

Holiday Ethics Tips

The holiday season is a potentially risky time of year due to the abundance of gifts to FIU employees and officials offered by vendors, lobbyists, and others. FIU's valued business partners often seek to show their appreciation via the giving of gifts, which can implicate Florida's gifts laws and FIU's policies.

The FIU Office of Compliance and Integrity has developed this resource to help FIU employees and officials comply with applicable requirements and to give and receive gifts responsibly, no matter the season! Please Contact the Office of Compliance with any questions or for more specific guidance!

Appearance of Impropriety



All FIU employees and officials must follow the basic standards of ethical conduct and use good judgment to **avoid the appearance of improper conduct**.

An employee, employee's spouse, and/or the employee's minor children may not accept any gift if the **employee knows or should know the gift is being given to influence an FIU decision or action**.

Heightened Restrictions: Procurement Employees & Form 1 Filers



Procurement employees and employees required to report their personal financial interests (Form 1) face additional restrictions on gift acceptance. Some unique restrictions also may apply specifically to procurement employees. Ask a supervisor or the Office of Compliance for assistance.

Holiday Gifts: Guidelines & Best Practices

FIU | University Compliance and Integrity



Gift Solicitation Prohibited

FIU employees **may not ask anyone for a gift in the course of their duties**, regardless of the value of the gift.



Discounts

An FIU employee may accept a **discounted price offered to all state government employees**, as long as the discount does not primarily benefit the employee.



Refuse, Return, Donate

FIU recommends that the offer of **gifts given by FIU vendors and business partners** be politely refused whenever possible.

If a gift can be returned, it should be. If the gift can be donated to charity, that is also an option and should be done as soon as possible following receipt of the gift.

Received a gift? Refer to our [Sample Gift Return/Donate Letter or Email](#) when responding!

Hypotheticals

An FIU employee's friend owns a company that does business with FIU. The employee receives an **invitation to a reception being held at the vendor's business headquarters** located in downtown Miami.

Should the FIU employee attend?



You open your FIU email and find that you have been sent a **digital gift card from an FIU vendor** in appreciation for your recent presentation at a conference sponsored in part by that entity.

What is the proper response?

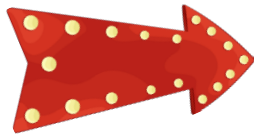


A representative of an FIU vendor that employs lobbyists brings **coffee, doughnuts, and advertising trinkets** to a morning meeting she is having with FIU faculty and staff on campus.

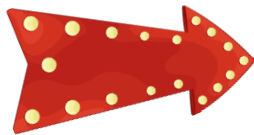
Is it OK for FIU employees and officials to accept the refreshments and trinkets given by the vendor?



No. Because the friend is promoting their business, and the food and beverages are being provided at the reception by an FIU vendor, the employee should not accept the food and beverages unless he or she pays the full value for them.



Do not redeem the gift card. Write or email the vendor politely explaining that as an FIU employee you are not able to accept gifts and advising them that you will not be redeeming the gift card. This response creates documentation of rejection in writing to the vendor (gift giver), who can deactivate the gift card.



Gifts given by vendors should be avoided as they can create misperceptions if the gifts are not refused. In addition, FIU procurement employees and employees required to report their personal financial interests via a Form 1 are prohibited from accepting certain gifts including gifts of limited value given by the employer of lobbyists to engender their goodwill.