University of
Central
Florida

Board of Trustees
University of Central Florida
Audit, Operations Review, Compliance, and Ethics Committee
August 22, 2014
2:00 p.m.
President's Boardroom, Millican Hall, 3rd Floor
Call-in number: 800-442-5794   Code: 463796

AGENDA

I. Opening comments and approval of minutes

Trustee Jim Atchison
Chair; Audit, Operations Review, Compliance, and Ethics Committee

II. University Audit update
- External Audits update
- 2014-15 Audit Plan and Major Department Initiatives (INFO-1)

Robert Taft
Chief Audit Executive

III. University Compliance, Ethics, and Risk update
- UCF IntegrityLine presentation (INFO-2)
- Conflict of Interest and Commitment Review and Survey overview (INFO-3)
- University Compliance, Ethics, and Risk program update
- Athletics Compliance program update

Rhonda L. Bishop
Chief Compliance and Ethics Officer

IV. Closing comments

Jim Atchison

Board of Trustees
Audit, Operations Review, Compliance, and Ethics Committee Meeting
January 8, 2014
Millican Hall, President's Board Room

MINUTES

CALL TO ORDER

Trustee Jim Atchison, chair of the Audit, Operations Review, Compliance, and Ethics
Committee, called the meeting to order at 10:00 a.m. via teleconference. Committee member
Reid Oetjen was present; committee members Alan Florez, Beverly Seay, and John Sprouls were
present via telephone. Board of Trustee Chair Calvet was present via telephone along with board
members Richard Crotty and Ray Gilley.

OLD BUSINESS

Minutes
Atchison called for approval of the June 21, 2013, Audit, Operations Review, Compliance, and
Ethics Committee meeting minutes, which were approved as written.

NEW BUSINESS

Chief Audit Executive Search
Vice President and Chief of Staff, Rick Schell, provided an update on the search for the chief
audit executive stating that Robert Taft was hired and will begin working at the end of January
2014. His background and qualifications were briefly summarized.

University Audit Update
Donna DuBuc, Interim Chief Audit Executive, provided a summary of fiscal year 2012-13
external audit results for Direct Support Organizations and Component Units. Each entity's
financials have been approved by their individual Board of Directors. All of the entities had
unqualified opinions and no incidents of non-compliance or significant deficiencies in internal
control. Athletics received three management comments, for which improvements are being
implemented. Repeat findings are not expected.

DuBuc stated that WUCF-TV, a department within the university, received an initial audit for
2012-13 as a requirement to receive Public Broadcasting Funding. It received an unqualified

opinion, and one material weakness in internal control was identified. The issue has since been rectified, and a repeat finding is not expected.

Update on External Audits
DuBuc provided an overview of the timing and status of external audits. The financial and federal audits are substantially complete with no significant findings expected. Operational audits are performed at least bi-annually. As no audit was performed in 2013, an audit in 2014 is highly likely. This will be determined within the next four to six weeks. The Bright Futures audit is also performed bi-annually with a two-year scope and is expected to commence soon.

Quality Assurance Report
DuBuc provided an overview of the Quality Assurance Report issued by the executive director of University Audit and Compliance at the University of South Florida. The report was the result of an independent review of University Audit's processes and procedures. The report showed University Audit was in conformance with Internal Auditing Standards. Other positive attributes included a strong collaborative partnership with the Compliance, Ethics, and Risk Office, a professional and knowledgeable University Audit team, and a high level of support from the Audit, Operations Review, Compliance, and Ethics Committee and university management. Opportunities regarding technology and resources were also identified.

University Compliance, Ethics, and Risk Management Program Update
Rhonda Bishop, Chief Compliance and Ethics Officer, introduced Christina Serra, the new director of compliance and ethics. Bishop summarized Serra's experience and outlined her role and responsibilities. The office is currently searching for a senior compliance analyst.

The transition of the conflict of interest process from the Office of Faculty Relations to the University Compliance, Ethics, and Risk office is complete. Bishop reported that her office is currently conducting a review of the university's conflict of interest and outside activities process as outlined by the committee's charter. This review will be updated annually, and a report will be provided to the committee when complete.

Bishop provided an overview of the University Compliance and Ethics Advisory Committee. The committee's charge includes advising on the development of the comprehensive compliance and ethics program and mitigation of compliance and ethical risks at UCF. In addition, the purpose of the committee is to ensure consistent communication and development of compliance and ethics programs across the university.

Beginning March 7, 2014, the university must comply with new federal reporting, program, and policy requirements under the Clery Act. Bishop provided an update on the efforts of her office to assess the university's preparedness and provide guidance and training.

Florida State University System Compliance Consortium
Bishop provided an update on the Florida State University System Compliance Consortium and noted that Joe Maleszewski, the new Inspector General for the Board of Governors, joined the group.

<u>Athletic Compliance Program</u>
Bishop reported on the annual NCAA compliance report due January 15, 2014, and provided highlights on the accomplishments of the athletics compliance program. As part of the university's ongoing corrective actions in response to the NCAA infractions case, Bishop summarized the continued work with The Compliance Group, a consultant hired by the university. The annual audit scheduled for 2014 is in its initial stage and is a review of the eligibility certification process. Bishop will provide the committee with updates and the final report when it is available.

Chair Atchison adjourned the Audit, Operations Review, Compliance, and Ethics Committee meeting at 10:30 a.m.

Respectfully submitted: _Donna L. DuBuc_   _2/27/14_
                        Donna DuBuc   Date
                        Interim Chief Audit Executive

Respectfully submitted: _Rhonda L. Bishop_   _3/5/2014_
                        Rhonda L. Bishop   Date
                        Chief Compliance and Ethics Officer

2014-15 Audit Plan and Major Department Initiatives

University of Central Florida

Audit, Operations Review, Compliance, and Ethics Committee

August 22, 2014

Agenda

- Audits completed since last committee meeting
- Status update on active audits
- Discussion of 2014-15 audit plan
- Other initiatives

Recently Completed Audits

1. Parking Services and Transportation
2. Rosen College of Hospitality Management
3. Office of Student Involvement

Common Themes of Recommendations

a) Development of and adherence to policies
b) Enhance controls over payment processes
c) Human Resource related activities

Active Audits

Carryover work from prior year's audit plan

- 317-UCF Convocation Corp (Final report issued)
- 319-Undergraduate Admissions (Draft Report)
- 320-Surplus Property Program (Draft Report)
- 321-NCAA Compliance (Fieldwork)
- 322-Registrar's Office (Fieldwork)

Development of 2014-15 Audit Plan

Risk-based methodology incorporating key selection factors:

