I. CALL TO ORDER

Beverly Seay
Chair; Audit and Compliance Committee

II. ROLL CALL

Margaret Melli
Executive Administrative Assistant of University Compliance, Ethics, and Risk

III. MEETING MINUTES

- Approval of the December 14, 2016, Audit and Compliance Committee meeting minutes
  Chair Seay

IV. NEW BUSINESS

- University Audit Update (INFO-1)
  Robert Taft
  Chief Audit Executive

- Amendment to University Regulation UCF-3.018 Conflict of Interest or Commitment; Outside Activity or Employment (AUDC-1)
  Rhonda L. Bishop
  Chief Compliance and Ethics Officer
  Youndy C. Cook
  Deputy General Counsel

- 2016-17 Work Plan Status of All Activities (INFO-2)
  Rhonda L. Bishop

- University Compliance, Ethics, and Risk Program Update
  Rhonda L. Bishop

V. CLOSING COMMENTS

Chair Seay
CALL TO ORDER
Trustee Beverly Seay, chair of the Audit, Operations Review, Compliance, and Ethics Committee, called the meeting to order at 9:00 a.m. Committee members Keith Koons and David Walsh were present.

MINUTES APPROVAL
The minutes of the September 14, 2016, Audit, Operations Review, Compliance, and Ethics Committee meeting were approved as submitted.

NEW BUSINESS
Audit and Compliance Committee Charter (AUDC-1)
Rhonda Bishop, Chief Compliance and Ethics Officer, and Robert Taft, Chief Audit Executive, presented an overview of the new Audit and Compliance Committee Charter. Updates incorporate the Board of Governors’ new regulations 4.002 and 4.003; changing the committee name; changes to the auditing function; and development of the compliance and ethics program. The committee unanimously approved the charter.

University Audit Charter (AUDC-2)
Taft presented for approval the University Audit Charter with revisions that included changes called for by the Board of Governors’ new regulations 4.001 and 4.002. The committee unanimously approved the charter.

Board of Governors’ Performance-based Funding Data Integrity Certification Audit Report (AUDC-3)
Taft provided an outline of the Board of Governors’ Performance-based Funding Data Integrity Certification Audit Report and the process involved for its acceptance. The committee unanimously accepted the report.
Performance-based Data Integrity Certification Form (AUDC-4)
Taft gave an update on the Performance-based Data Integrity Certification Form Audit Plan. The committee unanimously approved the plan.

Compliance, Ethics, and Risk Charter (AUDC-5)
Bishop presented for approval the Compliance, Ethics, and Risk Charter with revisions that included changes called for by the Board of Governors’ new regulation 4.003. The committee unanimously approved the charter.

Conflict of Interest and Commitment Initiatives (INFO-1)
Bishop reported on the annual Conflict of Interest and Commitment Initiatives Report and the university’s compliance with federal and state disclosure laws.

2016-17 Work Plan Status of All Activities (INFO-2)
Bishop provided an update of the 2016-17 Work Plan Status of All Activities.

Overview of Fair Labor Standards Act
Bishop introduced Maureen Binder, Associate Vice President and Chief Human Resources Officer, who provided an update on the Fair Labor Standards Act and the status of the Department of Labor’s overtime rule at the university.

University Compliance, Ethics, and Risk program update
Bishop gave an update on the University Compliance, Ethics, and Risk program.

Athletics Compliance program update
Bishop stated that the final annual compliance report is due to the NCAA on January 15, 2017, and a letter will be sent from the president in February affirming that UCF policies and practices conform to all NCAA regulations.

Chair Seay adjourned the Audit, Operations Review, Compliance, and Ethics Committee meeting at 10:31 a.m.

