



**November 16, 2021 Audit and Compliance Committee Meeting**  
Board of Trustees  
UCF Main Campus, Neptune Community Multipurpose Room 195 | Virtual  
Option  
Nov 16, 2021 9:00 AM - 10:00 AM EST

**Table of Contents**

**I. Agenda.....2**

**II. Minutes of the August 24, 2021 meeting.....3**

**III. Reports**

**IV. Discussion**

**A. DISC – 1 University Compliance, Ethics, and Risk Update.....5**

**B. DISC – 2 University Audit Update.....84**

**V. New Business**

**VI. Adjournment**



**Board of Trustees Meeting  
Audit and Compliance Committee  
November 16, 2021, 9:00 – 10:00 a.m.  
UCF Main Campus, Neptune Community Multipurpose Room 195**

Livestream: <https://ucf.zoom.us/j/92141225777?pwd=MzFpNkF3VjZ5bGtNQStUcy9xZE5BUT09>

Webinar ID: 921 4122 5777

Conference call number: 1 929 205 6099

Meeting ID: 921 4122 5777

### AGENDA

- |   |   |
|---|---|
| 1. Call to Order and Welcome              | Bill Christy <i>Chair, Audit and Compliance Committee</i>   |
| 2. Roll Call                              | Margaret Melli, <i>Executive Assistant University Compliance, Ethics, and Risk</i>                                |
| 3. Minutes of the August 24, 2021 meeting | Chair Christy   |
| 4. Reports                                | Chair Christy   |
| 5. Discussion                             | Chair Christy   |
|   | DISC – 1  |
|   | University Compliance, Ethics, and Risk Update<br><i>Rhonda L. Bishop, Vice President for Compliance and Risk</i> |
|   | DISC – 2  |
|   | University Audit Update<br><i>Robert Taft, Chief Audit Executive</i>  |
| 6. New Business                           | Chair Christy   |
| 7. Adjournment                            | Chair Christy   |



UNIVERSITY OF CENTRAL FLORIDA

**Board of Trustees  
Audit and Compliance Committee Meeting  
August 24, 2021  
President's Board Room, Millican Hall and Virtual**

**MINUTES**

**CALL TO ORDER**

Trustee Bill Christy, Chair of the Audit and Compliance Committee, called the meeting to order at 10:00 a.m. Board Chair Alex Martins (ex-officio), Vice Chair Tiffany Altizer and Committee members Joseph Harrington and Harold Mills were present. Committee members Danny Gaekwad and Beverly Seay attended virtually.

Other Trustees present included Meg Hall. Trustees Jeff Condello, John Miklos, and Michael Okaty attended virtually.

**MINUTES APPROVAL**

Trustee Mills made a motion to approve the minutes from the February 10, 2021, Audit and Compliance Committee meeting. Vice Chair Altizer seconded the motion. The minutes were unanimously approved with one minor edit.

**REPORTS**

**FY22 Audit and Compliance Committee Work Plan (INFO-1)**

Chair Christy introduced the FY22 Audit and Compliance Committee Work Plan. This plan provides an outline of the anticipated schedule of meetings and the items the Committee can expect to address during the fiscal year. There were no questions or discussions on the plan.

**NEW BUSINESS**

**Five Year External Program Review of UCF's Compliance and Ethics Program (AUDC-1)**

Rhonda Bishop, Vice President for Compliance and Risk presented the Five Year External Program Review of the Compliance and Ethics Program as required by Board of Governors regulation 4.003. Trustee Mills made a motion to approve the report and Vice Chair Altizer seconded the motion. The report was approved by the Committee, Trustee Harrington opposed the approval.

**University of Central Florida 2021 Florida Equity Report (AUDC-2)**

Nancy Fitzpatrick Myers, Director, Office of Institutional Equity, gave an overview of and provided highlights of the University of Central Florida 2021 Florida Equity Report. She

specifically reviewed the data related to students, including the downward trend of male to female graduation rates, employees, and Athletics, as well as the university's goals in these categories. Trustee Harrington made a motion to approve the report, Trustee Altizer seconded the motion. The University of Central Florida 2021 Florida Equity Report was approved unanimously.

Compliance, Ethics, and Risk Update (DISC-1)

Bishop gave an overview of UCF's Foreign Influence Assessment Program. Bishop stated that the Florida Legislation House Bill 7017 became effective on July 1, 2021, and she provided an overview of the five new sections of statute regarding foreign influence.

UCF IntegrityLine Report 2020 (INFO-2)

Bishop provided the annual update of the UCF IntegrityLine Report. She explained reporting trends, case outcomes, and referred cases.

2021-22 Compliance and Ethics Annual Work Plan (INFO-3)

Bishop provided an overview of the Compliance and Ethics Annual Work Plan 2021-22 and highlighted activities scheduled for the year. Highlights included developing and managing the university-wide Privacy Program, overseeing compliance efforts with the implementation of House Bill 7017, and launching the fourth Compliance and Ethics Culture Survey.

2020-21 Compliance and Ethics Work Plan Status of All Activities Report – July 1, 2020 to June 30, 2021 (INFO-4)

Bishop highlighted some of the positive outcomes from the 2020-21 Work Plan Status of All Activities which included the 100 percent employee completion rate of the annual Code of Conduct refresher training; working with SGA to create an IntegrityLine video tutorial; and overseeing compliance efforts with the acceptance of CARES Act funding.

University Internal Audit Update (DISC-2)

Robert Taft, Chief Audit Executive provided highlights on the University Internal Audit Department status update. Taft gave a project status update on current and in process audits. He provided a staffing update of University Audit and gave an overview of the audit planning process. Taft gave an update on the planned audit cycles highlighting upcoming audits including potential audits of colleges and Direct Support Organizations along with an overview of external audit activities including the Board of Governors Direct Support Organization internal controls project.

**ADJOURNMENT**

Chair Christy adjourned the Audit and Compliance Committee meeting at 12:03 p.m.

Reviewed by:

\_\_\_\_\_  
Bill Christy  
Chair, Audit and Compliance Committee      Date

Respectfully submitted:

\_\_\_\_\_  
Michael Kilbride  
Associate Corporate Secretary      Date



**Board of Trustees  
Audit and Compliance Committee  
November 16, 2021**

## **DISC-1: Compliance, Ethics, and Risk Update**

---

Information

Discussion

Action

**Meeting Date for Upcoming Action:** \_\_\_\_\_

**Purpose and Issues to be Considered:**

The Compliance, Ethics, and Risk update and any discussion will cover changes in federal or state requirements impacting the university, current or pending external compliance activities, and updates to the committee on key compliance, ethics, and risk initiatives at UCF.

**Background Information:**

The UCF Audit and Compliance Committee Charter provides for oversight and direction of the institutional compliance, ethics, and enterprise risk management and insurance programs, and that committee members be knowledgeable of the program with respect to its implementation and effectiveness. Updates and the opportunity for discussion by committee members are provided to ensure that the elements of an effective program and the committee’s charter are met.

The update includes an overview of the university’s insurance portfolio and program, highlights from the annual report and the Status of All Activities Report. The annual report provides a comprehensive view of the university-wide compliance and ethics program and the extensive activities achieved across the campus. The reporting of this information serves as part of the assessment process to evaluate the effectiveness of the program, opportunities for improvement, or gaps in the university-wide compliance and ethics efforts. The Compliance and Ethics 2020-21 Work Plan - Status of All Activities Report contains a summary of projects and activities completed from July 1, 2021, through September 30, 2021.

**Recommended Action:**

N/A

**Alternatives to Decision:**

N/A

**Fiscal Impact and Source of Funding:**

N/A

**Authority for Board of Trustees Action:**

N/A

---

**Contract Reviewed/Approved by General Counsel**  N/A



**Committee Chair or Chair of the Board has approved adding this item to the agenda** ☒

**Submitted by:**

Rhonda L. Bishop, Vice President for Compliance and Risk

**Supporting Documentation:**

Attachment A: University Compliance, Ethics, and Risk Update

Attachment B: Compliance and Ethics 2021 Annual Report

Attachment C: Compliance and Ethics Annual Work Plan Status 2021-22

**Facilitators/Presenters:**

Rhonda L. Bishop, Vice President for Compliance and Risk

# University Compliance, Ethics, and Risk Update

Board of Trustees  
Audit and Compliance Committee  
November 16, 2021

# Three Main Types of Commercial Insurance

## Property Insurance



Coverage for damage or loss to UCF property / assets

## Worker's Compensation



Coverage for UCF employees injured on the job

## Liability Insurance



Coverage for 3<sup>rd</sup> party damage or loss as a result of UCF negligence

# UCF Insurance Portfolio

## State Risk Management Trust Fund

- Automotive Liability
- Court Awarded Fees
- Federal Civil Rights Liability and Employment Discrimination
- General Liability
- Off Duty Law Enforcement Officers
- Property
- Worker's Compensation & Employer Liability

## FL Department of Management Services

- Accident & Sickness – Camp
- Accidental Death & Dismemberment (AD&D)
- Contractor's Equipment
- Electronic Data Processing Equipment (EDP)
- Fine Art
- Miscellaneous Property
- Ocean Marine

## Private Market

- Automotive Physical Damage
- Builder's Risk
- Crime
- Cyber
- Department Specific Liability Coverage
- Educator's Legal Liability
- Equipment Breakdown
- Excess General Liability
- International General & Automotive Liability
- Travel Accident & Sickness

# Cost of University Insurance Coverage

Gross Insurance Premium	2020	2021	2022
<b>State Risk Management Trust Fund</b>	<b>\$3,868,172</b>	<b>\$4,144,834</b>	<b>\$3,839,101</b>
Worker's Compensation	2,739,340	2,970,033	2,666,399
Property	853,537	865,674	861,698
Other	275,595	309,127	311,004
<b>Department of Management Services</b>	<b>\$92,428</b>	<b>\$88,855</b>	<b>\$121,559</b>
Other	92,428	88,855	121,559
<b>Private Market</b>	<b>\$1,037,444</b>	<b>\$1,356,158</b>	<b>\$1,688,885</b>
Educator's Legal Liability	249,696	278,483	345,000
Excess General Liability	174,012	201,598	252,000
Cyber Liability	149,670	331,000	400,000
Equipment Breakdown	99,227	174,282	232,993
Auto Physical Damage	111,904	126,085	152,000
Other	252,936	244,710	306,892
<b>Total Insurance Premiums</b>	<b>\$4,998,044</b>	<b>\$5,589,847</b>	<b>\$5,649,545</b>



# Enterprise Risk & Insurance Roadmap

## 2018-2020

- ❖ Centralized administration of insurance coverages
- ❖ Developed a consolidated view of insurance premiums
- ❖ Re-established FL SUS Insurance Roundtable

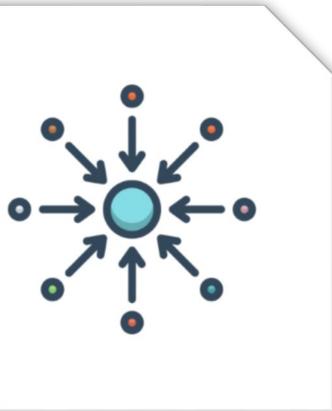


## 2022 and Beyond

- ❖ Implement ERM program
- ❖ Conduct retention and claim reserve analysis
- ❖ Partner with DSOs regarding insurance strategy

## 2020-2022

- ❖ Execute ITN to streamline broker partners
- ❖ Continue evaluation of coverage and funding strategy
- ❖ Develop ERM program





# Compliance and Ethics 2021 Annual Report

# Compliance and Ethics 2021 Annual Report

UCF Research

Research Commercialization Integrity & Compliance Centers & Institutes Development Research Foundation

## Protecting Against Foreign Influence

Understanding the Risks Related to Inappropriate Foreign Influence

INAPPROPRIATE FOREIGN INFLUENCE    SCREENING PROCESS FOR RESEARCH POSITIONS    WHAT DO I NEED TO DO?    CASE STUDIES    RESOURCES



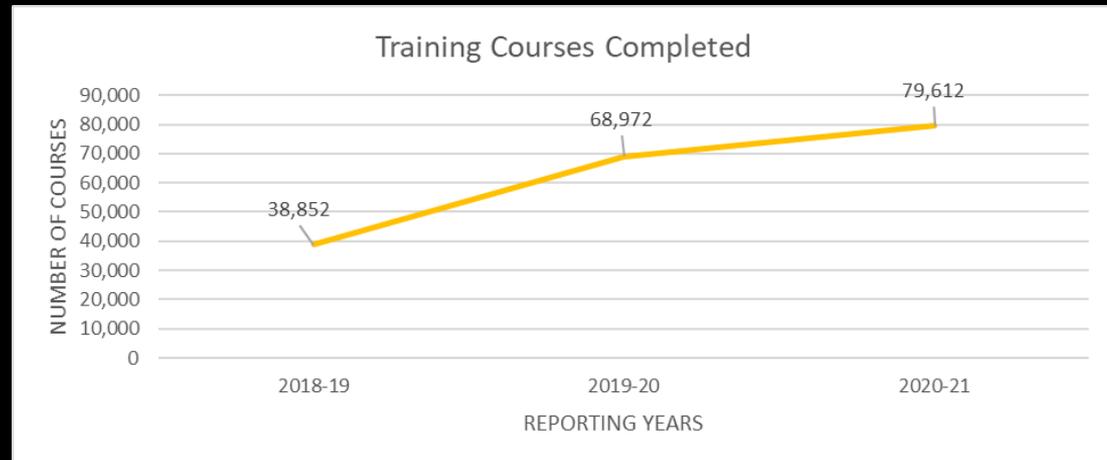
## Youth Protection Program – New Squire Registration System



— Design by All-free-download.com —

**What is a Squire?**

The historical definition of squire is a young nobleman acting as an attendant to a knight before becoming a knight himself. In honor of our Knights, and all of the squires attending our youth programs here at UCF, we honor you by naming our new Youth Protection Program registration system, Squire.



# Compliance and Ethics Work Plan Status Update



# Compliance and Ethics Annual Work Plan Status 2021-22

Activities completed  
July 1, 2021, to  
September 30, 2021



2021-22 outside activity and potential conflicts of interest and commitment disclosure launch August 30, 2021, 93.7% completion by 30 day deadline



Monitored compliance with requirements contained in agreements for the acceptance of CARES Act and associated funding



2021 Code of Conduct Refresher training deployed on September 27 to all non-student employees, available in English and Spanish





# University Compliance, Ethics, and Risk

Compliance and Ethics Annual Report 2021



I am pleased to share the University of Central Florida (UCF) Comprehensive Compliance and Ethics Program Report for fiscal year 2020-21. The report provides a comprehensive look at the university-wide compliance and ethics program's activities and outcomes that demonstrate the university's unwavering commitment to a culture of compliance and ethics. My office has published an annual report since 2017, with the purpose of providing the UCF community, the UCF Board of Trustees and the State of Florida Board of Governors a comprehensive view of the university-wide compliance and ethics program and the extensive activities achieved across the campus. As in previous years, this annual report encompasses the joint efforts of all compliance offices and compliance partners at UCF and includes a summary of the work performed during 2020-21 to meet various federal and state regulatory and compliance requirements. Building on a solid foundation, the program is developed to comply with the Florida Board of Governors Regulation 4.003 and the Federal Sentencing Guidelines by implementing the elements of an effective program and industry best practices. Benefitting from the work of a well-established and trusted compliance partner network along with presidential and Board of Trustees support, the program encompasses all members of the university community and helps inform decision making across the campus.



A handwritten signature in black ink that reads "Rhonda L. Bishop".

Rhonda L. Bishop  
Vice President for Compliance and Risk  
Chief Compliance, Ethics, and Risk Officer

# CONTENTS

<b>Introduction</b> .....	<b>4</b>
<b>Success Stories</b> .....	<b>7</b>
<b>Comprehensive Annual Report</b> .....	<b>11</b>
<b>Oversight of Compliance and Ethics</b> .....	<b>12</b>
<b>Routine Regulatory Reporting</b> .....	<b>15</b>
<b>Promoting a Culture of Ethics and Compliance</b> .....	<b>17</b>
<b>Effective Lines of Communication</b> .....	<b>19</b>
<b>Response to Regulatory Agency Requests and         Non-routine External Reviews</b> .....	<b>23</b>
<b>Policies and Procedures</b> .....	<b>24</b>
<b>Training and Education</b> .....	<b>28</b>
<b>Reported Concerns and Investigations</b> .....	<b>33</b>
<b>Monitoring of Compliance Efforts and Program         Assessments</b> .....	<b>44</b>
<b>Enforcing and Promoting Standards Through         Incentives and Discipline</b> .....	<b>52</b>





# INTRODUCTION

---

## Compliance and Ethics Program Requirements

### Chapter 8 of the U.S. Federal Sentencing Guidelines

- Contains the elements for an effective program
- Defines the responsibility of the board, president, senior leadership, and the compliance and ethics officer

### Board of Governors Regulation 4.003

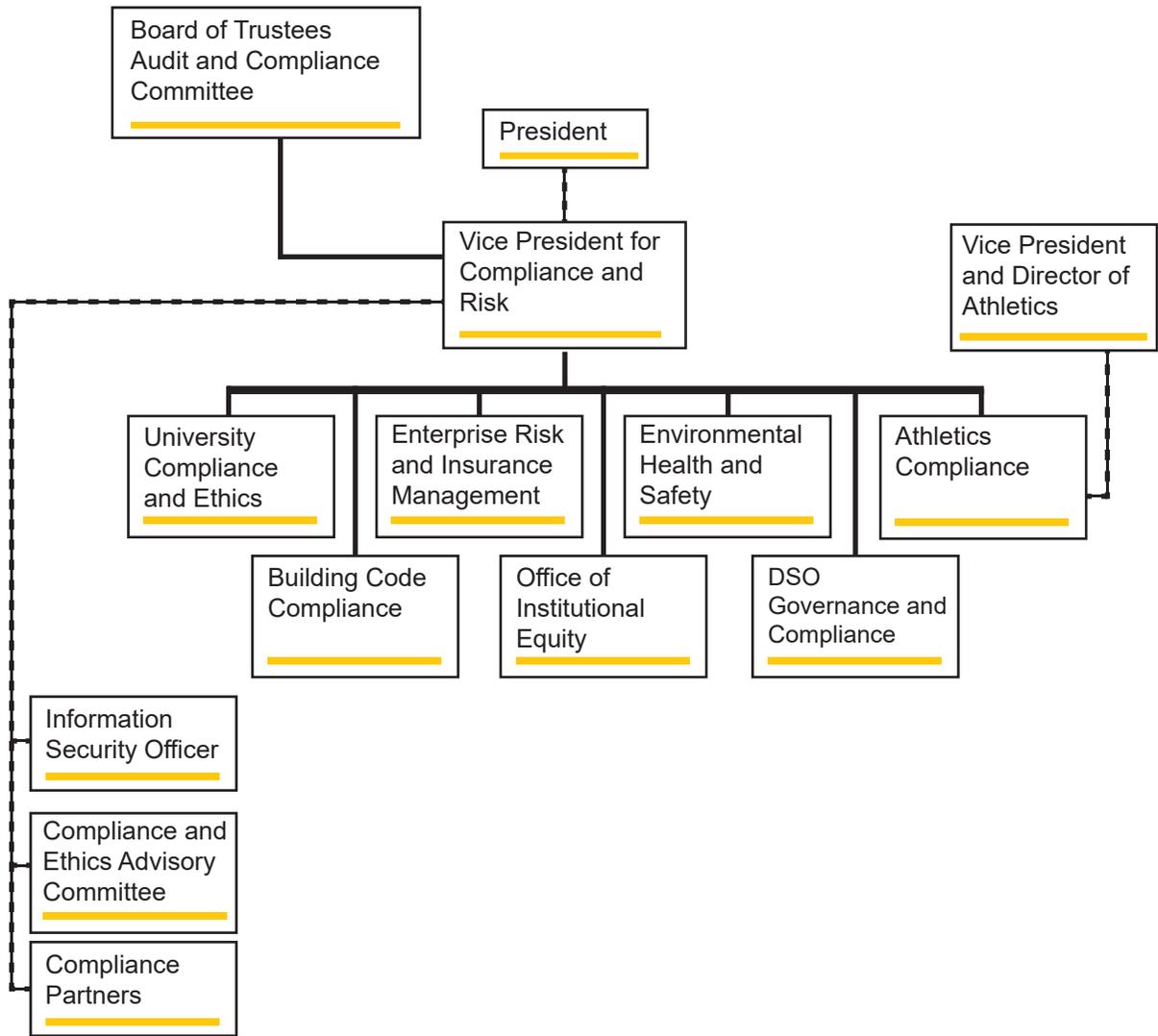
- Requires that each SUS school have a compliance and ethics program
- Defines reporting relationship to the BOT and president
- Includes requirements for annual periodic reporting to BOG

### Elements of an Effective Program

1. Standards and Procedures
2. Oversight
3. Education and Training
4. Monitoring and Auditing
5. Reporting
6. Incentives and Disciplinary Measures
7. Response and Prevention
  - Risk Assessment
  - Effectiveness Assessment
8. “Promote an organizational culture that encourages ethical conduct and a commitment to compliance with laws.”

