Doing The Right Thing

The news today seems to play a continuous loop of stories about people who know of wrongdoing and do nothing about it. The Penn State scandal tops the recent list, with other incidents involving Florida A&M in Tallahassee, Florida and Emory University here in Atlanta. The question of why otherwise disciplined and respectable people refuse to report wrongdoing (of the worst kind at Penn State) does not get addressed in the news stories, even though we know that ethical violations are becoming more prevalent in higher education. I would like to touch on it in this newsletter as we begin a new academic year.

Doing what is right the first time is the obvious correct choice. Sometimes there exists the problems of taking an action that carries the risk of ostracism, career damage, relationship damage, or even physical retaliation. In his book, *Moral Courage*, Dr. Rushworth Kidder offers us a path along the difficult journey from figuring out the best choice in an ethical dilemma to actually carrying out that action as the best of our ethical or moral options. So why is it that some of us do not carry out that action when we know what the right choice is? According to Dr. Kidder, for most of us, the biggest problem is fear. Fear gets in the way of allowing us to act with moral courage.

Ethical decision-making should be a part of our internal compass and embrace our everyday life. It is the place where moral courage resides and is demonstrated. The actions that we engage in daily, help to form habits which can build our ability to respond ethically when faced with an ethical dilemma. Someone who consistently strives to do the right thing, by drawing upon personal, professional, and organizational moral principles and, despite the potential threat to self, goes beyond compliance to achieve a moral action, engaging in a response that is based on virtuous motives. Such moral courage, choosing to do the right thing when faced with an ethical challenge or dilemma takes character strength. At Morehouse, we can demonstrate such courage for others to see by engaging in the following:

* Getting to know each other personally
* Including ethics into systematic processes

Cont’d on Page 2
Doing The Right Thing Cont’d—Page 1

* Modeling exemplary professionalism and demonstrating personal integrity in all actions and at all levels

* Creating a collaborative dialogue across ranks about ethical challenges

* Addressing moral breaches swiftly

* Making your individual behavior overt—leader values and expectations must be visible

* Making it clear that it is everyone’s responsibility to uphold the College’s core values and to report violations

Title IX—Sexual Discrimination and Sexual Violence

The administration of the College’s Title IX Program now resides in the Ethics and Compliance Office, Office of the General Counsel. Pursuant to a “Dear Colleague Letter” recently issued by the U.S. Department of Education, Title IX is now giving greater focus on issues of sexual discrimination and sexual violence within our campus community. Title IX of the Education Amendments of 1972 is a comprehensive federal law intended to end sex discrimination in all areas of education. Doris Coleman, Director of Ethics and Compliance, serves as the College’s Title IX Coordinator to address all sexual discrimination and sexual violence issues brought to her attention on campus. The Title IX Coordinator will take immediate and appropriate steps to investigate all complaints and take prompt and effective action to end discrimination and violence, remedy the effects, and prevent it from occurring again.

Title IX prohibits discrimination on the basis of sex in all educational programs or activities by recipients of Federal financial assistance. This means that Title IX protects students in connection with all academic, educational, extracurricular, athletic, and other programs of a college or university, whether those programs take place in a college or university’s facilities, in a class or training program, or elsewhere. Title IX is applicable to all educational institutions including all male and all female colleges and universities.
What Were They Thinking?

Emory University intentionally misrepresented its admissions data for more than a decade, with the knowledge of the Admissions and Institutional Research Offices. The misrepresented data was sent to U. S. News and World Report and other recipients, including the U. S. Department of Education. The discovery was made in May 2012, by the new Assistant Vice Provost and an investigation was initiated. The investigation found that the two former Deans of Admission and the leadership of the Institutional Research Department were responsible for the misreporting. None of the responsible employees remain at Emory. There is no evidence that anyone else in the institution was aware of the misreporting. It was reported during the investigation that some lower-level employees raised questions about how the data was being reported, but no one acted. The University had reported SAT and ACT scores of admitted students rather than enrolled ones since the year 2000. As a result of this, Emory has taken swift action in dealing with this situation and has submitted corrected information. They are also in the process of correcting their internal records as well, and have released a plan to improve their data reporting and oversight.