Respectfully submitted: ___________________________  ________________
Robert Taft  Date
Chief Audit Executive

Respectfully submitted: ___________________________  ________________
Rhonda L. Bishop  Date
Chief Compliance and Ethics Officer
ITEM: INFO-1

University of Central Florida
Board of Trustees
Audit and Compliance Committee

SUBJECT: University Audit Update
DATE: April 12, 2017

PROPOSED COMMITTEE ACTION

Information only.

BACKGROUND INFORMATION

Supporting documentation: Attachment A: University Audit Update
Prepared by: Robert Taft, Chief Audit Executive
Submitted by: Robert Taft, Chief Audit Executive
Attachment A

The State of the Department: University Audit

UCF Audit and Compliance Committee presentation

April 12, 2017
Quote of the Day

It takes 20 years to build a reputation and five minutes to ruin it. If you think about that, you'll do things differently.

— Warren Buffett —

AZ QUOTES
Agenda

1. SWOT Analysis (Strengths, Weaknesses, Opportunities, and Threats)
2. Audit Plan update
3. Audit watch lists
Overview of Activities

• Started as Chief Audit Executive in January 2014
• One staff change: Senior IT Auditor hired in March 2016
• Revised Audit Department Charter and our Committee Policy
• Development of UCF Internal Controls Policy
• Updating of UCF Fraud Prevention and Detection Policy
• Proposed policies:
  ➢ Whistleblower Determination and Investigation policy
  ➢ Direct Support Organization External Auditor Selection policy
• Completion of Microsoft Active Directory and Identity Management external consulting project
• Extensive use of third-party internal control frameworks
• Individual Development Plans and Department Skill Set Matrix
SWOT Analysis

- **STRENGTHS** (Positive Internal)
- **WEAKNESSES** (Negative Internal)
- **OPPORTUNITIES** (Positive External)
- **THREATS** (Negative External)
Strengths

Concept

• Characteristics that give your business an advantage over others?
• What is your value proposition and how does it differentiate with your competitors?
• What do other perceive as your strengths?

Examples

A. Experienced staff
B. Centers of excellence
C. Auditing up the organization
D. Comprehensive and detailed approach
E. Responsive and flexible
Weaknesses

Concept

• Internal characteristics that place the business at a disadvantage relative to others?
• What do your competitors do better than you?
• What do others perceive as your weaknesses?

Examples

A. Need for speed
B. Closing the loop
C. Knowledge gaps
D. “Trusted Advisor” or “Part of the Problem”
Opportunities

Concept
• What are the external elements your organization or function could exploit to its advantage?
• What trends, conditions that may positively impact you?

A. Outreach efforts (committee and task force participation)
B. Demand for audit services
C. Identify and eliminate “Organizational Drag”
D. Leverage time, talent, and energy
E. Scale x Excellence = Impact
Threats

Concept

• What are the elements in the environment that could cause trouble for your business?
• What trends or conditions may negatively impact you?

A. Staff turnover
B. Increased regulatory requirements or Board of Governors oversight requests
C. “Cyber weapon” proliferation
D. Changes in business model, funding sources, and industry trends
Next Steps and Priorities

**Shorter Term**
- MK Insight audit management software implementation
- Direct Support Organization governance consulting project
- Balanced Scorecard development

**Medium Term**
- Audit Plan adjustments as necessary
- Preparation for external Quality Assurance Review
Audit Plan Update

Audits in Progress

• UCF Athletics Association, Inc.
• College of Optics and Photonics (CREOL)
• Facilities vendor bidding and selection process

Audits On Deck

1. Environmental Health and Safety
2. Academic Advising
3. Health Insurance Portability and Accountability Act (HIPAA)/Health Information Technology for Economic and Clinical Health Act (HITECH)
4. Sole Source purchasing
Emerging risks and items on our radar

**Major initiatives**
- Downtown campus
- BRIDG
- Research reorganization
- UCF IT centralization
- UCF Lake Nona Medical Center

**Longer term decisions**
- Deferred maintenance
- HR transformation
- Sustainability
- Vendor and joint venture arrangements
- Leverage new and existing revenue sources
“The amount of video out there is outstripping our ability to sit down and watch it.” We project that by 2020, 95 percent of video or image content will never be viewed by humans, but instead will be vetted by machines that provide some degree of automated analysis.”

