

## Introduction

To ensure broad communication, certain key WashU policies are published on an annual basis in a special policy section of the *Record*. These policies are also available in a number of other places, including the Human Resources website at [hr.wustl.edu](http://hr.wustl.edu).

All members of the university community are essential to the continued endeavor for excellence in the teaching, research, service, and patient-care missions. Establishing and sustaining an open, positive, working and learning environment for faculty, staff, and students is a shared responsibility. These key policies are intended to promote and support such an environment. Please become familiar with the content of each of these policies and the resources available to you.

WashU is committed to the maximum use of all human resources and the goal of equal opportunity. Every effort shall be made to ensure that all employment decisions, university programs, and personnel actions are administered in conformance with the principles of equal employment opportunity.

I want to take this opportunity to reaffirm the university's commitment to equal opportunity in all aspects of our daily operations, including recruitment, hiring, training, and promotion in all jobs without regard to race, color, national origin, shared ancestry or ethnic characteristics, citizenship (where prohibited by law), age religion, sex, sexual orientation, gender identity or expression, veteran status, disability, or genetic information. Should you have questions regarding any of these policies, please feel free to contact Human Resources.

**Apryle M. Gladney**  
Interim Vice Chancellor and Chief Human Resources Officer

# Drug and Alcohol Policy

## Introduction and Policy Statement

Washington University is committed to maintaining a safe and healthful environment for members of the university community by promoting a drug-free environment as well as one free of the abuse of alcohol. Violations of this policy will be handled according to existing policies and procedures concerning the conduct of faculty, staff, and students.

This policy is adopted in accordance with the Drug-Free Workplace Act and the Drug-Free Schools and Communities Act.

## Standards of Conduct

Washington University strictly prohibits the unlawful manufacture, sale, distribution, dispensation, possession, or use of controlled substances or alcohol on university property or as a part of any university activity. All faculty, staff, and students must comply with this policy as a condition of their employment or enrollment. Faculty and staff members are prohibited from reporting to work under the influence of alcohol, chemicals, or drugs, including legally obtained prescription drugs, which impair one's ability to perform normal work activities. All faculty and staff members must notify their immediate supervisor(s) within five (5) days of any criminal drug statute conviction for a violation occurring in the workplace or in the conduct of university business.

## Violations

Violations of the standards of conduct will be dealt with on a case-by-case basis following the policies and procedures applicable to, as appropriate, faculty, staff, or students. Sanctions may include, among other things, reprimand, warning, suspension, probation, expulsion, or termination. Referral to an appropriate assistance or rehabilitation program also may be appropriate. Referral for prosecution will occur for serious violations. The Drug-Free Workplace Act requires the university: (1) within 10 days after receiving notice that an employee has been convicted of any criminal drug statute violation occurring in the workplace or in the conduct of university business, to notify appropriate government agencies of such conviction; and (2) within 30 days after receiving such notice, to take appropriate personnel action against such employee up to and including termination and/or to require the employee to satisfactorily participate in a drug abuse assistance or rehabilitation program.

## Authorized Use of Prescribed Medicine

Faculty and staff members undergoing prescribed medical treatment with any drug that interferes with their work activity must report this treatment to their supervisor. Prescribed medication should be kept in its original container, which identifies the drug, date, and prescribing doctor.

## Drug and Alcohol Counseling, Treatment, or Rehabilitation or Re-Entry Programs

Early recognition and treatment of drug or alcohol abuse are important for successful rehabilitation, and for reduced personal, family, and social disruption. WashU encourages the earliest possible diagnosis and treatment for drug and alcohol abuse; however, the decision to seek diagnosis and accept treatment for drug or alcohol abuse is the responsibility of the individual. The university encourages faculty, staff, and students to seek assistance in dealing with a substance abuse problem, or those problems of a family member, by contacting available resources. Resources include Student Health Services (Danforth Campus, 314-935-6666); Student and Employee Health (School of Medicine, 314-362-3523), the Psychological Service Center (314-935-6555), the Department of Psychiatry (314-286-1700), and the Employee Assistance Program (844-365-4587). Numerous non-university counseling programs exist in the St. Louis metropolitan area. Many programs advertise extensively in local media. Consultation with one's personal physician is advised prior to self-referral to such non-university programs. For further information regarding referral to such programs, contact the Student Health Services, School of Medicine Student and Employee Health, or your private physician.

