



UNIVERSITY OF CENTRAL FLORIDA

**Board of Trustees
Audit and Compliance Committee
August 28, 2018, 3:00 – 4:00 p.m.
President’s Board Room
Conference Call-In Phone #1-800-442-5794, passcode 463796**

AGENDA

- | | |
|---|---|
| I. CALL TO ORDER | Beverly Seay
<i>Chair, Audit and Compliance Committee</i> |
| II. ROLL CALL | Margaret Melli
<i>Executive Administrative Assistant of
University Compliance, Ethics, and Risk</i> |
| III. MEETING MINUTES | |
| <ul style="list-style-type: none">• Approval of the April 17, 2018, Audit and Compliance Committee meeting minutes | Chair Seay |
| IV. NEW BUSINESS | Chair Seay |
| <ul style="list-style-type: none">• Review of Audit and Compliance Committee Charter (INFO-1) | Christina L. Serra
<i>Director of Compliance and Ethics
and Interim Chief Compliance and
Ethics Officer</i>
Robert Taft
<i>Chief Audit Executive</i> |
| <ul style="list-style-type: none">• Approval of University Compliance, Ethics, and Risk Charter (AUDC-1) | Christina L. Serra |
| <ul style="list-style-type: none">• University Audit Report (INFO-2) | Robert Taft |
| <ul style="list-style-type: none">• University Compliance, Ethics, and Risk Report (INFO-3)<ul style="list-style-type: none">- 2017-18 Work Plan Status of All Activities (INFO-4)- 2018 Compliance and Ethics Culture Survey (INFO-5)- 2018-19 Compliance and Ethics Annual Work Plan (INFO-6) | Christina L. Serra |
| V. CLOSING COMMENTS | Chair Seay |



UNIVERSITY OF CENTRAL FLORIDA

**Board of Trustees
Audit and Compliance Committee Meeting
April 17, 2018
President’s Board Room**

MINUTES

CALL TO ORDER

Trustee Beverly Seay, chair of the Audit and Compliance Committee, called the meeting to order at 1:30 p.m. Trustees Kenneth Bradley, Danny Gaekwad, and David Walsh attended by teleconference call. Trustee John Lord was present.

MINUTES APPROVAL

The minutes from the January 12, 2018, meeting were approved unanimously.

NEW BUSINESS

University Audit Report (INFO-1)

Robert Taft, Chief Audit Executive, provided an outline of the University Audit Report which highlighted current and scheduled audits; a staffing model benchmark of audit offices in the state university system; staffing model proposal; and other activities.

University Compliance, Ethics, and Risk Report (INFO-2)

Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer, presented the University Compliance, Ethics, and Risk Report. The report included an update on the University Compliance, Ethics, and Risk program and the status of the 2017-18 work plan.

Chair Seay adjourned the Audit and Compliance Committee meeting at 2:15 p.m.

Respectfully submitted: _____
Robert Taft Date
Chief Audit Executive

Respectfully submitted: _____
Christina L. Serra Date
Director of Compliance and Ethics
and Interim Chief Compliance and Ethics Officer

ITEM: INFO-1

**University of Central Florida
Board of Trustees
Audit and Compliance Committee**

SUBJECT: Review of Audit and Compliance Committee Charter

DATE: August 28, 2018

PROPOSED COMMITTEE ACTION

Information only.

Supporting documentation: Attachment A: Audit and Compliance Committee Charter

Prepared by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer, and Robert Taft, Chief Audit Executive

Submitted by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer, and Robert Taft, Chief Audit Executive

Attachment A

UCF Audit and Compliance Committee Charter

1. Purpose

The Audit and Compliance Committee (“Committee”) is appointed by the University of Central Florida Board of Trustees (“Board”) and assists the Board in discharging its oversight responsibilities. The committee oversees the following for the University of Central Florida (“University”) and its direct support organizations (“DSO”):

- internal control structure,
- independence and performance of internal and external audits and corrective actions plans,
- integrity of information technology infrastructure and data governance,
- independence and effectiveness of the compliance and ethics program,
- compliance with applicable laws and regulations,
- standards for ethical conduct,
- risk mitigation,
- and internal investigation processes.

2. Membership

The Committee will consist of at least three members of the Board of Trustees.

Members will be independent and objective in the discharge of their responsibilities and free of any financial, family, or other material personal relationship that would impair their independence from management and the University.

The Chair of the Board will appoint the chair, vice chair, and additional members of the Committee. Members will serve on the Committee until their departure from the Board, resignation, or replacement by the Chair of the Board.

3. Experience and Education

Members of the Committee should have professional experience and expertise in at least one of the following fields: post-secondary education, non-profit administration, law, banking, insurance and financial services, finance, accounting, financial reporting, auditing, risk management, or information technology.

As requested, the University and outside resources, as directed by the committee, may provide the Committee with educational resources relating to the Committee in maintaining and enhancing an appropriate level of financial and compliance literacy.

4. Meetings

The Committee will meet as needed to address matters on its agenda, but not less frequently than three times each year.

A majority of the members of the Committee will constitute a quorum for the transaction of business.

Meeting agendas will be prepared jointly by the Committee chair, the chief audit executive, and the chief compliance and ethics officer taking into account recommendations from Committee members. Meeting agendas and appropriate briefing materials will be provided in advance to Committee members.

The Committee will maintain written minutes of its meetings.

The Committee may ask members of management or other individuals to provide pertinent information as necessary. In addition, the Committee may request special reports from University or DSO management on topics that may enhance its understanding of its activities and operations.

In addition to scheduled meetings of the full Committee, the Committee chair will meet with the chief audit executive and chief compliance and ethics officer on a regular basis or as needed.

The Committee is subject to Florida's Government in the Sunshine Law, as set forth in Chapter 286, Florida Statutes. The Sunshine Law extends to all discussions and deliberations as well as any formal action taken by the Committee.

5. Authority

The Board authorizes the Committee to:

- Perform activities within the scope of its charter.
- Have unrestricted access to management, faculty, and employees of the University and its DSOs, as well as to all their books, records, and facilities.
- Study or investigate any matter related to audit, compliance, or related concerns such as potential fraud or conflicts of interest that the Committee deems appropriate.
- Engage independent counsel and other advisers as it deems necessary to discharge its duties.
- Provide oversight and direction of the internal auditing function, of external auditors, and of engagements with state auditors.
- Provide oversight and direction of the institutional compliance, ethics, and risk program, and be knowledgeable of the program with respect to its implementation and effectiveness.
- Perform other duties as assigned by the Board.

6. Roles and responsibilities

With regard to each topic listed below, the Committee will:

A. Internal Controls and Financial Statements

- Evaluate the overall effectiveness of the internal control framework by reviewing audit reports and open audit issue status updates and investigation memorandum to determine if recommendations made by the internal and external auditors have been implemented by management.
- Make inquiries of management and the external auditors concerning the effectiveness of the University's system of internal controls.
- Determine whether the external auditors are satisfied with the disclosure and content of the financial statements, including the nature and extent of any significant changes in accounting principles.
- Review management's written responses to significant findings and recommendations of the auditors, including the timetable to correct weaknesses in the internal control system.
- Review the adequacy of accounting, management, and financial processes of the University and its DSOs.
- Review the financial reporting process implemented by management of the University and its DSOs.
- Review University and DSO management processes for ensuring the transparency of the financial statements and the completeness and clarity of the disclosures.

B. External Audit

- Receive and review audits by the State of Florida Auditor General.
- Receive and review audits of the direct support organizations and component units.
- Review and contract with external auditors for special audits or reviews related to the University's affairs and report the results of any such special projects to the Board.

C. Internal Audit

- Review the independence, qualifications, activities, performance, resources, and structure of the internal audit function and ensure no unjustified restrictions or limitations are made.
- Review the effectiveness of the internal audit function and ensure that it has appropriate standing within the University.
- Ensure that significant findings and recommendations made by the internal auditors and management's proposed response are received, discussed, and appropriately dispositioned.