*Nick Ingelbrecht: Gartner Group*

“Every day, we create 2.5 quintillion bytes of data — so much that 90% of the data in the world today has been created in the last two years alone. This data comes from everywhere: sensors used to gather climate information, posts to social media sites, digital pictures and videos, purchase transaction records, and cell phone GPS signals to name a few. “

*IBM Report: “This data is big data.”*
Questions?
SUBJECT: Amendments to University Regulation UCF-3.018 Conflict of Interest or Commitment; Outside Activity or Employment

DATE: April 12, 2017

PROPOSED COMMITTEE ACTION

Approve the attached amendments to existing university regulation UCF-3.018 Conflict of Interest or Commitment; Outside Activity or Employment.

BACKGROUND INFORMATION

Florida Board of Governors Regulation 1.001 provides that “Each Board of Trustees is authorized to promulgate University Regulations in accordance with the Regulation Development Procedure adopted by the Board of Governors.”

University Regulation UCF-3.018 is being amended to include additional Florida Code of Ethics language from Florida Statute 112.313(3) regarding university employees doing business with the university. The term “public employee” was also changed to “university employee” throughout. Additional minor changes have been incorporated into the regulation.

Supporting documentation: Attachment B: Proposed Amended Regulation UCF-3.018 (redline)

Prepared by: Youndy C. Cook, Deputy General Counsel

Submitted by: Scott Cole, Vice President and General Counsel
Attachment B

**UCF-3.018 Conflict of Interest or Commitment; Outside Activity or Employment.**

(1) Code of Ethics. The policies and requirements of Chapter 112, Part III, Florida Statutes, “Code of Ethics for Public Officers and Employees,” shall apply to all UCF employees whether or not they are members of a bargaining unit, and includes the following prohibited actions or conduct:

(a) Solicitation and Acceptance of Gifts. University Public employees may not solicit or accept anything of value, such as a gift, loan, reward, promise of future employment, favor or service, that is based on an understanding that their vote, official action, or judgment will be influenced by such gift.

(b) Unauthorized compensation. University Public employees, their spouses and minor children may not accept any compensation, payment, or thing of value when they know, or should know, that it is given to influence a vote or other official action.

(c) Misuse of Public Position. University Public employees may not use or attempt to use their official position or any property or resource that is within his or her trust to obtain special privilege, benefit, or exemption for themselves or others.

(d) Disclosure or Use of Information. University Public employees (including former employees) may not disclose or use information not available to the public and obtained by the reason of their position for their personal benefit.

(e) Doing Business with One’s Agency. University Public employees acting in their official capacity are prohibited from directly or indirectly purchasing, renting, or leasing any realty, goods, or services for the University or their agency from a business entity in which the employees or their spouses or children serve as an officer, partner, director, or proprietor, or own more than a 5% interest. Employees, acting in their private capacity, are also prohibited from renting, leasing, or selling any realty, goods, or services to the University.

(f) Conflicting Employment or Contractual Relationship. University Public employees may not work for or contract with a business entity or agency regulated by or doing business with the University or their agency. Public employees also may not work for or have a contractual arrangement which will impede the full and faithful discharge of his or her public duties. Employees may
Attachment B

not create a continuing or frequently recurring conflict between his or her private interests and the performance of his or her public duties.

(g) Contractual Services: Prohibited Employment. University employees who participate in the decision-making process involving a purchase request, who influence the content of any specification or procurement standard, or who render advice, investigation, or auditing regarding the University’s contract for services, may not be employed by a person holding such a contract with the University.

Additionally, Florida Statute 104.31 states that public employees may not use their position to interfere with an election, to command, coerce, or advise any other employee to contribute towards any political purpose, or advise where he or she might purchase commodities or interfere in any other way with the personal right of employees. Further, public employees may not participate in any political campaign for an election while on duty.

