



# Boston VA Research Institute, Inc.

**Date:** 12/05/2013

Governance

**POLICY NO. 10-01**

## **TITLE OF POLICY:**

### **STANDARDS OF ETHICAL CONDUCT AND RELATED EMPLOYEE RESPONSIBILITIES**

#### **1.0 PURPOSE**

The purpose of this policy is to set forth standards of ethical conduct and related responsibilities for BVARI Directors, Officers, employees, and stakeholders, and to inform them of their obligation to report any improper or unethical conduct.

#### **2.0 SCOPE**

To provide information regarding BVARI's standards of ethical conduct and related responsibilities for all Directors, Officers, employees, and stakeholders, and to inform them of their obligation to report any improper or unethical conduct. This memorandum informs Service Chiefs and Supervisors of their responsibility for the personnel management of their workforce as it relates to BVARI conduct.

#### **3.0 POLICY**

The goal of this policy is to assure and enhance the integrity, people, processes, and assets needed by all stakeholders of BVARI. We believe that BVARI's viability and integrity depend on the protection of our critical assets, including our people, physical assets, and our information. We also believe that our communication, internal controls, and processes must constantly adapt to the changing needs and objectives of the company as well as to the changing marketplace.

As mandated in VHA Handbook 1200.17, BVARI is required to collect a statement from each director, officer and employee of BVARI certifying their compliance with federal conduct and conflicts of interest laws. The certification intends to ensure that each director, officer and employee is aware of and in compliance with the Federal laws and regulations applicable to Federal employees with respect to conduct and conflicts of interest, related to performance of their office functions at BVARI. This policy outlines not only the certification but includes information to all employees to assist with their understanding of these Federal requirements.

In addition, 38 U.S.C. A§ 7366 (c)(2) requires that each employee must certify that he or she will comply with the federal laws and regulations applicable to Federal employees with respect to conflicts of interest.

The Standards of Ethical Conduct are codified in 5 CFR Part 2635.

#### **4.0 DEFINITIONS**

None.

**5.0 RESPONSIBILITIES**

5.1 BVARI Board of Directors: The BVARI Board of Directors is responsible for the overall policy, planning, and coordination of all BVARI activities within the VA Boston Healthcare System.

5.2 CEO: The BVARI CEO is responsible for developing, administering, and coordinating a business process that provides optimal internal controls for BVARI.

5.3 DIRECTOR OF FINANCE: BVARI's Department Director is responsible for ensuring that the BVARI employees follow the policies defined in the policy.

5.4 Employees are responsible for:

(1) Becoming familiar with and adhering to the laws and rules of ethical conduct and related responsibilities as described in Attachment A of this policy. Employees should consult with the BVARI Human Resources Administrator for advice or assistance in interpreting and applying these standards. Employees who fail to exercise good judgment in conduct matters, and who violate the rules and principles on which they are based, may be subject to disciplinary or adverse action.

(2) Certifying understanding and compliance with the BVARI Standards of Ethical Conduct and Related Employee Responsibilities.

(3) Following the guidelines of the Whistleblower Policy when warranted by observation of violations of the Standards of Ethical Conduct.

5.5 Supervisors are responsible for:

(1) Discussing this memorandum with each employee individually or in groups, and providing a copy to each employee upon hire as a BVARI employee. All BVARI employees are required to have a Without Compensation (WOC) appointment. This appointment requires that each employee abide by the Standards of Ethical Conduct policies of the VA Boston Healthcare System.

(2) Initiating or recommending appropriate corrective action when an employee violates conduct rules or the principles on which they are based.

**6.0 PROCEDURES**

6.1 Maintain all signed Standards of Ethical Conduct forms and confirm receipt for each BVARI board member, officer, and employee.

6.2 CEO confirms receipt of these documents in the June 1st Annual Report to VA NPC Oversight Office.

6.3 Take corrective action and prepare a report to the BVARI Board within seven (7) days of any notification of violations.

**7.0 RELATED DOCUMENTS:**

Standard of Ethical Conduct-Letter from the Secretary.doc

SEC Form Attachment A (6.22.09).doc

Standards of Ethical Conduct (July, 2009).doc

**8.0 REVISION HISTORY**

<b>Revision Letter</b>	<b>Author</b>	<b>Revision Date</b>	<b>Description of Changes</b>
A	Nancy Watterson-Diorio	12/03/2008	Original document
B	Daniel Burke	04/09/2010	Changed referenced documents

**Transmittal Sheet**

**REASON FOR ISSUE:**

This policy was created to ensure that all BVARI Directors, Officers, employees, and stakeholders are informed of and agree to the ethical standards of the institution.

**SUMMARY OF CHANGES:**

Revision: 04/09/2010  
7.0 Related Documents  
Changed documents required for policy

**RELATED DOCUMENTS:**

Standard of Ethical Conduct-Letter from the Secretary.doc  
SEC Form Attachment A (6.22.09).doc  
Standards of Ethical Conduct (July, 2009).doc

Helpful Links

<http://www.usoge.gov> - the U.S. Office of Government Ethics website

Click on "Forms, Publications and Other Ethics Documents", then click on "Reference Publications".

Publications of interest include:

Standards of Ethical Conduct for Employees of the Executive Branch (2002)  
Do It Right (1995)  
Take the High Road (1995)  
A Brief Wrap on Ethics (2000)

**RESPONSIBLE OFFICER:**

Director of Human Resources for Employees; Director of Compliance for Board members and Researchers

**RECISSION:**

This policy supersedes previous BVARI Standards of Ethical Conduct policies.

**RECERTIFICATION: This policy is scheduled for recertification on or before the last working day of December 2013.**



**Martin Abramson**

**Chariman of the Board**

DISTRIBUTION Board of Directors, Date: 1/28/2009

FLD: Sharepoint Server 4/9/2010 E-mailed N/A to:

BVARI Staff, Stakeholders