- Review the proposed internal audit plan for the coming year or the multi-year plan and ensure that it addresses key areas of risk based on risk assessment procedures performed by Audit in consultation with management and the Committee.
- Obtain reports or notification concerning financial fraud resulting in losses in excess of \$10,000 or involving a member of senior management.

D. Data Integrity

- Review the adequacy of the university's information technology management methodology with regards to internal controls, including applications, systems, and infrastructure.
- Review the adequacy of the university's data management policies and procedures to ensure data security and data integrity in institutional reporting.

E. Compliance and Ethics Program

- Review and approve the Compliance Program Plan and any subsequent changes.
- Review the independence, qualifications, activities, resources, and structure of the compliance and ethics function and ensure no unjustified restrictions or limitations are made.
- Review the effectiveness of the compliance and ethics program in preventing or detecting noncompliance, unethical behavior, and criminal misconduct and ensure that it has appropriate standing and visibility across the University.
- Ensure that significant findings and recommendations made by the chief compliance and ethics officer are received, discussed, and appropriately dispositioned.
- Ensure that procedures for reporting misconduct, or ethical and criminal violations are well publicized and administered and include a mechanism that allows for anonymity or confidentiality, whereby members of the university community may report or seek guidance without the fear of retaliation.
- Review the effectiveness of the system for monitoring compliance with laws and regulations and management's investigation and follow-up (including disciplinary action) of any wrongful acts or non-compliance.
- Review the proposed compliance and ethics work plan for the coming year and ensure that it addresses key areas of risk and includes elements of an effective program as defined by Chapter 8 of the Federal Sentencing Guidelines.
- Obtain regular updates from the chief compliance and ethics officer regarding compliance and ethics matters that may have a material impact on the organization's financial statements or compliance policies.
- Review the findings of any examinations or investigations by regulatory bodies.

- Review the University and DSO conflict of interest policies to ensure that: 1) the term "conflict of interest" is clearly defined, 2) guidelines are comprehensive, 3) annual signoff is required, and 4) potential conflicts are adequately resolved and documented.

G. Reporting Responsibilities

- Regularly update the Board about its activities and make appropriate recommendations.
- Ensure the Board is aware of matters that may cause significant financial, legal, reputational, or operational impact to the University or its DSOs.
- Receive a summary of findings from completed internal and external audits and the status of implementing related recommendations.
- Receive a summary of findings from completed reports related to the compliance, ethics, or risk programs.

H. Evaluating Performance

- Evaluate the Committee's own performance, both of individual members and collectively, on a periodic basis and communicate the results of this evaluation to the Board.
- Review the Committee's charter annually and update as necessary.
- Ensure that any changes to the charter are discussed with the Board and reapproved.

Approved by the UCF Board of Trustees January 13, 2017.

ITEM: AUDC-1

**University of Central Florida
Board of Trustees
Audit and Compliance Committee**

SUBJECT: Internal Compliance, Ethics, and Risk Charter

DATE: August 28, 2018

PROPOSED COMMITTEE ACTION

Approve the charter for University Compliance, Ethics, and Risk Office.

BACKGROUND INFORMATION

The University Compliance, Ethics, and Risk office provides centralized and coordinated oversight of the university's ethics, compliance, and risk mitigation efforts. The charter formally defines the purpose, authority, and responsibility of the office and staff. It further establishes the programs position within the organization, authorizes access to records, personnel, and physical properties, and defines the scope of compliance, ethics, and risk activities. The charter was revised to update the reporting structure of the office.

Supporting documentation: Attachment B: University Compliance, Ethics, and Risk Office Charter

Prepared by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer

Submitted by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer

Attachment B

UNIVERSITY COMPLIANCE, ETHICS, AND RISK CHARTER

Purpose and Mission

University Compliance, Ethics, and Risk provides oversight and guidance to university-wide ethics, compliance, and enterprise risk management activities, and fosters a culture that embeds these disciplines in all university functions and activities. The office provides centralized and coordinated oversight through the ongoing development of effective policies and procedures, education and training, monitoring, communication, risk assessment, and response to reported issues as required by Chapter 8 of the Federal Sentencing Guidelines and Board of Governors Regulation 4.003. These guidelines and regulation set forth the requirements of an effective compliance and ethics program and require promoting compliance with laws and ethical conduct.

The mission of the office is to support and promote a culture of ethics, compliance, risk mitigation, and accountability.

Reporting Structure and Independence

University Compliance, Ethics, and Risk reports administratively to the president ~~and the vice-president and executive chief of staff~~, and functionally to the Audit and Compliance Committee of the Board of Trustees. This reporting structure promotes independence and full consideration of compliance, ethics, and risk recommendations and action plans.

The chief compliance and ethics officer and staff shall have organizational independence and objectivity to perform their responsibilities and all activities of the office shall remain free from influence.

Authority

University Compliance, Ethics, and Risk has the authority to review or investigate all areas of the university, including its direct support organizations and faculty practice plan. Reviews and investigations shall not be restricted or limited by management, the president, or the Board of Trustees. University Compliance, Ethics, and Risk has unrestricted and timely access to records, data, personnel, and physical property relevant to performing compliance reviews and investigations, and to allow for appropriate oversight and guidance related to compliance, ethics, and risk mitigation efforts.

The chief compliance and ethics officer will notify the president and request remediation of any unresolved restriction or barrier imposed by any individual on the scope of any inquiry, or the failure to provide access to necessary information or people for the purposes of such inquiry. If unresolved by the president or if the inappropriate restriction is imposed by the president, the chief compliance and ethics officer will notify the chair of the Audit and Compliance Committee of the Board of Trustees. If not resolved, the chief compliance and ethics officer will notify the Board of Governors through the Office of the Inspector General and Director of

Compliance.

Documents and records obtained for the above purposes will be handled in compliance with applicable laws, regulations, and university policies and procedures. As required by law, University Compliance, Ethics, and Risk will comply with public records requests.

Duties and Responsibilities

The duties and responsibilities of the chief compliance and ethics officer and staff include projects and activities that fulfill the requirements for an effective compliance and ethics program as required by Chapter 8 of the Federal Sentencing Guidelines and Board of Governors Regulation 4.003. The University Compliance, Ethics, and Risk Program (Program) will be reasonably designed to optimize its effectiveness in preventing or detecting noncompliance, unethical behavior, and criminal conduct. The Program's design supports mitigation of risks to the university and its employees and provides safe harbor in the event of misconduct or noncompliance. The following elements define the duties and responsibilities of the office:

1. Oversight of Compliance and Ethics and Related Activities
2. Development of Effective Lines of Communication
3. Providing Effective Training and Education
4. Revising and Developing Policies and Procedures
5. Performing Internal Monitoring, Investigations, and Compliance Reviews
6. Responding Promptly to Detected Problems and Undertaking Corrective Action
7. Enforcing and Promoting Standards through Appropriate Incentives and Disciplinary Guidelines
8. Measuring Compliance Program Effectiveness
9. Oversight and Coordination of External Inquiries into Compliance with Federal and State Laws and Take Appropriate Steps to Ensure Safe Harbor

The chief compliance and ethics officer and staff will:

- Develop a Program plan based on the requirements for an effective program. The Program plan and subsequent changes will be provided to the board of trustees for approval. A copy of the approved plan will be provided to the board of governors.
- Provide training to university employees and Board of Trustees' members regarding their responsibility and accountability for ethical conduct and compliance with applicable laws, regulations, rules, policies, and procedures. The Program plan will specify when and how often this training will occur.
- Obtain an external review of the Program's design and effectiveness at least once every five years. The review and any recommendations for improvement will be provided to

the president and Board of Trustees. The assessment will be approved by the Board of Trustees and a copy provided to the Board of Governors.