The vice president for compliance and risk, who serves as the university’s chief compliance, ethics, and risk officer, oversees the office of University Compliance, Ethics, and Risk, and provides oversight and coordination of compliance partners who lead targeted compliance programs across the university, including information security, research compliance, healthcare compliance, and export control compliance. The Compliance and Ethics Advisory Committee, established in 2013, is charged with assisting University Compliance, Ethics, and Risk in the development of the comprehensive compliance and ethics program. The advisory committee is chaired by the vice president for compliance and risk and is made up of over 30 members across various departments within the university who collectively contribute to this report on an annual basis.

# Compliance and Ethics Program Structure





### **New Legislation - Six New Florida Statutes Addressing Foreign Influence**

In response to growing concerns related to improper foreign influence and with the purpose of ensuring that Florida's public postsecondary institutions are accurately reporting all sources of research support, financial interests and affiliations, Florida Statutes Section 1012.977 became effective on July 1, 2020. University Compliance, Ethics, and Risk revised regulation UCF-3.018 Conflict of Interest or Commitment; Outside Activity or Employment. Working with the Office of Research, Compliance Office, and the Chairs of the Faculty Senate and Faculty Research Council, the office established a Faculty Ad Hoc Working Group to revise UCF Policy 4-504.3 Reporting Outside Activities, Financial Interests, and Potential Conflicts of Interest or Conflicts of Commitment in Research. As a result of the Working Group discussions the office:

- distributed communications to employees regarding the new law, the delayed disclosure reporting period, and provided instructions on how to submit new activities during the interim period to comply with the new statute;
- added a new question to the disclosure form to meet the requirements of the new statute and committed to re-evaluating the new question during next report year;
- developed a matrix detailing each disclosure question, its regulatory purpose, what to disclose, examples, and what does not need to be disclosed; and
- developed additional supporting documents and materials to assist faculty and staff with the disclosure process, which included a video tutorial and disclosure guidance that was posted to the University Compliance, Ethics, and Risk website.

To meet the requirements of the new statute, this year the disclosure window was shortened to four months as opposed to a typical 12-month reporting window. The university was required to include an additional 1,000 new employees in the disclosure process to fulfill the new statutory requirements and achieved a 99.86% overall compliance rate. The university has consistently achieved 100% compliance with disclosure reporting in previous years; however, given the significant changes in disclosure requirements and the delayed start to the disclosure year, we consider this an outstanding outcome.

In May 2021, the Office of International Collaboration and Export Control launched a new website focused on protecting the university against foreign influence and providing resources to the university community.



In response to House Bill 7017 Foreign Influence University Compliance, Ethics, and Risk formed a working group consisting of the Office of Research, Office of the General Counsel, Human Resources, Academic Affairs, UCF Global, Graduate Studies, and Finance and Accounting to track the proposed requirements and provide feedback to House staff on the proposed bill. The governor in June 2021 signed the bill establishing five new Florida Statutes: Reporting Foreign Gifts and Contracts (286.101 and 1010.25), International Cultural Agreements (288.860), and Requirements Regarding Screening Applicants (1010.35), which became effective on July 1, 2021; and International Travel Pre-Approval, Monitoring & Reporting (1010.36) effective January 1, 2022. The Working Group continues to meet regularly to discuss the implementation of the new statutes.



---

## **Code Compliance**

Facilities Operations achieved a 98% compliance rate with code-required inspections on life safety systems that must be completed within two days of a scheduled inspection date.

---

## **Crisis Intervention**

As a result of the UCF Police Department's implementation of required crisis intervention training, a sergeant and two officers were able to assist a student in crisis. During a routine check of a parking garage by UCF Police Department's Sgt. Christopher Holt a student was found in a very distraught and emotional mental state perched on the ledge of the top floor of the parking structure. Officers Nelson and Sparks responded to assist Sgt. Holt and after speaking with the student, who had several prior suicide attempts, they were able to convince the student to come down from the ledge. The student then agreed to be transported to University Behavioral Health for further evaluation and treatment. Sgt. Holt and Officers Nelson and Sparks undoubtedly saved a life thanks to their crisis intervention training, compassion, and willingness to help.

---

## **Kognito At-Risk for Faculty and Staff Training**

UCF Human Resources diligently worked to achieve a 100% completion rate for employees taking the required Florida Board of Governors' Kognito At-Risk for Faculty and Staff mental health training. This training provides an interactive experience for faculty and staff to learn how to identify, support and refer students to important mental health resources.

---

## **COVID-19 Efforts**

To implement the Board of Trustee's approved Return to Campus Plan and response to the pandemic, compliance partners engaged to implement the plan's health measures and the university's emergency COVID-19 policies.

Facilities and Safety was featured in a New York Times article regarding COVID-19 measures taken to protect the campus. Facilities Operations was also featured on ABC's *Good Morning America* for the installation of plexiglass and hand sanitizing stations throughout all campuses.





In attempts to slow the spread of the COVID-19 virus in our community, Student Health Services played an instrumental role in hosting mass vaccination events for the faculty, staff, and student population. During this reporting period just under 20,000 COVID-19 vaccines were administered by Student Health Services to members of the UCF community. Student Health Services continues to offer COVID-19 vaccines and COVID-19 testing at the Student Health Center and oversees the COVID-19 reporting, both with contact tracing and COVID-19 quarantine.



**ARMOR UP  
AND GET  
VACCINATED!**

ALL STUDENTS, FACULTY AND STAFF ARE STRONGLY ENCOURAGED TO GET VACCINATED. SCHEDULE YOUR SHOT AT UCF STUDENT HEALTH SERVICES.

SCHEDULE YOUR SHOT




Student Conduct and Academic Integrity was able to promote student understanding of the university's health measures and a student's impact on the university community through an educational intervention mindset. This approach worked to help students who were reported for face-covering violations understand through education the university's health measures and their role in reducing the spread of COVID-19 on campus and in the community.



**PLEASE WEAR  
A MASK**  
IT'S WHAT KNIGHTS DO.

 ARMOR UP WITH A FACE COVERING.




# Comprehensive Annual Report



## Oversight of Compliance and Ethics

University Compliance, Ethics and Risk is responsible for oversight of the university's comprehensive compliance and ethics program. The vice president for compliance and risk chairs the University Compliance and Ethics Advisory Committee, which is comprised of subject matter experts who are responsible for compliance in their respective areas, as well as representatives from the Faculty Senate and Staff Council, Office of the Provost, Office of the General Counsel, and University Audit. The committee met bi-monthly throughout the year to discuss compliance and ethics risks and program efforts across the institution to mitigate risks. Additionally, the vice president for compliance and risk continued quarterly meetings with compliance partners and senior leadership to provide updates on compliance and ethics initiatives and discuss concerns or issues.

### UCF Compliance and Ethics Office Key Program Elements



## Compliance and Ethics Offices and Partners Key Program Elements

Department	Compliance Activities		
Environmental Health and Safety	Radiation Safety Laser Safety Workplace Safety Laboratory Safety	Chemical Safety Biological Safety Fire Safety Spill Prevention	Air Quality Hazardous Waste Illicit Discharges Industrial Wastewater Storage Tank Compliance
Facilities and Safety	Operation and Maintenance of Buildings and Assets  Planning, design, bid, permit, construction, and close-out of all construction projects	Real Estate Management  Surplus Property Management	Records Storage Destruction  Sustainability  Utility and Energy Services
Finance and Accounting	Budget Analysis and Planning  Cash Investment Management  Collection and Recording of Revenues	Disbursement of Funds  Financial Reporting  Student Financial Services	Fixed Asset Accountability and Control  Procurement Services  Tax Compliance  DSO Compliance with Debt Covenants
Health Affairs, Legal Compliance	Clinical Services Compliance Program  UCF Health's Coding and Billing Activities	HIPAA Privacy for the College of Medicine and Faculty Practice	UCF Health
Human Resources	Benefits  Compensation	Employee Relations  Payroll	Employment Services and Records  Recruitment
Information Security Office	Cybersecurity  Identity and Access Management	Safeguarding Information Assets  Security Awareness	Security Incident Response
Office of International Collaboration and Export Control	Export-controlled Technology and Restricted Research	Foreign Influence Reporting and Investigation	U.S. Export and Sanctions Regulation Compliance
Office of Institutional Equity	Discrimination, Harassment, and Retaliation  Protection of Civil Rights	Equal Opportunity and Affirmative Action  ADA Compliance and Accommodations	Title IX  Equitable Recruitment and Hiring



## Compliance and Ethics Offices and Partners

Department	Compliance Activities		
Office of Research, Compliance Office	Research Reporting Requirements Effort Reporting and Certification Research Conflict of Interest	Responsible Conduct of Research Institutional Review Board	Facility Security Research Animal Welfare
Office of Student Rights and Responsibilities	Student Conduct Academic Integrity	Golden Rule Student Handbook Admission Clearance Process	Dean's Certifications Remedial Measures for Student Related Title IX Incidents
University Registrar	FERPA Academic Records Excess Hours Surcharge	Enrollment Issuance of Diplomas State Authorization Compliance & Reciprocity	Residency Classifications Athletic Eligibility
Student Accessibility Services and Inclusive Education Services	Academic Accommodations	Classroom and Campus Accessibility for Students	
Student Financial Assistance	Student Financial Aid	Work Study Assignments	Federal Aid and Grants
Student Health Services	Alcohol and Other Drug Prevention and Treatment Programs	Infection Prevention/Risk Management Assessments	Human and Health Services Regulations
UCF Global	SEVIS Records	U.S. Visa Issuance	English Proficiency Immigration Related Documentation
UCF Police Department	Criminal Activity and Reporting Emergency Operations Management Continuity of Operations	Access Control Comprehensive Emergency Management Plan Threat Assessments	Violence Prevention Antiterrorism
Undergraduate Admissions	Student Admission and Enrollment		



## Routine Regulatory Reporting

As part of its compliance oversight, University Compliance, Ethics, and Risk, along with the compliance offices and partners conducted the following routine reviews and where applicable, submitted appropriate regulatory reports to the various agencies:

- Annual Security Report - Clery Act
- Biennial Drug Free Schools and Communities Act Program Review
- Bright Futures Grades and Hours Report (Annual)
- Campus Master Plan
- Collection and reporting of student complaints to comply with federal regulations and regional accreditation requirements (Annual)
- Consumer Confidence Report for Potable Water (Annual)
- Educational Plant Survey
- Employee Data and Payroll Data Reports to the State of Florida (Monthly)
- Enrollment Report to the National Student Loan Data System
- Exchange Visitor Program Redesignation
- Expenditure Analysis (Annual)
- Federal Foreign Gifts and Contracts Report (Biannual)
- Financial disclosure items to the Electronic Municipal Market Access System
- Financial reporting to the Florida Board of Governors
- Fiscal Operations Report and Application to Participate in Campus Based Funding (FISAP) (Annual)
- Infection Prevention/Risk Management Assessment Report (Biannual)
- Legislative Budget Requests for Operations and Fixed Capital Outlay (Annual)
- National Collegiate Athletic Association (NCAA) Academic Progress Report (Annual)
- NCAA Graduation Success Rate (Annual)
- Nonresident Aliens (NRA) Withholding Data (Annual)
- Number of Employee Positions Posted and Current Employees Report (Monthly)
- Operating Budget (Annual)
- Operating Budget, Capital Outlay Budget, and Carry-forward Spending Plan (Annual)
- Occupational Safety and Health Administration (OSHA) 300 Report (Monthly)
- OSHA 300A Report (Annual)
- Police Community Outreach Report (Biannual)
- Police Compliance Report (Annual)
- Police Use-of-Force Data Report (Monthly and Annually)
- Public Debt Disclosure Notifications to Bondholders
- Reconciliations of NRA Payments (Annual)

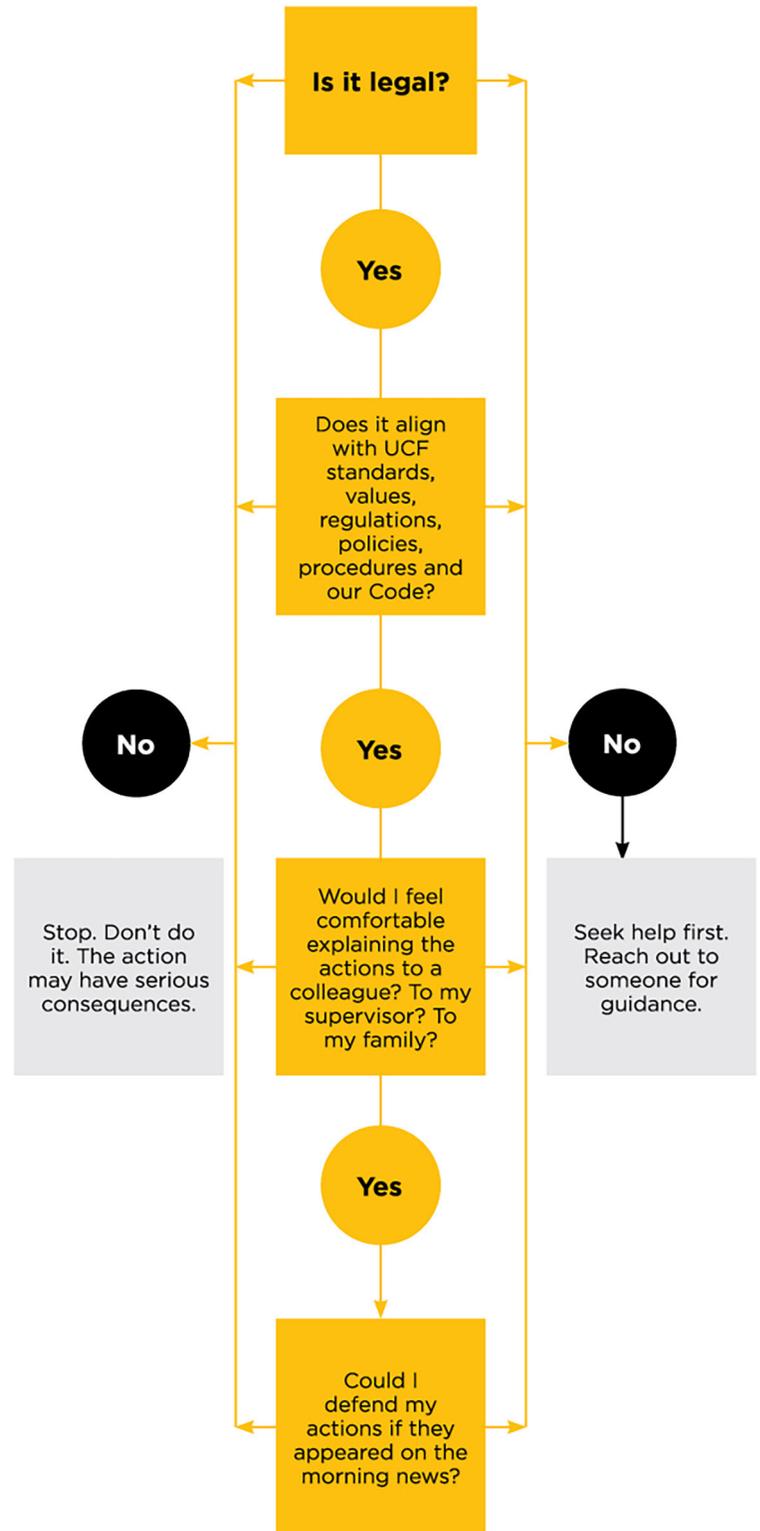
- Report of Financial Information to Debt Rating Agencies (Annual)
- Report of Health Insurance Portability and Accountability Act (HIPAA) Breaches (Annual)
- Report to the Division of Bond Finance (Annual)
- Report to the Florida Center for Students with Unique Abilities (Annual)
- Research Exemption Report to the Governor and Legislature on behalf of the Board Chair (Annual)
- Student and Exchange Visitor System (SEVIS) Recertification
- Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) Report (Annual)
- Statistical Summary of Police Internal Affairs Investigations (Annual)
- Tier II Emergency Industrial Planning and Community Right-to-Know Act Report (Annual)
- Uniformed Crime Report (Annual)
- University Affirmative Action Report (Annual)
- University Florida Equity Report (Annual)
- Veterans' Employment and Training Service (VETS)-4212 Report (Annual)
- Workers Compensation Report (Quarterly)



# Promoting a Culture of Ethics and Compliance

At UCF, each of us is responsible for ensuring that we conduct university activities and business in compliance with the law, university regulations, policies and standards of conduct. The UCF Ethical Standards - honesty and integrity, respect, responsibility and accountability, and stewardship are the ethical principles and values that help guide us in all decisions and actions. Ethical conduct goes beyond simple compliance with legal, regulatory, and university requirements. Behaving ethically means doing the right thing, even when it's not required. Distinguishing ethical behavior may seem straightforward; however, there will be times when 'doing the right thing' will not be clear in each situation. University Compliance, Ethics, and Risk communicates the university's values, provides guidance on ethical decision making, offers training and awareness to the UCF community, manages conflicts of interests and university ethics policy and procedures, and reinforces expectations through investigating allegations of misconduct.