➢ Major university initiatives and/or strategic plan

➢ First time audits

➢ Required compliance audits

➢ Management and Board of Trustees requests

➢ Re-audits of poor performers

➢ Niche audits

➢ Balancing audits

Current Version of Plan

Audit Year	Audit Quarter	Audit Name	Estimated Hours	Auditor in Charge	Level 1 Audit Review	Level 2 Audit Review
2014-15	1	WUCF	300	VS	VM	RT
	1	Academic Affairs-Academic Program Review	300	CP	KM	RT
	1	Distance Learning Fees	200	VM	TM	RT
		Quarter 1 sub-total	*800*			
	2	UCF Foundation	450	CP	KM	RT
	2	BOG PBF Data Integrity Certification	350	VS, KM, CP, VM	KM, VS	RT
	2	Marketing	325	VS	VM	RT
		Quarter 2 sub-total	*1125*			
	3	Global UCF	450	VM	TM	RT
	3	College of Medicine	450	CP	KM	RT
	3	BOG PBF Data Integrity Certification	350	VS, KM, CP, VM	KM, VS	RT
		Quarter 3 sub-total	*1250*			
	4	NCAA Compliance	325	VS	TM	RT
	4	Research-Sub Recipients & Contractors	300	VM	KM	RT
	4	Title IX Compliance	350	CP	KM	RT
		Quarter 4 sub-total	*975*			
		Grand Total of Hours Committed		**4150**		

Audit Plan Evaluation Process

- Review on a quarterly basis and adjust as necessary
- Focus on completing current audits first
- Consider potential impact of investigations, follow-up, special projects, staffing vacancies
- Evaluate requirements of Board of Governors' performance based funding review
- Maintain a "watch list" of potential audits
- Obtain your suggestions on audit topics

Information Technology (IT) Auditing

- Identified need for IT audit resources
- Use third-party resources to provide services for current year
- Consult with Chief Information Officer and staff on potential topics
- Continue to benchmark with other higher education audit departments
- Implement longer term solution by hiring permanent IT staff

Other Initiatives

Use of Balanced Scorecard Concept

– Development of Project and Task List aligned to these five perspectives

Perspective	Description
1. Audit Committee (AC)	*Frequency and depth of interaction with the AC, how do we measure their satisfaction with us, communicate and escalate issues, incorporate their concerns into our work?*
2. External Customers	*Interaction with Federal and State Regulators, vendors, service providers, consultants, etc.*
3. Management and Internal Customers	*Interaction with audit clients via joint projects, participation on internal committees, relationship development meetings, etc.*
4. Internal Audit Processes	*Audit process cycle, standards and guidelines, audit administration and adherence to standards, audit plan and risk assessment work, review of budget and staffing model, department structure*
5. Innovation and Learning	*Training, career plan development, interaction with other audit organizations, methods used to obtain information on higher education industry in general and UCF specifically. How is this information used to enhance and expand our scope of services?*

COSO* Framework

- Developed to established a common internal control model against which organizations can better design, implement, and assess internal control
- Goal is to increase confidence that controls implemented by the organization mitigate risks to acceptable levels
- End result is multiple parties have reliable information to support sound decision making
- Originated in 1992 and updated in 2013
- Used by large majority of publicly traded companies for Sarbanes-Oxley Act compliance requirements
- Suitable for financial, operational and compliance auditing
- Updated version encourages development of fraud risk assessment and increased focus on vendor and third party risk
- Typically paired with COBIT** framework for IT Auditing
- Incorporates five components and 17 principles

*   Committee of Sponsoring Organizations
** Control Objectives for Information and Related Technology

COSO Components and Principles

COSO Component	Principles (From COSO 2013 Framework book)
Control Environment	- The organization demonstrates a commitment to integrity and ethical values - Independent Oversight is exercised for the development and performance on internal control - Management establishes, with board oversight structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives. - The organization demonstrates a commitment to attract, develop and retain competent individuals in alignment with objectives. - The organization holds individuals accountable for their internal control responsibilities in the pursuit of objectives

COSO Components and Principles

COSO Component	Principles (From COSO 2013 Framework book)
Risk Assessment	• The organization specifies reporting, operations and compliance objectives with sufficient clarity to enable the identification and assessment of risk relating to objectives • The organization identifies risks to the achievement of its objectives across the entity and analyses risks as a basis for determining how the risks should be managed. • The organization considers the potential for fraud in assessing risks to the achievement of objectives • The organization identifies and assesses internal and external changes that could significantly impact the systems of internal control.

COSO Components and Principles

COSO Component	Principles (From COSO 2013 Framework book)
Control Activities	• The organization selects and develop control activities that contribute to the mitigation of reporting, operations and compliance risks to the achievement of objectives to acceptable levels. • The organization select and develops general control activities over technology to support the achievement of objectives • The organization deploys control activities through policies that establish what is expected and procedures that put policies in action

COSO Components and Principles

COSO Component	Principles (From COSO 2013 Framework book)
Information and Communication	• The organization obtains or generates and uses relevant quality information to support the functioning of internal control • The organization internally communicates information including objective and responsibility for internal control necessary to support the functioning of internal controls • The organization communicates with external parties regarding matters affecting the function in internal control

COSO Components and Principles

COSO Component	Principles (From COSO 2013 Framework book)
Monitoring	• The organization selects, develops and performs ongoing and/or separate evaluations to ascertain whether the components of internal control are present and functioning. • The organization evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including senior manager and the board of director as appropriate.

Audit Process Changes

- Complete a COSO principles "gap analysis" as part of risk assessment and scope development work

- Revising our audit report format

- Distribute Audit Client Surveys

- Discuss our Cost Savings Idea Generator Worksheet with audit clients

- Perform Audit Engagement Appraisal

Other Initiatives-Innovation and Learning

- Implement Staff Individual Development Plans
- Create a new training and professional certification policy
- Use Microsoft Access to develop administrative databases
- Establish student chapter of Association of Certified Fraud Examiners
- Consider use of student interns

Audit Committee Ideas

- Interaction with other UCF Integrated Assurance providers that are involved in potential "high dollar" risk scenarios *(source: 2014 United Educators Insurance Large Loss Report*)

- ➤ Campus safety and wrongful death
- ➤ Overseas study
- ➤ Sexual harassment and discrimination
- ➤ Data breaches and identify theft
- ➤ Wrongful termination
- ➤ Medical care and research

RHONDA L. BISHOP
UNIVERSITY COMPLIANCE AND ETHICS OFFICER

IntegrityLine Access

❖ www.ucfintegrityline.com

❖ www.ucf.ethicspoint.com

❖ Toll-free 855.877.6049

❖ University Compliance, Ethics, and Risk Office
www.compliance.ucf.edu

Marketing

Communication Plan

❖ UCF News and Information

❖ Direct mailing

❖ All-employee email

❖ Poster distribution

❖ UCF At Work newsletter

❖ New employee orientation

❖ Ethics training

IntegrityLine Attributes

❖ 24, 7, 365 access

❖ Anonymous and confidential

❖ Open dialogue and web chat

❖ Tiered access levels

❖ Report and trend analysis

❖ Core element for model compliance and ethics program

❖ Independent, scripted, third-party interview

UNIVERSITY OF CENTRAL FLORIDA

Home · Follow-up on a Report · The UCF Creed · UCF Policies and Procedures · UCF Regulations · University Compliance · FAQs

ATTENTION! This webpage is hosted on EthicsPoint's secure servers and is not part of the University of Central Florida website or intranet.