- Identify and provide oversight and coordination of compliance partners responsible for compliance and ethics related activities across campus and provide communication, training, and guidance on the Program and compliance and ethics related matters.
- Administer and promote the UCF IntegrityLine, an anonymous mechanism available for individuals to report potential or actual misconduct and violations of university policy, regulations, or law, and ensure that no individual faces retaliation for reporting a potential or actual violation when such report is made in good faith.
- Maintain and communicate the university's policy on reporting misconduct and protection from retaliation and ensure the policy articulates the steps for reporting and escalating matters of alleged misconduct, including criminal conduct, when there are reasonable grounds to believe such conduct has occurred.
- Communicate routinely to the president and the board of trustees regarding Program activities. Annually report on the effectiveness of the Program. Any Program plan revisions, based on the chief compliance and ethics officer's report, shall be approved by the Board of Trustees. A copy of the report and revised plan will be provided to the Board of Governors.
- Promote and enforce the Program, in consultation with the president and board of trustees, consistently through appropriate incentives and disciplinary measures to encourage a culture of compliance and ethics. Failures in compliance and ethics will be addressed through appropriate measures, including education or disciplinary action.
- Initiate, conduct, supervise, coordinate, or refer to other appropriate offices such inquiries, investigations, or reviews deemed appropriate in accordance with university regulations and policies, state statutes, and/or federal regulations.
- Make necessary modification to the Program in response to detected non-compliance, unethical behavior, or criminal conduct and take steps to prevent its occurrence.
- Assist the university in its responsibility to use reasonable efforts to exclude within the university and its affiliated organizations individuals whom it knew or should have known through the exercise of due diligence to have engaged in conduct not consistent with an effective Program.
- Coordinate or request compliance activity information or assistance as necessary from any university, federal, state, or local government entity. Oversee and coordinate external inquiries into compliance with federal and state laws and take appropriate

steps to ensure safe harbor in instances of non-compliance.

University Compliance, Ethics, and Risk provides guidance on compliance, ethics, and related matters to the university community. The office collaborates with compliance partners and senior leadership to review and resolve compliance and ethics issues and coordinate compliance and ethics activities, accomplish objectives, and facilitate the resolution of problems.

To ensure University Compliance, Ethics, and Risk staff has the capabilities to perform the duties and responsibilities as described the chief compliance and ethics officer will:

- Maintain a professional staff with sufficient size, knowledge, skills, experience, and professional certifications
- Utilize third-party resources as appropriate to supplement the department's efforts
- Perform assessments of the program and make appropriate changes and improvements

Professional Standards

University Compliance, Ethics, and Risk adheres to the *Florida Code of Ethics* and the *Code of Professional Ethics for Compliance and Ethics Professionals*.

The University Compliance, Ethics, and Risk Charter will be reviewed at least every three years for consistency with applicable Board of Governors and university regulations, professional standards, and best practices. Subsequent changes will be submitted to the Board of Trustees for approval. A copy of the charter and any subsequent changes will be provided to the Board of Governors.

Approved by the UCF Board of Trustees January 13, 2017

ITEM: INFO-2

**University of Central Florida
Board of Trustees
Audit and Compliance Committee**

SUBJECT: University Audit Report

DATE: August 28, 2018

PROPOSED COMMITTEE ACTION

Information only.

Supporting documentation: Attachment C: University Audit Report

Prepared by: Robert Taft, Chief Audit Executive

Submitted by: Robert Taft, Chief Audit Executive

Attachment C

University Audit Report

August 28, 2018



Agenda

1. Status update on active audits
2. Audit Plan discussion
3. Quality Assurance Review update
4. Other Activities



Audits In Progress

1. Environmental Health & Safety
2. College of Nursing
3. Board of Governors Performance Based Funding Data Certification



Management Advisory Services

1. Web Accessibility Compliance
2. Performance Unit Plan 2017-18
3. Data Backup & Retention strategy



Audits On Deck

1. Financial Aid
(Scholarship Process)
2. Library Services
3. Export Control
Processes



Audit Watch List

Ongoing internal initiatives

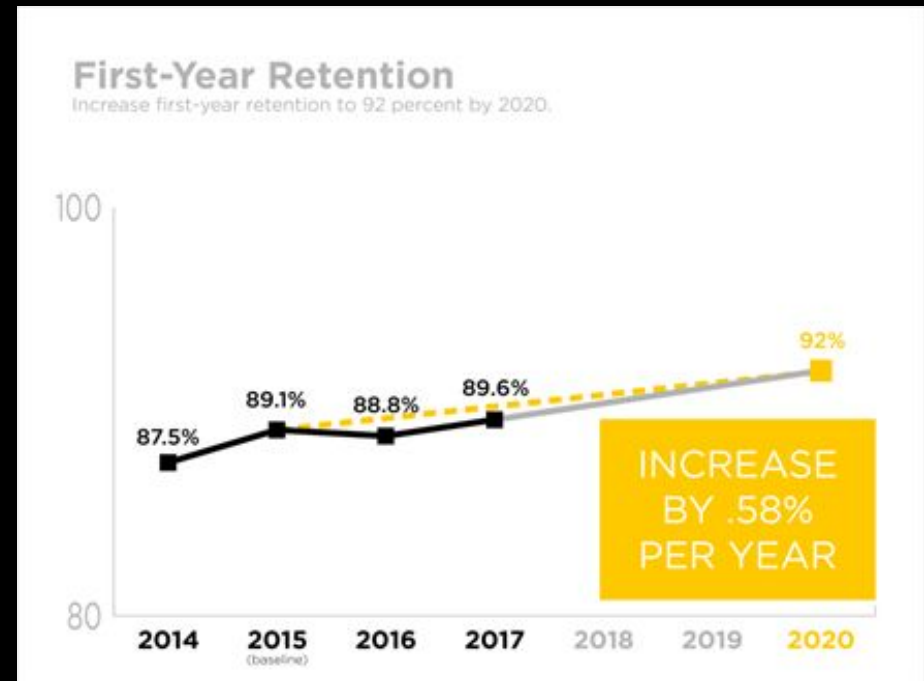
1. UCF Health/CFCPO
2. Academic Advising
3. Direct Connect
4. Grant Proposal Process
5. Disaster Recovery & Business Continuity
6. Research Incubators



Audit Watch List

Strategic Plan initiatives

- Downtown Campus
 - ✓ *Contracts & Procurement*
 - ✓ *IT Implementation*
- Hospital at Lake Nona
- Deferred Maintenance
- UCF Global
- Intellectual Property & Technology Transfer



IT Risk Assessment Approach

IT Risk Assessment Questions:

1. How have your budgets been trending?
2. Do you have a wish list of items you would ideally like to have?
3. What types of violations to Network Policy do you most often see? How are these identified and resolved?
4. Are you aware of any Policy or Procedure Gaps? If so, are they obsolete, in draft, or non-existent?
5. What are some of the most common errors you see? What's their root cause? Are there associated training gaps?
6. What types of reports do you provide to Management? How well are they perceived? Are there any standard comments or feedback?
7. Do you perceive there to be any gaps in IT (i.e. system or department level)?
8. Are you aware of any processes or activities that are outdated and can be retired or streamlined?
9. What projects do you have planned over the next year?
10. Do you have any other areas of issue or concern to discuss?

IT Risk Assessment Approach

<u>IT Audit Evaluation Criteria</u>		
<i>Number</i>	<i>Description</i>	<i>Weight</i>
i.	First time audits or length-of-time since last audit	5%
ii.	High visibility and reputation risk	10%
iii.	Impact on major university initiatives or strategic plan	20%
iv.	Financial Impact of Hardware/Software	8%
v.	Potential for consolidation or cost savings opportunities	5%
vi.	Availability of Hardware/Software	5%
vii.	Integrity and decision making reliance of the data	7%
viii.	Confidentiality of data stored within and in transit	5%
ix.	Process complexity/3rd party vendor reliance	5%
x.	Re-audits of poor performers	5%
xi.	Mandatory requirement or requests from management	20%
xii.	Significant changes in management or organizational structure	5%

IT Risk Assessment

Initial Observations

1. Centralization and/or Consolidation of Services
2. Personnel
3. System integrations (SnapLogic)
4. Cloud computing (general storage and ERP migration timeline)
5. Security & Governance

Quality Assurance Review

- a) Required every five years to verify compliance with IIA standards
- b) Internal self-assessment
- c) External team of internal auditors validates our self-assessment
- d) Workpaper, policies & procedures review, resource & technology evaluation, interviews and surveys
- e) Report issued by December 2018



Updated Mission and Vision Statements

Mission Statement:

➤ **What we want to do now**

- *“To serve the university by providing recommendations to improve performance, delight customers, mitigate risk and leverage opportunities through the development and implementation of effective and efficient internal controls”*

Vision Statement:

➤ **What we want to do in the future**

“To provide data supported, future-focused advisory services in a structure, format and manner for management to make better and faster decisions and successfully achieve their strategic and operational objectives.”