To emphasize the importance of promoting a culture of ethics and compliance, the vice president for compliance and risk personally delivered several virtual sessions on Ethical Leadership to employees throughout the year.



University Compliance, Ethics, and Risk and compliance partners aide in the promotion of an ethical culture through regular activities such as participation in university committees to support UCF’s compliance and ethics efforts and programs.

- University Compliance and Ethics Advisory Committee
- Emerging Issues and Crisis Response Team
- University Policies and Procedures Committee
- University Title IX Response Team
- University Title IX Advisory Council
- University Youth Protection Program Committee
- University Diversity and Inclusion Workgroup
- University President Advisory Staff Council
- University Records Management Advisory Committee
- UCF Online Appeals Committee
- Residency Appeals Committee
- Fee Appeals Committee
- Athletics Compliance Committee
- Human Resources Advisory Committee
- International Incident Advisory Team

- Merchant Services Committee for Payment Card Industry Data Security Standards (PCI DSS) Compliance
- Federal Trade Commission’s Red Flags Compliance Committee
- University Tax Peer Group
- University Financial Conflict of Interest Committee
- University Security Incident Response Advisory Committee
- Enterprise Directory Governance Committee
- Security Leads Committee
- Security Operations Center Advisory Committee

- University F&S Safety Committee
- University Laboratory Safety Committee
- University Radiation Safety Committee
- University Institutional Biosafety Committee
- UCF Institutional Animal Care and Use Committee
- UCF Institutional Safety Council
- UCF Institutional Biosafety Committee

- University Institutional Review Board
- UCF Health Services HIPAA Collaborative Group
- Student Health Services Ad-Hoc Committee
- University Institutional Safety Council
- UCF Student Health Services Breach Committee
- University College of Medicine Clinical Services Compliance Program Committee
- UCF Student Health Services Patient Advocate Reporting
- University DFSCA Biennial Review Committee
- University Bias Incident Communications Group
- UCF Student Conduct Board
- University Assessment Committee
- USPS Staff Council
- University Leadership Council for Equity, Inclusion and Diversity
- President’s Advisory Staff Council
- Golden Rule Review Committee



## Effective Lines of Communication

Building a culture of ethics and compliance requires effectively communicating the university’s expectations for all employees to follow, and each employee taking an active role in understanding and promoting an ethical culture. It also requires timely response to regulatory and other external agencies.

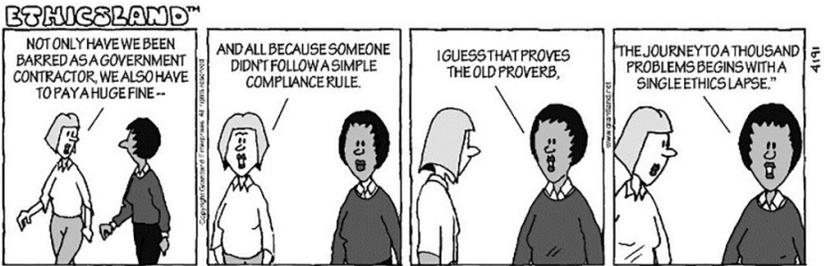
As part of the comprehensive program, University Compliance Ethics, and Risk has developed several communication outlets to promote these expectations.

# IntegrityStar

UCF Compliance & Ethics Newsletter

The UCF *IntegrityStar* newsletter, published each semester, is distributed campus-wide to all employees. Each edition focuses on a different compliance topic, and includes articles written by compliance partners. This year’s newsletters provided information on several compliance and ethics related topics as well as a new “Case Corner” section featuring actual investigations conducted by the investigative offices at UCF.

Edition	Featured Articles and Materials	Recognition
October 2020	<p>Compliance and Ethics Culture Survey Results</p> <p>Ethical Leadership</p> <p>UCF IntegrityLine Report</p> <p><b>Audit Unlocked:</b> Questions to Ask Yourself - Part 1 - Approving Invoices</p> <p><b>Cartoon:</b></p> <p><b>Video:</b> Ethical Leadership</p>	<p>Shreya Trivedi, Ombuds Officer, and Daniel Thompson, Deputy Ombuds Officer, for serving our students, faculty, staff, alumni, and parents, providing them with a SAFE place to ask questions and discuss concerns.</p>

Edition	Featured Articles and Materials	Recognition
<p>March 2021</p>	<p>Preventing Loss of Academic Research  Disclosing Financial Interests and Outside Activities with International Partners  Youth Protection Program – New Squire Registration System  <b>Audit Unlocked:</b> Questions to Ask Yourself – Part 2 – Approving Pcard Purchases  <b>Case Corner:</b> Export Control and Conflict of Interest case overview</p> <p><b>Cartoon:</b></p>  <p><b>Video:</b> Conflicts of Interest, 2<sup>nd</sup> Edition</p>	<p>Associate Dean Dr. Nancy Stanlick, for her efforts in supporting UCF's Speak Up culture through reviewing concerns raised through the IntegrityLine and taking appropriate actions.</p>
<p>July 2021</p>	<p>Recent Updates to UCF Policies Covering Data Security and Protection  Data Privacy and Security  What to do if Someone Requests a Copy and/or the Removal of Their Personal Data  <b>Audit Unlocked:</b> Questions to Ask Yourself – Part 3 – Travel Reimbursements  <b>Case Corner:</b> FERPA case overview</p> <p><b>Cartoon:</b></p>  <p><b>Video:</b> Conflicts of Interest, 2<sup>nd</sup> Edition</p>	<p>Michael Constantino, Information Security Awareness &amp; Education Coordinator, within our UCF Information Security Office, for his contributions in raising security awareness.</p>



## UCF IntegrityLine

Doing the right thing means acting with honesty and integrity and speaking up when you know of or suspect unethical behavior.

En Español

The UCF IntegrityLine is a secure reporting system administered by an independent third party, NAVEX Global. The IntegrityLine is available 24 hours a day, 365 days a year, and is available at [www.ucfintegrityline.com](http://www.ucfintegrityline.com), or by calling **1-855-877-6049** toll-free. NAVEX Global uses their case management system, EthicsPoint to provide individuals who may be reluctant to report suspected misconduct through university administrative or central offices a way to report with complete anonymity. The Internet portal never identifies a visitor and deletes the internet address so that anonymity is preserved. Callers are not traced or recorded.

IntegrityLine reports are processed by EthicsPoint and sent to the University Compliance, Ethics, and Risk Office to address appropriately. All reports will be reviewed, investigated, and responded to as discreetly and promptly as possible.

***For more information about what should be reported, how to submit a report and what happens after you submit a report, watch the IntegrityLine tutorial.***

IntegrityLine  
Tutorial

The office developed an IntegrityLine video tutorial explaining how to submit a report and what happens after a report is submitted and posted the link to the UCF IntegrityLine webpage. The SGA judicial branch subsequently introduced the training to students to assist them with using the IntegrityLine. The office also served on the Student Reporting Work Group to discuss reporting options for students, including the IntegrityLine, and to develop a reporting options website.

Promotion of the IntegrityLine occurs within the publication of each *IntegrityStar* newsletter, in compliance videos, on the University Compliance, Ethics, and Risk website, on the websites of all compliance partners, and at virtual tabling events. This year, to ensure consistency and increased

communication touch points during and after investigations, the office revised the IntegrityLine intake and closeout processes.

As part of the development of the Privacy Compliance Program, University Compliance, Ethics, and Risk created a UCF Privacy mailbox to monitor and manage all privacy-related inquiries. Additionally, the office created the Privacy Compliance webpage, brochure, and updated the university's Privacy Policy page.

Compliance partners also contribute to building an ethical culture by promoting compliance and ethics within their respective areas of expertise and to the UCF Community through monthly meetings, emails to departmental staff, and sending campus-wide communications on topics such as annually required notices on the Drug Free Campus Schools Act, the availability of the Annual Security and Fire Safety Guide (Annual Security Report) availability, and the Family Educational Rights and Privacy Act (FERPA).



In support of UCF's foreign influence program, the Office of International Collaboration and Export Control issued notices to the UCF community regarding concerns related to high-risk entities and issued a separate notice on inappropriate foreign influence, launching a new inappropriate foreign influence website to assist the UCF community in identifying and mitigating the risks of inappropriate foreign influence.

Many of the compliance partners also issued their own departmental newsletters. For example, Student Health Services distributed a HIPAA newsletter on a quarterly basis throughout the year, and the Information Security Office communicated security best practices through the Information Technologies and Resource newsletter. Additionally, the UCF Police Department published an internal magazine called the *Safety Scoop*. UCF Global maintained and updated a COVID-19 FAQ page and hosted information sessions on Zoom to communicate and maintain open communication with international students. A weekly email was also sent university-wide that included COVID-19 updates as it related to the university activities.

## Response to Regulatory Agency Requests and Non-routine External Reviews

The vice president for compliance and risk continued to oversee the university's response to non-routine external reviews and requests for information. These included the National Science Foundation (NSF), National Aeronautics and Space Administration (NASA), and the Department of Energy (DOE) investigation related to UCF's compliance with Title IX, the American Disabilities Act (ADA), and Section 504 of the Rehabilitation Act and a separate review by the DOE related to UCF's compliance with Title IX, specifically the Department of Material Science and Engineering. The vice president for compliance and risk, the Office of Institutional Equity, and the Office of the General Counsel worked together to respond to requests from NSF and DOE. These reviews are still pending completion.

The Office of Federal Contract Compliance Programs (OFCCP) issued its Corporate Scheduling Announcement List showing UCF as subjected to an establishment review (full compliance audit) and initiated its audit in June 2021. Led by the Office of Institutional Equity, and in collaboration with University Compliance, Ethics, and Risk, the Office of the General Counsel, Human Resources, and Academic Affairs, the university prepared and submitted an initial response to the OFCCP. This compliance review remains in progress.

The Office of Research, Compliance Office prepared documents for the NSF COVID-19 Flexibilities Assessment that NSF conducted to assess if UCF appropriately implemented NSF policy changes in response to the pandemic. Working with the vice president of compliance and risk, the Office of Research, Compliance Office responded to any findings and implemented appropriate corrective actions.

A Title IX audit was conducted by the NCAA to ensure compliance in all areas including participation requirements, female/male scholarship dollars proportional to their participation, and equal treatment across 11 different provisions . The audit has been completed, but the results have not been distributed and are expected in the near future.

State Auditors also requested information on multiple capital projects. The requested information was provided by Facilities and Safety, and no further requests have been made.

To assist with ease in locating policy development information, University Compliance, Ethics, and Risk created a “Resource” page to the online University Policy Library and posted the following newly developed resources to support departments with their policy development and review process:



### UNIVERSITY POLICY RESOURCES

- Draft Policy Submission Cover Memo Form [VIEW PDF](#)
- Policy Glossary [VIEW PDF](#)
- Policy Template (Microsoft Word document automatically downloads) [VIEW PDF](#)



University Compliance, Ethics, and Risk maintains the university's policy manual containing 114 policies and oversees the university's policy review process which includes identifying when new policies are required and distributing campus-wide communications when new or revised policies become effective. Individual policy owners are required to develop new policies when needed, review existing university policies annually for updates, acquire appropriate stakeholder input, and make any necessary changes for submission to the university's Policies and Procedures Committee and approval by the president.

This report year the University Policies and Procedures Committee reviewed the following policies that were later approved by the president:

#### Legal, Compliance, and Administration Policies

- UCF Policy 2-004.2 Prohibition of Discrimination, Harassment, and Related Interpersonal Violence
- UCF Policy 2-008.1 Internal Control Policy
- UCF Policy 2-012 Title IX Grievance Policy
- UCF Policy 2-107.6 Signature Authority / Salary Supplement Policy
- UCF Policy 2-800.2 Fraud Prevention and Detection
- UCF Policy 4-505.2 Reporting of Substantive Change

#### Financial Policies

- UCF Policy 3-211 University Budget Process
- UCF Policy 3-212 Allocation and Use of EG Carry Forward Funds

#### Advancement and Development Policies

- UCF Policy 2-202.2 UCF Foundation Solicitation of Charitable Gifts

#### Technology and Communication Policies

- UCF Policy 4-002.2 Use of Information Technologies and Resources
- UCF Policy 4-008.2 Data Classification and Protection
- UCF Policy 4-015 Security Incident Response

### Facilities and Safety Policies

- UCF Policy 3-109.2 Building Code Compliance
- UCF Policy 3-111.2 Energy and Water Efficiency
- UCF Policy 3-114 New Construction, Remodeling, and Renovation Projects
- UCF Policy 3-115.2 Alcoholic Beverages
- UCF Policy 3-122.1 Campus Safety and Health Policy
- UCF Policy 3-303.1 University-Controlled Utilities and Interconnections
- UCF Policy 3-400.3 Non-Research Animals on Campus
- UCF Policy 3-507.1 Designations of Personnel for Emergencies

### Research Policies

- UCF Policy 4-504.3 Reporting Outside Activities, Financial Interests, and Potential Conflicts of Interest or Conflicts of Commitment in Research

### Academic Affairs Policies

- UCF Policy 4-400.3 Final Exams

University Compliance, Ethics, and Risk also assisted with 17 updates to Emergency COVID-19 policies and based on requests from faculty, developed and published a separate weblink to view tracked edits for each update. The office also distributed 17 all-campus email notices to all employees alerting them of new or modified policies and where to locate them.

University Compliance, Ethics, and Risk collaborated with the Information Security Office to develop a new “Clean Desk Policy” embedded within UCF Policy 4-008 Data Classification and Protection, as well as provided guidance on revisions made to UCF Policy 4-002 Information Technology and Resources. Additionally, the office 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; reviewed the newly developed university-wide policy on HIPAA compliance and the supplemental policy manual containing 33 specific HIPAA targeted policies.



In addition to the university-wide policies maintained in the university policy manual, many individual departments and compliance partners maintain university regulations, local policies and procedures, guidance, and handbooks specific to their areas of compliance that supplement university policies. The chart below summarizes departmental updates made during this reporting year.

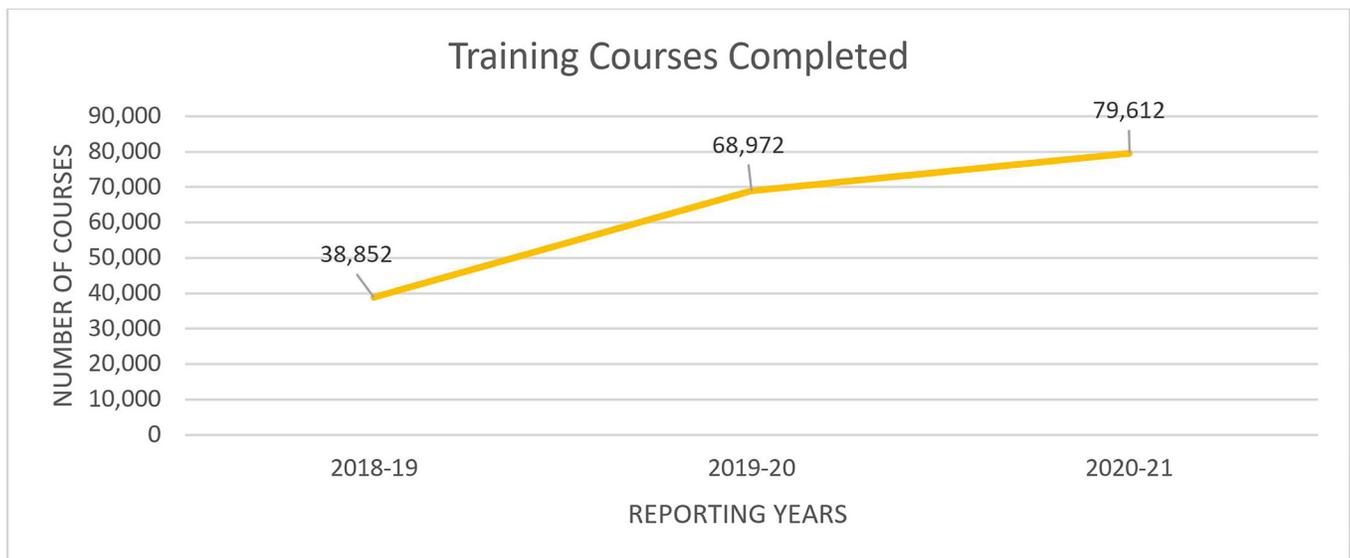
<b>Compliance Partner</b>	<b>Related New or Updated Materials</b>
Academic Services for Student-Athletes	UCF Student-Athlete Handbook
	Standard Operating Procedures Manual
Facilities and Safety	Project Manager Manual
	Multiple Internal Policies and Procedures
Health Affairs Legal Compliance	Three Internal Policies
Human Resources	Knights Care Leave Share Program Procedures
	Telecommuting Manual
	Emergency Policy on Remote Work Arrangements
	Three University Regulations
	ePAF Originator Source Guide
Information Security Office	Information Security Standards
Office of International Collaboration and Export Control	Sponsored Programs Export Routing Guidelines
	J1 and H1B Visa Export Routing Guidelines
	Conflict of Interest Guidelines
	Foreign Influence Assessment Procedures
Office of Institutional Equity	Fourteen University Regulations
	Investigation Procedures
Office of Research, Compliance Office	NSF/Arecibo Roles and Responsibility Guidelines
	Employee Compensation Compliance Guidelines
Registrar	Undergraduate Catalog
	Graduate Catalog
Student Accessibility and Inclusive Education Services	Standard Operating Procedures
	Inclusive Education Services Student Handbook



Compliance Partner	Related New or Updated Materials
Student Care Services	One University Regulation
Student Conduct and Academic Integrity	Ten University Regulations
Student Financial Assistance	Student Financial Assistance Policy and Procedures Manual
	Student Financial Assistance Scholarship Manual
	NCAA Athletics By-Laws Florida Department of Education State Programs Manual
Student Health Services	Twelve Internal Policies
UCF Police Department	Fifty-seven General Orders
Undergraduate Admissions	Undergraduate Admission training manuals

## Training and Education

Training and education are key components of an effective compliance and ethics program. Training courses are developed to communicate various regulatory requirements, university regulations, policies, and procedures, as well as expectations for standards of conduct. During this report year, over 79,000 training courses were completed which is a significant increase from the 68,972 courses completed last year and the 38,852 course completions reported in 2019.



Please see the chart below for specific compliance training delivered by the various compliance offices and partners with the total number of employees who completed the training.