October is Domestic Violence Awareness Month

The month of October is recognized as Domestic Violence Month throughout the U. S. Domestic Violence Awareness Month (DVAM) evolved from the “Day of Unity” in October 1981 by the National Coalition Against Domestic Violence (NCADV). The intent was to connect domestic violence and advocates and service providers across the country who were working to end violence against women and their children. In 1989, the first DVAM legislation was passed by the U. S. Congress. Such legislation has passed every year since 1981. In 1994, the first Violence Against Women Act was passed. Yet, sponsors of the current renewal effort have not been able to get enough votes in the Senate to overcome strong opposition from Republicans, who object to new provisions. Domestic Violence is described as the systematic use of abusive tactics to compel submission of one person to another in an intimate relationship that includes emotional, psychological, sexual, financial, and physical abuse. These tactics span a broad, and ever changing spectrum. Studies have shown that domestic violence is committed primarily by men against women; although women and men in same-sex relationships experience domestic violence at the same rates as heterosexual women.

During October, many organizations and institutions, including Morehouse and the AUC community, will sponsor programs and hold events to educate the community about the impact of domestic violence and bring attention to this serious problem not only throughout the nation, but in the State of Georgia. We will communicate planned activities on campus in recognition of this worthy cause in the upcoming weeks. The statistics are alarming. Consider this:

• The CDC reports that 1:4 women and 1:9 men will become the victim of domestic violence. Everyone should know that domestic violence is a crime and NOT a private family matter.
• Georgia ranks 6th in the nation for its rate of men killing women (Violence Policy Center, 2011). From 2003-2011, at least 1,071 Georgia citizens lost their lives due to domestic violence (Georgia Commission on Family Violence, Georgia Commission Against Domestic Violence, 2012).
• In 41% of the cases studied through Georgia’s Domestic Violence Fatality Review Project, children were present during the domestic violence killing (Georgia Commission on Family Violence, Georgia Commission Against Domestic Violence, 2012).
• And, in 2011, there were 2,900 victims who were turned away from a Georgia domestic violence shelter due to lack of space (Georgia Commission on Family Violence, 2012).

Purple is the color of this worthy cause. Join us as we rock purple ribbons and work toward helping those who are victims of such horrible acts of violence.
Grants Administration Questions Answered

The National Grants Management Association held its annual conference recently and several questions arose during a question and answer session which are reflected below (Federal Grants Management Handbook, June 2012).

1. Is food allowable under a grant?
   Every agency is different. The circulars indicate that food is an allowable cost, but entertainment is not. If a grantee is hosting an after-hours event and there is a cash bar, the cost is not allowed. That keeps it simple and fair.

2. Is food such as donuts and coffee allowable at a conference?
   Yes, as long as it is written regular business hours. Light refreshments keep people on site and are a reasonable expense. If a recipient is going to buy food, it must be disclosed to the federal agency and the circumstances.

3. Is food allowable if the recipient employees are meeting to discuss grant activities or if the recipient is conducting grant training to its employees?
   Such instances are considered internal business meetings. The cost of refreshments are not allowed during regular internal business meetings. If you are a recipient getting together for staff meetings or having a discussion on grant activities, bring your own coffee. The circulars says the costs would be allowable if it were for a conference where there is a structured agenda, as compared to a regular day-to-day operations.

4. Are incentives and gift cards allowable?
   Incentives are allowed for research projects and gift cards are a form of incentive. However, individuals have to earn them by participating in research projects, for example, not just to get people to show up for a meeting. It also depends on the reasonableness. Federal agencies do not approve them all the time, so make sure you check with your agency first.

5. Once an entity is awarded a grant, can it rely on the funding opportunity announcement to determine if certain costs are allowable?
   The grantee should rely on their proposal and budget in addition to the funding opportunity notice. From these, it is often clear what the grantee can spend funds on. Costs that are unallowable will not be approved under any circumstances. However, some parts of the cost principles are allowable with agency approval. Also, some agencies require a scope of work based on the funding announcement.