(2) General.

(a) This regulation applies to all University employees, irrespective of bargaining unit, pay plan, rank, or employment status.

(b) University employees are expected to fully and competently perform all duties pertinent to their employment. Outside activity or employment which interferes with an employee’s obligations to the university or which represents a conflict of interest or commitment is prohibited.

(c) Employees are required to submit a report of their intention to participate in outside activity or employment in advance of such engagement; and to resubmit such report annually or as required by section (3), below. If in the opinion of the president, or representative, the outside activity or employment creates an actual or potential conflict of interest or interference with the employee’s duties, the employee will be notified to resolve the conflict or to provide further information that will allow the university to adequately manage any actual or potential conflict.

(d) Any employee who wishes to request the use of any university facility, equipment, personnel, or other university resources in connection with an outside activity or employment is required to submit a written request for such use, in
(3) Submission of Reports.

(a) Faculty, Executive Services, Post-doctoral employees, and select individuals identified in University positions of trust or other employee types engaged in the design, conduct, and reporting of research must submit a report of outside activity or employment and potential conflicts of interest or commitment at the beginning of each academic year, irrespective of whether the employee has any activity or employment to report, using Form AA-21, “Potential Conflict of Interest or Commitment; Outside Activity or Employment Report.” This report must be resubmitted during the course of the reporting period should there be a change in activity, such as new outside activity or employment, substantial increase in the commitment required for an outside activity or employment, or change in relationships that could create a conflict of interest. This report should be submitted online using the reporting process set forth by the University Compliance, Ethics, and Risk Office and the Office of Research and Commercialization. Further information is available in the Faculty Handbook, as well as on the web sites for the University Compliance, Ethics, and Risk Office and the Office of Research and Commercialization.

(b) All other employees must submit a report prior to the initiation of any outside activity or employment, using Form HR-11, “Report of Potential Conflict of Interest, Outside Activity/Employment.” This form must be resubmitted during the course of the reporting period should there be a change in activity, such as new outside activity or employment, substantial increase in the commitment required for an outside activity or employment, or change in relationships that could create a conflict of interest.

(c) Any employee who wishes to request the use of university facilities, equipment, or personnel in conjunction with an outside activity or employment must submit a written request for such use using the appropriate form. For Faculty, Executive Service, Post-doctoral employees, and select individuals identified in University positions of trust or other employee types engaged in the design, conduct, and reporting of research must submit a report of outside activity or employment and potential conflicts of interest or commitment at the beginning of each academic year, irrespective of whether the employee has any activity or employment to report, using Form AA-21, “Potential Conflict of Interest or Commitment; Outside Activity or Employment Report.” This report must be resubmitted during the course of the reporting period should there be a change in activity, such as new outside activity or employment, substantial increase in the commitment required for an outside activity or employment, or change in relationships that could create a conflict of interest. This report should be submitted online using the reporting process set forth by the University Compliance, Ethics, and Risk Office and the Office of Research and Commercialization. Further information is available in the Faculty Handbook, as well as on the web sites for the University Compliance, Ethics, and Risk Office and the Office of Research and Commercialization.

(a) Faculty, Executive Services, Post-doctoral employees, and select individuals identified in University positions of trust or other employee types engaged in the design, conduct, and reporting of research must submit a report of outside activity or employment and potential conflicts of interest or commitment at the beginning of each academic year, irrespective of whether the employee has any activity or employment to report, using Form AA-21, “Potential Conflict of Interest or Commitment; Outside Activity or Employment Report.” This report must be resubmitted during the course of the reporting period should there be a change in activity, such as new outside activity or employment, substantial increase in the commitment required for an outside activity or employment, or change in relationships that could create a conflict of interest. This report should be submitted online using the reporting process set forth by the University Compliance, Ethics, and Risk Office and the Office of Research and Commercialization. Further information is available in the Faculty Handbook, as well as on the web sites for the University Compliance, Ethics, and Risk Office and the Office of Research and Commercialization.
Attachment B

reporting of research, any such request should be included with the report on Form AA-21. All other employees must use Form HR-12, “Permission to Use University Personnel, Equipment, Facilities, Students, or Services.” Failure to submit such a request constitutes specific lack of permission to use any university resources in conjunction with an outside activity or employment. Each request will be evaluated on its own merits. The university is under no obligation to grant any such request.