To Make a Report

Online

Select the location in which the violation took place.

| - Select - |

By Phone

Dial toll-free, within the United States, Guam, Puerto Rico and Canada: **855-877-6049**

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After **5-6** business days, use your report key and password to check your report for feedback or questions.

EthicsPoint is NOT a 911 or Emergency Service:
Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

Our Commitment

The University of Central Florida is committed to providing members of the university community with a safe working and learning environment that promotes ethical conduct and compliance with applicable laws. It takes all of us working together to ensure a positive environment at UCF. Our expectation is that as a member of the UCF community, you will report incidents of suspected unethical, noncompliant, criminal, or inappropriate behavior through the appropriate channels.

UCF has partnered with NAVEX Global, a third party provider, to offer the EthicsPoint reporting system so our faculty, staff, and student employees may make anonymous and confidential reports in good faith. Students wanting to report potential misconduct by a UCF employee, contractor, or agent may use this system, but should refer to the procedures in the Golden Rule Student Handbook for all other concerns.

The University of Central Florida strives for an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management to address your concerns. The UCF IntegrityLine is not intended to replace any existing reporting methods available at the university, but is available in instances where you feel uncomfortable using these channels.

In situations where you prefer to place an anonymous report in confidence, you are encouraged to use the UCF IntegrityLine to submit reports or ask for guidance. Your concerns and partnership in addressing issues is important to us. All reports will be reviewed, investigated, and responded to as discreetly and promptly as possible.

EthicsPoint will send the information you provide to the University Compliance, Ethics, and Risk Office on a confidential and anonymous basis if you should choose. However, please understand that incidents related to alleged discrimination or harassment are difficult to investigate when you remain anonymous. We encourage you to use established university channels whenever possible.

See the EthicsPoint FAQs for more information.

Questions and Answers for Employees

About EthicsPoint

Reporting – General

Reporting Security & Confidentiality

Tips & Best Practices

About EthicsPoint

What is EthicsPoint?

EthicsPoint is a case management tool offered by the third party provider, NAVEX Global, which provides comprehensive and anonymous reporting solutions for the UCF IntegrityLine. The UCF IntegrityLine allows university management and employees to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- We believe that our faculty, staff, and students deserve a supportive campus environment that respects the rights and contributions of every individual. By creating open channels of communication, we can promote a positive environment and maximize productivity.

- There may be times when you are uncomfortable reporting a concern and want to remain anonymous. This system provides an avenue for you to report in those circumstances.

- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

UNIVERSITY OF CENTRAL FLORIDA

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To Make a Report

Online

Select the location in which the violation took place.

Orlando Campus

Click the "Continue" button to proceed with filing your report.

Continue

By Phone

Dial toll-free, within the United States, Guam, Puerto Rico and Canada: **855-877-6049**

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After **5-6** business days, use your report key and password to check your report for feedback or questions.

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UNIVERSITY OF CENTRAL FLORIDA

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Please select the type of report you would like to make. Click on "Details" for a full description.

Academic Affairs		
	Academic Misconduct	Details
	Alcohol / Drug Abuse	Details
	Credentials Misrepresentation	Details
	Sexual Harassment	Details
	Student Safety	Details
	Student Travel	Details
	Other Academic Affairs Matters	Details

Accounting and Financial		
	Accounting and Auditing Matters	Details
	Donor Stewardship	Details
	Falsification of Contracts, Reports or Records	Details
	Fraud	Details
	Improper Disclosure of Financial Records	Details
	Improper Giving or Receiving of Gifts	Details
	Improper Supplier or Contractor Activity	Details
	Theft / Embezzlement	Details
	Waste, Abuse or Misuse of Institution Resources	Details
	Other Financial Matters	Details

	Waste, Abuse or Misuse of Institution Resources	Details
	Other Financial Matters	Details
Athletics	**Fraudulent Activities**	Details
	Improper Giving or Gifts	Details
	Inappropriate Activities	Details
	Misuse of Assets, Players or Endorsements	Details
	Recruiting Misconduct	Details
	Scholarship / Financial Aid Misconduct	Details
	Sexual Misconduct	Details
	Substance Abuse	Details
	Other Athletic Matters	Details
Human Resources	**Conflict of Interest**	Details
	Discrimination or Harassment	Details
	EEOC or ADA Matters	Details
	Employee Benefits Abuses	Details
	Employee Misconduct	Details
	Nepotism	Details
	Offensive or Inappropriate Communication	Details
	Sexual Harassment	Details
	Threat or Inappropriate Supervisor Directive	Details
	Time Abuse	Details
	Unsafe Working Conditions	Details

	Violence or Threat	Details
	Workers Compensation or Disability Benefits Abuses	Details
	Other Human Resource Matters	Details
Information Technology	**Data Privacy/Integrity**	Details
	Malicious / Inappropriate Use of Technology	Details
	Misuse of Resources	Details
	Software Piracy/Intellectual Property Infringement	Details
	Other Information Technology Matters	Details
Medical	**Healthcare Fraud**	Details
	HIPAA	Details
	Insurance Issues	Details
	Patient Abuse/Physical or Verbal	Details
	Patient Care	Details
	Patient Rights	Details
	Research Misconduct	Details
	Sponsored Projects Non-Compliance	Details
	Other Medical Research or Patient Matters	Details
Research	**Conflict of Interest**	Details
	Data Privacy	Details
	Environmental and Safety Matters	Details
	Fraud	Details
	Human or Animal Research	Details

	Other Medical Research or Patient Matters	Details
Research	**Conflict of Interest**	Details
	Data Privacy	Details
	Environmental and Safety Matters	Details
	Fraud	Details
	Human or Animal Research	Details
	Intellectual Property Infringement, Misappropriation or Disclosure	Details
	Research Grant Misconduct or Misappropriation of Costs	Details
	Scientific Misconduct	Details
	Other Research Matters	Details
Risk and Safety Matters	**Confidentiality**	Details
	Data Privacy	Details
	Disclosure of Confidential Information	Details
	Environmental and Safety Matters	Details
	Improper Supplier or Contractor Activity	Details
	Improper Use of Intellectual Property, Copyright Violations or Software Piracy	Details
	Public Safety	Details
	Sabotage or Vandalism	Details
	Unsafe Working Conditions	Details
	Other Risk and Safety Matters	Details
Other	**Other**	Details

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Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

☐ * Yes - I agree to the Terms and Conditions of making this report.