## Health Risks

Drugs: A detailed description of the health risks associated with abuse of controlled substances is provided in the chart, Drug Uses and Effects, published by the U.S. Department of Justice's Drug Enforcement Administration ([hr.wustl.edu](http://hr.wustl.edu), Workplace Support, Key Policies); Appendix A. Alcohol: Abuse of alcohol can produce severe health risks, including death. Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood that the driver will be involved in an accident. Low-to-moderate doses of alcohol also increase the incidence of a variety of aggressive acts, including spouse and child abuse. Moderate-to-high doses of alcohol cause marked impairments in higher mental functions, severely altering a person's ability to learn and remember information. Very high doses cause respiratory depression and death. If combined with other depressants of the central nervous system, much lower doses of alcohol will produce the effects just described. Repeated use of alcohol can lead to dependence. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations, and convulsions. Alcohol withdrawal can be life threatening. Long-term consumption of large quantities of alcohol, particularly when combined with poor nutrition, can also lead to permanent damage to vital organs such as the brain and the liver. Women who drink alcohol during pregnancy may give birth to infants with fetal alcohol syndrome. These infants have irreversible physical abnormalities and intellectual disabilities. In addition, research indicated that children of alcoholic parents are at greater risk than other youngsters of becoming alcoholics.

## Legal Sanctions

Drugs: The manufacture, possession, sale, distribution, and use of controlled substances are prohibited by federal, state, and local law; punishments range from fines to life imprisonment. Section 195.214 of the Missouri statutes makes it a class A felony to distribute or deliver controlled substances on or near university property. Persons convicted of this

offense can be sentenced to imprisonment for not less than 10 years. The Federal Controlled Substances Act prohibits the knowing, intentional, and unauthorized manufacture, distribution, or dispensing of any controlled substance or the possession of any controlled substance with intent to manufacture, distribute, or dispense. A detailed description of the penalties associated with illegal drug trafficking is provided in the chart, Federal Trafficking Penalties, published by the U.S. Department of Justice's Drug Enforcement Administration ([hr.wustl.edu](http://hr.wustl.edu), Workplace Support, Key Policies); Appendix B. Alcohol: Missouri's Liquor Control Law makes it illegal, among other things, for a person under the age of 21 years to purchase, attempt to purchase, or possess any intoxicating liquor (R.S.Mo. Section 311.325). Violation of this provision can result in a fine between \$50 and \$1000 and/or imprisonment for a maximum term of one year. County and municipality ordinances contain similar prohibitions and sanctions.

## Loss of Workers' Compensation Benefits

The Missouri Workers' Compensation Act requires the forfeiture of benefits or compensation otherwise payable to an employee when the use of alcohol or non-prescribed controlled drugs is the proximate cause of the employee's injury. At a minimum, the Act provides for a reduction in benefits or compensation when the employee is injured while using alcohol or non-prescribed controlled drugs.

## Testing Requirement for Commercial Drivers Licenses (CDLs)

To meet requirements of the U.S. Department of Transportation (DOT), the university has established a drug and alcohol testing program for its employees who are drivers of its commercial motor vehicles requiring commercial driver's licenses (CDLs), and who perform safety-sensitive functions, e.g., operate a vehicle requiring the display of hazardous material placards. This drug and alcohol testing program also applies to applicants selected for hire for designated safety-sensitive positions. Participation in the drug and alcohol testing program is a condition of employment for these positions. This program requires pre-employment drug testing as well as DOT-mandated random testing of current employees who are required to have CDLs. Questions regarding this requirement may be directed to the Designated Employee Representative for this program or to Human Resources.