(d) Reports submitted under this regulation will be reviewed at appropriate levels of supervision. If a potential or actual conflict of interest or commitment is identified, the employee will be notified to resolve the conflict. If the employee has additional information that would assist the University in reviewing such conflict, the employee bears the burden of making that information available to the University. The resolution to a potential or actual conflict of interest may require the employee to cease the outside activity or employment or to divest oneself of the interests that are creating the conflict.

(e) The Florida Commission on Ethics also requires individuals who are identified under Florida Statute 112.3145 as reporting individuals, to submit to the Commission a disclosure of their financial interests within 30 days of appointment, annually by July 1, and within 60 days after leaving their position. Employees considered reporting individuals will be notified of their status by a member of the Human Resources Department.

(4) If an employee does not agree with a decision by the president or representative, the employee may request relief under the provisions of the applicable UCF grievance procedure, but must follow the University’s directive while pursuing the grievance.

(5) Other Applicable Regulations. Any employee who accepts compensation for outside employment shall comply with the applicable requirements of Section 112.313, F.S., and University Regulation UCF-3.0032.

(6) Nothing contained in this regulation shall excuse any employee who engages in outside employment or other activities which constitute a conflict of interest or commitment. A determination by the university not to object to an outside activity or employment does not preclude a finding by the State Ethics Commission that the activity or employment is not in
Attachment B

accordance with all applicable laws and regulations respecting conflicts of interest. The employee’s obligation to avoid conflicts of interest is a continuing one.

Authority: BOG Regulation 1.001. History–New 10-8-75, Amended 11-22-77, 4-30-81, 8-15-84, 11-4-90. Formerly 6C7-3.18, Amended 4-23-03, 10-30-07; Formerly 6C7-3.018, Amended 6-24-10, 3-13-14, 10-30-14, ______-17.
ITEM: INFO-2

University of Central Florida
Board of Trustees
Audit and Compliance Committee

SUBJECT: 2016-17 Work Plan Status of All Activities
DATE: April 12, 2017

PROPOSED COMMITTEE ACTION
Information only.

BACKGROUND INFORMATION

Supporting documentation: Attachment C: 2016-17 Work Plan Status of All Activities
Prepared by: Rhonda L. Bishop, Chief Compliance and Ethics Officer
Submitted by: Rhonda L. Bishop, Chief Compliance and Ethics Officer
UCF’s comprehensive compliance and ethics program is based on the elements of an effective compliance program set forth in Chapter 8 of the Federal Sentencing Guidelines. These requirements set forth an effective compliance and ethics program for organizations and require not only promoting compliance with laws, but also advancing a culture of ethical conduct. Federal agencies use these guidelines to determine the effectiveness of a compliance and ethics program, and to determine whether the existence of the program will provide safe harbor in the event of noncompliance.

1. **Oversight of Compliance and Ethics and Related Activities**
   Promote accountability among UCF employees for compliance with applicable federal, state, and local laws and regulations, and appoint knowledgeable individuals responsible for developing and implementing a comprehensive compliance and ethics program.

2. **Develop Effective Lines of Communication**
   Create communication pathways that allow the dissemination of education and regulatory information and provide a mechanism for reporting compliance activities or concerns.

3. **Conduct Effective Training and Education**
   Educate the UCF community on its compliance responsibilities, regulatory obligations, and the university compliance and ethics program.

