



UNIVERSITY OF CENTRAL FLORIDA

**Board of Trustees
Audit and Compliance Committee
November 30, 2018, 4:15 – 5:15 p.m.
Millican Hall
Provost's Conference Room 395E
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 August 28, 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 Self-Assessment (AUDC-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">• University Audit Report (INFO-1) | Robert Taft |
| <ul style="list-style-type: none">• 2018 Compliance, Ethics, and Risk Annual Report (INFO-2) | Christina L. Serra |
| <ul style="list-style-type: none">• University Compliance, Ethics, and Risk Report (INFO-3) | Christina L. Serra |
| V. CLOSING COMMENTS | Chair Seay |



UNIVERSITY OF CENTRAL FLORIDA

**Board of Trustees
Audit and Compliance Committee Meeting
August 28, 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 3:00 p.m. Trustees Kenneth Bradley and Bill Yeargin attended by teleconference call. Chairman Marcos Marchena attended by teleconference call.

MINUTES APPROVAL

The minutes from the April 17, 2018, meeting were approved unanimously.

NEW BUSINESS

Review of Audit and Compliance Committee Charter (INFO-1)

Christina L. Serra, Director of Compliance and Ethics and Interim Chief Compliance and Ethics Officer and Robert Taft, Chief Audit Executive, presented the Audit and Compliance Committee Charter and discussed the development of a committee effectiveness survey.

Approval of the University Compliance, Ethics, and Risk Charter (AUDC-1)

Serra provided an update on the University Compliance, Ethics, and Risk Charter, the edit relates to the reporting structure of the office. The Committee approved the charter.

University Audit Report (INFO-2)

Taft provided an outline of the University Audit Report which included audits in process and future audits. He gave details on the IT Risk Assessment process and an update on the department's ongoing Quality Assurance Review.

University Compliance, Ethics, and Risk Report (INFO-3)

Serra presented the University Compliance, Ethics, and Risk Report that included an update on the University Compliance, Ethics, and Risk program, 2017-18 Work Plan Status of All Activities, 2018 Compliance and Ethics Culture Survey and the 2018-19 Compliance and Ethics Annual Work Plan.

Chair Seay adjourned the Audit and Compliance Committee meeting 3:53 p.m.

Reviewed by: _____
Beverly Seay
Chair, Audit and Compliance Committee Date

Respectfully submitted: _____
Grant J. Heston
Associate Corporate Secretary Date

ITEM: AUDC-1

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

SUBJECT: Audit and Compliance Committee Self-Assessment

DATE: November 30, 2018

PROPOSED COMMITTEE ACTION

Approve the Audit and Compliance Committee Self-Assessment.

BACKGROUND INFORMATION

As required by the Audit and Compliance Committee Charter and discussed during the August 28, 2018 meeting, attached is the committee effectiveness survey template for review and approval.

Once approved, the survey will be distributed to all committee members for on-line completion. The results will be compiled and provided to the committee for discussion at a future meeting.

Supporting documentation: Attachment A: Audit and Compliance Committee Self-Assessment

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 BOT Audit and Compliance Committee Self-Assessment Questionnaire

A. Committee Composition and Independence	B. Understanding the University and Continuing Education	C. Committee Processes and Procedures	D. Oversight of Audit, Compliance and Ethics functions
1. There is adequate diversity and expertise on the committee (educational and personal backgrounds, industry experience and prior/current career positions) to provide a variety of perspectives on issues the committee handles.	1. New committee members participate in orientation programs to educate themselves on the university, Robert's Rules of Orders, the committee charter, and their responsibilities as part of the Board of Trustees.	1. The committee reviews its charter annually to determine whether its responsibilities are described accurately.	1. The committee reviews the adequacy of the approach, role and scope of the internal audit and compliance functions, e.g., the charters, audit and compliance program plans, budgets, and staffing.
2. The committee has the appropriate number of members to fulfill its duties.	2. The committee seeks input from other departments within the university to present or provide information to the committee to get increased knowledge of audit and compliance issues.	2. Committee members are aware of UCF's strategic plan, related goals and objectives and how the committee assists in achieving the plan and its objectives.	2. Committee members have the ability to ask questions and obtain more details on reports and memos transmitted to them outside of committee meeting agenda packets.
3. The committee meetings include active discussions and a willingness of all members to participate and provide their perspective.	3. The committee participates in continuing education to enhance its members' understanding of relevant accounting, reporting, regulatory, auditing, and industry issues.	3. The frequency and length of committee meetings are appropriate for the committee to fulfil its responsibilities.	3. Committee discussions are adequately focused on all categories of risk including strategic, reputation, technology, operational and regulatory risk.
4. No one or two committee members dominate conversations or try to control discussions at the exclusion of other committee members.	4. The committee has appropriate access to executive management outside of standard committee meetings to obtain visibility into decision making processes.	4. The committee has the means to provide input on meeting agendas.	4. The committee ensures that the audit and compliance offices are free from inappropriate management pressure for these offices to be able to perform their duties.

Audit and Compliance Committee - New Business

A. Committee Composition and Independence	B. Understanding the University and Continuing Education	C. Committee Processes and Procedures	D. Oversight of Audit, Compliance and Ethics functions
5. All members of the committee appear to be free of conflicts of interest or recuse themselves if a conflict of interest is identified.	5. The committee has access to internal/external experts and programs for benchmarking, leading practices and overall professional development.	5. Committee members interact between meetings with the CCERO and CAE as needed.	5. The committee adequately reviews and discusses the timing and completeness of management's responses to recommendations made by Audit and Compliance.
6. All committee members make a strong effort to attend all meetings and review meeting materials in advance.	6. Committee members have the appropriate qualifications to meet the objectives of the committee's charter, including knowledge of financial statements, funding sources and basic accounting and financial practices.	6. Committee members interact with external auditor and government regulatory agencies, as appropriate and maintains awareness of potential non-compliance identified by these third parties.	6. The committee ensures that the Audit and Compliance offices have the authority, visibility and influence in the organization to perform their duties and provide the committee with essential information.
7. The committee is successful in preventing excessive management influence during their meetings.	7. Committee members are aware of and abide by the UCF Creed and UCF Code of Conduct.	7. The committee has a clear escalation process which defines when the CAE and CCERO should escalate information to the committee and when the committee should escalate information to the full board and/or external parties.	7. The committee has an appropriate role in processes relating to receipt of complaints, whistleblower determinations and investigation processes.
8. All committee members maintain confidentiality as required as well as adhering to open access and transparency requirements.	8. Committee members have a basic understanding of the higher education regulatory environment.	8. The committee maintains adequate detail and accuracy on meeting minutes and supporting documentation.	8. The committee conducts a periodic review of staffing resources and performance of both the Audit and Compliance offices.