Cont’d on Page 5
Questions and Answers on Grants Administration Cont’d—Page 4

6. Is it true that property purchased with federal grant funds is “government property?”
A review of the OMB-issued administrative requirements provides guidance on real property, equipment and supplies (OMB Circular A-102, Common Rules and OMB Circular A-110, 2 CFR 215.32, 215.34, and 215.35). These circulars state that, with very limited exceptions, title to any of these types of property vests with the recipient of sub-recipient that carries out the purchase. On the other hand, the terms “federally owned property” and “government-furnished property” are used when property that was purchased by the federal government, and which it continues to own, is provided to a non-federal party for use during the duration of a federal award. While this situation does arise in federal grants and cooperative agreements, it is not common. Organizations that receive federal contracts are much more likely to encounter such “government property.”

Grantees Encouraged to Put Policies in Writing

Federal grant recipients who have internal, yet unwritten, business policies should craft policy manuals to help them better adhere to federal standards and promote consistency, a grants management consultant told attendees at a recent National Grants Management Association training session. Grantee organizations should develop written manuals that address financial management, travel, property management, personnel, and procurement.

According to Richard Solloway, President of Solloway and Associates, and an advisory board member for Thompson’s grants publications, “it’s quite often that a federal agency is going to ask if you have these written policies in place. If you don’t have one for any of these policies, it’s quite possible that you may be subject to special award conditions. The other thing is that auditors also look at written policies to determine if you are adhering to your own policies, if they are adequate, and if they are applied consistently.” Mr. Solloway reminded attendees that some organizations have drafted policies, but have not put them in writing. He stated that the “worst thing is not to have them issued and out there for people to work with.”
Morehouse EthicsLine Reporting

EthicsLine is the name of our confidential reporting telephone and web-based system for reporting a concern regarding business conduct and was first implemented in 2004. The purpose of the EthicsLine is first to ensure that you as an employee, student, business partner or anyone associated with the College has a place to report any inappropriate behavior or practices you may experience within the Morehouse community. Second, the EthicsLine provides guidance if you are in doubt about ethical issues. The College is committed to operating with integrity in full compliance with all applicable laws, regulations, policies and procedures and in compliance with our ethical values.

The EthicsLine can be used to:
- report misconduct that has been observed or is suspected; and
- ask questions about Morehouse policies, or difficult issues of behavior or ethics, when the answers cannot be found elsewhere.

The College relies on you to speak up if you believe that you have observed unethical, illegal or suspicious behavior. When you speak up, you provide the information necessary to investigate and remedy a potentially damaging situation.

The EthicsLine is operated by an independent and impartial company. Anyone using it may remain anonymous. All matters reported through the EthicsLine are investigated. The College will not tolerate retaliation against anyone who files a report in good faith, regardless of whether or not the claim can be substantiated.

How To Use The EthicsLine

As an employee, student, business partner or anyone associated with the College, you may submit a report online at www.tnwinc.com/morehouse or by phone at 1-888-299-9540, 24 hours a day, seven days a week. Posters regarding the EthicsLine can be found throughout the campus along with NSF and NASA Fraud posters. These posters are in 12 locations throughout the campus in Gloster Hall, Kilgore Hall, the Physical Plant Building, Campus Police Building, Post Office Building, Nasbrit Hall, Tech Tower, Archer Hall, Brawley Hall, Dansby Hall, Wheeler Hall, Sale Hall and the Leadership Center. We have an EthicsLine page on Tigernet that is accessible to all employees and students. In addition, every new hire is introduced to the EthicsLine during New Hire Orientation and receives a brochure and pocket card with information on contacting the EthicsLine. If you have any questions about EthicsLine reporting, please contact C. O. Hollis at ext. 8562 or Doris Coleman at ext. 7589.

We again remind you that you may access and file your concern(s) with the EthicsLine by email, phone. You may also choose to meet with the Ethics and Compliance Officer, Chief Audit Officer or the Assistant Vice President of Human Resources to discuss and/or report any issues that you want to raise. Remember, that an ethical workplace starts with YOU! By acting with integrity every day, you help the College build a reputation for excellence and integrity.