Department	Topic	Delivery	No. Trained
University Compliance, Ethics, and Risk	Potential Outside Activity Employment and Conflict Tutorial	Video	170
	IntegrityLine Tutorial	Video	11
	National Compliance and Ethics Week Topics ( <i>Embracing Your Diversity, Unconscious Biases, and Civility in the Workplace</i> )	Video	351
	Ethical Leadership	In-person	146
	Gifts and Honoraria Training	Online	141
	Potential Conflicts - Florida Code of Ethics for Public Officers and Employees	Online	3,721
	Annual UCF Employee Code of Conduct Training with Certifications	Online	7,070
	New Hire UCF Employee Code of Conduct/Speak Up! Training	Online	2,099
	Youth Protection Training	Online	425
Athletics Compliance	NCAA Rule Education	In-person	110
Environmental Health and Safety	Aerial Lift Safety Training & Practical	Mixed	77
	Animal Exposure in a Research Setting	Online	94
	Biological Safety Practical	In-person	187
	Biological Safety Training	Online	648
	Bloodborne Pathogens	Mixed	742
	Comprehensive Safety Orientation	In-person	135
	Confined Space Awareness	In-person	38
	Confined Space Entry	In-person	15
	Controlled Substances	Online	41
	Electrical Safety	In-person	37
	Ergonomics	In-person	22
	Fall Protection	In-person	77
	Forklift Safety Training & Practical	Mixed	44
	Hands Only Adult CPR	In-person	135
	Hearing Conservation	Mixed	12
	Laboratory Principal Investigator and Manager Training	Online	128
	Laboratory Safety Practical	In-person	977
Laboratory Safety Training	Online	1,812	
Laser Safety Training	Online	308	

Department	Topic	Delivery	No. Trained
Environmental Health and Safety	Lock Out Tag Out	In-person	37
	Mechanical Room Safety at UCF	Online	80
	OSHA 10-HR Course	In-person	27
	Radiation Safety Awareness	Online	61
	Radiation Safety Practical	In-person	12
	Radiation Safety Training	Online	70
	Respiratory Training	Online	86
	Sealed Source Training	Online	2
Finance and Accounting	Budget and Journal Inquiry	Online	53
	Chart of Accounts	Online	93
	Credit Card Info Security	Online	88
	Financials Basic Navigation	Online	97
	Create and Upload Journals	Online	61
	Pcard Training for Approvers	Online	58
	Pcard Training for Cardholders	Online	129
	All About Pcard	In-person	38
	Petty Cash Accounts	Online	6
	Procurement Training	In-person	89
	Unauthorized Procurement Actions	Online	54
Health Affairs Legal Compliance	COM Clinical Services Compliance Program Overview	In-person	210
	COM Code of Ethics and Conduct	In-person	212
	COM HIPAA	Online	1,246
	COM Industry Relations	Online	190
	Fraud, Waste and Abuse in Delivery and Payment of Health Care Services	Online	177
	HIV Safety for Florida Clinical Laboratory Personnel	Online	25
	OSHA Bloodborne Pathogens	Online	27
	OSHA Fire Safety	Online	27
	OSHA Hazard Communication and Chemical Hygiene	Online	27
	Routine Venipuncture	Online	26
	Information Blocking Rule	In-person	7
Human Resources	Kognito at-risk for Faculty and Staff	Online	11,146
	Civility at Work - Non-supervisor Version	In-person	209
	Fostering a Civil Workplace - Supervisor Version	In-person	136
	UCF Annual Notices to Employees	Online	12,242



Department	Topic	Delivery	No. Trained
Human Resources	Practical Coach	In-person	111
	Giving & Receiving Feedback	In-person	90
	New Employee Orientation	Mixed	377
	Parental Leave Training and/or Worker's Compensation	In-person	96
	Payroll Authorizer	Online	21
	Payroll Processor	Online	42
	Faculty Hiring	Mixed	52
	International Hiring	Mixed	83
	Supervisory Performance Management	In-person	104
	Return to Campus Operations	Online	3,825
	Supervisory Performance Appraisal Workshop	In-person	112
Information Security Office	Information Security Awareness	Online	1,747
Office of Institutional Equity	HR Liaison Training: OIE and UCF Nondiscrimination Policies	In-person	29
	Search and Hiring Guidelines	In-person	363
	New Faculty Orientation	In-person	65
	Title IX Training	In-person	2,047
	New Student Orientation Title IX Module	Online	7,554
	UCF Actions to Prevent and Correct Discrimination	Online	3,875
Office of International Collaboration and Export Control	Export Controls (Sponsored Programs and Unit Administrators)	In-person	15
	Export Control Researcher Training	Online	159
	Visual Compliance Screening Training	In-person	25
	Introduction to Export Controls (General Students, Staff, Unit Personnel)	In-person	3
Registrar	FERPA: Faculty and Staff Training	Online	8,766
	FERPA: Student Training	In-person	145
Student Accessibility Services and Inclusive Education Services	Exploring Disabilities from the Lived Experience	In-person	55
	Examining the Real Disability Barriers	In-person	131
	Lab Animal Researcher/Technicians/Students	In-person	105
	Developing an Accessible Document using Office 365	In-person	27
	Easy Checks for Website Accessibility	In-person	27
	Knights of the Round Table Accessibility Leadership Summit	In-person	10
	Student Academic Resource Center Peer Tutor and Supplemental Instruction Training	In-person	32
	Experience the Impact of Virtual Learning as a Student with Disabilities	In-person	34

Department	Topic	Delivery	No. Trained
Student Accessibility Services and Inclusive Education Services	Foundation of Digital Accessibility	In-person	26
Student Conduct and Academic Integrity	Student Conduct Review Board	In-person	80
Student Health Services	HIPAA (include Code of Conduct, Confidentiality, Security of Personal Health Information)	Mixed	160
	De-escalation of Patients / Persons	Online	160
	OSHA Hazard Communication and Chemical Hygiene	Mixed	160
	Basic Life Support including AED and infant training	In-person	74
UCF Global	Federal Immigration Regulations on F/J Visas (various topics)	In-person	1,500+
	International Health and Safety	In-person	40
UCF Police Department	Clery Act CSA Training	In-person	324
	Criminal Justice Standards and Training Commission (CJSTC) Discriminatory Profiling and Professional Traffic Stops	Online	3
	CJSTC Recognizing Head Injuries in Infants and Children	Online	61
	CJSTC Autism Spectrum Disorders (ASD) & Interviews	Online	76
<b>Training Courses Completed from July 1, 2020 through June 30, 2021</b>			<b>79,612+</b>

This year, University Compliance, Ethics, and Risk implemented measures to improve the compliance rate with mandatory new hire training, which included a new tracking and notification process. Compliance with timely completion of the required New Hire UCF Employee Code of Conduct/Speak Up! training increased by 27%, and Potential Conflicts - Florida Code of Ethics for Public Officers and Employees increased by 4% as a result of these notifications.

As part of the development of the Privacy Compliance Program, University Compliance, Ethics, and Risk led Privacy Compliance related training in the form of a Privacy Awareness Discussion during the UCF PegaSec Virtual Cyber Security Expo and during Data Privacy Day through a webinar, in addition to updating the Information Security Office's new hire training to include Privacy-related content. Privacy Compliance tips were also created for the Research Cyberinfrastructure (RCI) website and the office presented Privacy Principles and Best Practices during a "Share the Knowledge Talk" for the Office of Research Human Resources.



## Reported Concerns and Investigations

Responding promptly to detected problems and undertaking corrective actions are a key element in an effective compliance and ethics program. When members of the university community become aware of or have reason to suspect university activities and business are not conducted in an honest, ethical, and lawful manner, UCF expects members of the university community to make good faith reports of suspected misconduct.

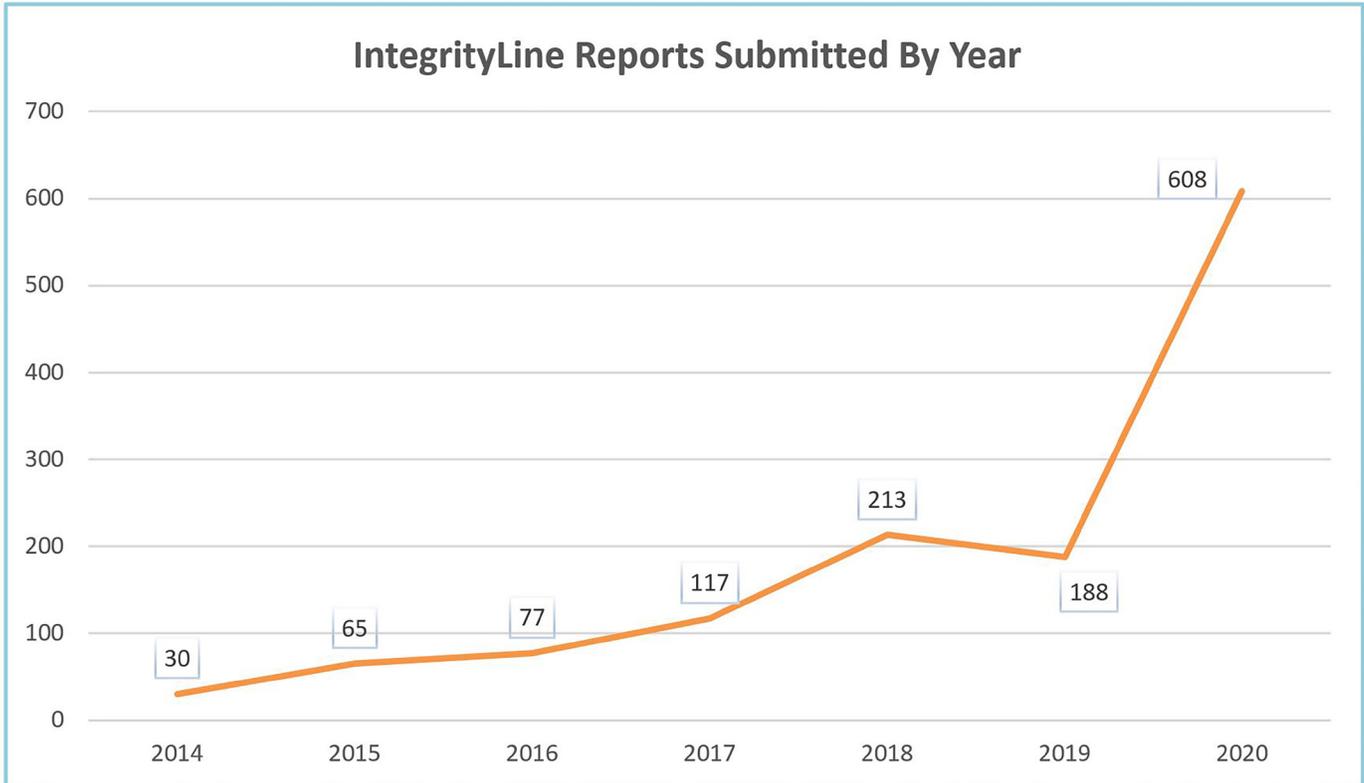
Employees who are reluctant to report concerns to their direct supervisors or a central office are encouraged to use the UCF IntegrityLine, a secure and anonymous reporting system administered by an independent third party.

Reports of potential misconduct are also made directly to University Compliance, Ethics, and Risk and are forwarded to University Audit for whistleblower determination. Of the seven reports made directly to the office, six of those were closed this reporting period and one of those reports was still actively being investigated at the end of the year.

University Compliance, Ethics, and Risk oversees the university's foreign influence compliance program and works with the Office of Research, Compliance Office and the Office of International Collaboration and Export Control to determine when to initiate a foreign influence investigation. Under the foreign influence assessment process inquiries that are found to have potential foreign influence compliance issues are investigated. This year, the offices jointly investigated 16 cases, three of which were substantiated, and appropriate actions were taken by the university. The remainder of the cases were closed with no further action necessary.

## UCF IntegrityLine Report January 1, 2020, to December 31, 2020

During the 2020 calendar year, the UCF IntegrityLine received a total of 608 reports, a significant increase (223%) from the 188 reports submitted in 2019. Reports to the IntegrityLine have increased overall by 1,927% since the reporting tool became available in 2014.



The significant increase in reporting is most likely attributed to the increased marketing of the IntegrityLine reporting option and two major events that occurred during 2020: COVID-19 and allegations involving a faculty member. Of the 608 reports submitted in 2020, 605 contained allegations of suspected misconduct or ethical concerns and three reports were inquiries. Reports containing allegations of misconduct were triaged between University Compliance, Ethics, and Risk and University Audit. Based on the nature of the report, it was either investigated by University Compliance, Ethics, and Risk, University Audit, the Office of Institutional Equity, or referred to the appropriate compliance partner for review. Reports involving students under the UCF Golden Rule were referred to the Office of Student Rights and Responsibilities and reports criminal in nature were referred to the UCF Police Department.



## Issue Type

Reports submitted to the UCF IntegrityLine in 2020 spanned a range of 20 issue types.

Primary Issue	Total Reports	Percentage of Reports (Rounded)
Environmental and Safety Matters	251	41%
Discrimination or Harassment	138	23%
Offensive or Inappropriate Communication	88	14%
Other Human Resource Matters	20	3%
Academic Misconduct	19	3%
Employee Misconduct	19	3%
Other Academic Affairs Matters	13	2%
Other	11	2%
Alcohol / Drug Abuse	8	1%
Other Financial Matters	8	1%
EEOC or ADA Matters	7	1%
Sexual Harassment	6	1%
Waste, Abuse or Misuse of Institution Resources	5	1%
Conflict of Interest	3	0.5%
Data Privacy / Integrity	3	0.5%
Fraud	3	0.5%
Inquiry	3	0.5%
Nepotism	1	0.2%
Retaliation	1	0.2%
Time Abuse	1	0.2%
<b>Grand Total</b>	<b>608</b>	

### Environmental and Safety Matters

The highest number of reports in a single-issue type were categorized as Environmental and Safety Matters with 251 reports representing 41% of all reports submitted. This issue type includes any concern regarding health and safety and includes all COVID-19 related concerns submitted during 2020.

### Discrimination or Harassment

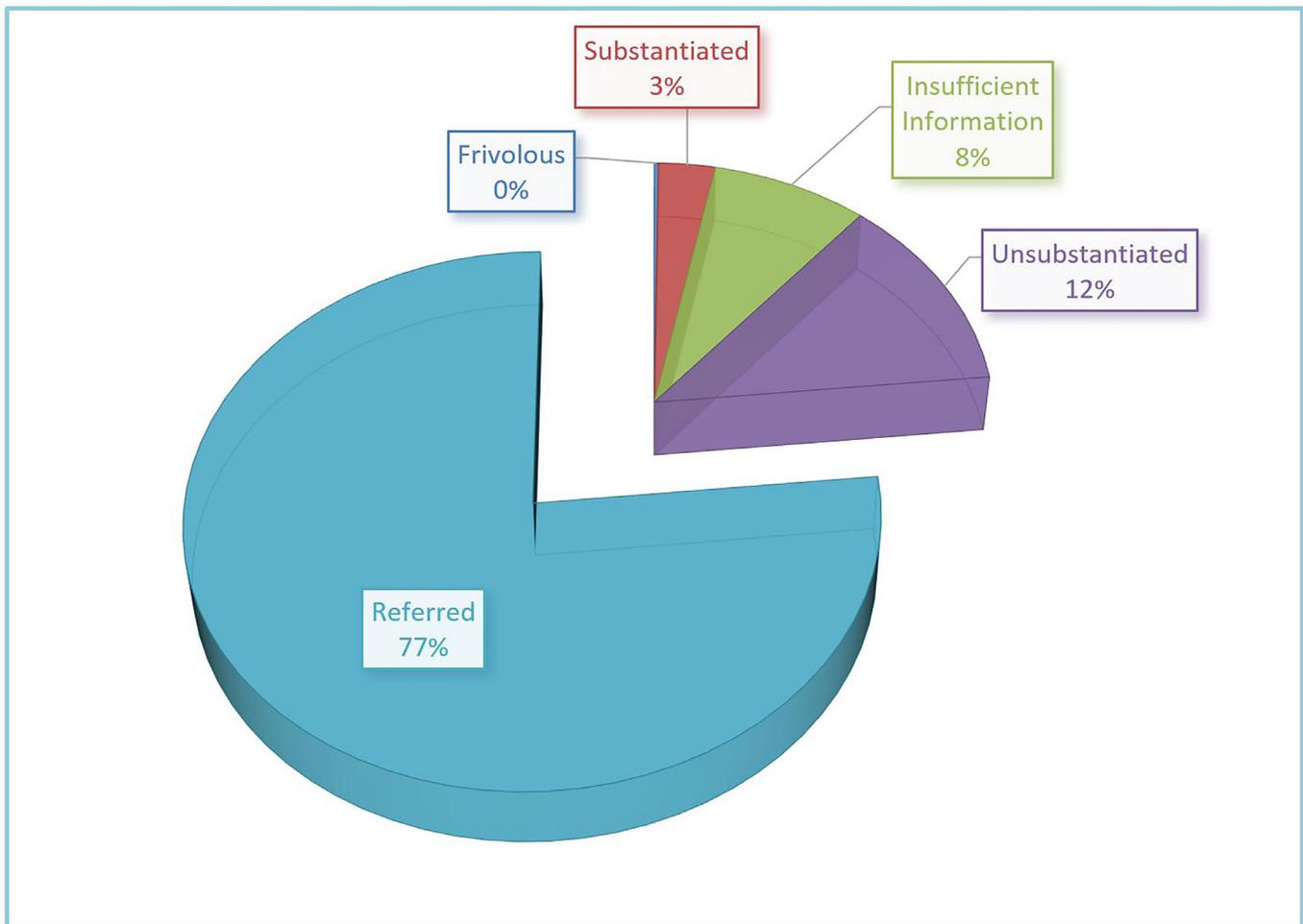
With 138 reports, representing 23% of all reports submitted, the second highest reported issue type was Discrimination or Harassment. These reports involve allegations of non-compliance with UCF 2-004 Prohibition of Discrimination, Harassment and Related Interpersonal Violence Policy, which includes but is not limited to uninvited and unwelcome verbal or physical conduct directed at an employee because of his or her sex, religion, ethnicity or beliefs.

### Offensive or Inappropriate Communication

The third highest number of reports made to the IntegrityLine in 2020 were categorized as Offensive or Inappropriate Communication with 88 reports representing 14% of all reports submitted. This issue type includes concerns related to inflammatory, derogatory, unduly critical or insulting communication and failure to treat one another with respect in accordance with the UCF Ethical Standards outlined in the UCF Employee Code of Conduct.

### **Closed Cases**

University Compliance, Ethics, and Risk closed 453 IntegrityLine cases during the 2020 calendar year, a significant increase (150%) from the 181 cases closed in 2019. Closed cases include a combination of reports received in 2020 as well as those submitted in a previous year. Below are the outcomes for all cases closed in 2020.