Audit and Compliance Committee - New Business

A. Committee Composition and Independence	B. Understanding the University and Continuing Education	C. Committee Processes and Procedures	D. Oversight of Audit, Compliance and Ethics functions
9. The committee has an adequate level of professional skepticism of management's projections and judgments.	9. The committee has a process and adequate resources for keeping current on emerging issues in higher education, audit, and compliance.	9. The committee reports regularly and in adequate detail on its activities, key issues, and committee actions to the full Board of Trustees.	9. The committee evaluates whether the university has the appropriate ethical tone at the top based on responses and escalation of information to the committee by management.
10. The committee has sufficient time and resources to carry out the responsibilities delegated to it by the board of trustees.	10. Committee members subscribe to and read the communications distributed by the Audit and Compliance offices including the UCF IntegrityStar compliance newsletter and Audit's twitter feed (@UCFAudit).	10. Committee members receive adequate lead time to review the agenda and related information in advance to prepare for meetings.	10. The committee formally reviews and endorses the content and appropriateness of audit and compliance program work plans.

Questionnaire will be developed and distributed using Qualtrics and will contain a seven point scale with the following response options:

Strongly Agree - Agree - Somewhat Agree - Neither Agree nor Disagree - Somewhat Disagree – Disagree - Strongly Disagree

ITEM: INFO-1

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

SUBJECT: University Audit Report

DATE: November 30, 2018

PROPOSED COMMITTEE ACTION

Information only.

Supporting documentation: Attachment A: University Audit Report

Prepared by: Robert Taft, Chief Audit Executive

Submitted by: Robert Taft, Chief Audit Executive

Attachment A

University Audit Report

Presented: November 30, 2018

Prepared: November 13, 2018

1

Agenda

1. General Thoughts
2. Deep Dive
 - Capital Projects
 - Disaster Recovery/Business Continuity
3. Other Activities

Themes of the day

Perspective

- What matters in the big scheme of things?
- Do we understand what all of our stakeholders are seeing & the potential impacts?
- Is this an incremental or innovation situation (or both)?

Objectivity

- Are we able to remove ourselves from the situation to do what is best for the organization?
 - Personal relationships
 - Internal biases
 - Ego vs. Humility

Capital Projects

1. What does the board want to know?
2. When does it want to know it?
3. How does it want to receive this information?

Capital Projects--Risk Based approach

1. Financial risk

- Funding stability and adequacy
- Percentage of funds spent/percentage of project completed
- Approvals throughout the project cycle

2. Safety risk

3. Project management risk

- Vendor management and decision making
- Change orders/scope creep
- Timetable adjustments and contingency plans

Capital Projects--Timing of Communications

- Incident scenarios
 - a) We think something of concern is going to happen
 - b) Something of concern has happened
 - c) Both

- Additional scenarios:
 - What adjustments to overall approach will be made for projects that go over the \$2 million mark after construction has already started?

Capital Projects--Methods of Communication

1. For the routine:
 - 60 day status memos for the duration of the project
 - Use of standard template to document observations (red/yellow/green approach)

2. For the critical:
 - Immediate discussion with the chair
 - Schedule/provide communication to the full committee

3. All materials will be provided for capital project post-evaluation work as requested

Capital Projects--Long Term Impact

1. When will we achieve “mission accomplished”?
2. Creation of new department position-Capital Projects, Real Estate and Facilities Operations audit manager
 - a) Subject matter expert and trusted advisor for these university activities (including DSO)
 - *Capital Project monitoring*
 - *Space utilization*
 - *Major renovations and building teardowns*
 - *Leases*
 - *Master plan and project/budget prioritization*
 - *Deferred maintenance*
 - *Efficiency and effectiveness of routine maintenance operations*
 - *Technology selection, training and usage*
 - b) Timing of posting/overall staff reorganization design

Disaster Recovery/Business Continuity

1. Upcoming IT audit
2. Focus primarily on IT capabilities, responsiveness, and preparedness
3. Also will incorporate other areas like Emergency Management, Insurance Operations, Facilities, Space Management, Procurement and Finance & Accounting
4. Need for/completion of comprehensive and unit level plans. Who is accountable?
5. Discuss a variety of scenarios
 - a) What if classes had to be canceled for a long period of time (full semester or longer)?
 - b) If a mass shooting took place, would we choose to have the building torn down?
 - c) Would employees continue to get paid if not working?
 - d) How would available funds, internal/external workspace and insurance benefits get prioritized for return to standard operations?