## Accidents Involving University-Owned Vehicles

The university reserves the right to require that an employee undergo immediate drug and/or alcohol testing if the employee is involved in a vehicular accident while driving a university-owned vehicle.

## Reasonable Cause

When the university has reasonable grounds to suspect that an employee unlawfully manufactured, distributed, possessed, or used controlled substances, alcohol, or drug paraphernalia on university property or at any of its activities, the university reserves the right to inspect the employee's locker, desk, or other university property under the control of the employee.

## Workplace Drug Testing

Pre-employment drug testing will be performed where required by law, or where a strong business case exists to protect the safety and welfare of the university and its faculty, staff, students, patients, and other members of the university community, and on final candidates for certain positions. Generally, all direct patient care and most patient-facing positions require successful completion of the urine drug screen. Positions which require specific drug testing will be identified in the job posting. In addition, the hiring manager will notify the final candidate when this requirement exists and post a contingent offer and acceptance, and will work with the Office of Human Resources to conduct the steps necessary to obtain a valid, confidential drug screen. "For Cause" Drug Testing: With Human Resources approval and under the following circumstances, an employee may be required to be tested to determine the presence of drugs or alcohol in an employee's system:

1. When there is reasonable suspicion that an employee is under the influence of drugs or alcohol;
2. When the employee has been involved in an on-the-job accident or near accident while on university property or business and there is reasonable suspicion that drugs or alcohol may have been a contributing factor;
3. When the employee is working in a position where public safety is at risk;
4. When monitoring the adherence to a required rehabilitation treatment program and up to two years after completion of the program. If an employee is asked to take a drug test, the supervisor should contact Human Resources and a plan will be made to escort the employee to BarnesCare or alternate facility as designated by HR where sample collection will take place. The employee's department will assume the cost of the test.

Updated December 2024

# Discrimination and Harassment

## Policy on Discrimination and Harassment

Washington University is committed to having a positive learning and working environment for its students, faculty, and staff. This policy prohibits discrimination and harassment on the basis of race, color, national origin, shared ancestry or ethnic characteristics, citizenship, age, religion, sex (including sexual harassment and sexual assault), sexual orientation, gender identity or expression, veteran status, disability, or genetic information. Such conduct may also violate federal, state, or local law.

## What is Discrimination?

Discrimination is generally defined as a materially adverse action affecting the terms and conditions of employment or academic status that is taken because of an individual's race, color, national origin, age, religion, sex, sexual orientation, gender identity, or expression, veteran status, disability, or genetic information.

## What is Harassment?

Harassment is a form of discrimination. It is generally defined as unwelcome conduct, on or off campus, that is based on race, color, national origin, age, religion, sex, sexual orientation, gender identity or expression, veteran status, disability, or genetic information, that (1) is subjectively and objectively offensive, (2) is severe or pervasive, and (3) has the purpose or effect of unreasonably interfering with an individual's work or educational performance and creating an abusive, hostile, or intimidating environment for work or learning. Whether particular conduct constitutes harassment often depends on the totality of the circumstances.

Sexual harassment is a form of discrimination based on sex. It may include unwelcome sexual advances or other nonconsensual conduct of a sexual nature, when (1) submission to or rejection of such conduct is used as a basis or threatened basis for employment decisions or for academic evaluation, grades, or advancement; or (2) such conduct has the purpose or effect of unreasonably interfering with an individual's work or academic performance and creating an abusive, hostile, or intimidating work or academic environment. Sexual violence is a form of sexual harassment and includes physical sexual acts perpetrated against a person's will or when, due to a person's use of drugs and/or alcohol, cognitive impairment or other disability, it would be apparent to a reasonable observer that the person is incapable of giving consent.