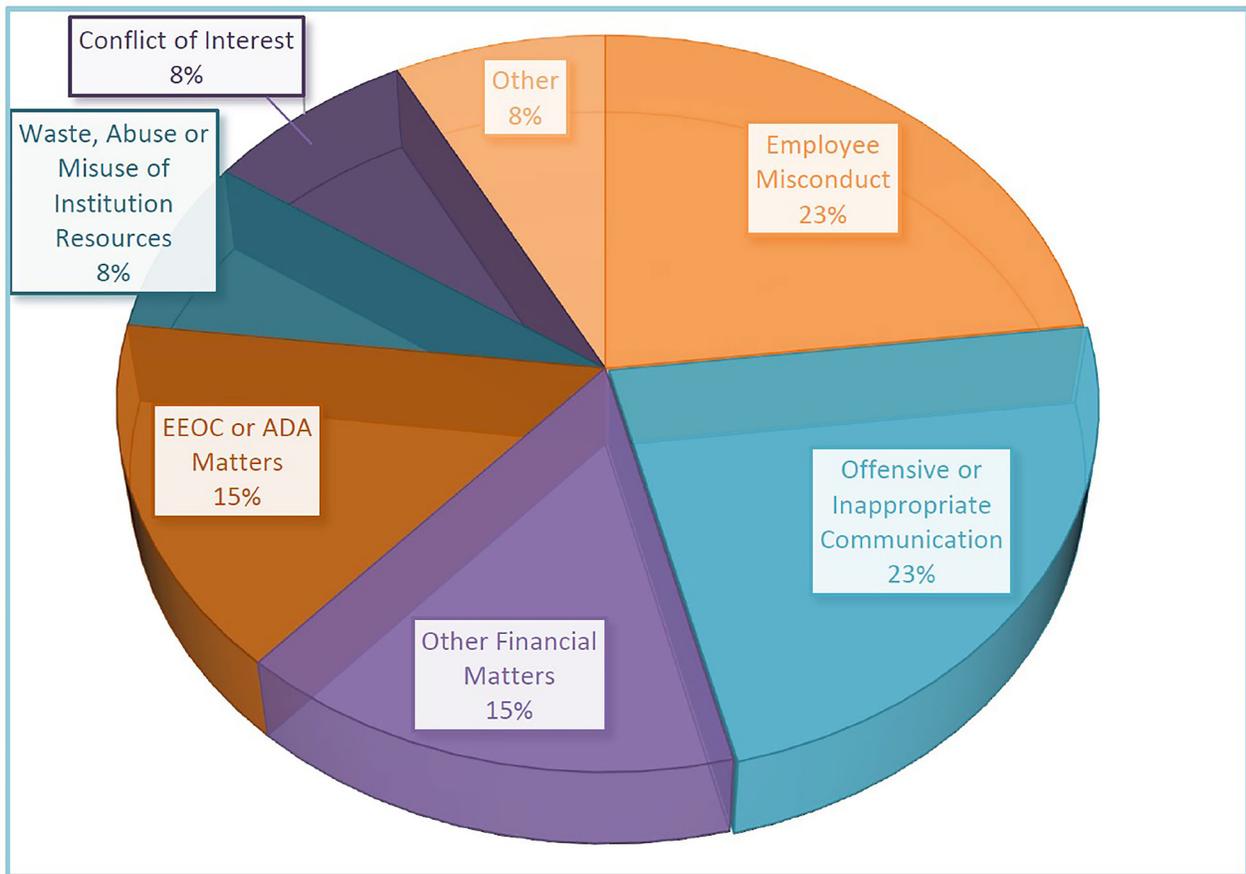
Closed Case Outcomes	Total
Referred	347
Unsubstantiated	56
Insufficient Information	36
Substantiated	13
Frivolous	1
<b>Grand Total</b>	<b>453</b>

**Closed Cases - Investigations with Substantiated and Unsubstantiated Findings**

In 2020, a total of 69 of the 453 cases were closed after an investigation was conducted by University Compliance, Ethics, and Risk, University Audit, or the Office of Institutional Equity, with the following outcomes:

**Substantiated Cases**

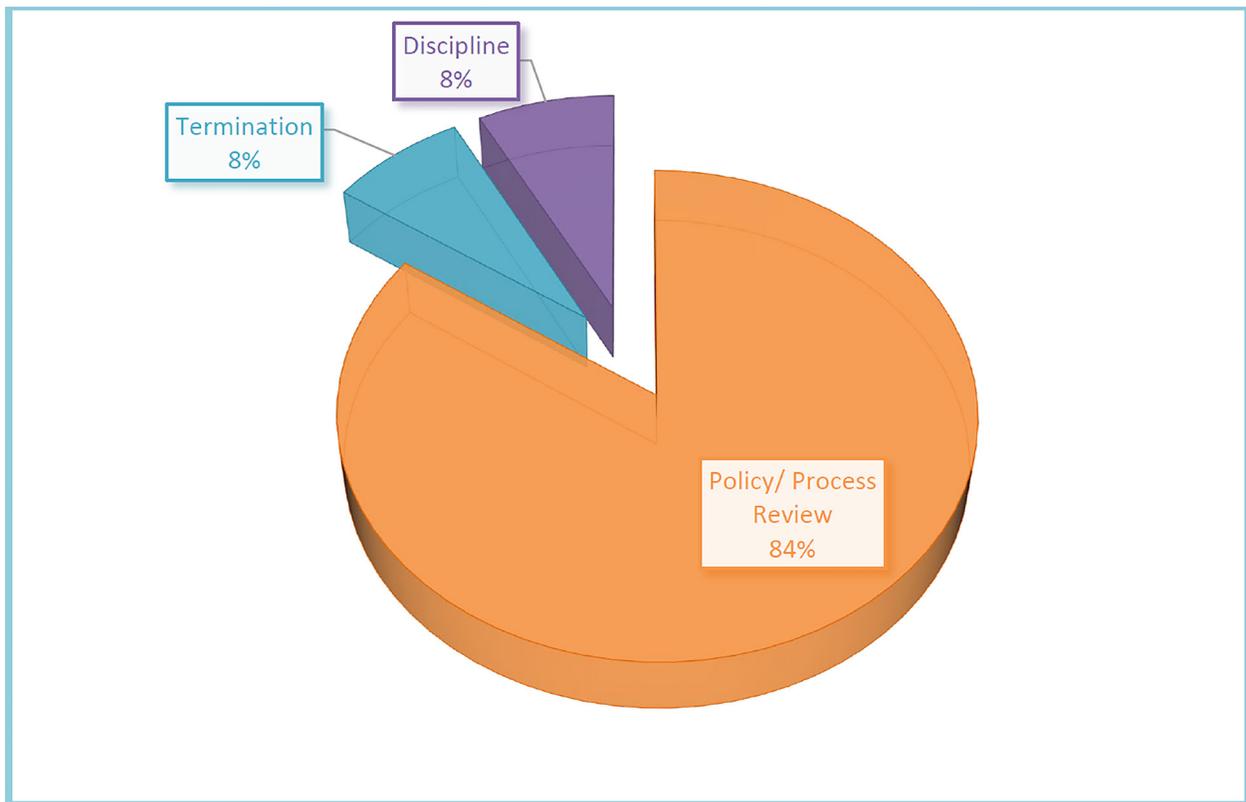
Thirteen investigations resulted in a substantiated finding (representing 3% of all closed cases) where investigations yielded evidence to support the complaint and a finding that misconduct occurred. The substantiated cases spanned a range of topics, with the highest in the categories of Offensive or Inappropriate Communication and Employee Misconduct at 23% each.



Primary Issue	Total
Offensive or Inappropriate Communication	3
Employee Misconduct	3
Other Financial Matters	2
EEOC or ADA Matters	2
Waste, Abuse or Misuse of Institutional Resources	1
Conflict of Interest	1
Other	1
<b>Grand Total</b>	<b>13</b>

### Substantiated Cases - Action Taken

For the 13 investigations that resulted in substantiated findings, the university took the appropriate action. Those actions included policy / process reviews, disciplinary action and termination.



Action Taken	Total
Policy / Process Review	11
Discipline	1
Termination	1
<b>Grand Total</b>	<b>13</b>



### **Unsubstantiated Cases**

The remaining 56 investigations (12% of closed cases) conducted by University Compliance, Ethics, and Risk, University Audit or the Office of Institutional Equity yielded insufficient or no evidence to support that misconduct occurred and were closed with an unsubstantiated outcome. Despite the unsubstantiated finding, 17 of the cases resulted in recommendations for improvements such as a review in a policy, process, or training due to identified weaknesses.

### **Closed Cases - Referred, Insufficient Information, Frivolous**

Three hundred and eighty-four cases (384) were not investigated by University Compliance, Ethics, and Risk, University Audit or the Office of Institutional Equity and were either referred out of the system or to another office, closed due to insufficient information or marked as frivolous.

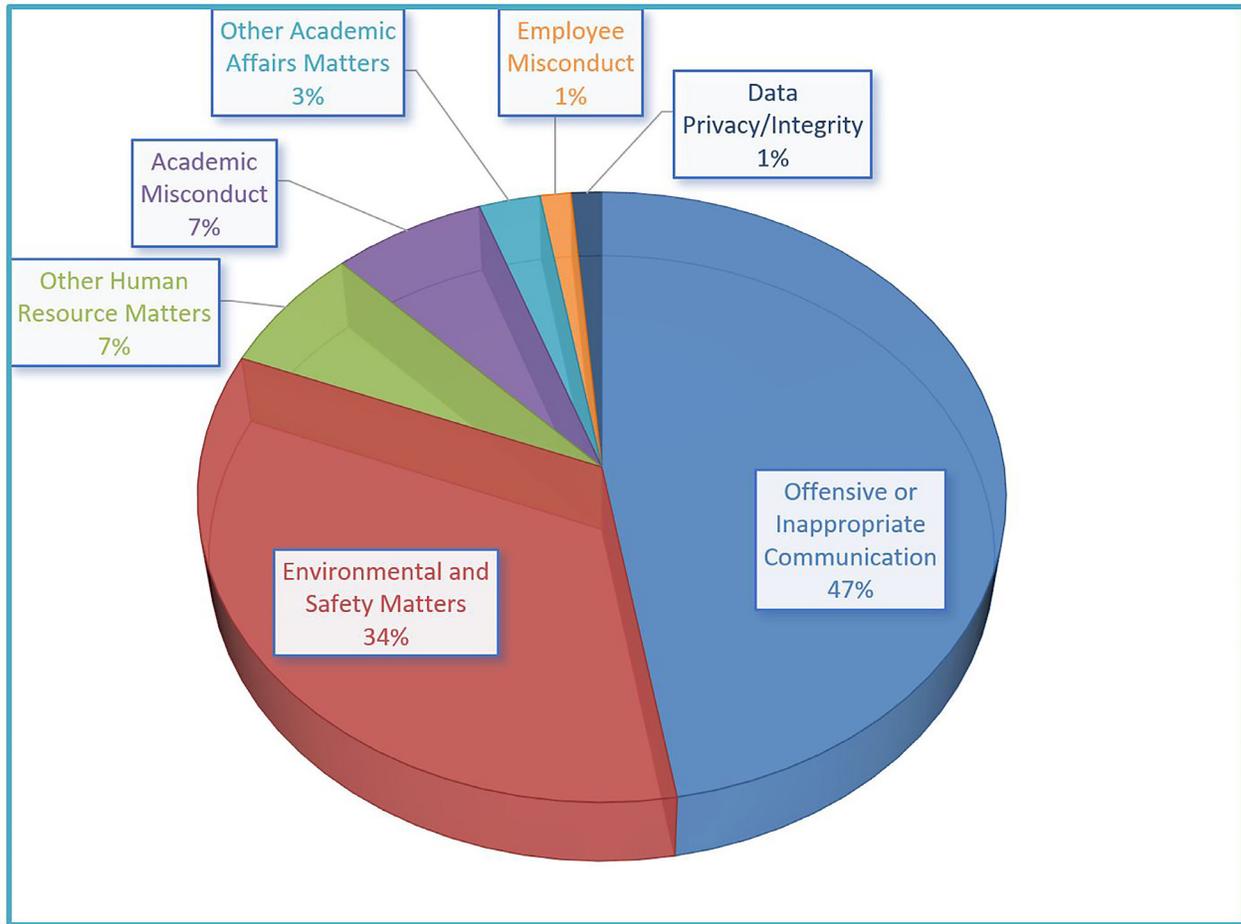
#### **Referred**

A total of 347 cases (77% of all closed cases) were referred as follows:

- » **Two hundred and ten cases** (210) were referred to the UCF Police Department, Student Conduct, or another college or department to address through the appropriate university process and closed out in the IntegrityLine system. These cases span the range of issues involving student misconduct such as alleged alcohol or drug abuse, grade disputes, COVID-19 policy violations, and interpersonal conflicts. Once the report is referred to the appropriate office, it is closed in the IntegrityLine system with a message posted back to the complainant.
- » **The remaining 137** cases were referred to a college or department to conduct an internal review and report back their findings.

#### **Referred - Substantiated**

Seventy-four (74) of the cases reviewed internally by a college or department resulted in a **substantiated** finding with the following issue types.

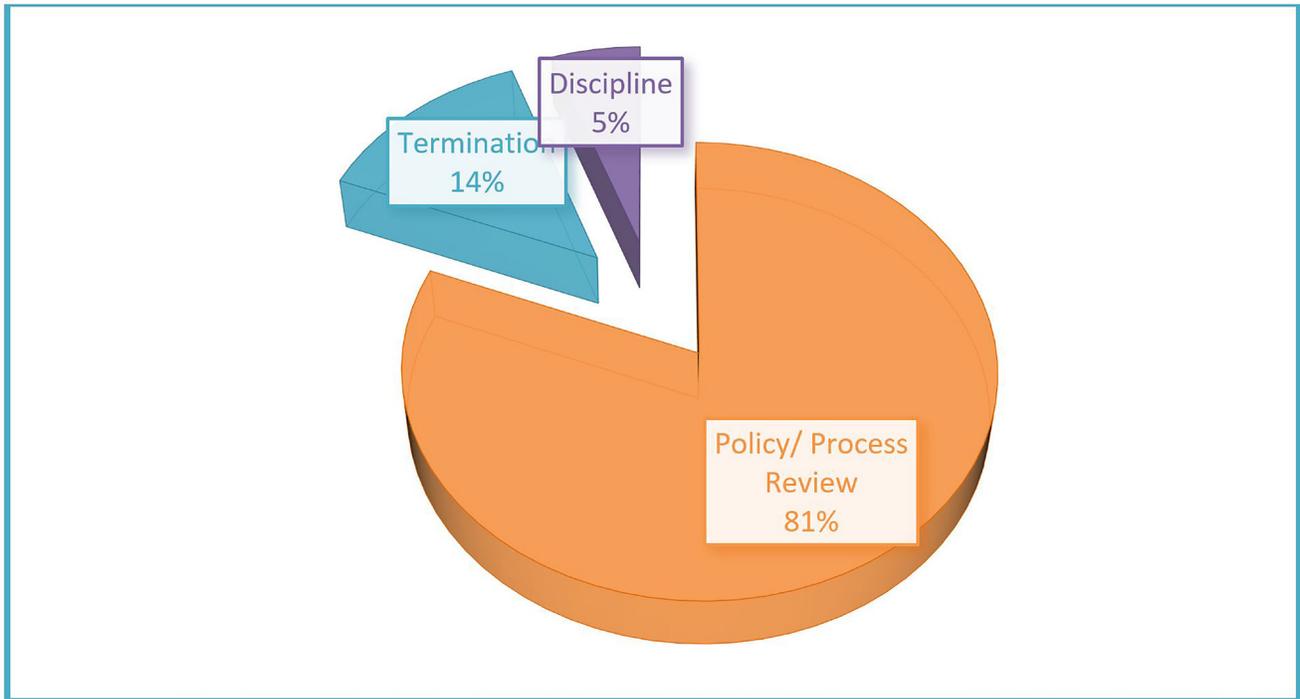


Primary Issue	Total
Offensive or Inappropriate Communication	35
Environmental and Safety Matters	25
Other Human Resource Matters	5
Academic Misconduct	5
Other Academic Affairs Matters	2
Employee Misconduct	1
Data Privacy/Integrity	1
<b>Grand Total</b>	<b>74</b>

**Referred – Substantiated - Action Taken**

The actions taken for the 74 referred investigations that were **substantiated** were as follows:





Action Taken	Total
Policy / Process Review	60
Discipline	4
Termination	10
<b>Grand Total</b>	<b>74</b>

### Referred - Unsubstantiated

The remaining 63 referred cases were **unsubstantiated**. However, 33 required improvements due to identified weaknesses which included policy or process reviews.

### Insufficient Information

For 36 cases (8% of all closed cases), questions were posted to the reporter requesting additional information with no response. These cases were closed due to insufficient information.

### Frivolous

One test case was submitted to evaluate system functionality, which resulted in removing an unnecessary question. This case was marked as frivolous and closed.

### Trends Identified

The UCF IntegrityLine received an unprecedented number of reports in 2020. The significant increase in reports this year was largely attributed to the pandemic



and the Armor Up awareness campaign which advertised the IntegrityLine as a mechanism to report allegations of non-compliance with the COVID-19 emergency policies. Also, in 2020 the university promoted the IntegrityLine for reporting allegations of non-compliance with UCF 2-004 Prohibition of Discrimination, Harassment and Related Interpersonal Violence Policy. As a result of these additional awareness campaigns, the highest number of reports submitted were those categorized as Environmental and Safety Matters with 251 reports representing 41% of all reports submitted. With 138 reports, representing 23% of all reports submitted, the second highest reported issue type was Discrimination or Harassment.

The third highest number of reports made to the IntegrityLine in 2020 were categorized as Offensive or Inappropriate Communication with 88 reports representing 14% of all reports submitted. This issue type includes concerns related to inflammatory, derogatory, unduly critical, or insulting communication and failure to treat one another with respect in accordance with the UCF Ethical Standards outlined in the UCF Employee Code of Conduct. In 2019, the office identified a trend of increased reporting and substantiated cases of Offensive or Inappropriate Communications. In response the office committed to evaluating the results of the 2020 Ethical Culture and Compliance Perception Survey while monitoring the IntegrityLine reports received that contained this issue type.

During 2020 the IntegrityLine continued to receive reports of Offensive or Inappropriate Communications and the results of the culture survey supported the need for the university to develop a strategy for improving respectful interactions in the workplace. In collaboration with Human Resources, the office developed a communication, education, and awareness campaign to address civility in the workplace. Since the initiation of the project, the following actions have been taken:

- » Human Resources delivered workshops titled *Civility at Work* (non-supervisors) and *Fostering a Civil Workplace* (supervisors) with the following completions:
  - Supervisors - 116
  - Non-Supervisors - 131
- » University Compliance, Ethics, and Risk
  - developed a brief training titled *Civility in the Workplace* for all employees during Compliance and Ethics Week and promoted the Human Resources civility workshops
  - added a module titled *Respecting Others* to the annual Code of Conduct training that is required of all non-student employees that is scheduled to launch on September 13, 2021

Additional communication and training will occur during FY 2021-22.