Please provide information as follows:

(* Required fields)

Organization/Tier: **University of Central Florida**

Location where incident occurred:
| Orlando Campus |
Physical address, branch and/or store number

City: [_____]   State/Province: [_____]

Zip/Postal Code: [_____]

Country: [_____]

* **Do you wish to remain ANONYMOUS for this report?**

○ Yes   ○ No

If you want University of Central Florida to know your identity, please complete the following:

Your Name: [_____] [_____]
First Name   Last Name

Your Phone Number: [_____]

Your E-mail Address: [_____]

Best time for communication with you:

[_____]

❯ *Relationship to Institution

[- Select One - ▾]

Report - Academic Misconduct

❯ *Please identify the person(s) engaged in this behavior:

Example:

John Doe, Director of Internal Audit
Unknown, Unknown, Night Supervisor

	First Name	Last Name		Title
#1	[_____]	[_____]	-	[_____]
#2	[_____]	[_____]	-	[_____]
#3	[_____]	[_____]	-	[_____]

*Relationship to Institution

[- Select One - ▼]

Report - Academic Misconduct

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Example:

John Doe, Director of Internal Audit
Unknown, Unknown, Night Supervisor

	First Name	Last Name		Title
#1	[ ]	[ ]	-	[ ]
#2	[ ]	[ ]	-	[ ]
#3	[ ]	[ ]	-	[ ]

Do you suspect or know that a supervisor or management is involved?

○ Yes   ○ No   ○ Do Not Know / Do Not Wish To Disclose

If yes, then who?

[   ]

Example:

John Doe, Director of Internal Audit

Any persons mentioned here will be restricted by
EthicsPoint from access to this reported information.

Is management aware of this problem?

○ Yes   ○ No   ○ Do Not Know / Do Not Wish To Disclose

What is the general nature of this matter?

[   ]

This should be a general description only, you will be
asked for specifics later.

Where did this incident or violation occur?

[   ]

We recognize that this incident may not have occurred in
a particular location. However, if this incident was
observed in some documentation or business
transactions, please indicate this accordingly.

Please provide the specific or approximate time this incident occurred:

[   ]

Examples:

Tuesday, May 3, 2002
Two weeks ago
Approximately a month ago

*How long do you think this problem has been going on?

If other, how?

Please identify any persons who have attempted to conceal this problem and the steps they took to conceal it:

Please identify by name and title.

Examples:

Ignored it
Changed documents
Said it was not a problem
Said they would look into it

If you have a document or file that supports your report, most common file types can be uploaded:

Click here to upload files

* Please provide all details regarding the alleged violation, including the locations of witnesses and any other information that could be valuable in the evaluation and ultimate resolution of this situation.

Please take your time and provide as much detail as possible, but exercise care to not provide details that may reveal your identity unless you wish to do so. It may be important to know if you are the only person aware of this situation.

When you submit the report, you will be issued a **Report Key**. Please write it down and keep it in a safe place. We ask you to use this **Report Key** along with the password of your choosing to return to EthicsPoint through the website or telephone hotline in 5-6 business days. By returning in 5-6 business days, you will have the opportunity to review any Follow-up Questions or submit more information about this incident.

Please choose a password for this report:

* Password:

* Re-enter Password:

Your passwords must match and be at least four characters long.

Submit Report

UCF

UNIVERSITY COMPLIANCE, ETHICS, AND RISK

Report on Conflict of Interest and Commitment Initiatives

August 22, 2014

Conflict of Interest and Commitment Initiatives

As a state institution and recipient of federal funds, the university must comply with both state and federal requirements regarding the disclosure and management of conflicts of interest and commitment. Additionally, the university is committed to conducting university business and activities with integrity and has developed policies and procedures to identify, manage, and when appropriate, remove potential and actual conflicts of interest and commitment.

University Compliance, Ethics, and Risk acquired oversight of the university's annual online conflict of interest and commitment reporting process in November 2013. Since acquiring oversight, we have identified more than 20 improvement initiatives and expect to complete these initiatives prior to launching the next conflict of interest and commitment reporting process. We have completed the following initiatives.

1. **Compliance review.** Our office performed a compliance review of the conflict of interest and commitment policies, procedures, and processes for the university, direct support organizations, and component unit to:

   - determine whether the online conflict of interest and commitment reporting process meets the university's obligations under applicable Florida statutes and federal research laws and standards,
   - assess the annual review and approval of disclosures and determine if potential conflicts are adequately resolved and documented,
   - confirm that appropriate university regulations and policies are in place, the term "conflict of interest" is clearly defined, and guidelines are comprehensive,
   - evaluate the efficiency of the conflict of interest and commitment reporting process and,
   - verify that direct support organizations (DSOs) and component unit have a conflict of interest policy and reporting process in place.

   The draft report is completed and submitted to the appropriate offices for review and comment.

2. **Compliance with online disclosure reporting.** To reduce the number of outstanding disclosures for the 2013-14 reporting period we implemented communication efforts. These efforts reduced the number of outstanding disclosures from 63 to seven and the number under review from 432 to 40.

3. **Potential conflict reviews.** To provide consistency in UCF's approach to approving outside activities and the receipt of gifts, we acquired oversight of two existing UCF conflict of interest and commitment review processes. Our office now reviews research exemption requests prior to signature by the provost, president, and board chair and reviews and approves potential conflicts with UCF employees receiving gifts.

4. **Identification of reporting individuals under Florida statutes.** In a joint effort with the Office of the General Counsel and Human Resources Department, we identified 22 additional individuals who are required to report to the state. Representatives from the Human Resources Department submitted the additional reporting individuals to the Florida Commission on Ethics in January 2014 as part of their annual process.

5. **Process and system improvements.** With the assistance of the Office of Operational Excellence and Assessment Support (OEAS), we developed and launched a survey of the 1,730 faculty, postdoctoral associates, and executive service personnel who are required to submit a conflict of interest and commitment disclosure. Survey results revealed a number of improvement areas including the need for more education and awareness on what defines a conflict, the purpose of the annual disclosure process, and the need to revise the questions in the disclosure form. Survey comments revealed additional improvement areas such as improving system functionality, streamlining the review and approval process, and compliance enforcement. Attached are the OEAS survey results.

   The following was completed based on the results of the survey:

   - simplified questions for the online disclosure reporting form
   - requested system improvements to enhance the process for the 2014-15 reporting year
   - reconciled employee information between two of the university's systems
   - coordinated removal of terminated employees from the online disclosure system.

6. **Awareness and training.** Our office identified the need for further training and communication of the conflict of interest and commitment reporting requirements. This need was further supported by the survey results and the following was completed:

   - conducted a workshop on the conflict of interest and commitment reporting process for faculty members with the Office of Research and Commercialization's Ethics and Compliance Office
   - issued a communication to all faculty members and staff to remind them of the standards of conduct and reporting responsibilities under Florida ethics laws with the Office of the General Counsel
   - developed a comprehensive communication plan for the 2014-15 reporting period, including additional guidance, training, and a plan for addressing non-compliance.