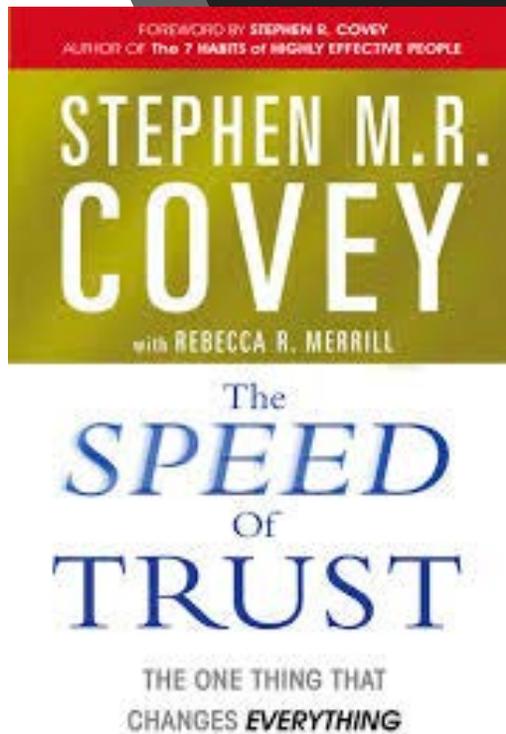
Other Activities

1. Downtown Campus
2. Amazon initiative
3. UCF Health
4. IIA Quality Assurance Report
5. Use and management of consultants
6. Direct Support Organizations
7. Audit Department staffing adjustments
8. Marketing the department (@UCFAudit)

Upcoming events

- Board of Governors Performance Based Funding Certification
- Open Audit Issue Follow-Up Report
- Auditor General Operational Report

Closing Thoughts



- 1) Trust is the operating system of every relationship.
- 2) Honesty is a component of trust. Yet some people can be basically honest but simply unreliable. Reliability is also a matter of trust.
- 3) You can have world-class processes in place, backed up by well-conceived procedures. But if trust is fragile, you can never achieve consistently good results.
- 4) Trust always affects two outcomes: speed and cost. When trust goes down, speed goes down and cost goes up.

ITEM: INFO-2

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

SUBJECT: 2018 Compliance, Ethics, and Risk Annual Report

DATE: November 30, 2018

PROPOSED COMMITTEE ACTION

Information only.

Supporting documentation: Attachment A: 2018 Compliance, Ethics, and Risk Annual 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

EXECUTIVE SUMMARY

For a second year in a row, the office of University Compliance, Ethics, and Risk is pleased to present an annual report on the comprehensive efforts of the university-wide compliance and ethics program. This report includes the extensive activities occurring across campus to meet the various regulatory and compliance requirements and our collective efforts to maintain a compliance and ethics culture at UCF. Also highlighted in this report are the many achievements of the office and the successes of our compliance partners.

Christina L. Serra
Interim Chief Compliance, Ethics and Risk Officer

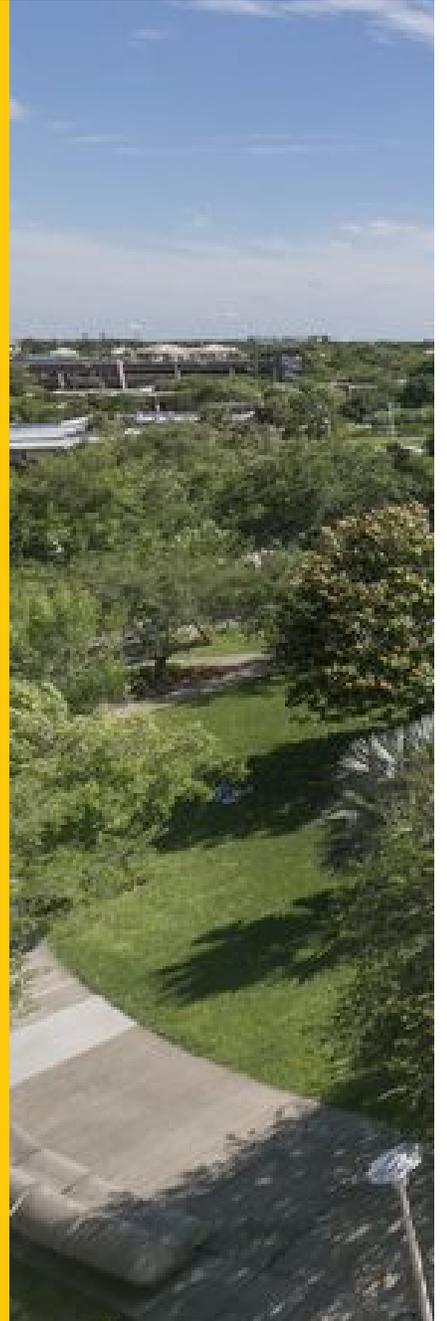


CONTENTS

About the Office	3
History	5
Purpose	5
Structure	5
Highlights - University Compliance, Ethics, and Risk	6
Comprehensive Annual Report	8
Compliance & Ethics Program Development	9
Education & Training	15
Policy Review & Development	20
Government Reporting & Regulatory Activities	25
Clery, VAWA, and Title IX Compliance	28
Conflict of Interest and Commitment	29
Investigation and UCF IntegrityLine	30
Research Compliance	32
Athletics Compliance	33
Success Stories	35



ABOUT THE OFFICE







HISTORY

In May 2011, the University of Central Florida formed the University Compliance, Ethics, and Risk (UCER) office and appointed the university's first Chief Compliance and Ethics Officer charged with developing and implementing a comprehensive compliance and ethics program based on key elements of the Federal Sentencing Guidelines, Chapter 8, Part B, Section 2.1(b) and the Florida Code of Ethics for Public Officers and Employees contained in Florida Statutes, Part III, Chapter 112. The Board of Governors passed Regulation 4.003 State University System Compliance and Ethics Programs, requiring all state universities to have compliance programs built on the same standards. Of the 19 measured regulatory components, UCF was proud to report having all 19 components in place during the 2017-2018 fiscal year.