Compliance offices and partners conduct investigations or reviews when reports of concern are made directly to the department when appropriate, and when referred to them by University Compliance, Ethics, and Risk or University Audit. The compliance offices and partners below reported the following reviews during this report year:

<b>Compliance Office / Partner</b>	<b>Type</b>	<b>Reviewed</b>	<b>Substantiated</b>
Athletics Compliance	NCAA	8	6
Environmental Health and Safety	Other Risk and Safety Matters	1	0
Facilities and Safety	OSHA Violation	1	1
Health Affairs Legal Compliance	HIPAA	7	0
	Billing and Coding	1	0
Office of Institutional Equity	ADA Compliance, EEO, Title IX	106	33
Office of Research, Compliance Office	Research Misconduct	9	1
	Cybersecurity	1	1
	Conflict of Interest/Costing/Other	4	0
Student Conduct and Academic Integrity	Academic Misconduct	287	283
	Other Student Misconduct	1,022	161
UCF Police Department	Traffic Crash	11	7
	Standard of Conduct	11	9
	Body Worn Camera	3	1
	Radio Communications	1	0
	Damage/Destruction to University Property	1	1
	Pcard Guidelines	1	0
	Property/Evidence	1	0
	Traffic Administration	1	0
	Misc. Complaint	1	0
<b>Total Compliance Office / Partner Reports Reviewed and Substantiated</b>		<b>1,478</b>	<b>504</b>

# Monitoring of Compliance Efforts and Program Assessments

## Compliance and Ethics External Program Review

UCF contracted with Ethisphere, a global leader in ethical culture and program assessments, to conduct the university’s first Five-Year External Compliance and Ethics Program Review as required by Board of Governors Regulation 4.003 State University System Compliance and Ethics Programs. Ethisphere is the global company that awards the “World’s Most Ethical Companies” designation and uses its data from millions of interactions and the World’s Most Ethical Companies to perform benchmarking of programs. Ethisphere conducted the assessment using the Florida Board of Governors Effectiveness Survey Tool and Ethisphere’s own program assessment process. Based on Ethisphere’s assessment, the program “generally conforms” the highest rating available under the Florida Board of Governors Effectiveness Survey Tool. Based on Ethisphere’s proprietary evaluation methodology the program fits into the “solid, trending very strong category” indicating program practices and elements exceed Ethisphere’s expectations for best practices.

 <b>Design &amp; Effectiveness Review</b> <b>Summary Scorecard</b>		
Assessment Area	Summary Outcome	Assessment Area Driving Factors
Program Structure and Resources	Solid, Trending Very Strong	<ul style="list-style-type: none"> <li>+ Solid access and involvement with leadership, BoT, and functions</li> <li>+ Excellent use of committees and resources to improve program</li> <li>- Hire staff to assist with investigations</li> </ul>
Measuring Perceptions of Ethical Culture	Solid, Trending Very Strong	<ul style="list-style-type: none"> <li>+ Good perception of trust in program</li> <li>- Opportunity to add focus groups, interviews for feedback</li> </ul>
Written Standards	Solid, Trending Very Strong	<ul style="list-style-type: none"> <li>+ Strong and improved policy governance practices</li> <li>- Could update policy layout/content more frequently</li> <li>- Consider adopting supplier guidance</li> </ul>
Training and Communications	Solid, Trending Very Strong	<ul style="list-style-type: none"> <li>+ Excellent perception of program as resource</li> <li>- Opportunity to further empower managers as ethical role models</li> <li>- Empower managers to set tone and communicate about ethics</li> </ul>
Risk Assessment, Monitoring, and Auditing	Solid	<ul style="list-style-type: none"> <li>+ Excellent transparency around figures, relationships between functions</li> <li>- Single-system tracking could help with resources</li> <li>- Empower managers around reporting</li> </ul>
Enforcement, Discipline, and Incentives	Solid	<ul style="list-style-type: none"> <li>- Opportunity for coordination among investigative bodies</li> <li>- Need to formalize root cause</li> <li>- Consider E&amp;C performance feedback for staff evaluations</li> </ul>
Overall	Solid, Trending Very Strong	<ul style="list-style-type: none"> <li>+ Hyper-efficient use of available resources</li> <li>+ Solid improved framework for future execution</li> <li>- Opportunity to improve resources for investigations and support staff</li> </ul>

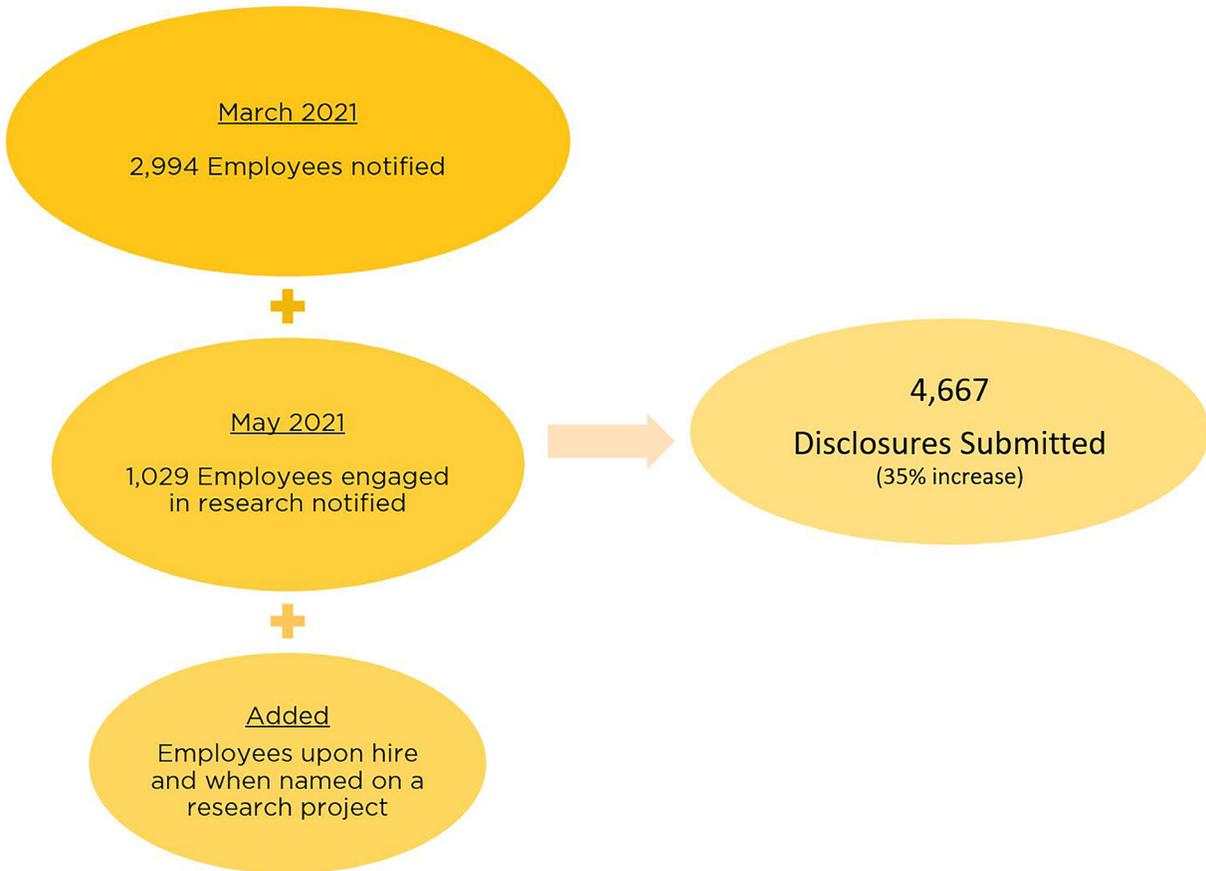
■ = Needs Attention     
 ■ = Needs Attention, but Trending to Solid     
 ■ = Solid     
 ■ = Solid, Trending Very Strong     
 ■ = Very Strong

\*Solid equals meeting best practice expectations.

## Outside Activity, Conflict of Interest and Commitment Disclosure Reporting

University Compliance, Ethics, and Risk oversees the online outside activity and potential conflict of interest and commitment disclosure reporting. The opening of the reporting system was delayed this year to allow for the changes required under new legislation. There were two launches for this year’s online disclosure reporting.





In addition to the total number of disclosures submitted, there were 95 amendments received. For each disclosure with at least one outside activity reported, University Compliance, Ethics, and Risk conducted a review - there were 1,368 reviews completed by the office (15% increase from last year). Of those reviewed, 72 required a monitoring plan or annual update based on potential conflicts identified. The report year closed with 78 disclosures under review.

For each positive response to the series of questions that were added to the online disclosure to comply with the new legislation, foreign influence red flag reviews were completed. By the end of the report year, 156 red flag reviews were completed. The following outlines the outcome of those reviews:

- » 139 were cleared with no concerns
- » 15 contained at least one red flag or potential risk which resulted in additional awareness provided to the faculty member and when it involved a High Risk Entity, additional awareness was provided to the department chair
  - One faculty member voluntarily ceased an activity as a result of the risks identified
- » Two potential red flag reviews were still under review

Reviews for potential conflicts were also performed outside the online system during the delay in launching the online disclosure. The office completed 293 requests for review of potential conflicts and 89 disclosures were reviewed through the Potential Conflicts Administrator email account (total of 382 COI reviews). The office also reviewed and provided feedback on 13 research exemption requests prior to coordinating with the provost, president, and Chair of the Board of Trustees for approval as required by state statute.

## Youth Protection Program – New Squire Registration System



— Design by All-free-download.com —

### What is a Squire?

The historical definition of squire is a young nobleman acting as an attendant to a knight before becoming a knight himself. In honor of our Knights, and all of the squires attending our youth programs here at UCF, we honor you by naming our new Youth Protection Program registration system *Squire*.

During this report year, the office launched the newly developed online registration system “Squire” to process youth program registrations and monitor compliance with the Youth Protection Policy requirements. At the start of this report year there were few youth programs occurring due to COVID-19. Seven programs were converted to virtual platforms prompting changes to requirements including a new Online Participant and Parent Code of Conduct form and Online Participant Agreement and Waiver of Liability form. Additionally, program staff were required to submit to the Program Sponsor a signed Online Program Staff Code of Conduct form.

In August 2020, when in-person youth programs were permitted with limitations under the Emergency Policy EP-20-2 Event Planning and COVID-19 Considerations, additional requirements for in-person programs were implemented which included revisions to the Participant Agreement and Waiver of Liability to include language pertaining to COVID-19.

Throughout the report year, the office:

- processed 66 registrations (19 online/virtual and 47 in-person) through the new system
- provided guidance to departments regarding Youth Protection Policy requirements
- facilitated two Youth Protection Program Q&A Zoom sessions (for a total of 56 Program Sponsors)
- provided two presentations on the State of Florida mandatory child abuse and neglect reporting requirements and how to recognize the signs of abuse
- Coordinated with EICRT to develop COVID-19 requirements for in-person youth programs to include the submission of a COVID-19 proposal. Sent four updated notices to all youth program sponsors
- Reviewed and approved 11 non-athletic youth program proposals and presented 10 athletic youth program proposals to EICRT for approval

### **Additional Monitoring Efforts**

During this report year, University Compliance, Ethics, and Risk conducted a six-month review and status update for the Post Investigation Action Plan items and conducted two Data Protection Impact Assessments.

The office continued its oversight of compliance requirements associated with the acceptance of CARES Act and associated funding, updating the compliance matrix with each tranche of funding, and periodic follow ups to obtain updates to the status of compliance efforts . At the request of the Board of Governors, the office coordinated with University Audit to prepare and submit a summary overview of the university's efforts in monitoring these funds.

### **Monitoring Activities by Compliance Offices and Partners**

The Athletics Compliance Office faced new challenges in 2020 with COVID-19 protocols in place limiting face-to-face interaction with coaches, staff, and student-athletes. To encourage continued engagement with coaches and staff, the office utilized video conferencing software for meeting and education requirements. During the reporting period over 100 virtual coaches' meetings were held. Entering the Spring term, with 15 sports competing, the office emphasized a greater presence at practice and competition, as well as continued efforts to meet with coaches and staff virtually. The Athletics

Compliance Office staff attended 55 practices and 72 competitions to monitor for NCAA compliance. In addition to monitoring each sport at UCF, the Athletics Compliance Office reviews the regular completion of compliance questionnaires by the Office of Academic Services for Student-Athletes.

In 2020-21, the Office of Institutional Equity continued its work to implement the recommendations set forth in University’s Audit’s internal audit report related to website accessibility at UCF. In response, the office filled a new position responsible for monitoring ADA compliance at the university.

Environmental Health and Safety completed inspections of 4,788 fire extinguishers and assisted with fire drills at the residential halls. Additionally, the department assisted the State Fire Marshal with 256 building inspections, performed inspection and servicing of 180 automated external defibrillators, and serviced 1,521 first aid cabinets.



The Office of Research, Compliance Office conducted multiple internal compliance reviews over the reporting period. These reviews included:

- random reviews of selected Institutional Review Board (IRB) approved human subject research protocols by non-IRB staff. Results of these reviews were submitted to the IRB for program evaluation and to determine if any actions were needed;
- reviews of conflict of interest disclosures related to research proposals to identify conflicts and if additional monitoring was necessary;
- allowable costs assessments on random sponsored projects; and
- property and subrecipient monitoring assessments for UCF’s Arecibo Observatory.

In addition, the office conducted a cost summary analysis for all assets constructed using contract and grant funds prior to entry into the university’s inventory system.



The Office of International Collaboration and Export Control monitored five labs that were under Technology Control Plans during the year. All labs were confirmed in compliance with federal export control regulations and university policies. In collaboration with University Compliance, Ethics, and Risk and the Office of Research, Compliance Office, conducted 28 foreign influence assessments, 16 of which led to full investigations.

The UCF Information Security Office continued efforts this year to assess, report, and provide system owners with migration methods for vulnerabilities and compliance related issues on internet facing data center systems. The office also conducted Payment Card Industry's Data Security Standards (PCI DSS) compliance reviews and self-attestations for reporting purposes. This year a third-party security firm was hired to conduct a compliance review and identify gaps in the university's preparedness for NIST 800-171 and Cybersecurity Maturity Model Certification (CMMC) compliance and to conduct a review of general UCF IT and information security programs, policies, and procedures. UCF's Offensive Security Team also conducted internal penetration testing of UCF owned information systems to manage any areas where a breach may occur.



The Registrar conducted security role checks on security authorizers within the university's PeopleSoft system. Academic record change transactions are audited by a separate team in the Registrar's Office whereby supporting documentation is confirmed along with the appropriate updates in PeopleSoft. Grades processing is monitored to identify late changes to grade rosters that have already been approved. This identifies patterns for possible misconduct and/or inappropriate access.

In an effort to improve project delivery, customer satisfaction, and compliance, Facilities and Safety's Facility Planning and Construction unit developed an annual assessment. The results of this year's assessment found the department within 10% of the desired target. The Utility and Energy Services unit solicited third-party support to create a Risk and Resilience Assessment, and Emergency Response Plan to meet new EPA requirements of America's Water Infrastructure Act of 2018. Facility Operations conducted routine inspections of buildings and assets to identify any safety deficiencies and create work orders to correct any unsafe conditions. In addition, Life Safety and State Fire Marshall reports are distributed weekly to supervisors to track compliance with work orders and ensure timely completion.

The Office of Student Financial Assistance conducted various security risk queries on a regular basis to ensure the correct staff members were appropriately updating financial aid tables and/or files (i.e. satisfactory academic progress, disbursement overrides). The office also monitored security role changes to ensure the correct security profile was given to the appropriate staff member based upon their role in the office.

Health Affairs and Legal Compliance supported the periodic check of College of Medicine (COM) HIPAA security audits by external consultants and University Audit. The office conducted an annual review of payments to COM faculty, physicians, residents and researchers by companies in the health care sector, if any, as listed on Centers for Medicare and Medicaid Services' Open Payments database and reviewed security access controls within the UCF Health systems on a quarterly basis.

UCF's Central Human Resources Office reviewed and audited vendor payment contribution submission files prior to sending to external vendors to ensure the accuracy of the information in compliance with State of Florida retirement, benefit rates and other personnel requirements. Other regularly conducted audits included security checks with various systems for all Human Resources staff to reduce exposure to data breaches; daily queries for the removal of access to systems when an employee is terminated; FMLA recertification reviews; and an audit on classifications and compensation of one specific college. The Employee Relations and HR Compliance unit conducted a review of 45 Employment of Relatives forms for compliance with the university's policy 3-008 Employment of Relatives.

The Payroll unit within Central Human Resources conducted queries on a bi-weekly basis to identify potential payroll errors and gather information for various reporting. In addition, Talent Acquisition conducted an internal audit to evaluate compliance with university hiring procedures concerning the university's policy 3-011 Background Check and identified areas in need of additional training to improve outcomes. Talent Acquisition also reviewed over



600 hire requests to ensure hiring practices were consistent and in compliance with legal requirements; processed 2,878 background checks to mitigate the risk associated with negligent hiring; and reviewed 791 requests for exceptions to the university's hiring freeze. Additionally, continued to monitor compliance with employee retention requirements associated with the acceptance of CARES Act funding and provided periodic updates to University Compliance, Ethics, and Risk on those efforts.

UCF Global's International Student & Scholar Services team conducted monitoring of F and J visa students and scholars using institution reports and SEVIS to ensure compliance with all relevant laws. The office's Employment and Taxation unit reviewed H-1B personnel files bi-weekly to ensure H-1B compliance and the Finance and Human Resources units conducted daily accounting of English Language Institute student payments. UCF Global also completed PCI compliance reviews to ensure safekeeping of financial transaction records.

Undergraduate Admissions conducted periodical internal audits on all areas within the office through the use of queries and file reviews to maintain a high confidence that all regulations, policies and procedures were being followed as they related to application processing and evaluation, classification of residency for tuition purposes, and transfer credit evaluation. This effort was conducted throughout the recruitment and enrollment cycle.

The UCF Police Department conducted an annual inventory, examination, and unannounced inspection of the Department's Evidence section. The examination reviewed the department's conformance with agency controls, policies, and procedures. All findings and recommendations in the report were found to have been completed. The department also conducted an annual review of bias free policing. The purpose of the review was to determine department compliance with current laws prohibiting biased based profiling, review of General Order 5045 Bias Free Policing, and to confirm that any allegation involving biased-based policing was properly investigated and documented. The review conducted for the 2020 calendar year showed the department follows current laws prohibiting biased based profiling. An annual review and analysis of use-of-force was also conducted. The purpose was to identify and examine patterns and trends. Use-of-Force incidents that occurred during the 2020 calendar year were determined to be within policy with no identifiable patterns to indicate concerns of profiling, unreasonable force, and violations of law and department written directives.