CONFLICT OF INTEREST SURVEY
2014 RESULTS

PURPOSE AND METHODOLOGY

This report summarizes some key findings from the UCF Conflict of Interest Survey which was administered to all faculty, postdoctoral associates and executive service personnel between March 10 and April 4, 2014. The purpose of the survey was to gather information concerning the annual conflict of interest disclosure process at UCF. There were 1,730 UCF personnel invited to participate in the survey via email, of which 338 responded (19.5% response rate). Survey responses and the analysis in this report are used to evaluate the level of satisfaction with the existing process and design improvements to make the process better. Tables can be found in Appendix I that display summarized responses for each survey item.

KEY FINDINGS

UNDERSTANDING OF THE CONFLICT OF INTEREST DISCLOSURE PROCESS AND DEFINITIONS

- 79% (255) respondents reported that they have a good understanding of the purpose behind the annual conflict of interest reporting process. (Table 7 in Appendix I)

- Although many respondents rated themselves positively in understanding the purpose behind the annual conflict of interest reporting process, 31% (80) missed at least one conflict of interest objective when presented with a list of choices. (Chart 4)

- 79% (259) respondents reported they have a good understanding of what defines a conflict of interest. (Table 8 in Appendix I)

- Although many respondents rated themselves positively in understanding what defines a conflict of interest , 27% (69) missed at least one example of a conflict of interest when presented with a list of choices. (Chart 5)

SATISFACTION WITH THE CONFLICT OF INTEREST DISCLOSURE PROCESS

- For respondents who answered 'yes' to at least one disclosure question on their last submitted form, 54% agreed that the on-line disclosure process was user friendly. Of those who did not answer 'yes' on their last submitted form, 66% agreed. (Chart 1)

- For respondents who answered 'yes' to at least one disclosure question on their last submitted form, 48% agreed that the questions on the disclosure form were easy to understand. Of those who did not answer 'yes' on their last submitted form, 68% agreed. (Chart 2)

- For respondents who answered 'yes' to at least one disclosure question on their last submitted form, 60% were satisfied with the amount of time it took to complete the form. Of those who did not answer 'yes' on their last submitted form, 71% were satisfied. (Chart 3)

IMPROVEMENT OBJECTIVES FOR THE DISCLOSURE PROCESS

- The objective ranked with most importance by reviewers was "Revising the questions in the disclosure form to improve understanding for the discloser and aid the reviewer" with 49% endorsement. (Chart 6)

- The objective ranked with least importance by reviewers was "Ensuring 100% response rate and closure of the process annually" with 41% endorsement. (Chart 6)

- A handful of open-ended survey comments suggested language revisions on the disclosure form questions for clarity.

SATISFACTION WITH THE CONFLICT OF INTEREST DISCLOSURE PROCESS

A majority of survey respondents, 56% (164), reported satisfaction with the overall annual conflict of interest disclosure process. 31% (91) of respondents were neutral, reporting neither satisfaction nor dissatisfaction, and 14% (42) reported being either dissatisfied or very dissatisfied with the process. Majority of respondents also reported satisfaction with topics on the process including usability of the on-line form, clarity of questions on the form and duration of time to complete the form.

Charts 1-3 show responses to survey questions on these specific topics. Each question is sliced by a second survey item which was used to categorize respondents into two groups, those who answered 'yes' on at least one question of their last completed disclosure form and those who did not (those responding 'Do not recall' were discarded for this analysis.) The question used to group respondents is: *"The last time you completed the disclosure form, did you respond 'yes' to any of the questions?"*

Chart 1

**On-line Disclosure Process is User Friendly
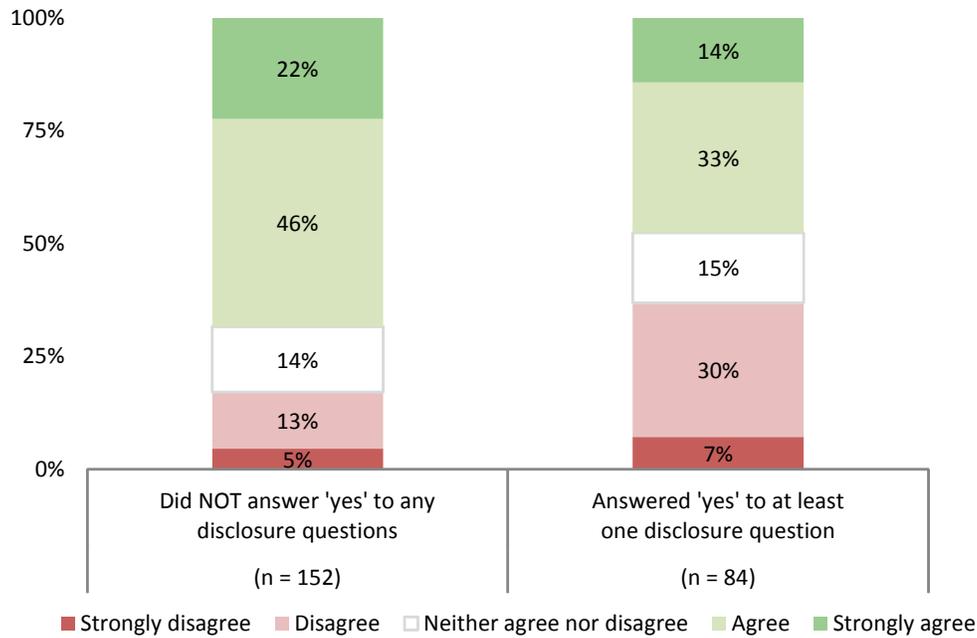by 'Yes' Response on Disclosure Form**
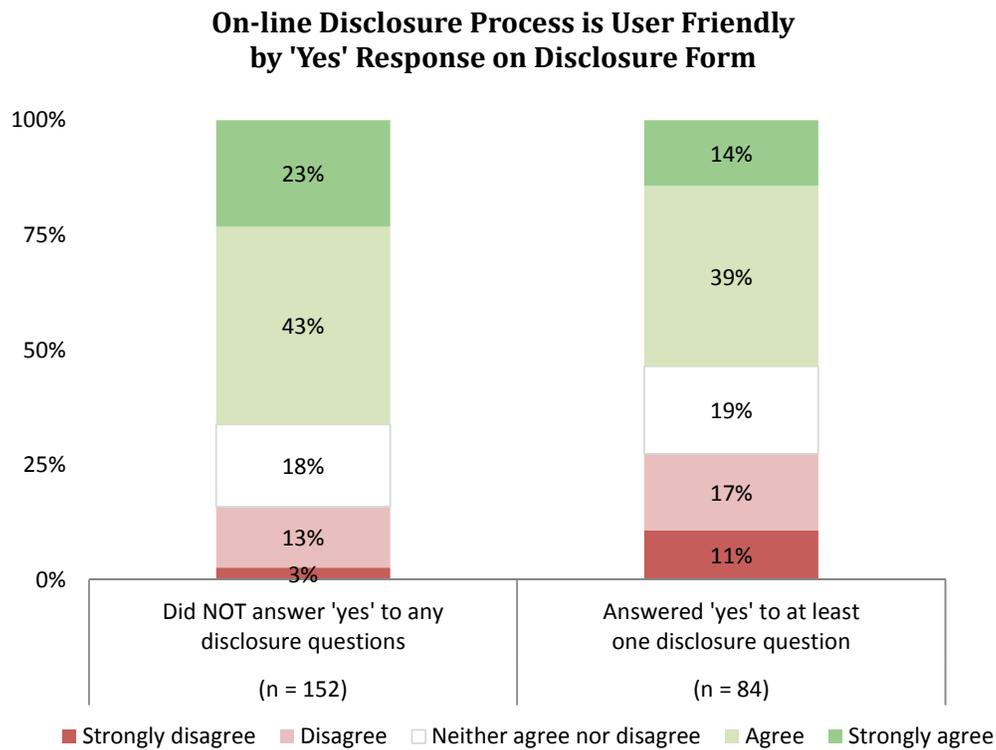
Of the 84 respondents who answered 'yes' to at least one disclosure question, 54% agreed that the on-line disclosure process was user friendly whereas 66% of those who did not answer 'yes' on their last submitted form agreed (Chart 1).