Harassment can be written, oral, visual, or physical. Some conduct obviously constitutes harassment, such as a threat that a grade or promotion will depend on submission to a sexual advance. But whether particular conduct constitutes harassment will often depend upon the specific context of the situation, including the participants' reasonable understanding of the situation, their past dealings with each other, the nature of their professional relationship (e.g., supervisor-subordinate, professor-student, or colleague), the frequency and severity of the conduct, and the particular setting.

The inquiry can be particularly complex in the classroom and the broader academic community, where the free and open exchange of ideas and viewpoints reflected in the concept of academic freedom may sometimes prove distasteful, disturbing, or offensive to some. Indeed, the examination and challenge of assumptions, beliefs, or viewpoints that are intrinsic to education may sometimes be disturbing or unwelcome to the individual. Allegations relating to the content of academic instruction and classroom discussion must be evaluated in the context of the subject matter and pedagogical purpose. This policy is not intended to compromise the university's traditional commitment to academic freedom or to education that encourages students to challenge their own views of themselves and the world.

## Conduct Prohibited By Title IX

Title IX of the Educational Amendments of 1972 prohibits a specific subset of the conduct addressed above and in this policy. Title IX and its implementing regulations prohibit discrimination based on sex (including sexual harassment and sexual violence) in the university's educational programs and activities. Title IX also prohibits retaliation for asserting claims of sex discrimination.

As required by Title IX, Washington University does not discriminate on the basis of sex in its educational programs and activities, in the student admissions process, or in the employment of faculty and staff.

Title IX prohibits certain forms of sexual harassment, specifically conduct on the basis of sex that satisfies one or more of the following (collectively "Prohibited Conduct"):

- An employee of the university conditioning

provision of an aid, benefit, or service on an individual's participation in unwelcome sexual conduct (also known as "quid pro quo" harassment);

- Unwelcome conduct by a university student or employee that, in the view of a reasonable person, is so severe, pervasive, and objectively offensive that it effectively denies an individual equal access to the university's education program or activity (also known as "hostile environment" harassment); or
- Any instance of sexual assault, dating violence, domestic violence, or stalking, as those terms are defined by the Clery Act (20 U.S.C. § 1092(f)) or the Violence Against Women Act (34 U.S.C. § 12291(a)) (also known as "per se" harassment).

To fall within the coverage of Title IX, Prohibited Conduct must take place within an educational program or activity of the university and against a person within the United States. For purposes of Title IX, an "educational program or activity" includes locations, events, or circumstances over which the university exercises substantial control over both the respondent accused of the Prohibited Conduct and the context in which the Prohibited Conduct occurs. Title IX also applies to Prohibited Conduct that occurs in any building owned or controlled by a student organization that is officially recognized by the university.

The university has designated a Title IX Coordinator who is responsible for coordinating the university's efforts to comply with Title IX, and respond to complaints relating to Prohibited Conduct under Title IX. Inquiries about the application of Title IX may be referred to the Title IX Coordinator.

Any person may report to the university's Title IX Coordinator at any time (including during non-business hours) any instance of sex discrimination, including sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sexual harassment), in person, by mail, telephone, electronic mail, or by any other means that results in the Title IX Coordinator receiving the person's verbal or written report.

The Title IX Coordinator's contact information is contained in the Appendix. Complaints or inquiries regarding Title IX may also be submitted to the United States Department of Education's Office of Civil Rights at 400 Maryland Avenue S.W., Washington, DC 20202-1100, by visiting [www2.ed.gov](http://www2.ed.gov), or by calling 1-800-421-3481.

## Options for Resolution

If you believe that you have been subjected to discrimination or harassment, you have a number of options. You should select the route you feel most appropriate for your circumstances. However you wish to proceed, you may consult at any time with the Title IX Coordinator and/or a Discrimination and Harassment Response Coordinator (listed in the Appendix), whose responsibilities include assisting students, faculty, and staff with questions regarding this policy and options for addressing concerns about discrimination or harassment. Regardless of how you choose to address your concerns, the university may be required, or may otherwise deem it necessary and protective of the university community, to commence its own investigation and take further action as described below.