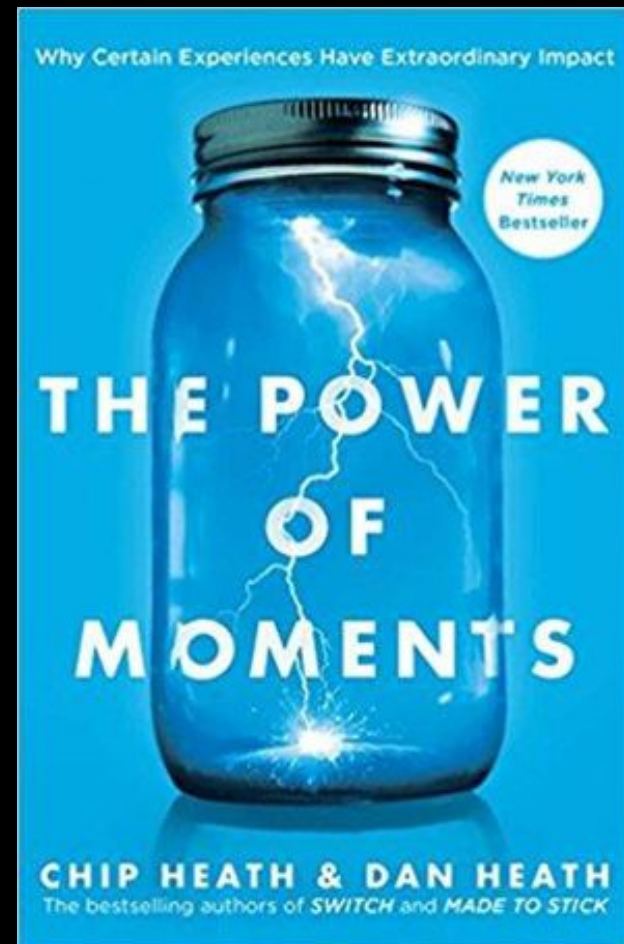
Other Activities

1. MKI Software Business Users module implementation
2. Open recommendations reporting timetable
3. Search Committees
4. Third-party rankings data distribution
5. Auditor General and Direct Support Organization auditor liaison activities
6. Training



Book Club Recommendation

“Transitions should be marked, milestones commemorated, and pits filled. That’s the essence of thinking in moments.”



Questions?

SCALE ×
EXCELLENCE =
IMPACT



ITEM: INFO-3

**University of Central Florida
Board of Trustees
Audit and Compliance Committee**

SUBJECT: University Compliance, Ethics, and Risk Report

DATE: August 28, 2018

PROPOSED COMMITTEE ACTION

Information only.

Supporting documentation: Attachment D: University Compliance, Ethics, and Risk Report

Prepared by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer

Submitted by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer

Attachment D

University Compliance, Ethics, and Risk Report

Audit and Compliance Committee Meeting

August 28, 2018



Agenda

- University Compliance, Ethics, and Risk Program Update
- 2017-18 Work Plan Status of All Activities
- 2018 Compliance and Ethics Culture Survey
- 2018-19 Compliance and Ethics Annual Work Plan

UCER Program Update

- Chief Compliance, Ethics, and Risk Officer
- Athletics Compliance
 - Sr. Associate Athletics Director, Compliance
- Office of Risk Management
 - Director, Enterprise Risk

2017-18 Work Plan Final Status

Develop Effective Lines of Communication

- *IntegrityStar* June 2018
 - Safety edition featuring articles on “Working together to keep UCF Safe,” “Campus Security and Crisis Response,” and “Environmental Health and Safety at UCF”
- Coordinated the collection of documents and final response to the Department of Education’s Office for Civil Rights on two cases

2017-18 Work Plan Final Status

Revise and Develop Policies and Procedures

- University Policies and Procedures Committee and policy development
 - Five-year policy review project update
 - Faculty Senate nominations; president appointed two faculty members to serve on the committee
- UCF Employee Code of Conduct revised and issued
 - President's message, Let's Be Clear, NIST, GDPR

2017-18 Work Plan Final Status

Measure Program Effectiveness

- 2nd Compliance and Ethics Culture Survey
 - Employees received an email invitation to participate in the anonymous survey
 - *IntegrityStar* article announcing the survey with instructions for participation
 - Of the 8,892 university employees, 1,700 employees (19%) responded
 - Results compared to 1st survey conducted in 2016

Compliance and Ethics Culture Survey

How long have you been employed at UCF?	2016		2018		Trend (2018 - 2016)
	Count	Percent	Count	Percent	
No Responses	364	17%	53	3%	-14%
Less than 1 year	380	18%	219	13%	-5%
1-3 years	436	20%	427	25%	5%
4-6 years	257	12%	269	16%	4%
7-10 years	247	12%	210	12%	1%
11-15 years	183	9%	210	12%	4%
16-20 years	130	6%	154	9%	3%
More than 20 years	140	7%	158	9%	3%
Total	2,137	100%	1,700	100%	-

The following describes my job title or job duties	2016		2018		Trend (2018 - 2016)
	Count	Percent	Count	Percent	
No Responses	353	17%	60	4%	-13%
Faculty Member	406	19%	424	25%	6%
Administrator (e.g. Senior Leaders, Deans, Directors)	146	7%	144	8%	2%
Professional Staff	703	33%	756	44%	12%
Technical, Clerical, Service Personnel	242	11%	239	14%	3%
Student Employee	287	13%	77	5%	-9%
Total	2,137	100%	1,700	100%	-

Compliance and Ethics Culture Survey

How familiar are you with...	2016		2018		Trend (2018 - 2016)
	Count	% Familiar	Count	% Familiar	
University Compliance, Ethics and Risk office	1,003	47%	1,162	69%	22%
UCF Creed	1,676	80%	1,410	84%	5%
UCF's policy for reporting Misconduct and Protection from Retaliation	1,278	61%	1,249	75%	14%
UCF IntegrityLine for anonymously reporting compliance and ethical concerns	945	45%	1,117	67%	22%
UCF Employee Code of Conduct	<i>Not applicable</i>		1,450	86%	-

% Familiar includes responses of "Very Familiar", "Familiar" or "Somewhat Familiar"

Compliance and Ethics Culture Survey

To what extent do you agree or disagree with the statement:	2016		2018		Trend (2018 - 2016)
	Count	% Agree	Count	% Agree	
I know where to find information on UCF policies and procedures.	1,649	78%	1,408	84%	6%
I know where to find information on UCF regulations.	1,576	75%	1,340	80%	5%
I feel comfortable reporting incidents or concerns of noncompliance to my supervisors.	1,457	69%	1,191	71%	2%
I feel that I would be protected from retaliation if I report a suspected compliance violation to my supervisor.	1,341	64%	1,106	66%	3%
I feel that I would be protected from retaliation if I report a suspected compliance violation to a central office (e.g. Human Resources, OIE, Procurement, etc.)	1,332	63%	1,103	66%	3%
I feel that I would be protected from retaliation if I report a suspected compliance violation through UCF IntegrityLine.	1,301	62%	1,128	67%	6%
I believe that most UCF employees know the laws, regulations, and policies that they are required to follow.	<i>Not applicable</i>		1,038	62%	-

% Agree includes responses of "Strongly Agree", "Agree" or "Somewhat Agree"



2018-19 Work Plan

Continue the activities supporting the eight elements for effective programs

Includes:

Internal Monitoring and Compliance Reviews

- Conduct risk assessment

New Regulations and Special Projects

- Chair Youth Protection Committee and develop Youth Protection program
- Co-Chair working group on European Union General Data Protection Regulation compliance

Questions?