4. **Revise and Develop Policies and Procedures**
   Revise or develop university regulations along with policies and procedures that reflect UCF’s commitment to ethical conduct and compliance with applicable laws and regulations.

5. **Conduct Internal Monitoring and Compliance Reviews**
   Identify and remediate noncompliance through proactive review and monitoring of risk areas.

6. **Respond Promptly to Detected Problems and Undertake Corrective Action**
   Conduct timely investigations of allegations of noncompliance and provide guidance on corrective actions.

7. **Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines**
   Promote the compliance and ethics program and university regulations, policies and procedures, and the consequences of noncompliance.

8. **Measure Compliance Program Effectiveness**
   Evaluate the overall compliance and ethics culture of UCF and the performance of the University Compliance, Ethics, and Risk office.
## 1. Oversight of Compliance and Ethics and Related Activities

**Coordinate and conduct bi-monthly meetings of the University Compliance and Ethics Advisory Committee**

- Chaired the Compliance and Ethics Advisory Committee meeting in January 2017.
- Introduced and welcomed two new members, discussed conflict of interest disclosure, new training developed by the office, and compliance requirements in the Board of Governors Regulation 4.003 and the National Institute of Standards and Technology 800-171 requirements impacting federal grants. Discussed articles planned for the April 2017 edition of the *IntegrityStar* newsletter and received updates from members on their compliance and ethics efforts.

**Conduct quarterly meetings with compliance partners and senior leadership**

- Met with vice presidents, key administrators, and compliance partners to provide updates on compliance and ethics initiatives and discuss any concerns or issues.
- Provided quarterly Athletics compliance update to the president and vice president and chief of staff.

**Serve on and provide compliance guidance to the Title IX workgroup**

- Provided guidance and support to the Title IX coordinator, served on and provided compliance guidance to the Title IX workgroup and Title IX policy committee.

**Serve as a member of the Security Incident Response Team and provide guidance**

- Served as a member of the Security Incident Response Committee and provided review and guidance associated with federal and state privacy and data breach requirements.


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<tr>
<th>2. Develop Effective Lines of Communication</th>
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<tr>
<td><strong>Prepare and distribute IntegrityStar, the compliance and ethics newsletter</strong></td>
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<tr>
<td>➢ Developed the April 2017 edition of the IntegrityStar covering the theme of respecting others and included articles by compliance partners.</td>
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<tr>
<td>➢ Included an article titled Respect and Inclusion at UCF by Karen Morrison, Chief Diversity Officer.</td>
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<td>➢ Included an article titled Harassment by Nancy Myers, Director of Equal Opportunity and Affirmative Action.</td>
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<tr>
<td>➢ Developed the article Discrimination Hurts Us All, which is followed by a short video on respecting others and a cartoon that emphasizes how important all employees are to creating a respectful culture at UCF.</td>
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<tr>
<td><strong>Administer and promote the UCF IntegrityLine</strong></td>
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<tr>
<td>➢ Continued administration of the UCF IntegrityLine to include review, tracking of all reports, data compilation, trend review, and reporting.</td>
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<tr>
<td>➢ Continued promoting the UCF IntegrityLine in the IntegrityStar newsletter; in compliance videos; in the Compliance, Ethics, and Risk pamphlet; on the Compliance, Ethics, and Risk website; on the websites of all compliance partners; and through distribution of custom IntegrityLine earbuds and wallet cards.</td>
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<td>➢ Continued providing UCF IntegrityLine wallet cards and pamphlets to all new employees during orientation.</td>
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<td><strong>Distribute compliance brief videos</strong></td>
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<td>➢ Acquired a new training video on the subject of employment of relatives and posted the video on the office’s training website.</td>
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<tr>
<td>➢ Posted the respecting others and phishing training videos from the Compliance and Ethics Week training sessions to the office’s training website.</td>
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<tr>
<td>➢ Distributed the respecting others training video to all employees in the April 2017 edition of the IntegrityStar newsletter.</td>
</tr>
<tr>
<td><strong>Maintain and promote the compliance and ethics website</strong></td>
</tr>
<tr>
<td>➢ Promoted the compliance and ethics website in the University Compliance, Ethics, and Risk pamphlets distributed to all new employees.</td>
</tr>
<tr>
<td>➢ Updated the website to include the April edition of the IntegrityStar newsletter, added additional videos to the training page, updated the organizational chart, and revised the compliance matrix to include changes to compliance partners.</td>
</tr>
</tbody>
</table>
### 3. Conduct Effective Training and Education