If you prefer to address the situation without assistance, you can communicate either orally or in writing with the person whose behavior is of concern. Your communication should clearly identify the conduct that is of concern and indicate that it was unwelcome and offensive and should cease. Such a communication often will cause the unwelcome behavior to stop, particularly where the person may not be aware that the conduct is unwelcome or offensive.

If you would like to discuss other options for addressing the concern, there are a number of resources available to you. As noted above, the Title IX Coordinator and/or a Discrimination and Harassment Response Coordinator listed in the Appendix can provide information about steps that might remedy the situation and can discuss university policy and procedures for initiating and resolving complaints. There are a variety of options for addressing and resolving concerns that may be appropriate for the particular circumstances. For example, intervention of Human Resources, the Title IX Coordinator, supervisors (where the behavior of a faculty or staff member is at issue), the Student Conduct Administrator (where the behavior of a student is at issue), or other university officials can often resolve the issue. Likewise, in certain situations a facilitated discussion between the individuals involved can be an effective means of addressing concerns.

Faculty and staff members also have the option of consulting with the appropriate university ombudsperson.[1] If you would like to report an incident involving a student, you also may contact the university's Bias Report and Support System and meet with a BRSS team member, who can make referrals to appropriate resources and explain what to expect from each resource.

You may also initiate a more formal complaint process, which may involve a committee hearing, by submitting a written complaint to the Title IX Coordinator or the Discrimination and Harassment Response Coordinator. Depending on the circumstances of your complaint, the Coordinator will investigate the allegations or forward the complaint to the appropriate board, committee, or administrator: for complaints against faculty, to the Discrimination and Harassment Hearing Committee; for complaints against staff, to the Discrimination and Harassment Hearing Committee or the Vice Chancellor for Human Resources; for complaints against students, to

the Student Conduct Administrator. Procedures for addressing such complaints are found below and posted online at [titleix.wustl.edu](http://titleix.wustl.edu) or are available from the Title IX Coordinator or a Discrimination and Harassment Response Coordinator.[2]

- [Discrimination Formal Complaint Process](#)
- [Staff Title IX Grievance Process](#)
- [Discrimination and Harassment Hearing Committee Procedure](#)
- [Faculty Title IX Grievance Process](#)

## Confidentiality

The university will strive to protect, to the greatest extent possible, the confidentiality of persons reporting discrimination and harassment and of those accused of such conduct. However, the university cannot guarantee complete confidentiality where it would conflict with the university's obligation to investigate meaningfully or take corrective action. Even when some disclosure of the university's information or sources is necessary, it will be limited to the extent possible. The university will, to the extent permitted by law, keep confidential all records of complaints, responses, and investigations.

If you believe you might have been subjected to discrimination or harassment and want to discuss the matter in a more confidential setting or clarify your feelings about whether and how you wish to proceed, you may want to consult a social worker, therapist, or clergy member who may be permitted by law to assure greater confidentiality. Information about counseling and clergy resources can be found in the university's Safety and Security brochure (available at [www.police.wustl.edu](http://www.police.wustl.edu)). In addition, students may contact the Student Health Services (935-6666 on Danforth Campus; 362-3523 on School of Medicine Campus) and employees may contact the Employee Assistance Program (1-844-365-4587) for confidential assistance and, if desired, referral to other resources. Discussions with Student Health Services and the Employee Assistance Program are confidential and are not considered notice to the university.

## Other University Action

The university reserves the right, independent of other complaint or reporting processes, to review allegations of discrimination and harassment and impose disciplinary or remedial actions where warranted. The university also reserves the right, independent of or in conjunction with other complaint or reporting processes, to take interim or remedial measures appropriate to the situation, in accordance with applicable university policies. Examples of such measures include administrative leave, alteration of reporting structures or job duties, temporary suspension, no-contact orders, temporary housing or course/classroom assignment changes, medical and counseling services, restriction of campus activities, or other academic support services and accommodations.