Chart 2

**Questions on Form are Easy to Understand
by 'Yes' Response on Disclosure Form**

	Did NOT answer 'yes' to any disclosure questions (n = 152)	Answered 'yes' to at least one disclosure question (n = 84)
Strongly agree	22%	14%
Agree	46%	33%
Neither agree nor disagree	14%	15%
Disagree	13%	30%
Strongly disagree	5%	7%

■ Strongly disagree   ■ Disagree   □ Neither agree nor disagree   ■ Agree   ■ Strongly agree

Of the 84 respondents who answered 'yes' to at least one disclosure question, 48% agreed that the questions on the disclosure form were easy to understand (Chart 2) and 60% were satisfied with the amount of time it took to complete the form (Chart 3). Of those who did not answer 'yes' on their last submitted form, 68% agreed that the questions on the disclosure form were easy to understand (Chart 2) and 71% were satisfied with the amount of time to complete (Chart 3).

Chart 3

**Satisfied with Amount of Time to Complete Form
by 'Yes' Response on Disclosure Form**

	Did NOT answer 'yes' to any disclosure questions (n = 151)	Answered 'yes' to at least one disclosure question (n = 84)
Strongly agree	26%	15%
Agree	45%	44%
Neither agree nor disagree	17%	19%
Disagree	9%	15%
Strongly disagree	3%	6%

■ Strongly disagree   ■ Disagree   □ Neither agree nor disagree   ■ Agree   ■ Strongly agree
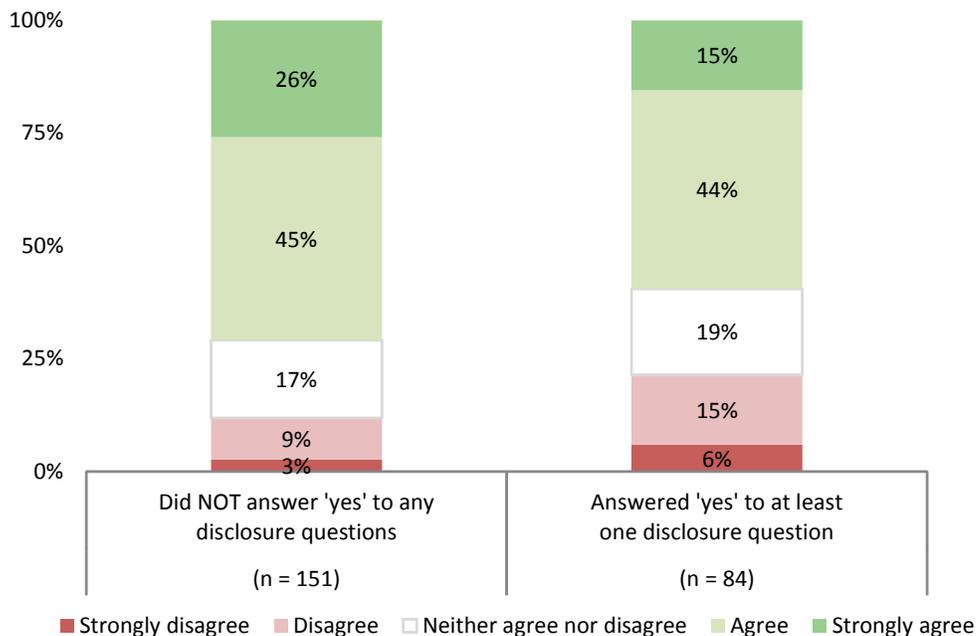
UNDERSTANDING OF THE CONFLICT OF INTEREST DISCLOSURE PROCESS AND DEFINITIONS

Two sets of questions on the survey were used to evaluate: 1) respondent understanding of the purpose of the process and 2) respondent ability to identify examples classified as conflicts of interest. In each set of questions one question was self rating and the second was a direct measure of the respondent's competency. The two pairs of questions are shown below in Table 1.

Table 1

		Response Options
Understanding Conflict of Interest Objectives	*Self Rating* — I have a good understanding of the purpose behind the annual conflict of interest reporting process	• Strongly agree • Agree • Neither agree nor disagree • Disagree • Strongly disagree
	Direct Measure — Which of the following are objectives of the annual conflict of interest disclosure process? (select all that apply)	• Determine if a financial conflict of interest exists • To comply with federal regulations • To comply with Florida state statutes • Mitigate any potential or real conflicts of interests and/or commitments • Ensure that UCF faculty, postdoctoral associates, and executive service personnel do not have any conflicts that would create bias or hinder their ability to effectively perform their job
Identifying Conflicts of Interest	*Self Rating* — I have a good understanding of what defines a conflict of interest	• Strongly agree • Agree • Neither agree nor disagree • Disagree • Strongly disagree
	Direct Measure — Select from the following list any potential or real conflicts of interest and/or commitment: (select all that apply)	• Hiring a family member to perform work for you under your grant sponsored research • Consulting or performing outside activities that conflict with your UCF work hours and/or responsibilities • Serving as a board member at an organization that also sponsors your research • Having authority in procuring services or commodities from a UCF vendor from which you also accept personal gifts • Using UCF resources (employees, students, and/or facilities, equipment) to perform an outside activity • Having an ownership interest (either direct or through a family member) in an entity that is connected to UCF, either through sponsoring research or providing services or commodities as a UCF vendor • Teaching full time at another university or college while also working full time for UCF

Chart 4

Understanding Conflict of Interest Objectives
Self Rating vs. Direct Measure

79% (254) of respondents reported they have a good understanding of the purpose behind the conflict of interest disclosure process (Table 7 in Appendix 1), however, 31% (80) of these respondents missed at least one objective from a list of choices in the direct measure question.