## Enforcing and Promoting Standards Through Incentives and Discipline

The compliance and ethics program is promoted and enforced consistently through the application of appropriate incentives and, when necessary, appropriate disciplinary measures. University Compliance, Ethics, and Risk, in consultation with the president and the Board of Trustees Audit and Compliance Committee, provides guidance and recommendations for appropriate incentives and disciplinary measures to encourage a culture of compliance and ethics.

### Incentives

Three times per year, employees are recognized in an article in the *IntegrityStar* newsletter. This year we recognized two individuals engaging and empowering others to promote a culture of respect and inclusivity; the Ombuds Officer and Deputy Ombuds Officer for their efforts in supporting students, faculty, staff, alumni, and parents; and an Associate Dean for their efforts in handling referred IntegrityLine reports and promoting a Speak Up culture.

The office also engages employees annually to offer incentives for participating in its Compliance and Ethics Week awareness campaign. This year the office recorded the highest rate of involvement with 127 employees participating. Activities commenced during the week November 2-6, 2020, and included two engaging activities for employees to win prizes:

- Training - Developed and posted three short training videos representing the UCF Ethical Standards of Respect: Embracing Your Diversity, Unconscious Biases, and Civility in the Workplace - employees listened for a “keyword” to email to the compliance and ethics email account (Total videos watched: 351)
- “Selfie” Contest - Employees asked to submit a drawing or phrase that explains what one of the UCF Ethical Standards (Honesty and Integrity; Respect; Responsibility and Accountability; Stewardship) means to them (Selfies Submitted: 32)



Thirty-two employees were randomly selected to receive prizes for their participation.

Complimentary to the incentives offered by University Compliance, Ethics, and Risk, Environmental Health and Safety and the UCF Police Department host annual awards ceremonies to promote a culture of ethics, safety, and compliance at the university. The UCF Police Department issued a total of 41 awards to both department employees and to members of the university community.



## Appropriate Discipline

University Compliance, Ethics, and Risk provides guidance to supervisors and members of the senior leadership team on appropriate disciplinary action up to and including termination when misconduct, noncompliance, or criminal conduct is identified. As part of this process, University Compliance, Ethics, and Risk collaborates with Human Resources, the office of Contract Compliance and Administrator Support, and the Office of the General Counsel to ensure that supervisors provide disciplinary action consistently and in compliance with applicable laws, and university regulations and policies. It is the responsibility of the supervisor or appropriate senior leader to ensure that disciplinary action is implemented, including criminal charges when appropriate, and that other corrective actions are completed. As noted above in the UCF IntegrityLine annual report for 2020, substantiated cases of misconduct resulted in discipline including termination for 8% of the cases substantiated by a central investigative office and 19% of the cases substantiated by a referral to a college or department.

Circumstances of each substantiated case will differ therefore, discipline may range from improvement plans that include remedial training or verbal counseling, to formal discipline such as suspension of duties or termination from employment. The office monitors the completion of recommended corrective actions and escalates issues as appropriate to senior leadership, the president, and the Board's Audit and Compliance Committee. These efforts serve to ensure that the program remains effective, and that the university is taking steps to prevent the re-occurrence of misconduct, noncompliance, or criminal activity.







# University Compliance, Ethics and Risk Office

## 2021-22 Work Plan Status July 1, 2021 – September 30, 2021

UCF's comprehensive compliance and ethics program is based on the elements of an effective compliance program as set forth in Chapter 8 of the Federal Sentencing Guidelines, and as required by Board of Governors Regulation 4.003 State University System Compliance and Ethics Programs. The Guidelines and Regulation establish the minimum standards for effective programs. Each year, University Compliance, Ethics, and Risk submits an Annual Workplan to the Audit and Compliance Committee of the Board of Trustees detailing the office's efforts that support an effective program. This report contains the activities committed to in the office's 2021-22 Compliance and Ethics Annual Work Plan and includes the status of the activities during the period July 1, 2021, through September 30, 2021.

---

### **1. *Provide 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.

#### **COORDINATE AND CONDUCT BI-MONTHLY MEETINGS OF THE UNIVERSITY COMPLIANCE AND ETHICS ADVISORY COMMITTEE**

- Developed materials and chaired the Compliance and Ethics Advisory Committee meeting in September.
- Provided updates on the Five Year Program Review; the annual Conflict of Interest disclosure launch and completion rate; the launch of the annual Code of Conduct refresher training; the HB 7017 Foreign Influence working group; and the speaker series developed by the UCF Center for Ethics.
- Highlights from the compliance partners include submission of the 2021-22 Annual Security and Fire Safety Guide; submission of materials in response to the Office of Federal Contract Compliance Programs audit; an update on the Name, Image and Likeness law effective July 1, 2021; efforts to address academic misconduct and online companies targeting students; and an update on the Faculty Senate's intent to host a Civil Discourse Speaker series.

#### **CONDUCT QUARTERLY MEETINGS WITH COMPLIANCE PARTNERS AND SENIOR LEADERSHIP**

- Met with vice presidents, key administrators, the faculty athletics representative, and compliance partners to provide updates on compliance and ethics initiatives and discuss any concerns or issues.

**SERVE ON AND PROVIDE COMPLIANCE GUIDANCE TO THE TITLE IX WORKGROUP**

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

**SERVE ON AND PROVIDE GUIDANCE TO THE SECURITY INCIDENT RESPONSE TEAM AND INFORMATION SECURITY AWARENESS ADVISORY BOARD**

- Continue to serve as members of the Security Incident Response Committee and the Information Security Awareness Advisory Board to provide guidance on federal and state privacy and data breach requirements.

**SERVE AS MEMBERS OF AND PROVIDE GUIDANCE TO THE CLERY ACT COMPLIANCE COMMITTEE**

- Provided guidance and support to the Clery Compliance Analyst and served on the Clery Act Compliance Committee. Supported survey initiative to identify Campus Security Authorities at the university.

---

## **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.

**PREPARE AND DISTRIBUTE *INTEGRITYSTAR*, THE COMPLIANCE AND ETHICS NEWSLETTER**

- Developed and issued the July 2021 edition of the *IntegrityStar* focused on Data Privacy and Information Security including a cartoon and video, information on how to respond to requests for changes to personal data, summaries of updates to existing policies, and frequently asked questions.
  - Included articles titled *Recent Updates to UCF Policies Covering Data Security and Protection* and *Data Privacy and Security*.
  - “Case Corner” article covered the investigation process and outcome following the office’s receipt of a student complaint regarding a Family Educational Rights and Privacy Act violation.

**ADMINISTER AND PROMOTE THE UCF INTEGRITYLINE, REINFORCE EXPECTATIONS FOR NON-RETALIATION, AND CONTINUE COMMUNICATIONS DURING AND AFTER INVESTIGATIONS**

- Continued administration of the UCF IntegrityLine to include review and tracking of all reports, data compilation, trend review, and reporting.
- Promoted the UCF IntegrityLine in the July 2021 edition of the *IntegrityStar* newsletter; continued promoting efforts in compliance videos; on the University Compliance, Ethics, and Risk website; on the websites of all compliance partners; and during new faculty orientation.
- Continue to serve on the Student Reporting work group to discuss reporting options for students, including the IntegrityLine, and to further develop the reporting options website.

#### **COORDINATE TIMELY RESPONSES TO REGULATORY AND OTHER EXTERNAL AGENCIES**

- Collaborated with the Office of Research Compliance and the Office of the General Counsel to review and prepare the response to an inquiry by the National Science Foundation (NSF). NSF subsequently dismissed the case.
- Coordinated the response to an ongoing investigation by NSF and the U.S. Department of Energy (DOE).

#### **MAINTAIN AND PROMOTE THE COMPLIANCE AND ETHICS WEBSITE**

- Promoted the compliance and ethics website in the University Compliance, Ethics, and Risk pamphlets distributed to all new employees during new employee orientation and the employee benefits fair.
- Updated the website to include the July 2021 edition of the *IntegrityStar* newsletter and the 2021-22 Annual Workplan. Revised the Conflict of Interest page with updated forms, supplementary documentation, and tutorial in preparation for the 2021-22 disclosure year. Also updated staff on the Our Staff page and the list of Compliance and Ethics Advisory Committee members.

#### **DISSEMINATE COMPLIANCE AND ETHICS PROGRAM INFORMATION AND EDUCATIONAL MATERIALS DURING NEW FACULTY ORIENTATION AND THE BENEFITS FAIR**

- Provided the UCF Employee Code of Conduct, a Compliance and Ethics webinar, office brochure, privacy compliance brochure, Speak Up wallet cards, and UCF IntegrityLine Speak Up earbuds for new faculty orientation.
- Provided the UCF Employee Code of Conduct, office brochure, privacy compliance brochure, and IntegrityLine Speak Up poster for the 2021 Virtual Benefits Fair.

---

### **3. *Conduct Effective Training and Education***

---

Educate the UCF community on its compliance responsibilities and regulatory obligations, and on the university compliance and ethics program.

#### **DELIVER AND TRACK NEW EMPLOYEE COMPLETION OF MANDATORY CODE OF CONDUCT AND POTENTIAL CONFLICTS – FLORIDA CODE OF ETHICS FOR PUBLIC OFFICERS AND EMPLOYEES TRAINING**

- Total number of new employees who took the online courses and passed the final quiz:
  - Employee Code of Conduct / Speak Up! = 1,181
  - Potential Conflicts – Florida Code of Ethics for Public Officers and Employees = 1,110

**PROVIDE ETHICAL LEADERSHIP TRAINING** Provided in-person Ethical Leadership training to supervisors as part of Human Resources' Supervisory Skills training series.

#### **LAUNCH SEVENTH ANNUAL COMPLIANCE AND ETHICS WEEK AWARENESS CAMPAIGN**

- Planning activities for Compliance and Ethics Week, November 8-12, 2021, that will include three superhero themed training videos and an activity on various compliance and ethics topics. Received donations from university departments and Direct Support Organizations for prizes to be distributed to employees who participate.

**PROVIDE SUPPORT TO CLERY COMPLIANCE ANALYST ON LAUNCH OF CAMPUS SECURITY AUTHORITY (CSA) IDENTIFICATION PROCESS AND LAUNCH OF NEW ONLINE TRAINING COURSE**

- Assisted with follow up and encouraged survey responses. A reminder email will be sent in October to all employees requesting they complete the survey if they have not already done so.
- Provided additional context to personnel on the survey questions as requested.
- As of September 30, there were 995 employees who responded to the survey, and 222 have self-identified as a CSA.

**PROMOTE GIFTS AND HONORARIA AND POTENTIAL CONFLICTS ONLINE TRAINING MODULES FOR CURRENT EMPLOYEES AND TRACK EMPLOYEE COMPLETION**

- Continue to promote the online training modules to employees.
- Total number of existing employees who took the online courses and passed the final quiz:
  - Gifts and Honoraria = 8
  - Potential Conflicts – Florida Code of Ethics for Public Officers and Employees = 242

**ISSUE ANNUAL MEMO ON VULNERABLE PERSONS ACT**

- Next annual memo to be distributed March 2022.

**DEVELOP AND LAUNCH MANDATORY ANNUAL CODE OF CONDUCT TRAINING WITH CERTIFICATIONS FOR NON-STUDENT EMPLOYEES AND MONITOR COMPLIANCE FOR COMPLETION**

- Annual Code of Conduct training with certifications for all non-student employees launched on September 27, 2021, with completion requested by October 27, 2021.
- Automated reminder emails have been scheduled to go weekly to those employees who have not yet completed the training.
  - Course completion as of September 30, 2021
  - English version – 1,814 (26.38%)
  - Spanish version – 35 (45.45%)

**MONITOR COMPLIANCE WITH COMPLETION OF THE YOUTH PROTECTION ONLINE TRAINING MODULE AS REQUIRED BY POLICY**

- As required Youth Protection training was completed by 183 program staff working with minors.

**IN PARTNERSHIP WITH THE INFORMATION SECURITY OFFICE, DELIVER MANDATORY SECURITY AND PRIVACY AWARENESS TRAINING, TRACK EMPLOYEE COMPLETION, AND LOOK FOR OTHER AVENUES TO RAISE SECURITY AND PRIVACY POSTURE**

- Worked with the Information Security Office to design the Insider Threat Awareness campaign, also creating privacy awareness content for the campaign

**IDENTIFY ADDITIONAL OPPORTUNITIES TO DEVELOP AND DELIVER COMPLIANCE AND ETHICS TRAINING**

- Attended the Chairs and Directors Excellence Program meeting to deliver an overview of the office, the IntegrityLine and Conflict of Interest and Commitment programs. There were 44 faculty members in attendance.
- Attended the Staff Advisory Council (SAC) meeting to deliver training regarding solicitation/gifts statutes followed by a Q&A session. There were 43 SAC members in attendance.

- Attended the UCF Learning and Development Co-op meeting and the Co-op Collaboration Competency subgroup meeting to identify gaps in training opportunities based on the measures within the employee performance appraisal documents.
- Collaborated with UCF Human Resources to develop training for upcoming Supervisors Training series and Panel discussion.
- With the Office of Research Operations, developed training for ancillary reviews, General Data Protection Regulation (GDPR) Decision Tool, GDPR Fundamentals, and Risk Matrix.
- Upon invitation, spoke to the Office of Research Operations – Sponsored Programs Team about Privacy Compliance.
- Developed a [Privacy guidance webpage](#) for the UCF Research Cyberinfrastructure website.
- Invited to co-present “Evaluating and Communicating the Effectiveness of Your Compliance Program” session at the National Association of College and University Attorneys Fall Continuing Legal Education Three Day Workshop.

**ISSUE ADDITIONAL REGULATORY ALERTS AND UPDATES AS APPROPRIATE**

- Communicated new draft Board of Governors Regulation 9.012 Foreign Influence to the Foreign Influence Working Group. Collected and submitted feedback upon request by UCF Institutional Knowledge Management.

---

#### ***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.

**CHAIR THE UNIVERSITY POLICIES AND PROCEDURES COMMITTEE AND PROVIDE GUIDANCE ON POLICY DEVELOPMENT**

- Chaired the University Policies and Procedures Committee. Provided coordination of the committee and management of the online Policies and Procedures Manual.
- Reviewed and edited policies and procedures prior to submission for approval to the committee. Worked directly with departments, provided guidance, and revised 17 policies to improve content and the communication of expectations to the university community.
- Developed and uploaded to the online policy library a Policy Glossary including all policy definitions.
- Met with the Faculty Senate president and committee leaders to discuss the policy process and acquire input for improving the process.

**CONTINUE TO ENFORCE UCF POLICY 2-001 UNIVERSITY POLICY DEVELOPMENT, WHICH REQUIRES ANNUAL POLICY REVIEWS BY DEPARTMENT AND MANDATORY FIVE-YEAR REVIEWS BY THE UNIVERSITY POLICIES AND PROCEDURES COMMITTEE**

- Continued progress on the five-year review project in compliance with UCF 2-001.5 University Policy Development to ensure that policies continue to be appropriate and current.

**SERVE AS MEMBERS OF THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA) COLLABORATIVE TO DEVELOP UNIVERSITY POLICIES AND PROCEDURES ON HIPAA COMPLIANCE**

- 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.
- Met with the Senior Coordinator and Contracts Manager and Associate General Counsel to finalize the HIPAA Compliance Policy and Policy Manual scheduled for review by the University Policies and Procedures Committee this fall.

---

**5. *Conduct Internal Monitoring and Compliance Reviews***

---

Identify and remediate noncompliance through proactive review and monitoring of risk areas.

**MANAGE UNIVERSITY-WIDE CONFLICT OF INTEREST AND COMMITMENT PROCESS**

- In preparation for the 2021-22 conflict of interest and disclosure process, developed and executed the Implementation and Communication Plan that included updated training modules, emails and resources posted to the website and the ARGIS disclosure system.
- On August 30, 2021, notified 3,813 employees by email to submit an online disclosure by September 29, 2021
  - 3,526 submitted within the deadline achieving a 93.7% compliance rate with employee submissions prior to the deadline
- Received and completed 13 reviews of potential conflicts of interest associated with the attendance at conferences or events sponsored by vendors.
- Reviewed and provided feedback on 12 research exemption requests prior to coordinating with the provost, president, and Chair of the Board of Trustees for approval as required by state statute.
- Received and completed 178 conflict of interest requests for employee and department assists.

**MANAGE UNIVERSITY-WIDE YOUTH PROTECTION PROGRAM**

- Processed 22 registration submissions (five virtual/17 in-person) approving 15 registrations and returning seven registrations back to departments to provide additional information.
- Compiled a list of frequently asked questions and posted to the Resources page of the Youth Protection webpage.
- Developed an “Open Lunch Permission Form” for program use that allows minor participants over the age of 15 to check in and out of a youth program for lunch with parent/guardian permission. Posted form to the Resources page of the Youth Protection webpage.
- Collaborated with Enterprise Risk and Insurance Management to develop camp insurance protocols for youth programs. Worked with the Squire vendor to revise the system to include an Insurance Portal for tracking compliance.

- Revised UCF Policy 2-005 Youth Protection to update language regarding background check screenings, registration procedures, and submission of a SAFE form, proof of insurance, and a required Safety Plan. Language was also updated to clarify minors working or volunteering for the university are not considered minors for the purpose of this policy. Draft revisions are currently being reviewed by university stakeholders.

#### **DEVELOP AND MANAGE UNIVERSITY-WIDE PRIVACY PROGRAM**

- Formed the Information Security & Privacy Advisory Committee and co-chaired the inaugural meeting.
- Initiated a data mapping project, created the UCF Personal Data Map Template and met with UCF departments to generate the mapping exercise.
- Updated the Data Subject Access Request process.
- Researched applicable laws regarding website cookies and conducted a review of approaches to cookies banners in higher education including benchmarking UCF operational, University Innovation Alliance, and Florida peers.
- Reviewed, provided guidance, and approved 39 contracts.

#### **CONTINUE COMPLIANCE PARTNER REPORTING**

- Compliance partners provided updates on their program activities during committee meetings and through separate meetings and discussions when significant issues and challenges arose.
- Compliance partner annual reports for 2021 were submitted and consolidated with the activities of University Compliance, Ethics, and Risk. The combined annual report was finalized for issuance during the November Audit and Compliance Committee of the Board of Trustees.

#### **REVIEW UCF INTEGRITYLINE AND DEPARTMENT DATABASE FOR TRENDS AND RISK AREAS AND ADDRESS APPROPRIATELY**

- In reviewing IntegrityLine case issue types submitted during this report period, identified the highest reported issue type as Offensive/Inappropriate Communication (24 out of 92 total submitted).