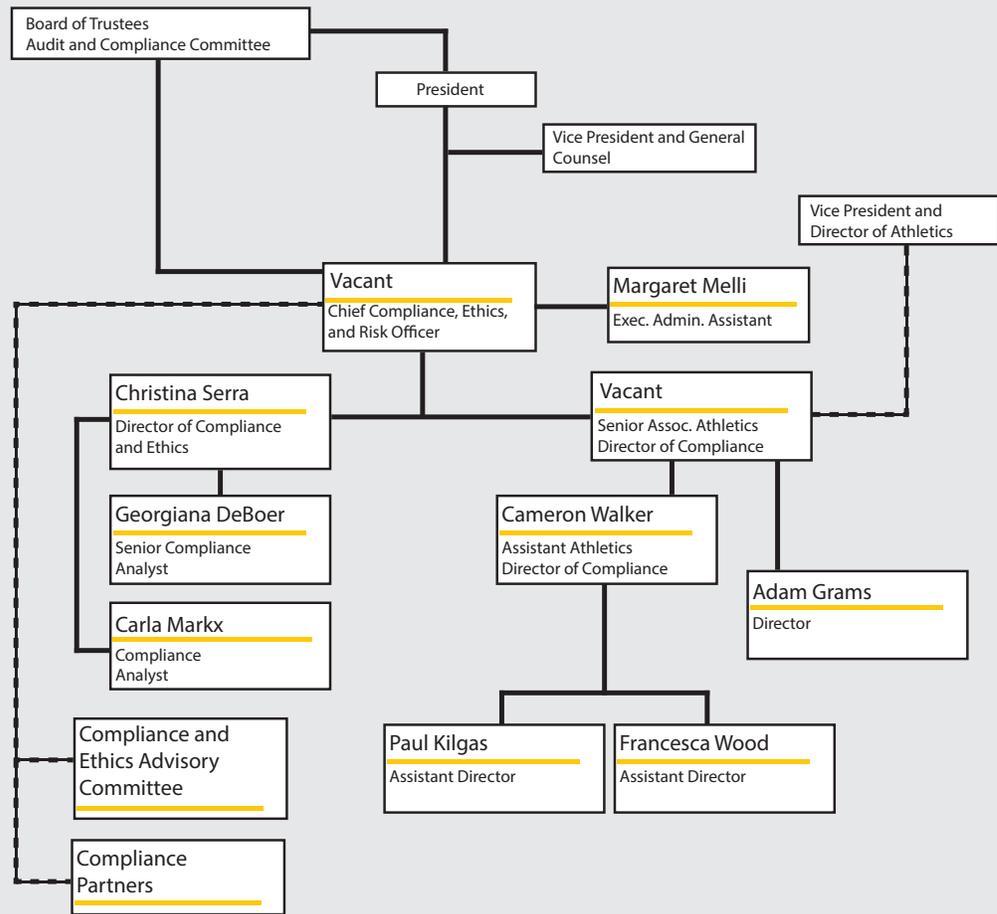


PURPOSE

The office provides centralized and coordinated oversight of the university's compliance, ethics, 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. It also established the Compliance and Ethics Advisory Committee, tasked with assisting in the development of the comprehensive compliance and ethics program and mitigating the compliance and ethics risks at UCF, and works with a team of compliance partners who lead the targeted compliance programs across the university.



STRUCTURE





UCER HIGHLIGHTS

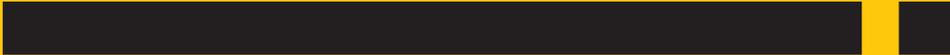
- Finalized and launched the UCF Employee Code of Conduct training, and worked with Human Resources to implement mandatory training for all new employees beginning November 2017. Subsequently, the UCF Employee Code of Conduct was revised to reflect updates to related policies and regulations, a new president’s message, the Let’s Be Clear campaign, departmental name changes, and the inclusion of NIST and GDPR requirements. The training was also revised to reflect such changes.
- Launched the second compliance and ethics culture survey, which revealed 86 percent of employees reporting familiarity with the new UCF Employee Code of Conduct. Benchmarking against the first culture survey resulted in a 22 percent increase in employee awareness of UCER and the UCF IntegrityLine, and a 14 percent increase in familiarity with the university’s policy for reporting misconduct and protection from retaliation. The success of the results were largely due to the outreach efforts conducted by UCER.
- Coordinated with the Office of Institutional Equity on the collection of documents and developed the final response to the Department of Education Office of Civil Rights on two open cases involving the university.
- Developed and disseminated four editions of the *IntegrityStar* newsletter featuring articles on “Personal Relationships in the Workplace,” “Gifts and Honararia,” “Working together to keep UCF Safe,” “Campus Security and Crisis Response,” and “Environmental Health and Safety at UCF”
- Developed and provided grand and contracts award training to faculty and administrators within the College of Nursing, College of Arts and Humanities, and the College of Health and Public Affairs.
- Achieved a 98.4 percent compliance rate with employees submitting a conflict of interest disclosure prior to the deadline.

The Board of Governors (BOG) passed Regulation 4.003 State University System Compliance and Ethics Programs, requiring all state universities to have compliance programs built on the same standards. Of the 19 measured regulatory components, UCF was proud to report having all 19 components in place.





Comprehensive Compliance, Ethics, and Risk Report



The following is a summary of UCF's comprehensive compliance, ethics, and risk program accomplishments, to include compliance partner reports from July 1, 2017, to June 30, 2018.

Compliance and Ethics Program Development. Developing and sustaining an effective compliance and ethics culture.

UNIVERSITY COMPLIANCE, ETHICS, AND RISK:

- Revised and implemented the UCF Employee Code of Conduct and training.
- Collaborated with campus partners on compliance efforts with NIST.
- Developed and disseminated four editions of the compliance and ethics newsletter, *IntegrityStar*. Information of featured articles are below:

July 2017

Featured articles on conflicts of interest, policies on amorous relationships and employment of relatives, personal relationships in the workplace and a video and cartoon.

October 2017

Featured articles on Compliance and Ethics Week 2017, the release of the Employee Code of Conduct with a cartoon, and an article on the UCF IntegrityLine cases on civility.

March 2018

Featured articles on the second annual compliance and ethics culture survey, youth protection program, gifts and honoraria with an informative video and cartoon, and the Let's Be Clear campaign.

June 2018

Featured articles on safety, by compliance partners from the UCF Police, the Department of Security and Emergency Management, and EHS. Also included was an article on university volunteers, and a training video on safety in the workplace.