■ Missed at least 1 objective   ■ Identified all 5 objectives

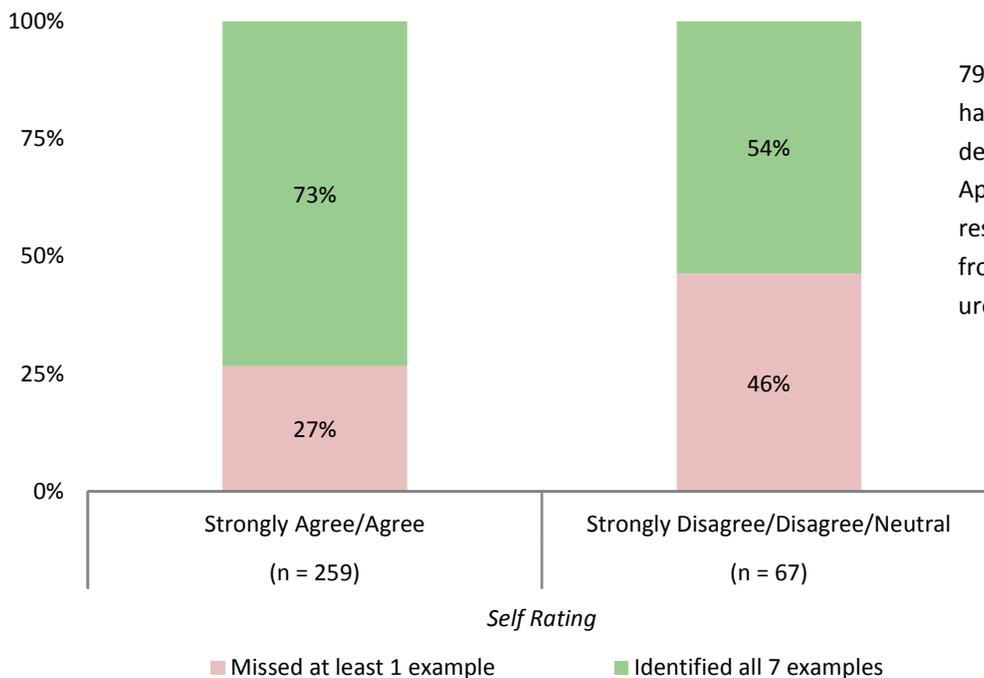**Chart 5**

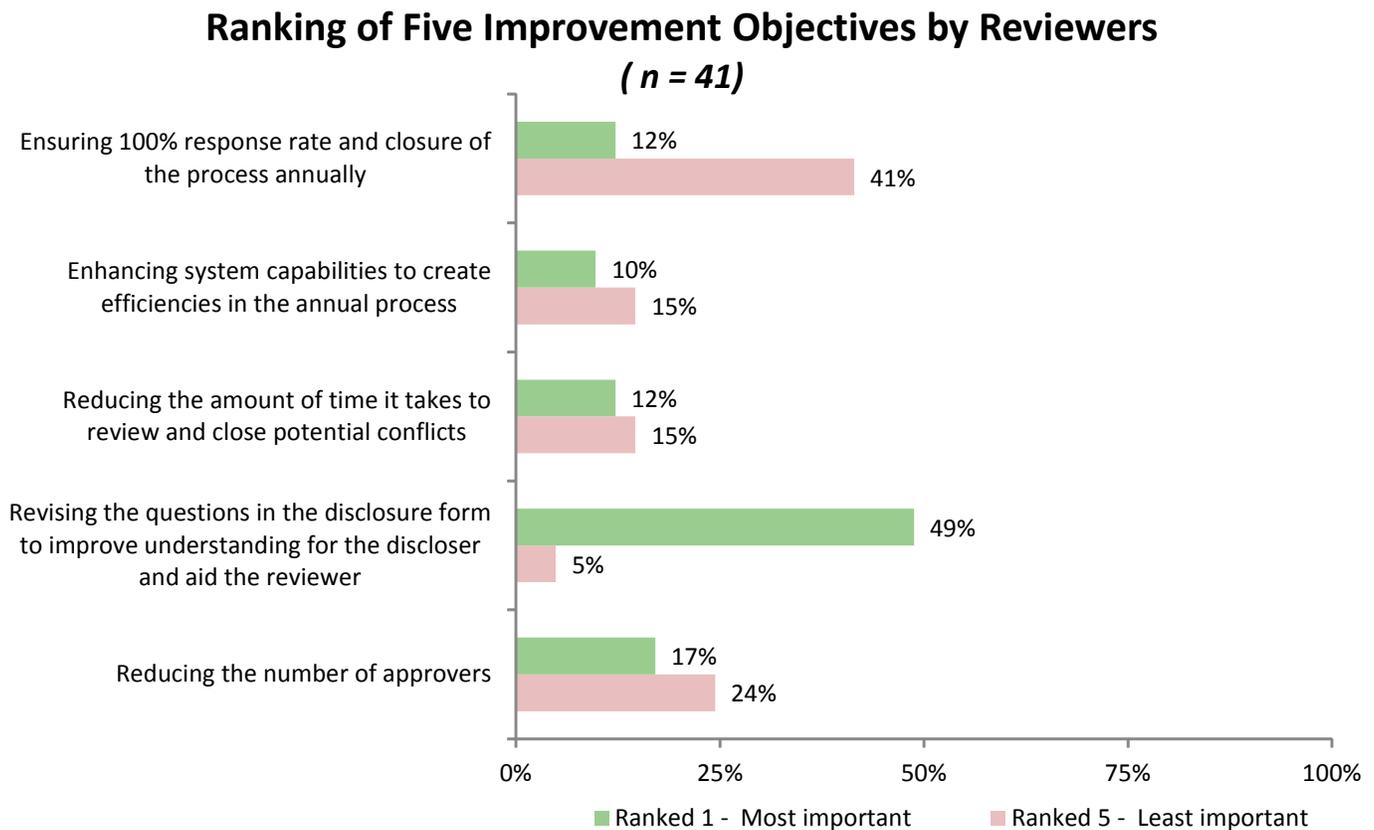## Identifying Conflicts of Interest
Self Rating vs. Direct Measure

79% (259) of respondents reported they have a good understanding of what defines a conflict of interest (Table 8 in Appendix 1), however, 27% (69) of these respondents missed at least one example from a list of choices in the direct measure question.

■ Missed at least 1 example   ■ Identified all 7 examples

RANKING OF IMPROVEMENT OBJECTIVES BY REVIEWERS

There were 41 respondents who identified themselves as reviewers for the disclosure form approval process. These respondents were asked to rank in order of importance a list of improvement objectives. Chart 6 shows each of the improvement objectives and two statistics: the percent of respondents who ranked the objective most important (bars in light gray) and the percent of respondents who ranked the objective least important (bars in dark gray).