ITEM: INFO-4

**University of Central Florida
Board of Trustees
Audit and Compliance Committee**

SUBJECT: 2017-18 Work Plan Status of All Activities

DATE: August 28, 2018

PROPOSED COMMITTEE ACTION

Information only.

Supporting documentation: Attachment E: 2017-18 Work Plan Status of All Activities

Prepared by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer

Submitted by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer

Attachment E



University Compliance, Ethics and Risk Office

2017-18 Work Plan Status of All Activities July 1, 2017 – June 30, 2018

UCF's comprehensive compliance and ethics program is based on the elements of an effective compliance program set forth in Chapter 8 of the Federal Sentencing Guidelines. These requirements set forth an effective compliance and ethics program for organizations and require not only promoting compliance with laws, but also advancing a culture of ethical conduct. Federal agencies use these guidelines to determine the effectiveness of a compliance and ethics program, and to determine whether the existence of the program will provide safe harbor in the event of noncompliance.

1. 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.

2. Develop Effective Lines of Communication

Create communication pathways that allow the dissemination of education and regulatory information and provide a mechanism for reporting compliance activities or concerns.

3. Conduct Effective Training and Education

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

4. Revise and Develop Policies and Procedures

Revise or develop university regulations along with policies and procedures that reflect UCF's commitment to ethical conduct and compliance with applicable laws and regulations.

5. Conduct Internal Monitoring and Compliance Reviews

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

6. Respond Promptly to Detected Problems and Undertake Corrective Action

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

7. Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines

Promote the compliance and ethics program and university regulations, policies and procedures, and the consequences of noncompliance.

8. Measure Compliance Program Effectiveness

Evaluate the overall compliance and ethics culture of UCF and the performance of the University Compliance, Ethics, and Risk office.

9. New Regulations and Special Projects

**2017-18 Compliance and Ethics Work Plan
Status of All Activities
July 1, 2017 – June 30, 2018**

1. Provide Oversight of Compliance and Ethics and Related Activities
Coordinate and conduct bi-monthly meetings of the University Compliance and Ethics Advisory Committee
<ul style="list-style-type: none"> ➤ Developed materials and chaired the Compliance and Ethics Advisory Committee meetings in July, November, January, March, and May. ➤ Outlined the requirements for an effective compliance and ethics program and discussed how compliance partners should be implementing the requirements within their programs. ➤ Provided an update on the Employee Code of Conduct, annual report, culture survey, gave an overview of the Department of Education Office of Civil Rights complaints against the university, and discussed the committee formed for addressing minors on campus. ➤ Discussed articles planned for the July, October, March, and June <i>IntegrityStar</i> newsletter editions and received updates from members on their compliance and ethics efforts. ➤ Highlights from compliance partners included a summary of the revision to the tax law, Title IX program update, updates on GDPR, NIST, as well as comprehensive discussions regarding the challenges and rewards of implementing and maintaining compliance and ethics at the university.
Conduct quarterly meetings with compliance partners and senior leadership
<ul style="list-style-type: none"> ➤ Met with vice presidents, key administrators, and compliance partners to provide updates on compliance and ethics initiatives and discuss any concerns or issues. ➤ Provided quarterly Athletics compliance update to the president and vice president and executive chief of staff.
Serve on and provide compliance guidance to the Title IX workgroup
<ul style="list-style-type: none"> ➤ Provided guidance and support to the Title IX coordinator and served on and provided compliance guidance to the Title IX workgroup and Title IX policy committee.
Serve as a member of the Security Incident Response Team and provide guidance
<ul style="list-style-type: none"> ➤ Served as a member of the Security Incident Response Committee and provided review and guidance associated with federal and state privacy and data breach requirements.

2. Develop Effective Lines of Communication

Prepare and distribute *IntegrityStar*, the compliance and ethics newsletter

- Developed and issued the July 2017 edition of the *IntegrityStar* covering the theme of personal relationships in the workplace.
 - Article titled *Relationships that Can Create Conflicts* included the 2017 annual reminder on the standards of conduct and reporting responsibilities under Florida ethics laws and promoted the office’s web courses titled *Potential Conflicts – Florida Code of Ethics for Public Officers and Employees* and *Gifts and Honoraria*.
 - Article titled *University Policies on Amorous Relationships and Employment of Relatives* provided an overview of the university policies with links to read the full policy.
 - Article titled *Personal Relationships in the Workplace* included examples of how personal relationships in the workplace can become a conflict and included a short training video on conflicts with the employment of relatives and a cartoon covering amorous relationships in the workplace.
- Developed and issued the October 2017 edition of the *IntegrityStar* announcing the university’s first UCF Employee Code of Conduct.
 - Article titled *Announcing the UCF Employee Code of Conduct* provided information on how to access the Code of Conduct and enroll in online training.
 - Article titled *UCF IntegrityLine Cases on Civility* provided data on reports of suspected or actual misconduct or ethical concerns.
 - Article titled *Celebrate Compliance and Ethics Week* announced the activities scheduled for the first week of November.
- Developed and issued the March 2018 edition of the *IntegrityStar* announcing the second UCF Compliance and Ethics Culture Survey.
 - Article titled *UCF Compliance and Ethics Culture Survey* announced the survey and provided instructions for employees to participate.
 - In the Spotlight article featured the Let’s Be Clear campaign.
 - Article titled *Minors on Campus* provided an update on the office’s development of a youth protection program.
 - Article titled *Gifts and Honoraria Reviews* provided additional information on the university policy UCF 2-009 Gifts and Honoraria and included a short “Know the Code” training video on gifts and honoraria and a cartoon on accepting gifts.
- Developed and issued the June 2018 edition of the *IntegrityStar* focusing on the issue of safety.
 - Articles titled *Working together to keep UCF Safe, Campus Security and Crisis Response*, and *Environmental Health and Safety at UCF* were provided by the UCF Police Department, Department of Security and Emergency Management, and Environmental Health and Safety.
 - In the Spotlight article highlighted university policy UCF 3-128, University Volunteers.
 - Short training video on maintaining a safe and secure workplace and a cartoon on safety were also included.

Administer and promote the UCF IntegrityLine

- Continued administration of the UCF IntegrityLine to include review and tracking of all reports, data compilation, trend review, and reporting.
- Continued promoting the UCF IntegrityLine in the *IntegrityStar* newsletter; through ethical leadership training; in compliance videos; in the Compliance, Ethics, and Risk pamphlet; on the Compliance, Ethics, and Risk website; on the websites of all compliance partners; tabling events; and through distribution of custom IntegrityLine earbuds and wallet cards.
- Continued providing UCF IntegrityLine wallet cards and pamphlets to all new employees during orientation.

Coordinate timely responses to regulatory and other external agencies

- Completed the 2017 State University System Enterprise Risk Management Survey and submitted to the Board of Governors.
- Documented UCF's completion of all 19 regulation components in compliance with BOG Regulation 4.003 State University System Compliance and Ethics Programs and provided response to the BOG in their request for a status update.
- Coordinated with the Office of Institutional Equity the collection of documents and final response to the Department of Education's Office for Civil Rights on two open cases.

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.
- Updated the website to include the July 2017, October 2017, March 2018, and June 2018, editions of the *IntegrityStar* newsletter, added additional videos to the training page, the UCF Employee Code of Conduct online training module, updated the organizational chart, revised the compliance matrix and the Compliance and Ethics Advisory Committee to include changes to compliance partners and members, added the Annual Report and Compliance and Ethics Program Plan, and photos for the Athletics Compliance staff.