- Chaired five Compliance and Ethics Advisory Committee meetings and provided updates on the Employee Code of Conduct, annual report, overview of the Department of Education Office of Civil Rights complaints against the university, and discussed the development of the Youth Protection Program.
- Continued to serve on the Security Incident and Response Team and provide a review and guidance associated with federal and state privacy and data breach requirements.
- Met with vice presidents, key administrators, and compliance partners to provide updates on compliance and ethics initiatives and respond to any concerns or issues.
- Continued to chair the Florida State University System Compliance and Ethics Consortium through March 2018.
- Chaired the Youth Protection Program committee charged with developing a university wide Youth Protection Program.

ACADEMIC SERVICES FOR STUDENT ATHLETES:

- Participated in biweekly staff meetings with the UCF Athletics Associated (UCFAA) as part of the "It's Cool to Know the Rules" campaign.

DEBT AND REVENUE MANAGEMENT:

- Responsible for oversight of the university's debt covenants to ensure that certain activities would or would not be carried out on behalf of the university, as well as oversight of contract compliance with university business partners.
- Served as a member of the team of financial advisors for the university's direct support organizations (DSO), including the UCF Convocation Corporation, UCF Finance Corporation, UCF Limitless Solutions, and the UCF Stadium Corporation. Worked to ensure that appropriate and sound debt management practices were in accordance with the regulations set forth by both the university's Board of Trustees and the State of Florida's Board of Governors.
- Facilitated compliance and ethics related discussions in regards to RFP/ITN processes, procurement, contractual terms and oversight, vendor relations, sponsorships, university partnerships with outside entities, retail tenant relations, and human resources. These discussions included the following university partners and/or DSO: Administration and Finance Division, Business Services, Parking and Transportation Services, and the UCF Convocation Corporation.

DEPARTMENT OF SECURITY AND EMERGENCY MANAGEMENT:

- Chaired the Continuity of Operations Space Planning and Allocations Committee.
- Utilized monthly staff meetings to communicate compliance and ethics topics relevant to the department.

ENVIRONMENTAL HEALTH & SAFETY:

- Staff were registered members and/or participated in the following non-university compliance related organizations: American Biological Safety Association, Environmental Management Association (member of the Board of Trustees), attended the 2017 Campus Safety Health and Environmental Management Association annual conference, Florida State University System Environmental Health and Safety Directors' Roundtable, Local Emergency Planning Committee, Risk Management Society, Southeastern Biological Safety Association, University Risk Management and Insurance Association.
- Participated in the following campus outreach events to promote awareness of EHS compliance programs: Faculty Center for Teaching and Learning new faculty orientation, faculty meetings, Human Resources benefits fair, KnightShare Expo, and new employee orientation.

FACILITIES OPERATIONS:

- Communicated compliance and ethics matters with staff via email and regularly scheduled staff meetings. Presented information in both English and Spanish, when able to do so. Implemented mandatory daily "huddle" team meetings, and weekly meetings for senior management. Also conducted mandatory annual "all-staff" meeting, where compliance and ethics related matters were discussed.

FINANCE & ACCOUNTING:

- Hosted monthly Financial Support Services meetings where financials users were informed of any policy and/or procedure updates or new compliance requirements related to finance and accounting. The Budget, Planning and Administration office, within finance and accounting, led monthly budget directors meetings to discuss any item of interest that could impact departmental operations.





HUMAN RESOURCES:

- Maintained effective oversight of employment laws, and AFSCME and PBA collective bargaining agreements.
- Supported and provided assistance and research efforts associated with investigations conducted by the Office of Institutional Equity, University Compliance, Ethics, and Risk, and University Audit.

INFORMATION SECURITY OFFICE:

- Provided compliance guidelines on PCI DSS to F&A and to the UCF merchant community.
- Communicated information security best practices through the Information Technologies and Resources quarterly newsletter, which was published in August 2017, November 2017, February 2018, and May 2018. Articles focused on information security enhancements and awareness, the university's vendor risk management process, NIST compliance, communication of new IT policies, data privacy, GDPR, and the university's simulated phishing campaign to create awareness of phishing emails.

INTEGRITY AND ETHICAL DEVELOPMENT:

- Served as co-administrator for University Turn-It-In (preventing plagiarism) Account.
- Participated as a member of the professional organization International Center for Academic Integrity (ICAI).



LEGAL AFFAIRS AND HEALTH CARE COMPLIANCE - COLLEGE OF MEDICINE:

- Provided guidance about industry relations, patient privacy, fraud and abuse involving arrangements with health care providers, and vendor relations.
- Served as co-chair of the College of Medicine Industry Relations Committee. The Committee is staffed by the Legal Affairs & Special Projects department.
- Developed and served as the UCF Health Compliance Liaison for the College of Medicine Clinical Services Compliance Program. The Clinical Services Compliance Program is intended to supplement and support the university-wide compliance programs by focusing on health care specific laws and regulations that impact health care practice by UCF clinicians. The Clinical Services Compliance Program applies to health care related issues that involve the provision of clinical care or services through the College of Medicine faculty practice, UCF Health, and to business relationships and agreements for the UCF College of Medicine or UCF Medical Affairs. The program applies to all UCF employees and trainees who are involved in the direct provision of clinical care or services through the College of Medicine faculty practice and UCF Health; involved in the support, administration or oversight of UCF Health's patient clinical care or services; or involved in the negotiation or approval of business relationships or agreements for the College of Medicine or UCF Medical Affairs. Established and co-chaired the Clinical Services Compliance Program Committee.
- Participated in the university's annual conflict of interest disclosure reviews

Led and supported the Health Sciences HIPAA collaborative efforts to develop uniform set of HIPAA Privacy and Security policies for relevant component parts of the university. Provided guidance to university partners with regards to HIPAA related questions and incidents. Managed HIPAA related incident investigations.