## Disciplinary and Remedial Actions

Potential disciplinary and remedial consequences for violations of this policy include but are not limited to the following:

- an apology to the victim
- required counseling or training
- oral or written reprimand
- loss of salary or benefit, such as sabbatical or research or travel funding
- fine
- transfer or change of job, class, or residential assignment or location
- suspension, probation, demotion, termination, dismissal, or expulsion

For student offenders, any of the other sanctions set forth in the university Student Conduct Code may also be invoked.

## Retaliation and Protection of Rights

The university will not tolerate retaliation against persons who report discrimination or harassment or against those who testify, assist, or participate in any investigation, proceeding, or hearing involving a complaint of discrimination or harassment. In this context, retaliation means behavior engaged in because of a person's participation in the reporting or investigation of an allegation of discrimination or harassment that adversely affects that person's terms or conditions of employment or education. Any such retaliation—or any encouragement of another to retaliate—is a violation of this policy, regardless of whether the particular claim of discrimination or harassment is substantiated. If you believe you have been subjected to such retaliation, you may use the procedures described above to seek redress.

The university seeks to protect the rights of all persons, accusers and accused, to fair procedures. Accusations of discrimination or harassment may have injurious far-reaching effects on the careers and lives of accused individuals. Allegations of discrimination or harassment must be made in good faith and not out of malice. Knowingly

# WashU Policies

making a false or frivolous allegation of discrimination or harassment, whether in a formal or informal context, will be treated as a serious offense under this policy. If you have a reasonable basis to believe that a complaint of discrimination or harassment against you was not made in good faith, you may use the procedures of this policy to seek redress.

## Obligations of Vigilance and Reporting

The university can respond to specific instances and allegations of discrimination and harassment only if it is aware of them. The university therefore encourages anyone who believes that he or she has experienced discrimination or harassment to promptly come forward with inquiries, reports, or complaints and to seek assistance from the university. In addition, any university employee who becomes aware of instances or allegations of discrimination or harassment by or against a person under his or her supervisory authority, and any faculty member who becomes aware of instances or allegations of discrimination or harassment against a student, must report it to those charged with responding to such reports, such as a coordinator, department head, director, or other similar administrator. It shall be the responsibility of these latter individuals to respond to reports of discrimination and harassment or refer them to other university officials for such response.

Any department head, director, or other similar administrator who becomes aware of information indicating a significant likelihood of discrimination or harassment must report such information to the Coordinator. These administrators must respond not only when they receive a specific complaint or report alleging improper activity, but also when such matters come to their attention informally. Unconfirmed or disputed allegations should be

clearly labeled as such and reports should indicate any steps already taken to investigate or otherwise respond. Administrators may wish to consult with a Coordinator prior to investigating or otherwise responding to any situation involving alleged discrimination or harassment.

## Education

Education is the best way to prevent discrimination and harassment. Please contact one of the Coordinators below to find out more about available training programs and for information and guidance on how to handle issues involving discrimination and harassment.

## Other Policies and Procedures

This policy and its associated procedures supersede any existing university, school, departmental, or other policies and procedures concerning prohibited discrimination and harassment.

- [1] Communications with ombudspersons are confidential unless there is an imminent risk of serious physical harm or disclosure is compelled by a court. Communicating a concern to an ombudsperson does not constitute notice to Washington University.
- [2] If the complaint alleges a sexual assault or other crime, the complainant may also file a criminal report with the Washington University Police Department or other appropriate law enforcement agency. The Complainant may simultaneously pursue criminal and university disciplinary processes. Ordinarily the university will not delay internal proceedings if criminal charges are filed, but may in its discretion postpone them while criminal proceedings are pending.