3. Conduct Effective Training and Education	
Provide training on ethical leadership and avoiding conflicts of interest to the Student Government Association, Leadership Enhancement Program, and the Leadership Development program	
<ul style="list-style-type: none"> ➤ Served as a mentor in the Leadership Enhancement Program hosted by the Office of Diversity and Inclusion, attended Program meetings, and met with the Program mentee. ➤ Provided Ethical Leadership training for the Leadership Development Program in Human Resources. ➤ Provided Ethical Leadership training for UCF Advancement Leadership and UCF Human Resources Leadership in Action series. 	
Conduct in-person Clery Act compliance training	
<ul style="list-style-type: none"> ➤ Developed and conducted Clery Act training for coaches and administrators in Athletics, the Student Government Association Cabinet members, resident assistants with Housing and Residence Life, and all staff in the Office of Institutional Equity. 	
Deliver in-person Gifts and Honoraria training	
<ul style="list-style-type: none"> ➤ Developed and delivered customized Gifts and Honoraria training at the Human Resources hosted meeting for the State University System College University Human Resources Executives in July 2017. ➤ Developed and delivered Gifts and Honoraria training for faculty and staff at the College of Medicine in September and October 2017. 	
Launch third annual Compliance and Ethics week awareness campaign	
<ul style="list-style-type: none"> ➤ Scheduled activities for the annual Compliance and Ethics week awareness campaign during November 6-9, 2017, to include hosting three brown bag lunch and learn training sessions and distributing an online word scramble. <ul style="list-style-type: none"> ○ Ethical Leadership training provided by the Chief Compliance and Ethics Officer Rhonda Bishop, Amorous Relationships training provided by the Director for the Office of Institutional Equity Nancy Myers, and Information Security training provided by the Information Security Officer Chris Vakhordjian. ○ Awarded three prizes to employees correctly completing the word scramble. 	

Develop and launch online Employee Code of Conduct training

- Finalized the Employee Code of Conduct training and launched the training in October 2017 to all existing employees. Worked with Human Resources to implement mandatory training for all new employees beginning on November 9. Total number of employees trained = 865 employees.
- Added the Employee Code of Conduct online training module to our website and featured the new training in our October edition of the *IntegrityStar*.
- Customized “Know the Code” mini courses on the following topics: *Communications with the Public and Media, Conflicts of Interest, Fraud, Gifts and Honoraria, Harassment in the Workplace, Reporting Violations, Sexual Harassment, and University Resources* and posted the courses to our website.
- Announced the Code of Conduct along with available training in the October 2017 edition of the *IntegrityStar*.
- Revised the Employee Code of Conduct for launch on July 1 to include a new president’s message, Let’s Be Clear campaign, related policies and regulations, departmental name changes, NIST, and GDPR.

Promote Gifts and Honoraria and Potential Conflicts online training modules and track employee completion

- Promoted the office’s web courses titled *Potential Conflicts – Florida Code of Ethics for Public Officers and Employees* and *Gifts and Honoraria* in the July 2017 and the March 2018 edition of the *IntegrityStar*.
- Distributed an all employee email in October 2017 promoting the *Potential Conflicts – Florida Code of Ethics for Public Officers and Employees* training.
- Promoted UCF 2-009 Gifts and Honoraria policy and provided training module – “Know the Code” Gifts and Honoraria in the March 2018 edition of the *IntegrityStar*.
- Total number of employees who took the course and passed the final quiz:
 - *Potential Conflicts – Florida Code of Ethics for Public Officers and Employees* = 272 employees.
 - *Gifts and Honoraria* = 118 employees.

Identify additional opportunities to develop and deliver compliance and ethics training

- Provided education and promotion of online training to employees following investigations. Provided education and promotion of online training in response to questions submitted through our complianceandethics@ucf.edu email account.
- Hosted a table at the New Faculty Orientation in August 2017 and the employee benefits fair in October 2017 to raise awareness of the office and provide education on the UCF IntegrityLine and the conflict of interest and commitment reporting; featured the newly available online UCF Employee Code of Conduct training module in our *IntegrityStar* newsletter.
- Developed and provided grant and contracts award administration training sessions to faculty and administrators within the College of Nursing, College of Arts and Humanities, and the College of Health and Public Affairs. This is an ongoing training effort with the Research Compliance Office within the Office of Research and Commercialization to ensure all research faculty receive training in federal compliance requirements.
- Delivered specialized training to the Research Conflict of Interest Committee members in the Office of Research and Commercialization.
- Distributed University Compliance, Ethics, and Risk pamphlets and IntegrityLine wallet cards to employees during new employee orientation.
- Acquired new compliance brief training videos which were posted to the office's training page website; Responding to Workplace Violence, Maintaining a Safe and Secure Workplace, and seven separate "Know the Code" training modules.
- Distributed video trainings including Employment of Relatives in the July 2017 edition of the *IntegrityStar* newsletter, "Know the Code" Gifts and Honoraria training in the March 2018 edition and maintaining a Safe and Secure Workplace training video in the June 2018 edition.

Issue additional regulatory alerts and updates as appropriate

- Issued the annual communication to all faculty and staff members to remind them of the standards of conduct and reporting responsibilities under Florida ethics laws in October 2017.
- Prepared and issued the annual Vulnerable Persons Act Memo in March 2018.

4. Revise and Develop Policies and Procedures

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 when needed revised policies to improve content and the communication of expectations to the university community. Reviewed and edited 10 policies that were approved by the committee and president.
- Revised the UCF Employee Code of Conduct to include a new president’s message, Let’s Be Clear campaign, related policies and regulations, departmental name changes, NIST, and GDPR.
- Initiated a policy five-year review project in compliance with UCF-2-001.5 University Policy Development to ensure that policies continue to be appropriate and current.
- Sought nominations from the Faculty Senate for potential candidates to become members of the University Policies and Procedures Committee and coordinated with the president, the nomination of two faculty members to the committee.

Serve as members of the 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.

5. Conduct Internal Monitoring and Compliance Reviews

Manage university-wide conflict of interest and commitment processes

- Developed and issued the annual conflict of interest and commitment report dated October 2017 to the Board of Trustees Audit and Compliance Committee covering the office’s activities from August 8, 2016, to August 7, 2017.
- In preparation for the 2016-17 conflict of interest and commitment disclosure process, revised seven training modules to reflect updates from the previous year and provided the trainings to faculty and staff members as an online resource.
- Implemented communication plan for the 2017-18 conflict of interest and commitment online disclosure process and launched the new disclosure year on August 14, 2017.
- Distributed a number of communications, monitored online disclosure submissions, conducted reviews, and worked with faculty and administrators to resolve potential conflicts. Tracked compliance rates and worked with Academic Affairs to address noncompliance.
- Notified 2,586 employees by email to submit an online disclosure and 2,545 submitted within the deadline (extended by two weeks due to Hurricane Irma), achieving a 98.4 percent compliance rate with employee submissions prior to the deadline.
- Identified a steady increase in the office’s review and mitigation of potential conflicts. This year, the office reviewed 1,116 online disclosures (a slight increase from the 1,056 last year), with potential conflicts identified in 121 requiring a monitoring plan (an increase from 100 last year). Completed 282 online reviews for the employment of relatives (an increase of 20 from 262 last year).
- Conflict of interest reviews outside the online system were also tracked and included 147 requests for review of potential conflicts and guidance provided to employees and departments (an increase of 22 from 125 last year).
- Reviewed and provided feedback on 22 research exemption requests prior to coordinating with the provost, president, and chair of the Board of Trustees for approval as required by state statute. On behalf of the president and Board of Trustees, prepared the annual research exemption report and submitted it to the governor and legislature as required by state statute. Developed the report in partnership with the Research Integrity Compliance Office and submitted in February 2018.
- Received and completed 133 reviews of potential conflicts of interest associated with the attendance at conferences or events sponsored by vendors (an increase of 15 requests from 118 last year).
- Provided additional support to employees who meet the state definition of a reporting individual to include: coordinating efforts with Human Resources to identify and notify reporting individuals of their mandatory filing requirements and monitoring the delinquent list posted on the Commission on Ethics’ website and providing support until all forms were submitted to prevent employees from accruing fines.