OFFICE OF INSTITUTIONAL EQUITY:

- Assisted HR in reviewing the processes related to employees' leaves of absence and requests for accommodations to ensure compliance with the ADA; assisted the Faculty Salary Equity Study Working Group in reviewing the salaries of tenured/tenure-earning faculty based on gender and ethnicity; and assisted the Ad Hoc Committee on Freedom of Expression for the Faculty Senate in its review of faculty's role in freedom of expression, the impact of Senate Bill 4, First Amendment protections, and harassment.
- Provided multiple university communications on the rights and obligations contained in the university's nondiscrimination policy via the office's website, the Shield website from July 2017 - December 2017, the Let's Be Clear website from January 2018 - present, and the president's office.





OFFICE OF STUDENT RIGHTS AND RESPONSIBILITIES:

- Served as the advisor to the Golden Rule Review Committee, which is a committee of students established for the purpose of responding to the changing needs of the student body with regard to the policies, procedures, and regulations for students. The office was responsible for assembly, dissemination and continuing education to faculty, staff, and students for the Golden Rule Student Handbook and UCF Creed.
- Ensured that the student conduct review process and Rules of Conduct are in compliance with Board of Governors student discipline section.
- Coordinated investigations of hazing allegations through the university's hazing response protocol.
- Provided oversight of the admission clearance process which involved the review of applicants seeking admission to UCF with a prior criminal background or educational disciplinary history. Florida Board of Governors Regulation 6.001 authorizes universities to refuse admission to applicants due to past misconduct. In addition, OSRR Provided oversight of the discipline clearance process for students seeking admission into a graduate program, studying abroad, applying to the bar, having a background check completed for employment with the federal government, transferring to another institution, etc.

PROCUREMENT AND BUSINESS SERVICES:

- Sent multiple notifications to the university on regulatory updates and best practices to verify and update departmental requisition approval authority delegations, and to ensure compliance with established policies and procedures.

QUALITY MANAGEMENT AND IMPROVEMENT:

- Conducted compliance assessments to gauge contract and procedural performance levels. Resulting quality management findings (QMF) were recorded for tracking through completion of corrective actions.

REGISTRAR'S OFFICE:

- Distributed annual FERPA notifications to students, FERPA training requirements for faculty, and FERPA training requirements for all staff requiring PeopleSoft security to student records.



STUDENT ACCESSIBILITY SERVICES:

- Participated in discussions with university partners on several matters to include web accessibility, policy for extended time for testing, classroom materials accessibility and accommodations, facility accessibility, parking, policy for parenting/pregnant students and employees, and guardianship for students in Inclusive Education Services.
- Established SAS faculty liaisons through the various UCF colleges.
- Communicated on the SAS website the resources for both faculty and students to promote compliance and ethics

UCF GLOBAL:

- Developed a website dedicated to the ongoing immigration-related changes and hosted workshops and information sessions for the international community to learn of these changes. Conducted outreach to university partners via email and in-person meetings regarding updated immigration regulations.
- Improved forms to include updated immigration compliance for students.

Personnel from UCER and/or compliance partners served as members on the following committees or workgroups:

<ul style="list-style-type: none">• University Compliance and Ethics Advisory Committee• University Policies and Procedures Committee• University Title IX Workgroup• University Title IX Advisory Council• University Youth Protection Program Committee• University Diversity and Inclusion Workgroup• University President Advisory Staff Council• University Bias Incident Communications Group• University Security Incident Response Committee• University Assessment Committee• University Records Management Advisory Committee	<ul style="list-style-type: none">• Merchant Services Committee for Payment Card Industry Data Security Standards (PCI DSS) Compliance• Federal Trade Commissions Red Flags Compliance Committee• University Tax Peer Group• University Assessment Committee• University Financial Conflict of Interest Committee
<ul style="list-style-type: none">• University Institutional Review Board• UCF Health Services HIPAA Collaborative Group• University Institutional Safety Council	<ul style="list-style-type: none">• University F&S Safety Committee• University Laboratory Safety Committee• University Radiation Safety Committee• University Institutional Biosafety Committee• UCF Institutional Animal Care and Use Committee



Education and Training. Educating the UCF community about compliance responsibilities, regulatory obligations, and the university's compliance and ethics program.

UNIVERSITY COMPLIANCE, ETHICS, AND RISK:

- Launched the third annual Compliance and Ethics Week awareness campaign. Hosted three brown bag lunch-and-learn sessions led by compliance partners on trainings titled, "Ethical Leadership," "Amorous Relationships, Title IX and Reporting Responsibilities," and "Information Security."
- Provided ethical leadership training for the Leadership Development Program in Human Resources, and for UCF Advancement Leadership and UCF Human Resources Leadership in Action series.
- Developed and delivered in-person customized Gifts and Honoraria training for faculty and staff at the College of Medicine in September and October 2017.
- Hosted tabling events for new faculty during orientation in August 2017 and for all employees at the employee benefits fair in October 2017, offering materials and guidance on conflicts of interest and commitment, the UCF IntegrityLine, and the *IntegrityStar* newsletter. Distributed UCER pamphlets to all new faculty and employees during their respective orientations.
- Finalized and launched the Employee Code of Conduct training in October 2017 to all existing employees. Worked with HR to implement mandatory training for all new employees beginning November 2017. Announced and promoted the new training in the October 2017 edition of the *IntegrityStar*, as well as added the online training module to the UCER website. Total number of employees trained: 865.
- 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 the UCER website.
- Promoted the "Know the Code" mini course Gifts and Honoraria in the March 2018 edition of the *IntegrityStar*, and "Maintaining a Safe and Secure Workplace" in the June 2018 edition.
- Promoted the office's web courses titled Potential Conflicts – Florida Code of Ethics for Public Officers and Employees, and Gifts and Honoraria (118 employees trained) in the July 2017 and the March 2018 edition of the *Integrity Star*. Distributed an all employee email in October 2017, promoting the Potential Conflicts – Florida Code of Ethics for Public Officers and Employees training, completed by 272 employees. Issued the annual communication to all faculty and staff members to remind them of standards of conduct and reporting responsibilities under Florida ethics laws.
- Provided education and promotion of online training to employees following investigations and in response to questions submitted to the office email account.
- Prepared and issued the annual Vulnerable Persons Act Memo in March 2018.
- Posted two new training videos, "Responding to Workplace Violence" and "Maintaining a Safe and Secure Workplace" to the UCER website.