Chart 6

Ranking of Five Improvement Objectives by Reviewers
(n = 41)

Objective	Ranked 1 - Most important	Ranked 5 - Least important
Ensuring 100% response rate and closure of the process annually	12%	41%
Enhancing system capabilities to create efficiencies in the annual process	10%	15%
Reducing the amount of time it takes to review and close potential conflicts	12%	15%
Revising the questions in the disclosure form to improve understanding for the discloser and aid the reviewer	49%	5%
Reducing the number of approvers	17%	24%

The objective ranked with most importance was 'Revising the questions in the disclosure form to improve understanding for the discloser and aid the reviewer' (49% endorsement). The objective ranked with the least importance was 'Ensuring 100% response rate and closure of the process annually' (41% endorsement).

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APPENDIX I: RESPONSES BY SURVEY ITEM

Table 1

In which academic year did you last complete a conflict of interest disclosure form?	Count	Col %
2013-2014	279	83%
2012-2013	55	16%
2011-2012	0	0%
2010-2011	0	0%
2009-2010	0	0%
Prior to the 2009-2010 academic year	0	0%
I Have never completed this form	4	1%
Total	338	100%

Table 2

Please indicate any of the reasons why you have never completed a conflict of interest disclosure form: **(select all that apply)**	Count	%
I did not know I was expected to complete a form	2	50%
I did not know how to access the form	1	25%
I did not have the time to complete the form	0	0%
I did not understand the questions on the disclosure form	0	0%
I do not think it is necessary for me to submit a disclosure form	1	25%
Other (please specify)	2	50%

Percentages will not sum too 100% since this question was 'select all that apply.' Percentages are calculated from the 4 respondents who answered this question.

Table 3

Overall, how satisfied are you with the annual conflict of interest disclosure process?	Count	Col %
Very satisfied	61	21%
Satisfied	103	35%
Neither satisfied nor dissatisfied	91	31%
Dissatisfied	32	11%
Very dissatisfied	10	3%
Total	297	100%

Table 4

Agree or Disagree: I find the existing on-line process to disclose conflicts of interest to be user friendly	Count	Col %
Strongly agree	73	22%
Agree	139	43%
Neither agree nor disagree	56	17%
Disagree	41	13%
Strongly disagree	18	6%
Total Responses	327	100%

Table 5

Agree or Disagree: The questions asked in the disclosure form are easy to understand	Count	Col %
Strongly agree	69	21%
Agree	144	44%
Neither agree nor disagree	47	14%
Disagree	50	15%
Strongly disagree	17	5%
Total Responses	327	100%

Table 6

Agree or Disagree: I am satisfied with the amount of time it takes to complete the disclosure form	Count	Col %
Strongly agree	80	24%
Agree	144	44%
Neither agree nor disagree	60	18%
Disagree	33	10%
Strongly disagree	11	3%
Total Responses	328	100%

Table 7

Agree or Disagree: I have a good understanding of the purpose behind the annual conflict of interest reporting process	Count	Col %
Strongly agree	112	35%
Agree	143	44%
Neither agree nor disagree	36	11%
Disagree	25	8%
Strongly disagree	7	2%
Total Responses	323	100%

Table 8

Agree or Disagree: I have a good understanding of what defines a conflict of interest	Count	Col %
Strongly agree	103	31%
Agree	156	48%
Neither agree nor disagree	37	11%
Disagree	25	8%
Strongly disagree	6	2%
Total Responses	327	100%

Table 9

The last time you completed the disclosure form, did you respond 'yes' to any of the questions?	Count	Col %
Yes	87	26%
No	152	46%
Do not recall	92	28%
Total	331	100%

Table 10

The last time you completed the disclosure form, did you complete it within the stated deadline (30 days from the Provost's announcement/email)?	Count	Col %
Yes	274	82%
No	11	3%
Do not recall	48	14%
Total	333	100%

Table 11

Please indicate any of the reasons why you did not complete a conflict of interest disclosure form within the stated deadline: **(select all that apply)**	Count	%
I was not aware of a 30 day deadline	4	36%
I was on leave without access to the online reporting form	1	9%
Completing the form took several sessions which could not be completed within the deadline	1	9%
My prior year's disclosure form was still pending review which prevented me from completing within the deadline	3	27%
I was waiting for information necessary to complete the form which did not arrive in time to meet the deadline	0	0%
Other (please specify)	4	36%

Percentages will not sum too 100% since this question was 'select all that apply.' Percentages are calculated from the 11 respondents who answered this question.

Table 12

Have you ever served as a reviewer to approve submitted conflict of interest disclosure forms?	Count	Col %
Yes	46	14%
No	287	86%
Total	333	100%

Table 13

As a **reviewer,** please rank the five improvement objectives in terms of importance by dragging and dropping them in order: **(1 is most important and 5 is least important)**	Ranked 1 Most important		Ranked 5 Least important	
	Count	Col %	Count	Col %
Reducing the number of approvers	7	17%	10	24%
Revising the questions in the disclosure form to improve understanding for the discloser, and in obtaining the information necessary to aid the reviewer *(ranked most important)*	20	49%	2	5%
Reducing the amount of time it takes to review and close potential conflicts	5	12%	6	15%
Enhancing system capabilities to create efficiencies in the annual process	4	10%	6	15%
Ensuring 100% response rate and closure of the process annually *(ranked least important)*	5	12%	17	41%
Total	41	100%	41	100%

Table 14

Which of the following are objectives of the annual conflict of interest disclosure process? **(select all that apply)**	Count	%
Determine if a financial conflict of interest exists	302	92%
To comply with federal regulations	248	75%
To comply with Florida state statutes	269	82%
Mitigate any potential or real conflicts of interests and/or commitments	279	85%
Ensure that UCF faculty, postdoctoral associates, and executive service personnel do not have any conflicts that would create bias or hinder their ability to effectively perform their job	292	89%

Percentages will not sum too 100% since this question was 'select all that apply.' Percentages are calculated from the 329 respondents who answered this question.

Table 15

Select from the following list any potential or real conflicts of interest and/or commitment: **(select all that apply)**	Count	%
Hiring a family member to perform work for you under your grant sponsored research	277	87%
Consulting or performing outside activities that conflict with your UCF work hours and/or responsibilities	305	96%
Serving as a board member at an organization that also sponsors your research	264	83%
Having authority in procuring services or commodities from a UCF vendor from which you also accept personal gifts	289	91%
Using UCF resources (employees, students, and/or facilities, equipment) to perform an outside activity	292	92%
Having an ownership interest (either direct or through a family member) in an entity that is connected to UCF, either through sponsoring research or providing services or commodities as a UCF vendor	282	89%
Teaching full time at another university or college while also working full time for UCF	287	91%

Percentages will not sum too 100% since this question was 'select all that apply.' Percentages are calculated from the 317 respondents who answered this question.

Table 16

What is your current position at UCF?	Count	Col %
Instructor or lecturer	91	27%
Assistant Professor	47	14%
Associate Professor	51	15%
Professor	67	20%
Postdoctoral Associate	15	5%
Executive Services	9	3%
Other (please specify)	53	16%
Total	333	100%

Table 17

How many years have you been in this position at UCF?	Count	Col %
0 to 5 years	147	44%
6 to 15 years	125	38%
More than 15 years	60	18%