## Appendix: Title IX/Discrimination and Harassment Response Coordinators

(as of August 1, 2024)

### Title IX Coordinator

Jessica Kennedy  
314-935-3118  
jwkennedy@wustl.edu

Office: Umrath Hall, Room 001  
Address: One Brookings Drive, MSC 1175-0153-0B,  
St. Louis, MO 63130

### Discrimination and Harassment Response Coordinators

[Apyrle M. Gladney, Interim Vice Chancellor and Chief Human Resources Officer](#)  
(314) 935-1252; [apyrle.gladney@wustl.edu](mailto:apyrle.gladney@wustl.edu)

Gillian Boscan, Director, Investigations and Conflict Resolution, Office of Institutional Equity, 314-935-1139  
[oie-investigations@wustl.edu](mailto:oie-investigations@wustl.edu)  
[gillian.boscan@wustl.edu](mailto:gillian.boscan@wustl.edu)

Office: The Link in the Loop  
Address: 621 N. Skinker Blvd, Suite 300,  
St. Louis, MO 63130

Washington University Reporting Hotline 1-844-484-5957  
<https://secure.ethicspoint.com/domain/media/en/gui/57349/index.html>

# Washington University Code of Conduct

## Statement of General Principles

This code applies to the following members of the Washington University community: (a) individuals who are paid by Washington University when they are working for the university—this category includes faculty and staff; (b) consultants, vendors, and contractors when they are doing business with the university; and (c) individuals who perform services for the university as volunteers. The Code of Conduct refers to all these persons collectively as “members of the university community” or “community members.”

## Integrity and Ethical Conduct

Washington University is committed to the highest ethical and professional standards of conduct as an integral part of its mission, the promotion of learning. To achieve this goal, the university relies on each community member’s ethical behavior, honesty, integrity, and good judgment. Each community member should demonstrate respect for the rights of others. Each community member is accountable for their actions.

This Code of Conduct describes standards to guide us in our daily university activities, standards we believe are already being followed.

## Compliance with Laws and University Policies

The university and each community member must transact university business in compliance with all laws, regulations, and university policies related to their positions and areas of responsibility. Managers and supervisors are responsible for teaching and monitoring compliance in their areas.

## Procedures for Reporting Violations or Concerns

The university’s compliance effort focuses mainly on teaching members of the university community the appropriate compliance standards for the areas in which they work. Nevertheless, violations may occur. In addition, members of the university community may have concerns about matters that they are not sure represent violations. This section describes community members’ responsibilities for reporting violations or concerns, and how these responsibilities may be carried out.

Each community member is expected to report violations or concerns about violations of this Code of Conduct that come to their attention. Managers have a special duty to adhere to the standards set forth in this Code of Conduct, to recognize violations, and to enforce the standards. Disciplinary actions for proven violations of this Code, or for retaliation against anyone who reports possible violations, will be determined on a case-by-case basis and may include termination of employment. Individuals who violate the Code may also be subject to civil and criminal charges in some circumstances.

## How to Report a Violation or Discuss a Concern

You may report violations or concerns to your immediate supervisor or department head, if appropriate. You may also report violation or concerns on a confidential basis through the Washington University Reporting Hotline <https://wustl.ethicspoint.com> or by calling 1-844-484-5957. Reports may be made anonymously to this number, if the caller so desires.

You may also access an online form on the Code of Conduct website (<http://codeofconduct.wustl.edu>) that can be used to report violations or concerns which can also be reported anonymously.

For matters dealing with one of the specific areas below, you may call the number indicated, or you may call the University Compliance Office (314) 362-4915.