ATHLETICS COMPLIANCE:

- Conducted new employee orientation/noncoaching staff educational training sessions, and the Athletics Compliance Office Rules Education, which included attendance by student-athletes, coaches, athletics staff, boosters, alumni, fans, and parents.

DEPARTMENT OF SECURITY AND EMERGENCY MANAGEMENT:

- Provided 124 employees with training on Incident Command System (ICS) courses: Intro to ICS for Higher Education, Expanding Incidents in ICS, National Incident Management Systems, National Response Framework; and provided “Shots Fired” training to 582 employees.

ENVIRONMENTAL HEALTH & SAFETY:

- EHS Workplace Safety Team facilitated training for 3,931 individuals on special topics such as blood borne pathogens, aerial lifts, confined spaces, electrical safety, forklift safety, hearing conversation, lock out/tag out, fall protection, and driving awareness.

FINANCE & ACCOUNTING:

- The Merchant Services (MS) office offered an online training class, FSC111: Credit Card Information Security, to maintain PCI DSS compliance.

INFORMATION SECURITY OFFICE:

- Promoted Information Security Conference during the National Cybersecurity Awareness Month in October 2017, as well as Data Privacy Day in January 2018.
- Provided security awareness presentations at the HR new employee orientation.



HUMAN RESOURCES:

- Learning & Organizational Effectiveness made contact with over 650 new hires through New Employee Orientation (NEO). During NEO, informed and distributed UCF's Employee Code of Conduct and the 2018 UCF HR Annual Notice Booklet. The HR Annual Notice Booklet contains important information for all employees such as the President's Statement Regarding Equal Opportunity and Affirmative Action, Notice of Drug-Free Schools and the Drug-Free Workplace policy, 403(b) Plan Notice of Retirement Eligibility, Eligibility for Overtime Compensation, Earned Income Tax Credit, Public Service Loan Forgiveness Program, Information Security for Faculty & Staff, FDLE – Florida Sexual Offenders and Predators Notification, and university contact information. The Annual Notice Booklet was also distributed to current employees as well.
- Classification & Compensation team held 26 meetings with vice presidents and deans to educate and gain support on the current redesigning of UCF's compensation structure to promote consistent pay practices and job classifications.
- Employment Services & Records presented 60 employees with a compliance refresher regarding I-9/E-verifying compliance requirements.
- Talent Acquisition presented "Interviewer Certification Workshops" to over 130 employees. This workshop covers UCF policies, state and federal regulations outlining free of bias or discrimination hiring, and state statutes regarding Florida Veteran's Preference.
- Leave Administration provided over 100 employees with training sessions covering the university's parental leave program and Family and Medical Leave Act (FMLA).
- Employee Relations created an Employee Resources Guide as a single piece of communication to distribute to new and current employees and list on the HR website in an effort to educate employees on the various offices across campus and the services they provide, including education on the university's IntegrityLine. Employee Relations and Learning & Organizational Effectiveness facilitated training to over 130 participants covering Performance Management and Supervisory Performance Appraisal training.
- Departmental HR Liaisons were presented with university partner sessions on the following topics: F&A training on Composite Fringe Benefit Rate; UCF Global training on Visa Sponsorship for UCF International Faculty & Staff; UCER training on UCF Employee Code of Conduct; HealthAdvocate training on Disrespect vs. Harassment and Working Through Stressful and Changing Times; UCF Police Department training on Campus Safety.

INTEGRITY AND ETHICAL DEVELOPMENT:

- Facilitated 75 workshops reaching a total of 9,688 individuals on "Ethics in Graduate School and Beyond" for incoming graduate students through a partnership with the College of Graduate Studies, and facilitated workshops for students associated with College Life Skills, such as traps of academic misconduct, how to avoid plagiarism, consequences of academic misconduct, and developing person ethical standards.

LANDSCAPE AND NATURAL RESOURCES:

- Established a train-the-trainer program to train facilities staff on proper operation and safety requirements of heavy equipment, ladders, and other power equipment. Also held was a departmental refresher training on the proper use of protective personal equipment to prevent hearing injuries.



LEGAL AFFAIRS AND HEALTH CARE COMPLIANCE - COLLEGE OF MEDICINE:

- Provided online HIPAA training required of faculty and staff, including senior leadership, the graduate medical education program core participants and medical students, and to the Burnett Biomedical Science students as needed. Total number trained: 692.
- Employee Code of Conduct and Ethics training was provided to all employees. Each new employee was required to review, acknowledge receipt, and agree to comply during College of Medicine new employee orientation.
- College of Medicine Clinical Services Compliance Program Overview information was provided to all existing employees, which each were required to review, acknowledged by 439 employees, and agree to comply. New employees were provided the information as part of College of Medicine new employee orientation.
- Delivered in-person training on the new university policy on Gifts and Honoraria to 103 College of Medicine faculty and staff.
- Presented in-person HIPAA training to UCF Health staff.

OFFICE OF RESEARCH, RESEARCH INTEGRITY COMPLIANCE:

- Created a list of all UCF CITI training courses and training requirements for research integrity and compliance programs was linked to the Research Integrity & Compliance website. CITI training completion reports were made available for Office of Research staff with access to ARGIS.
- Communicated with central and departmental administrators of sponsored programs when investigators were notified of submitted proposals that had not yet completed the required conflict of interest CITI training for award set-up.
- Delivered research compliance training for university departments and unit administrators for compliance updates and changes as needed at the monthly EXCIT meetings.
- Provided one-on-one training to new effort coordinators regarding time and effort reporting (ECRT).
- Conducted faculty training on Federal Programs Award Management from October 2017 through February 2018, as well as export control training for faculty and students for research projects requiring a technology control plan or data management plan as required under the EAR/ITAR. Updated all affected departments with regards to the FRAC Annual Export Control update.
- Provided NIST 800-171 briefing to all affected departments.
- Delivered Research Misconduct presentation at the new faculty ORC Series Workshop.
- Developed a guidance memo to provide departments and units guidance on denied entities.
- Developed a guidance memo to provide departments and units guidance on the Iran Developed Covered Defense Information process for complying with NIST 800-171 with Contracts & Grants.
- Monitored compliance with Responsible Conduct of Research training requirements for NSF and select NIH awards.



