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## MEMORANDUM

**DATE:** March 2021

**TO:** Chancellors

**FROM:** Katie Ignatowski  
UW System Chief Compliance Officer

**SUBJECT:** [Wis. Stat. Chapter 19 Subchapter III](#): Code of Ethics for Public Officials and Employees  
[Wis. Admin. Code UWS 8.025](#): Report of Outside Activities and Interests Faculty, Academic Staff, Limited Appointees  
[UW System Administrative Policy 1290](#): Code of Ethics  
[Regent Policy Document 20-22](#): Code of Ethics University Staff  
[Regent Policy Document 13-4](#): University of Wisconsin System Policy on Institutional and Employee Relationships with Educational Loan Lenders

Pursuant to Board of Regent policies, chancellors or their designees are to provide each newly hired employee with the code of ethics to which the employee is subject and thereafter, annually provide all employees with the appropriate code of ethics. This memo serves as the annual reminder of (1) the UW System policies and obligations for faculty, academic staff, and limited appointees with half-time appointments or more to report on outside activities, (2) the requirement to advise university staff of their obligation to avoid conflicts of interest, and (3) the obligation to inform all staff of [Regent Policy Document 13-4](#) on institutional and employee relationships with educational loan lenders.

### **Code of Ethics and Outside Activities Reporting – Faculty, Academic Staff, Limited Appointees**

Faculty, academic staff, and limited appointees (other than state public officials) are subject to Chapter [UWS 8](#), which outlines standards of conduct to avoid activities which cause, or tend to cause, conflicts between their personal interests and their public responsibilities, and to improve standards of public service. Whenever it appears that a material conflict may arise, these employees should follow the procedure outlined in UWS 8.04.

Pursuant to Wis. Admin Code [UWS 8.025](#) and [SYS 1290](#), all UW System faculty, academic staff, and limited appointees with half-time appointments or more are required to report annually outside activities and interests related to their areas of professional responsibility and for which they receive remuneration by April 30 of each year. These reports are public records, which can be viewed by any member of the public and therefore should be maintained in a central location at each institution. While this form gathers information for the prior year, it is important staff understand that throughout the year they are required to promptly update any changes in

circumstances as they occur. Note that all contracting personnel are also required by UWS 8.06 to file an annual Statement of Economic Interests.

### **Code of Ethics – State Public Officials**

Individuals holding the following positions are state public officials: President, Chancellors, Vice Chancellors, and all Vice President titles. State public officials remain subject to [Subchapter III of Wis. Stat Chapter 19](#) and shall annually, on or before April 30, file a statement of economic interest with the secretary.

### **Conflicts of Interest – University Staff**

The University Staff Code of Ethics is set forth in section III of [Regent Policy Document 20-22: Code of Ethics \(RPD 20-22\)](#) for guidance of University staff employees to avoid activities which cause, or tend to cause, conflicts between their personal interests and their public responsibilities as UW System employees. University staff shall be advised of the Standards of Conduct outlined in section III.C in particular, Section III.C.2 that clearly defines those activities that cause a conflict of interest.

University staff will also be advised of their responsibility, as outlined in RPD 20-22 section III.D, to submit a written statement describing the nature of possible conflict to their supervisor or other appropriate administrator.

### **Institutional and Employee Relationships with Educational Lenders- All UW System Staff**

Per [section 5.3 of Regent Policy Document 13-4](#): Wisconsin System Policy on Institutional and Employee Relationships with Educational Loan Lenders, UW employees will be regularly informed of the provisions of the policy, as well as applicable state code of ethics and related state and federal laws and regulations.

If you have any questions, please visit the [UW System Compliance & Integrity website](#), or contact me directly.

Thank you.

cc: President Thompson