### Animal Care Issues

Dr. Mark Lowe, Vice Chancellor for Research  
(314) 747-0515

### Computer Use and Security Policies

Matters pertaining to the Danforth Campus schools or the Central Fiscal Unit:  
Chris Shull, Chief Information Security Officer  
[cshull@wustl.edu](mailto:cshull@wustl.edu)

### Matters pertaining to the School of Medicine

Amy Walter, Deputy Chief Information Officer—Research, Clinical and Medical Education Technologies  
(314) 935-8604  
[amywalter@wustl.edu](mailto:amywalter@wustl.edu)

### Conflict of Interest Issues—Research

Dr. Mark Lowe, Vice Chancellor for Research  
(314) 747-0515  
[lowe@wustl.edu](mailto:lowe@wustl.edu)

### Conflict of Interest Issues—Clinical and Physician Relationships with Drug and Medical Equipment or Device Companies

Dr. Paul Scheel, Vice Chancellor for Clinical Affairs  
(314) 362-6249  
[scheelp@wustl.edu](mailto:scheelp@wustl.edu)

### Conflict of Interest—Procurement Issues

Gregory Parrott, Director, Resource Management  
(314) 935-5024  
[gcparrott@wustl.edu](mailto:gcparrott@wustl.edu)

### Environmental Health and Safety Issues

Lance Franklin, Assistant Vice Chancellor for Environmental Health & Safety  
[flance@wustl.edu](mailto:flance@wustl.edu)

### Export Control

Hollie Noia, Manager, Research Compliance  
(314) 747-1378  
[hbeck22@wustl.edu](mailto:hbeck22@wustl.edu)

Dr. Mark Lowe, Vice Chancellor for Research, Interim  
(314) 747-0515  
[lowe@wustl.edu](mailto:lowe@wustl.edu)

### Family Educational Rights & Privacy Act (FERPA)

Keri Disch, University Registrar  
(314) 935-5959  
[keri.disch@wustl.edu](mailto:keri.disch@wustl.edu)

### Financial Issues

David Gray, Interim Senior Vice Chancellor for Finance & CFO  
[davidgray@wustl.edu](mailto:davidgray@wustl.edu)

### HIPAA (Health Insurance Portability Act)

#### HIPAA Privacy Issues

Christine Schorb - Executive Director, Chief HIPAA Privacy Officer  
(314) 747-0865  
[schorbc@wustl.edu](mailto:schorbc@wustl.edu)

#### HIPAA Security Issues

Matters pertaining to the School of Medicine:  
(314) 747-4975  
Toll Free: 866-747-4975  
[hipaa@wustl.edu](mailto:hipaa@wustl.edu)

### Matters pertaining to Danforth Campus schools or the Central Fiscal Unit

Chris Shull, Chief Information Security Officer  
[cshull@wustl.edu](mailto:cshull@wustl.edu)

### Human Studies Issues

Dr. Mark Lowe, Vice Chancellor for Research  
(314) 747-0515  
[lowe@wustl.edu](mailto:lowe@wustl.edu)

### Human Resources/Personnel Issues

All Campuses  
Apyrle M. Gladney, Interim Vice Chancellor and CHRO  
(314) 935-1252  
[apyrle.gladney@wustl.edu](mailto:apyrle.gladney@wustl.edu)

### International Activities/Foreign Corrupt Practices Act

David Gray, Interim Senior Vice Chancellor for Finance & CFO  
[davidgray@wustl.edu](mailto:davidgray@wustl.edu)

### Minors at WashU or participating in WashU programs/ Reporting suspected child abuse, neglect, or inappropriate interactions with minors

Angela Coonce, Chief of Campus Police  
(314) 935-8088  
[coonce@wustl.edu](mailto:coonce@wustl.edu)

John Ursch, Executive Director of Protective Services at WashU Medicine  
(314) 362-4357  
[jursch@wustl.edu](mailto:jursch@wustl.edu)

Apyrle M. Gladney, Interim Vice Chancellor and CHRO  
(314) 935-1252  
[apyrle.gladney@wustl.edu](mailto:apyrle.gladney@wustl.edu)

### Physician and Medical Professional Billing Issues

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