Continue compliance partner reporting

- Compliance partners provided updates on their program activities during committee meetings and, when significant issues and challenges arose, through separate meetings and discussions.
- Formal annual reports were submitted by compliance partners again this year. Those reports will be consolidated with the activities of the University Compliance, Ethics, and Risk office and published in the 2018 compliance and ethics program annual report.

Conduct risk assessment
<ul style="list-style-type: none"> ➤ Risk assessment project was moved to the 2018-19 Work Plan.
Review UCF IntegrityLine and department database for trends, risk areas, and address appropriately
<ul style="list-style-type: none"> ➤ Based on an identified trend, distributed an awareness email to deans and directors regarding substantiated cases concerning professors offering extra credit in exchange for a positive rating and requested that the deans and directors incorporate information on the topic during new faculty onboarding and to existing faculty members as a reminder. ➤ In response to four substantiated cases involving employee non-compliance with the Florida ethics laws last academic year, implemented a number of preventative measures and training.
6. Respond Promptly to Detected Problems and Undertake Corrective Action
Receive and evaluate UCF IntegrityLine reports and allegations of misconduct made directly to the office and conduct investigations
<ul style="list-style-type: none"> ➤ 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 164 reports through the UCF IntegrityLine alleging misconduct (an increase of 65 cases from 99 last year). ➤ 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, 90 cases were investigated and closed. ➤ Received 25 allegations of misconduct directly to University Compliance, Ethics, and Risk (up one from 24 last year) and when appropriate, conducted investigations and provided recommendations for corrective actions and improvement of ethical conduct. Sixteen of these cases were closed.

Provide recommendations for corrective actions and improvement of ethical conduct
<ul style="list-style-type: none"> ➤ Continued providing recommendations for corrective actions and improvements of ethical conduct to the appropriate authorities following investigations or requests for guidance.
7. Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines
Develop and promote compliance and ethics incentive opportunities
<ul style="list-style-type: none"> ➤ Offered incentives to employee during Compliance and Ethics Week activities. ➤ Recognized 12 employees for their outstanding efforts in compliance and ethics in the July 2017, October 2017, March 2018, and June 2018 editions of the <i>IntegrityStar</i> newsletter.
Promote awareness of UCF regulations, policies and procedures, and regulatory requirements
<ul style="list-style-type: none"> ➤ Highlighted new and revised UCF policies and regulations in the July 2017, October 2017, March 2018, and June 2018 editions of the <i>IntegrityStar</i> newsletter. ➤ <i>IntegrityStar</i> articles also featured policies, regulations, and training available. <ul style="list-style-type: none"> ○ <i>June 2018 issue featured UCF 3-128 University Volunteers.</i> ○ <i>March 2018 issue featured UCF 2-009 Gifts and Honoraria.</i> ○ <i>October 2017 issue featured the UCF Employee Code of Conduct.</i> ○ <i>July 2017 issue featured UCF-2004 Prohibition of Discrimination, Harassment and Related Interpersonal Violence and UCF 3-0082. Employment of Relatives.</i> ➤ Distributed notices for policies posted for public review for 10 policies. ➤ Provided overviews of new regulatory requirements to senior leadership, compliance partners, and the Board of Trustees Audit and Compliance Committee.

Promote accountability and consistent discipline
<ul style="list-style-type: none"> ➤ Following investigations with outcome of substantiated employee misconduct, recommended to the appropriate authorities consistent discipline that ensured accountability. ➤ Continued serving as the point of contact and source for guidance to research compliance related to award management, scientific misconduct, export controls, conflict of interest, and development of policies and procedures.
8. Measure Compliance Program Effectiveness
Develop and issue the University Compliance, Ethics, and Risk Annual Report
<ul style="list-style-type: none"> ➤ Compiled and designed a broader annual report for 2016-17 which included compliance partners and programs across the university and a better communication of the program's efforts. In November it was presented to the Board of Trustees Audit and Compliance Committee and a copy was sent to the Board of Governors.
Launch second Compliance and Ethics Culture Survey to benchmark results against first survey
<ul style="list-style-type: none"> ➤ Developed and launched the second UCF Compliance and Ethics Culture Survey. ➤ All university employees, including hourly, and student employees with email addresses received an invitation to participate in the anonymous survey, which contained questions about the employee's familiarity with the office, the UCF IntegrityLine, UCF policies and regulations, and asked whether employees had experienced or witnessed misconduct, bullying, or retaliation, and if so, whether they reported it. ➤ Of the 8,892 university employees emailed, 1,700 employees (19 percent) responded. ➤ Employee responses regarding whether they experienced or observed a violation of laws, regulations, or university policies or regulations within the last 12 months and whether they were asked to bend, break, or circumvent laws, regulations, or university policies or regulations was similar in 2016 and 2018 response. Eighty-three percent had <u>not</u> experienced or observed a violation of laws, regulations, or university policies or regulations within the last 12 months and 94 percent stated that they were <u>not</u> asked to bend, break, or circumvent laws, regulations, or university policies or regulations. ➤ Employees reported a 22 percent increase in awareness of University Compliance, Ethics, and Risk and the UCF IntegrityLine. Awareness of the office increased from 47 percent in 2016 to 69 percent in 2018, and awareness of the UCF IntegrityLine increased from 45 percent to 67 percent. Additionally, employees reported greater familiarity with UCF's policy for reporting Misconduct and Protection from Retaliation, from 61 percent in 2016 to 75 percent in 2018, an overall increase of 14 percent. ➤ Eighty-six percent of employees reported familiarity with the new UCF Employee Code of Conduct.

<p>Develop, measure, and track department process improvement efforts using the university assessment process</p>
<ul style="list-style-type: none"> ➤ Outcomes and measures supporting the continuous improvement of several processes such as the conflict of interest and commitment disclosure process, UCF IntegrityLine reporting, and increased awareness efforts continue to be reviewed, measured, and improved. ➤ Prepared the 2016-17 Assessment Results Report documenting the outcome of the office’s efforts in improving the online conflict of interest and commitment disclosure process. Achieved the highest compliance rates with employee submissions and reviewer responses for online disclosure reporting with a record 96 percent compliance rate with the 30-day employee submission requirement and 95 percent compliance rate with disclosures reviewed and closed within 60-days. ➤ Prepared the 2017-18 Assessment Plan focused on increased employee awareness of the UCF IntegrityLine and University Compliance, Ethics, and Risk, both identified in the first Culture Survey as requiring improvement.
<p>9. New Regulations and Special Projects</p>
<p>Manage compliance efforts with National Institute of Standards and Technology 800-171 (NIST) federal requirements</p>
<ul style="list-style-type: none"> ➤ Collaborated with campus partners including UCF Information Technologies and Resources and the Office of Research and Commercialization to prepare for compliance with the National Institute of Standards and Technology 800-171 (NIST) federal requirements affecting multiple areas of the university. ➤ Coordinated bi-weekly meetings and tracked progress of the workgroup’s efforts, providing guidance and support. ➤ Provided senior leadership with an overview of requirements, potential impact and risks to the university, and the resources needed to develop a NIST compliance program and infrastructure.
<p>Chair Youth Protection Committee (formerly known as Minors on Campus Committee)</p>

- Chaired the Youth Protection Committee (formerly known as Minors on Campus Committee) consisting of representatives from the Office of Institutional Equity, Human Resources, Continuing Education, Environmental Health and Safety, Office of the General Counsel, Procurement Services, and Student Development and Enrollment Services.
- The Committee is charged with developing a university-wide minor protection program and a university policy.
- Updated the draft university policy to be approved by the Youth Protection Committee prior to presenting it to the University Policy and Procedures Committee for approval.
- Developed employee training and program registration materials.
- Reviewed and updated draft brochure and informational materials to distribute to university personnel.

Served on the University Assessment Committee and Divisional Review Committee Chair for the President's Division

- Served as the Assessment Divisional Review Committee Chair for the President's Division, voting member of the University Assessment Committee, and Assessment Coordinator for University Compliance, Ethics, and Risk which involved oversight of seven departments in developing their university assessment results from 2016-17 and plans for improvement in 2017-18. Departments achieved exemplary ratings.

