grant a leave of absence for the election process, the employee must choose between the position of employment and the desire to be elected to another position.
- d. **Political Contributions from Employees:** Employees may make personal contributions to candidates for office and political organizations, with the exception that no state employee may contribute personal services, money, or goods of value to a candidate campaigning for Speaker of the Texas House of Representatives.
- e. **Use of Official Authority Prohibited:** No employee may use his or her official authority or influence to permit the use of a program administered by the University to interfere with or affect the result of an election or nomination of a candidate or to achieve any other political purpose. No employee may use his or her official authority to interfere with the results of an election. Any employee who violates either of these provisions is subject to immediate termination of employment, in accordance with the Texas Government Code.

X. DUAL OFFICE HOLDING

- a. **Non-selective State or Federal Office:** Employees may hold non-elective offices with boards, commissions, and other state and federal entities, provided that the holding of such office is of benefit to the State of Texas, or is required by state or federal law, and is not in conflict with the employee's position within TSU. Such appointments must be approved by the President. Prior to the President accepting an invitation to serve in an additional non-elective office, the Board of Regents must determine that the appointment meets the two requirements stated above. The Board must also make an official record of any compensation to be received by the President from such appointment, including salary, bonus, per diem, or other types of compensation.
- b. **Positions of Employment with Government Agencies:** Employees may hold other positions of employment with agencies, boards, commissions, or other entities of government so long as the holding of such positions is consistent with the prohibitions



against dual office holding in the Texas Constitution. Consulting arrangements with federal, state, or local governmental agencies of a detached and independent advisory nature are not considered to be appointments with such agencies.

XI. UNIVERSITY PROPERTY AND SERVICES

- a. **Misuse of Authority:** It is a violation of state law for employees acting with the intent to obtain a benefit or with intent to harm another, to intentionally or knowingly misapply anything of value belonging to the government that comes into their custody or possession by virtue of their office or employment.
- b. **Misuse of Official Information:** It is a violation of state law if an employee, in reliance on information to which he or she has access in his or her official capacity and which has not been made public and acquires or aids another to acquire a pecuniary interest in any property, transaction, or enterprise that may be affected by the information; or speculates or aids another to speculate based on the information.
- c. **Telephones and Other Communications Equipment:** From time to time, employees may need to make personal telephone calls during working hours. Normally, such use does not result in additional costs or damage to the university and generally will not hinder the day-to-day operation of an office. Incidental use of university telephones during working hours by employees for local calls is not considered to be a misapplication of state property and is permissible so long as it does not unduly interfere with the employee's assigned responsibilities or the normal functioning of an office. Use of telephones, facsimile machines, electronic mail, and other means of communication is a misapplication of state equipment if it results in additional costs being incurred by the University, including long-distance charges or damage to the equipment.
- d. **Other University Equipment:** No employee shall entrust state property to any state official or employee or to anyone else to be used for other than state purposes. Employees shall not use university equipment or property for their own benefit unless; (1) such uses benefits the University and has been approved by the President or designee(s) in advance, and suitable arrangements have been made in advance for payment of the agreed-upon value of the use of such property, or (2) the property consists of books from the library, recreational facilities and other such items of well-established usage that are authorized for such use by the President.
- e. **University Vehicles:** No employee shall use any vehicle owned by the University for any purpose other than official University business. Employees may not use such vehicles in connection with any political campaign or for any personal or recreational activity, including transportation to and from work daily; however, a vehicle may be driven to an employee's home and retained overnight on specific occasions when doing



so allows the employee to effect significant time or cost savings or meet a specific out-of-town appointment to conduct university business.

XII. OUTSIDE EMPLOYMENT FOR UNIVERSITY EMPLOYEES

A. Outside Employment and Consulting: Full-time employees are expected to devote their time and efforts on a full-time basis to their assigned duties and responsibilities. Members of the faculty of the University should not be discouraged from providing consultation or other professional services on a private basis outside the University in accordance with Section 5.13 of the Faculty Manual. Outside employment may be authorized as provided by University policies, provided that the following conditions are met:

1. The employment does not interfere with the quality of performance of the employee;
2. The employment is reasonable in the amount of time taken for the outside employment and its related activities;
3. The employment avoids unfair competition with legitimate private enterprises;
4. The employment does not bring an employee into conflict with the interests of the State of Texas;
5. The official connection of the employee is not used in connection with the employment;
6. The employment is approved in advance by the appropriate University official and all reports required by policy are properly filed;
7. The standards of conduct prescribed by law for state employees are observed;
8. Any research done in connection with such outside employment is conducted in an objective and scientific manner, and in accordance with the highest ethical standards of the employee's profession; and
9. Any request for employment which is permanent or semi-permanent in character (such as consulting service with a specific firm on an annual basis) or any employment which will be considered other than temporary must be approved by the President.

B. Reference: Additional information regarding outside employment and consulting can be found in MAPP 02.02.08 - Consulting and Outside Employment.

XIII. NEPOTISM

A. Prohibitions: All employees who exercise hiring and appointive power are prohibited from hiring, appointing, voting for, or confirming the appointment of any person related to such officer or employee within the third degree by consanguinity (blood) or within the second



degree by affinity (marriage) when the salary or compensation for such person is to be paid from public funds.