Provide training on ethical leadership and avoiding conflicts of interest to the Student Government Association, Leadership Enhancement Program, and Supervisory Skills Series program

- Served as a mentor in the Leadership Enhancement Program (LEP) hosted by the Office of Diversity and Inclusion, attended LEP meetings, and met with the LEP mentee monthly.

**Conduct Clery Act compliance training and develop an online module**

- Developed and conducted a session of Clery Act training for Housing and Residence Life in December 2016.

**Launch second annual Compliance and Ethics week awareness campaign**

- Completed the Compliance and Ethics week awareness campaign and the campaign’s outcomes were reported in the December 2016 work plan status update. The campaign held November 7-10, 2016, included training sessions with compliance partners in the Equal Opportunity and Affirmative Action office and the Information Security office, an online crossword puzzle distributed to all employees, and prizes awarded to employees for participation.

**Launch an online ethics training module**

- Ethics training module development is in progress.

**Develop an online training module for state employees covering state ethics law requirements**

- Finalized the training titled *Potential Conflicts – Florida Code of Ethics for Public Officers and Employees.* Compliance partners currently reviewing the content and providing feedback.

**Issue annual memo on Vulnerable Persons Act**

- Completed the Annual Vulnerable Persons Act memo that was issued March 22, 2017.
### Identify additional opportunities to develop and deliver compliance and ethics training

- Delivered in-person ethics training to Faculty and Academic Affairs staff in the College of Medicine.
- Developed and provided grant and contracts award administration training sessions to faculty and administrators within the College of Engineering and Computer Science and the College of Sciences. This is an ongoing training effort with the Research Compliance Office within Research & Commercialization to ensure all research faculty receive training in federal compliance requirements.
- Distributed University Compliance, Ethics, and Risk pamphlets and IntegrityLine wallet cards to employees during new employee orientation.

### Issue additional regulatory alerts and updates as appropriate

- Provided an overview to the president, vice presidents, and senior leadership on the new Board of Governors Regulation 4.003 for compliance programs and the new National Institute of Standards and Technology 800-171 requirements impacting federal programs.
- Communicated receipt of the NCAA close out letter removing UCF from probation and expectations for compliance.

### 4. Revise and Develop Policies and Procedures

#### Chair the University Policies and Procedures Committee and provide guidance on policy development

- Reviewed and edited policies and procedures prior to submission for approval to the committee. Worked directly with departments, provided guidance, and when needed revised policies to improve content and the communication of expectations to the university community. Reviewed and edited ten policies that were approved by the committee and president.
- Served on the UCF Health Sciences HIPAA Collaborative, a university-wide task force involved with the development of a single set of HIPAA Privacy and Security policies for the university. Provided guidance and communicated compliance expectations for development of policies.
## Implement a university-wide Code of Conduct

- Drafted a UCF Code of Conduct that summarizes the compliance and ethics program, expectations for ethical behavior, and highlights important UCF policies and regulations in a reader friendly format. The Code of Conduct educates new and existing employees on the university’s expectations and their responsibilities in the compliance program.
- Engaged an outside vendor to provide design input and develop the online template.

## Implement a gift and honoraria policy

- Submitted the draft policy for review through the University Policies and Procedures Committee process.