Provided Support to Compliance Partners and University Stakeholders

- Served on hiring committees for new compliance positions within the Office of Institutional Equity.
- Responded promptly to public records requests from the press for information on the closed IntegrityLine cases, partnered with UCF News and Information and the Office of the General Counsel on cases published in the media and communicated outcomes with the members of the Board of Trustees.
- Continued intake and timely responses to emails submitted to the department email address complianceandethics@ucf.edu and conflict of interest email address PCA@ucf.edu.

Chaired the State University System Compliance and Ethics Consortium

- To support the development of effective compliance and ethics programs at the Florida State University System level, as well as assisting compliance and ethics colleagues with their respective programs, continued service as chair of the Florida State University System Compliance Consortium, provided leadership on the development of the consortium, and coordinated quarterly meetings. In December the consortium discussed the charter, voted and approved a new chair beginning June 2018.

ITEM: INFO-5

**University of Central Florida
Board of Trustees
Audit and Compliance Committee**

SUBJECT: 2018 Compliance and Ethics Culture Survey

DATE: August 28, 2018

PROPOSED COMMITTEE ACTION

Information only.

Supporting documentation: Attachment F: 2018 Compliance and Ethics Culture Survey

Prepared by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer

Submitted by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer



University Compliance, Ethics and Risk Office

2018 Compliance and Ethics Culture Survey

Background

In 2016, University Compliance, Ethics, and Risk conducted a compliance and ethics culture survey to evaluate the compliance and ethics culture at UCF. The results of the survey were extremely positive, with a few opportunities for improvement such as a relatively low employee familiarity with University Compliance, Ethics, and Risk, the UCF IntegrityLine, and UCF's policy for reporting Misconduct and Protection from Retaliation. To increase employee awareness and education about the office, the UCF IntegrityLine, UCF policies and regulations, and compliance and ethics topics, the office implemented a number of initiatives such as the new UCF Employee Code of Conduct, three online web trainings titled *Gifts and Honoraria*, *Potential Conflicts*, and the *UCF Employee Code of Conduct*, and the compliance and ethics newsletter, the *IntegrityStar*. Annual Compliance & Ethics Week awareness campaigns were held each November and the office hosted tabling events for faculty during orientation and for staff during the benefits fair each year. All new employees also began receiving information about the office, the UCF IntegrityLine, and UCF Employee Code of Conduct.

In 2018, the culture survey was repeated. From March 1 to March 30, 2018, the office distributed the anonymous survey by email to all university employees, including hourly, and student employees with email addresses. An article was included in the March 2018 edition of the compliance and ethics newsletter, the UCF *IntegrityStar*. Of the 8,892 university employees, 1,700 employees (19%) responded. The results from this survey were benchmarked against the initial results from the compliance and ethics culture survey conducted in 2016. The following summary highlights the key responses and trends. The complete survey results and trend report are attached.

Results

The 2018 survey revealed a 22% increase in employee awareness of the University Compliance, Ethics, and Risk office and the UCF IntegrityLine. Employee awareness of UCF's policy for reporting Misconduct and Protection from Retaliation increased by 14%, with 75% employees reporting familiar with this policy. There was also an increase in the percentage of employees who knew where to find information on UCF policies and procedures, with 78% reporting familiar in 2016 to 84% in 2018. Knowledge on finding information on UCF regulations also increased from 75% in 2016 to 80% in 2018. Familiarity with the UCF Creed also increased from 80% in 2016 to 84% in 2018.

An impressive 86% of employees reported that they were familiar with the new UCF Employee Code of Conduct.

Employee responses regarding whether they experienced or observed a violation of laws, regulations, or university policies or regulations within the last 12 months and whether they were asked to bend, break, or circumvent laws, regulations, or university policies or regulations were similar in 2016 and 2018. Eighty-three percent had not experienced or observed a violation of laws, regulations, or

Attachment F

university policies or regulations within the last 12 months and 94% stated that they were not asked to bend, break, or circumvent laws, regulations, or university policies or regulations.

The responses regarding integrity and ethical behavior were similar in 2016 and 2018. Respondents stated that they believed that employees (83%) and employees in leadership positions (78%) at UCF demonstrate integrity and ethical behavior.

With regard to reporting incidents or concerns of potential misconduct, most employees (71%) responded that they felt comfortable reporting incidents or concerns to their supervisor. When asked if they felt protected from retaliation when reporting to their supervisor, 66% responded favorably. The same percentage of employees reported that they felt protected from retaliation for reporting to a central office, with 67% responding favorably to protections offered through the UCF IntegrityLine. Employee responses were 3-6% higher than reported in 2016.

Response to Survey

The office will continue its communications and training during fiscal year 2018-19 to raise awareness of University Compliance, Ethics, and Risk, the UCF IntegrityLine, UCF policies and regulations, and compliance and ethics topics. The culture survey will be repeated in 2020.

ITEM: INFO-6

**University of Central Florida
Board of Trustees
Audit and Compliance Committee**

SUBJECT: 2018-19 Compliance and Ethics Annual Work Plan

DATE: August 28, 2018

PROPOSED COMMITTEE ACTION

Information only.

Supporting documentation: Attachment G: 2018-19 Compliance and Ethics Annual Work Plan

Prepared by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer

Submitted by: Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer

Attachment G



University Compliance, Ethics and Risk Office

Compliance and Ethics Annual Work Plan 2018-19

University Compliance, Ethics, and Risk provides centralized and coordinated oversight of UCF’s ethics, compliance, and risk mitigation efforts through the ongoing development of effective policies and procedures, education and training, monitoring, communication, risk assessment, and response to reported issues as required by Chapter 8 of the Federal Sentencing Guidelines. These guidelines set forth the requirements of an effective compliance and ethics program for organizations and require not only promoting compliance with laws, but also promoting a culture of ethical conduct. The compliance and ethics program is focused on projects that will mitigate risks to the resources and reputation of UCF as well as the careers and professional reputations of its employees.

The following work plan lists the required elements and the activities that will be conducted from July 1, 2018, to June 30, 2019.

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
	Conduct quarterly meetings with compliance partners and senior leadership
	Serve on and provide compliance guidance to the Title IX workgroup
	Serve as a member of the Security Incident Response Team and provide guidance
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 <i>IntegrityStar</i> , the compliance and ethics newsletter
	Administer and promote the UCF IntegrityLine
	Coordinate timely responses to regulatory and other external agencies
	Maintain and promote the compliance and ethics website

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	Promote online Employee Code of Conduct training module and track employee completion
	Promote "Know the Code" online video training series
	Launch fourth annual Compliance and Ethics week awareness campaign
	Conduct in person Clery Act compliance training and work with the university's Clery Compliance Coordinator to develop an online training module
	Promote Gifts and Honoraria and Potential Conflicts online training modules and track employee completion
	Issue annual memo on Vulnerable Persons Act
	Identify additional opportunities to develop and deliver compliance and ethics training
	Issue additional regulatory alerts and updates as appropriate
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
	Serve as members of the HIPAA Collaborative to develop university policies and procedures on HIPAA compliance
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 processes
	Continue compliance partner reporting
	Conduct risk assessment
	Review UCF IntegrityLine and department database for trends and risk areas and address appropriately

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 and conduct investigations
	Provide recommendations for corrective actions and improvement of ethical conduct
7. Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines	
Promote the compliance and ethics program and university regulations, policies and procedures, and consequences of noncompliance	Develop and promote compliance and ethics incentive opportunities
	Promote awareness of UCF regulations, policies and procedures, and regulatory requirements
	Promote accountability and consistent discipline
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
	Develop, measure, and track department process improvement efforts using the university assessment process
9. New Regulations and Special Projects	
	Oversee compliance efforts with National Institute of Standards and Technology 800-171 (NIST) federal requirements
	Chair Youth Protection Committee and develop Youth Protection program
	Co-Chair working group on European Union General Data Protection Regulation compliance