B. Degrees of Relationship:

1. **Consanguinity:** Relatives within the third degree by consanguinity include an officer or employee's parent, child, grandparent, sibling, grandchild, great-grandparent, uncle, aunt, nephew, niece, and great-grandchild.
2. **Affinity:** Relatives within the second degree by affinity include the officer or employee's spouse; the spouse's parents, grandparents, and siblings; the officer or employee's son- or daughter-in-law; and the officer or employee's grandchild's spouse.

C. Exceptions for Continuous Employment:

1. These prohibitions do not apply if the person who is related to the employee exercising appointive power has been continuously employed in the office or position for at least thirty (30) days prior to appointment or employment of the officer or employee.
2. If the related person continues in such a position, the appointive employee may not participate in any deliberation or voting on the appointment, reappointment, confirmation of the appointment or reappointment, employment, reemployment, change in status, compensation, or dismissal of the related individual if that action applies only to that individual and is not taken regarding a bona fide class or category of employees.

D. Departmental Provisions:

1. Departments or comparable administrative units may employ individuals who are related as spouse, as parent-child, or as siblings, provided such employment does not cause one such relative to:
 - (1) Have responsibility for the direct or indirect supervision of the other relative; or
 - (2) Have authority over the salary received or other terms and conditions of employment of the other relative.
2. These conditions apply to the continuation of employment as well as the initial appointment.



XIV. SEXUAL HARASSMENT/TITLE IX

A. Policy Compliance: All employees are expected to comply with the provisions of the University's Sexual Harassment Policy (MAPP 02.05.11) and Title IX Grievance Procedure (02.05.09) and their mandatory reporting requirements.

B. Prohibited Conduct: The University is committed to maintaining an employment and educational environment free from sexual discrimination, sexual harassment, sexual assault, domestic violence, dating violence, and stalking. Conduct constituting sexual discrimination, sexual harassment, sexual assault, domestic violence, dating violence, and stalking is specifically prohibited and will result in appropriate disciplinary action, up to and including termination of employment.

C. Broader Protections: In addition to the protections above, harassment based on the following is strictly prohibited:

- Race, color, or national origin;
- Age;
- Disability;
- Sexual orientation; and
- Military status.

XV. REPORTING ETHICAL VIOLATIONS AND CONFLICTS OF INTEREST

A. Reporting Obligation: All employees must promptly report ethical violations and potential conflicts of interest to their immediate supervisor. If the report involves the employee's supervisor, the employee must report to the University's Office of Internal Audit, Office of Institutional Compliance, or the Executive Director of Human Resources. Each report shall be reviewed, and appropriate administrative action will be taken to ensure that the violation is corrected.

B. Prohibition Against Retaliation: The University strictly prohibits retaliation against any individual who engages in protected activity. Protection applies to any employee who reports a suspected violation in good faith and with a reasonable belief in the truth of the allegation, irrespective of whether an investigation ultimately determines that the allegation is unsubstantiated.

C. Scope of Protected Activity: Protected activity includes, but is not limited to:



1. **Reporting suspected violations of:** (a) Federal or state law; (b) Rules or regulations governing public funds; (c) Federal grant requirements (including 2 CFR Part 200); or (d) Conduct that may implicate the federal False Claims Act.
2. **Participating in:** (a) Internal or government investigations and audits; or (b) Filing or assisting in a whistleblower or qui tam action under federal or state law.

D. Prohibited Retaliatory Actions: Prohibited retaliation includes, but is not limited to:

- Termination, demotion, or suspension;
- Reduction in compensation or benefits;
- Adverse changes in job duties or working conditions;
- Harassment, intimidation, or coercion; or
- Any action that would dissuade a reasonable person from reporting misconduct.

E. Federal Law Protections:

1. **False Claims Act (31 U.S.C. § 3730(h)):** Employees are protected from retaliation for lawful acts taken to stop violations of the Act. The University will not discriminate against any employee for reporting suspected fraud involving federal funds.
2. **Federal Grant Compliance:** Employees working on federally funded programs are protected under 2 CFR Part 200 when reporting misuse of grant funds or noncompliance.

F. Reporting Retaliation: Any employee who believes they have been subjected to retaliation should report the matter immediately to the Office of Internal Audit, Human Resources, or the **Anonymous Ethics Hotline at 1.866.588.3344**. Confirmed retaliation will result in disciplinary action, up to and including termination. Individuals may also have rights to remedies under applicable federal or state law.

XVI. CONFIDENTIALITY AND ACCOUNTABILITY

A. Confidentiality Obligations: All university employees are expected to abide by the University Confidentiality Policy. (MAPP 02.05.02) The policy requires all employees to safeguard the confidentiality of any information that they may come in contact with regarding Texas Southern University and/or its employees, students, or regents.



B. Disciplinary Action: Any violation of the Confidentiality Policy and/or this policy shall constitute grounds for disciplinary action up to and including dismissal. Any disciplinary action shall be dispensed in accordance with the University's Discipline & Termination Policy. (MAPP 02.05.03)

C. External Penalties: Notwithstanding the above, an employee who violates this policy is subject to any applicable civil or criminal penalty if the violation also constitutes a violation of another statute or rule.