#### **REVIEW AND PROVIDE GUIDANCE ON THE ANNUAL SECURITY REPORT IN COMPLIANCE WITH THE CLERY ACT**

- Reviewed the annual security report and made recommendations for edits prior to releasing before the required deadline of October 1. Clery Compliance Coordinator to make edits.

---

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

---

Conduct timely investigations of allegations of noncompliance and provide guidance on corrective actions.

**RECEIVE AND EVALUATE UCF INTEGRITYLINE REPORTS AND ALLEGATIONS OF MISCONDUCT MADE DIRECTLY TO THE OFFICE; 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 92 reports through the UCF IntegrityLine alleging misconduct in this reporting period.
- Coordinated triage of reports with University Audit and the Office of Institutional Equity. When appropriate, reports were referred to a compliance partner or University Audit for review or investigation. During this time, 59 IntegrityLine cases were investigated and closed.
- During this time, two new reports of potential misconduct submitted directly to University Compliance, Ethics, and Risk were received and five cases that were under review were completed and closed.

**PROVIDE RECOMMENDATIONS FOR CORRECTIVE ACTIONS AND IMPROVEMENT OF ETHICAL CONDUCT**

- Continued providing recommendations for corrective actions and improvements of ethical conduct following investigations or requests for guidance.

---

**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.

**DEVELOP AND PROMOTE COMPLIANCE AND ETHICS INCENTIVE OPPORTUNITIES**

- Highlighted in the July 2021 edition of the *IntegrityStar* an employee from the Information Security Office for his contributions to communicate to students and employees the security threats that UCF faces and promote learning effective means to protect our data.

**PROMOTE AWARENESS OF UCF REGULATIONS, POLICIES AND PROCEDURES, AND REGULATORY REQUIREMENTS**

- Highlighted in the July 2021 edition of the *IntegrityStar* a total of nine new and revised UCF Policies and seven new and revised regulations that had been implemented.
- Distributed one campus email to all employees alerting them of the approval of four new, revised, and/or emergency policies.

**PROMOTE ACCOUNTABILITY AND CONSISTENT DISCIPLINE**

- Following investigations with outcomes of substantiated employee misconduct, provided recommendations for appropriate discipline to ensure accountability and consistency in corrective actions.
- Continued serving as the point of contact and source for guidance to research compliance related to scientific misconduct, export controls, conflict of interest, and development of policies and procedures.

---

## **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.

### **DEVELOP AND ISSUE THE UNIVERSITY COMPLIANCE, ETHICS, AND RISK ANNUAL REPORT**

- Compiled and designed the annual report for 2020-21 which included the activities of our compliance partners and programs across the university. The report will be issued in November 2021 to the Audit and Compliance Committee of the Board of Trustees and submitted to the Board of Governors (BOG) as required by BOG Regulation.

### **IMPLEMENT IMPROVEMENT MEASURES IDENTIFIED IN THE FIVE-YEAR COMPLIANCE AND ETHICS PROGRAM REVIEW**

- Developed and implemented action plan to address each recommendation.
- Job description for proposed hire of an additional compliance investigator was created and approved by Human Resources. Once funding is obtained, the position will be filled.
- Manager intake form created and circulated to investigative offices for feedback. Manager training session in coordination with Human Resources, Ombuds Office, and investigative offices in progress.
- Working with Procurement Services, evaluating the recommendation to consider implementing a Supplier Code of Conduct.

### **LAUNCH FOURTH COMPLIANCE AND ETHICS CULTURE SURVEY TO BENCHMARK RESULTS AGAINST PRIOR YEAR'S RESULTS IN 2016, 2018, AND 2020**

- Development of an implementation and communication plan is in progress. The survey will be issued in March 2022.

### **DEVELOP, MEASURE, AND TRACK DEPARTMENT PROCESS IMPROVEMENT EFFORTS USING THE UNIVERSITY ASSESSMENT PROCESS**

- The 2020-21 results report and 2021-22 assessment plan were submitted and are under review by the Divisional Review Committee.
- For this year's plan and to support a five-year program review recommendation, added an improvement measure to track IntegrityLine case closure times with the goal to reduce the time it takes to close cases.

---

## **9. New Regulations and Special Projects**

---

### **OVERSEE COMPLIANCE EFFORTS WITH NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY 800-171 (NIST) FEDERAL REQUIREMENTS**

- Continue as an active participant within UCF's NIST working group.
- Continue as an active participant in the NIST Privacy Workforce Public Working Group (PWWG).

#### **OVERSEE COMPLIANCE EFFORTS WITH THE ACCEPTANCE OF CARES ACT FUNDING**

- Continued periodic follow-ups to obtain updates to the matrix containing the requirements associated with the acceptance of CARES Act funding and the plan for addressing each. Revised the matrix for each tranche of funding received and communicated with stakeholders to ensure compliance was maintained.

#### **OVERSEE COMPLIANCE EFFORTS WITH EUROPEAN UNION GENERAL DATA PROTECTION REGULATION (GDPR)**

- Worked with the Office of Research Operations to develop a GDPR Decision Tool and Fundamentals (Awareness) document.
- Worked with the Office of Research Operations to develop ancillary review criterion for research projects involving GDPR data.
- Reviewed CITI Training on GDPR for the Office of Research and provided feedback.
- Reviewed, provided guidance, and approved contracts and reciprocal student exchanges (RSEs) involving GDPR data.

#### **WORKING WITH THE OFFICE OF RESEARCH COMPLIANCE, CUSTOMIZE HURON SOFTWARE TO ACCOMMODATE ONLINE OUTSIDE ACTIVITY AND CONFLICT OF INTEREST AND COMMITMENT REPORTING**

- Participated in weekly meetings with Huron and Office of Research Core Team to complete the following actions:
  - Customized Huron Smartforms with UCF questions and disclosure profile categories
  - Identified workflow needs
  - Determined deployment approach
  - Established system setting and integration needs
- Core Team met with the faculty committee to review the draft Smartforms and based on feedback, revised the forms for further review.

#### **OVERSEE COMPLIANCE EFFORTS WITH THE IMPLEMENTATION OF HB 7017 FOREIGN INFLUENCE**

- Established Foreign Influence Working Group and led bi-weekly meetings to discuss implementation of the new statutes. Subgroups also formed which meet more frequently to establish processes and procedures to comply with the new statutes.
- Developed compliance matrix to track completion of action items to ensure compliance with each new section of statute:
  - 286.101 Foreign Gifts and Contracts
  - 288.860 International Cultural Agreements
  - 1010.25 Foreign Gift Reporting
  - 1010.35 Screening Foreign Researchers
  - 1010.36 Foreign travel; research institutions
- Updated and distributed the matrix weekly with most current status and progress on compliance efforts.
- Coordinated compliance efforts in collaboration with the SUS schools and the Board of Governors Inspector General's office during SUS Compliance and Ethics Consortium special meetings.
- Developed procedures, processes and a reporting template for reporting required under 1010.25 Foreign Gift Reporting led by this office.

**WORKING WITH HUMAN RESOURCES, CONTINUE TO EVALUATE AND DEVELOP A COMMUNICATION, EDUCATION, AND AWARENESS CAMPAIGN TO ADDRESS INCREASED REPORTS OF OFFENSIVE OR INAPPROPRIATE COMMUNICATION**

- Customized a Respecting Others short video training that addresses civility in the workplace and included the mini-series in the 2021 Code of Conduct refresher training deployed on September 27, 2021.
- Working with the co-founder of the UCF Center for Ethics, invited a researcher specializing in civility to speak on the topic during the Center's speaker series initiative. Continue to work with the Center to identify additional speakers for the series.



Board of Trustees  
Audit and Compliance Committee  
November 16, 2021

## DISC-2: University Audit Update

---

Information

Discussion

Action

Meeting Date for Upcoming Action: \_\_\_\_\_

### Purpose and Issues to be Considered:

The Committee should review the attachment in advance to prepare for any discussion among committee members, UCF’s Chief Audit Executive, and other members of UCF management. This discussion may relate to completed activities and proposed future activities of the internal audit function along with management’s plans for changes to their objectives, key processes, and related internal control activities.

### Background Information:

In accordance with the UCF Audit and Compliance Committee Charter, the Committee will meet on a periodic basis to fulfill their oversight responsibilities. The attached document is intended to provide the committee with information regarding the work of University Audit to assist the committee in successfully completing their oversight duties.

### Recommended Action:

No recommended actions required.

### Alternatives to Decision:

N/A

### Fiscal Impact and Source of Funding:

N/A

### Authority for Board of Trustees Action:

N/A

---

Contract Reviewed/Approved by General Counsel  N/A

Committee Chair or Chair of the Board has approved adding this item to the agenda

### Submitted by:

Robert Taft, Chief Audit Executive

### Supporting Documentation:

Attachment A: University Audit Update

### Facilitators/Presenters:

Robert Taft, Chief Audit Executive



# University Audit Update November 16, 2021

---

# Agenda

1. Project status update
2. Upcoming schedule
3. Staffing update
4. Department scorecard
5. Other information



## Project status update

Project	Status
• Student Academic Integrity audit	<i>Draft report provided to audit client</i>
• Data Centers audit	<i>Fieldwork wrapping up/Issuing separate memos</i>
• Investments audit	<i>Draft report provided to audit client</i>
• Faculty Clusters audit	<i>Entrance Conference held/In Planning phase</i>
• CARES Act review	<i>Continuing to monitor expenses and external report filing/Second memo forthcoming</i>
• Roth Athletic Center monitoring project	<i>Targeting closeout with Certificate of Occupancy issued/Project Closeout Draft Memo prepared</i>
• Board of Governors Direct Support Organization internal controls review	<i>Supporting January 2022 Crowe fieldwork/Completion of Internal Control Questionnaires</i>
• Performance Based Funding metrics review	<i>Fieldwork in progress</i>
• KnightVision	<i>Engaged on multiple fronts</i>

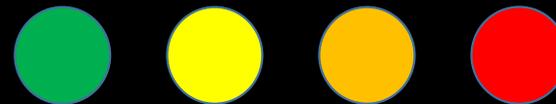
# Audit Report & Scoring Methodology Change

## Old format:

- Eleven-point scale (0 to 10)
- Focus on residual risk
- Twelve criteria in scoring model
- Numeric scores on a gradient-colored heat map

## New format:

- Results – four levels
- Focus on required actions
- Nine criteria in scoring model
- Non-numeric symbols where one of four is calculated



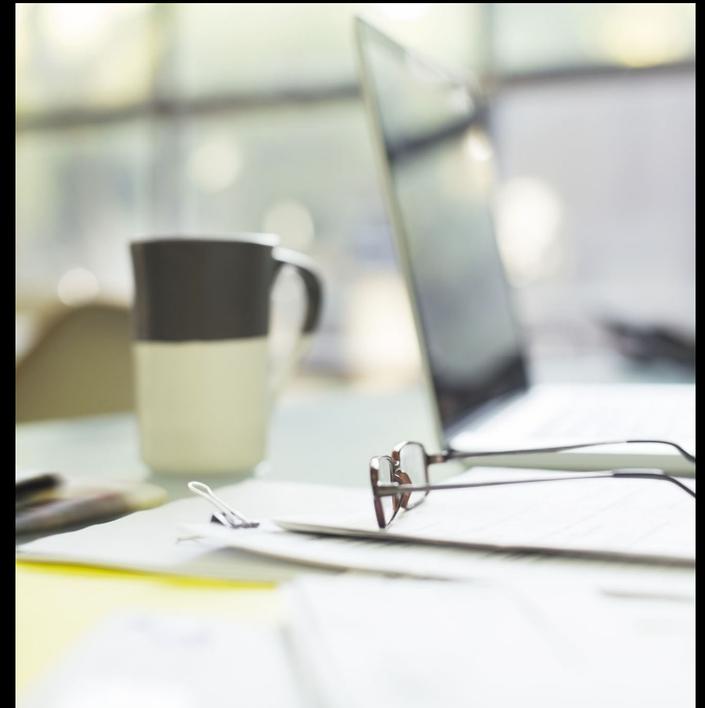
# Planned audit projects

<b>Project</b>	<b>New Information</b>
AIM Construction	<i>Recent Huron project on Facilities covering topic—may defer audit while those recommendations are implemented</i>
Downtown Campus	<i>Enrollment, real estate, Valencia faculty teaching UCF courses</i>
Career Services	<i>Noted career services personnel at individual colleges &amp; central office- review level of services and related coordination</i>
Export Controls	<i>Deferred for multiple audit cycles per management request/New Background Check vendor</i>
College of Engineering and Computer Sciences	<i>No update</i>
UCF Foundation	<i>New reserve and credit card policies, Gravity software pilot project</i>

# Staffing Update

---

- IT Auditor 1—Alan McMillian hired with November 1 start date
- All budgeted staff positions have been filled
- Four UCF student interns engaged for Crowe Board of Governors Direct Support Organization project
- Attendance at Association of College and University Auditors Annual Conference
- Attendance at Society of Compliance and Ethics Certification Bootcamp
- Attendance at Institute of Internal Auditors Tools and Techniques training



# Scorecard Intent

Goal—*To better implement our mission and vision.*

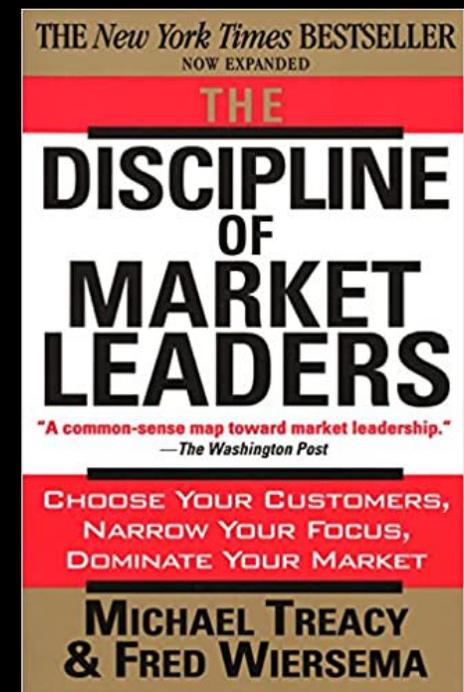
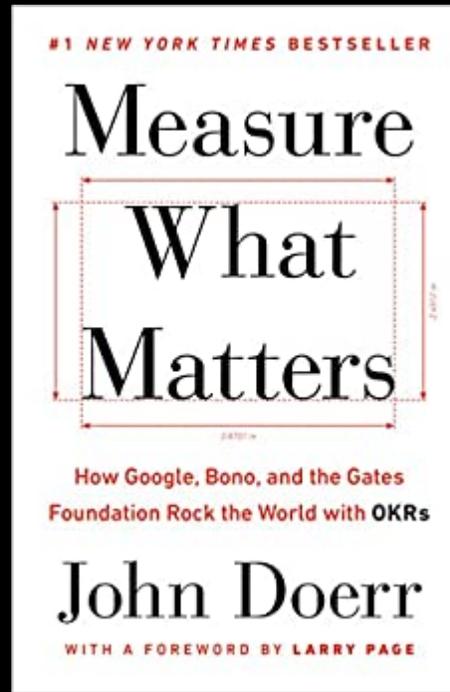
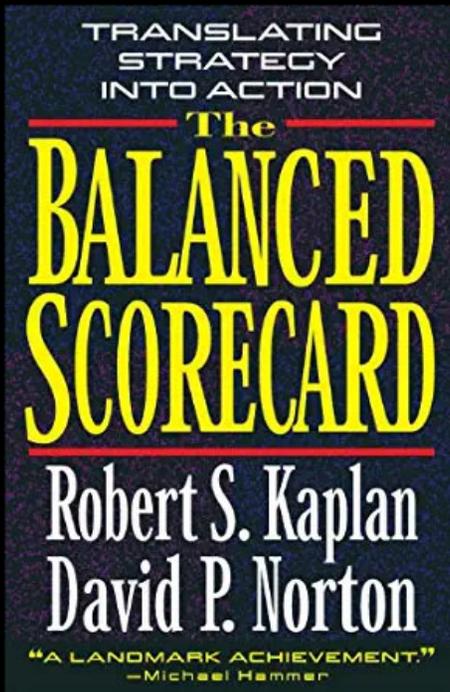
## Mission

“As a trusted advisor, we help the UCF community achieve their purpose by doing the right things in the right way at the right time.”

## Vision

“Transform ideas into effective action and efficient results”

What do we do, why is it important to UCF and how can we measure progress?



# Scorecard Resources

# Scorecard Themes

Balanced Scorecard	Criteria	Key Performance Indicators (KPI) Concept
Financial	Better	Operational Excellence
Customer	Faster	Produce Leadership
Internal Processes	Cheaper	Customer Intimacy
Employee Learning and Growth	Smarter	=====

# KPI Examples

	KPI Description	Balanced Scorecard Category	Criteria (Better, Faster, Cheaper, Smarter)	KPI Theme	Annual Target/Goal
1	Percentage of staff retained after 3 years of hire/within the next 3 years	Employee Learning & Growth	Smarter	Customer Intimacy	80% of staff
2	Percentage of projects where reporting is less than 33% of total project hours	Internal Processes	Better	Product Leadership	70% of projects
3	Percentage of staff participating on a key university search or project committee	Customer	Smarter	Customer Intimacy	80% of staff
4	Staff utilization rate	Internal Processes	Better	Operational Excellence	78% of total hours are used on non-administrative activities
5	Percentage of investigations where known reporter is interviewed within 14 days of contact	Internal Processes	Faster	Operational Excellence	90% of all investigations

## Other KPI's under consideration

- Office Electricity Usage
- Office Copier Usage
- Percentage of staff promoted or transferred internally after 5 years of hire
- Cost per hour of Continuing Professional Education or UCF Credit hour (include cost of course and related travel)
- Cost savings identified from process improvements or control adjustments
- Communication to Audit/Compliance committee between meetings
- Percentage of staff that complete all initiatives from their Individual Development Plans (IDP)
- Ratio of recommendations to total project hours
- Percentage of projects where audit client response is received in less than 30 business days
- Percentage of audit recommendations completed within 90 days of initial due date
- Audit client survey results
- Risk factors added to audit universe
- Annual Audit department budget as a percentage of total UCF revenues
- Annual Audit department budget as a percentage to total UCF consulting services
- Number of improvements relating to more efficient use of department technology

# Scorecard project plan



Go live January 1, 2022



Target of 12-16 KPI



Balance of quality versus quantity metrics



Inputs/Effort versus Output/Results



Verify data is readily available



Automate to extent possible (impact of Workday, Adaptive Planning and other new systems)

# Other information

- Auditor General report and response coordination responses
- UCF Regulation 4.015 (Fraud Protection and Detection)
- Driver And Vehicle Information Database (DAVID) internal control reviews
- Working on department's fiscal year 2023 budget
- Provided feedback to UCF Athletics on proposed Reserve Policy