## 5. Conduct Internal Monitoring and Compliance Reviews

### Manage university-wide conflict of interest and commitment processes

- Monitored submissions for the 2016-17 disclosure process, conducted reviews, and worked with faculty or administrators to resolve potential conflicts. Tracked compliance rates and worked with Academic Affairs for address noncompliance.
- Conducted 18 reviews of potential conflicts of interest and provided guidance; reviewed one state research exemption request prior to sending to the provost, president, and chairman of the Board of Trustees for approval as required by state statute; and completed 37 reviews of potential conflicts of interest associated with the attendance at conferences or events sponsored by vendors.

### Continue compliance partner reporting

- Revised the compliance partner annual report template that identifies key dates and deadlines to better manage the consolidation of compliance partner annual reports with the activities of the University Compliance, Ethics, and Risk office.

### Review UCF IntegrityLine and department database for trends, risk areas, and address appropriately

- Included detailed guidance to 42 employees who disclosed an outside employment, contractual, and business ownership, in their online conflict of interest disclosures to increase awareness efforts on this section of statute.
### Special Project – Conducted the Biennial Review of the University’s Alcohol and Other Drugs Program

- As part of the university’s compliance with the federal Drug-Free Schools and Communities Act, every two years UCF must conduct a review of the Alcohol and Other Drug prevention program to assess program effectiveness and the consistency of policy enforcement. Organized and served as chair of the Biennial Review Committee, provided an overview of the compliance requirements to committee members, and provided guidance on the analysis and development of the report.

### 6. Respond Promptly to Detected Problems and Undertake Corrective Action

**Receive and evaluate UCF IntegrityLine reports and allegations of misconduct made directly to the office and conduct investigations**

- Provided administration and oversight of the UCF IntegrityLine to include review and tracking of all reports until completion, data compilation, trend review, and reporting.
- Received 23 reports through the UCF IntegrityLine alleging misconduct. Coordinated triage of reports with University Audit and the Equal Opportunity and Affirmative Action office. When appropriate, reports were referred to a compliance partner or University Audit for review or investigation. During this time, seven cases were investigated and closed.
- Received one new allegation of misconduct directly to University Compliance, Ethics, and Risk. Conducted investigations on eight reports, closed seven and when appropriate provided recommendations for corrective actions and improvement of ethical conduct.

**Provide recommendations for corrective actions and improvement of ethical conduct**

- Continued providing recommendations for corrective actions and improvements of ethical conduct to the appropriate authorities following investigations or requests for guidance.
- Worked with Human Resources to establish a process for consultation with the University Compliance, Ethics, and Risk office when background checks result in findings.
7. Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines

Develop and promote compliance and ethics incentive opportunities

- Continued efforts to recognize employees for their outstanding efforts in compliance and ethics in the *IntegrityStar* newsletter.

Promote awareness of UCF regulations, policies and procedures, and regulatory requirements

- April 2017 edition of the *IntegrityStar* newsletter highlighted new and revised UCF policies and regulations.
- Distributed notice for policies posted for review for two policies.

Promote accountability and consistent discipline

- Recommended to the appropriate authorities consistent discipline to ensure accountability following investigations with outcomes of substantiated employee misconduct.

8. Measure Compliance Program Effectiveness

Develop and issue the University Compliance, Ethics, and Risk Annual Report

- Developed an annual report schedule that maps out key dates and deadlines to ensure issuance of the annual report in July 2017.

Interpret Compliance and Ethics Culture Survey results and implement action plan to address weaknesses

- Developed and implemented an action plan for increasing awareness of the office and the UCF IntegrityLine.

Develop, measure, and track department process improvement efforts using the university assessment process

- Continued efforts detailed in the 2016-17 Assessment Plan including the continuous improvement of several processes such as the conflict of interest and commitment disclosure process, UCF IntegrityLine reporting, and the involvement of compliance partners in developing the comprehensive compliance and ethics program.