OFFICE OF INSTITUTIONAL EQUITY:

- Delivered in-person training on employee search guidelines to search committees in the following departments: Administration and Finance, Biology Department, Career Services and Experiential Learning, College of Medicine, Department of Mathematics, Department of Physics, and the UCF Police Department. Total number of employees trained: 1,702.

OFFICE OF STUDENT RIGHTS AND RESPONSIBILITIES:

- Provided annual training to 95 members of the Student Conduct Review Board on compliance with university student conduct review processes and procedures.
- Student Care Services staff provided training to 115 employees on the Student of Concern process, which includes education about Mandated Assessment procedures for involuntary hospitalizations and reporting procedures for the Student of Concern process.

PROCUREMENT AND BUSINESS SERVICES:

- Provided training to a UCF-wide general forum attended by 116 staff on procurement processes and procedures that would, when adhered to, prevent unauthorized procurements. The training also included the competitive solicitation process, exemptions to the procurement process, proper review and approval of contracts, supplier input, tools to facilitate expeditious, cost effective, and legally sufficient buying.
- Conducted two customized training sessions for 39 employees on procurement guidelines such as unauthorized contractual actions, vendors writing specifications, and invalid sole sources and competition waivers, etc.

REGISTRAR'S OFFICE:

- Conducted FERPA Training for faculty, staff, and students via in person and online. Total number of individuals trained: 2,882.

STUDENT ACCESSIBILITY SERVICES:

- Facilitated various training sessions on accessibility and inclusion to 223 participants. Sessions have been created, modified and removed to meet the demand and needs of the campus community. During this academic year, the following sessions were offered: Disability Rights, Responsibilities and You, Disability in Media, Barriers Be Gone, Escape Room, and Digital Media Training.
- Implemented an online "Optional Practical Training (OPT) Application Form" and Webcourse to provide clear instructions to improve efficiency, transparency, and compliance with immigration regulations.
- Hosted a "Question and Answer" session for the international community, which included immigration attorneys, following Executive Orders, and litigation related to the entry ban.
- Presented training on DACA and recent DACA changes, as well as conducted training on the J-1 Exchange Visitor Program.
- Conducted on the following subject areas for internal employees and campus personnel: public records for newly hired police personnel, bias-based profiling for newly hired police personnel, compliance and ethics for newly hired police personnel, SAFE (Self-Defense Awareness & Familiarization Exchange) classes, response to interpersonal violence, and patrol response to sexual violence for police personnel.





Policy Review and Development. Ensuring policies and procedures reflect UCF's commitment to ethical conduct and compliance with applicable laws and regulations.

UNIVERSITY COMPLIANCE, ETHICS, AND RISK:

- Served as chair of the University Policies and Procedures Committee and provided coordination of the committee and management of the online Policies and Procedures Manual.
- Reviewed policies and procedures prior to submission for approval to the committee. To improve university policies and compliance, worked directly with departments and provided guidance and recommendations to improve content and the communication of the 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.
- 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.



DEPARTMENT OF SECURITY AND EMERGENCY MANAGEMENT:

- Updated the following policies and procedures: Rosen Emergency Guide; Video Camera Standards, Public Safety and Physical Design Standards; and Public Records Release Disclaimer.

ENVIRONMENTAL HEALTH & SAFETY AND RESOURCE MANAGEMENT:

- EHS and RM conducted the 5-year review of university policy 3-107, Procurement Use and Possession of Hazardous Materials and Regulated Devices and Equipment.
- RM assisted in developing approximately 50 policies and procedures, at both the departmental and university-wide levels.
- EHS updated the Occupational Health Medical Surveillance Program with its partner Florida Hospital Centra Care to provide medical surveillance services.
- Developed UCF Policy 3-128 University Volunteers, which characterizes the relationship between the university and its volunteers, and provides a procedure for minimizing risk and protecting the interests of all parties.



FACILITIES OPERATIONS:

- The Facilities and Safety Code of Professional Conduct, which outlines behaviors required and expected of employees, was distributed in English and Spanish to FO employees. Employees acknowledged the contents with their signatures.
- Eighteen new Facility & Safety-level Standard Operating Procedures (SOPs) were established.

HUMAN RESOURCES:

- The following UCF Regulations were updated during the year: UCF-3.0122 Resignation and Nonrenewal of Non-unit Faculty and Administrative and Professional Staff Members; UCF-3.035 University Closures; UCF-3.040 Benefits and Hours of Work.
- Leave Administration reviewed and enhanced the telecommuting manual and agreement.
- Developed a memorandum of understanding paid parental leave to educate leadership on absence practice. Additionally, in collaboration with SDES and Parking Services, HR continued to review and support UCF's Expecting Mother parking.

INFORMATION SECURITY OFFICE:

- Developed and published the following new policies: UCF Policy 4-016 Email Provisioning, De-provisioning, and Use, and UCF Policy 4-017 Enterprise Directory Governance.
- Enhanced the Vendor Risk Management (VRM) program procedures and processes.
- In collaboration with campus covered entities, drafted HIPAA security policies (e.g., Authentication/Authorization, PHI Access Control, Password Controls, Encryption/Decryption, etc.) Standards Development (<https://infosec.ucf.edu/policiesandstandards/>).

LANDSCAPE & NATURAL RESOURCES:

- Developed and updated 26 standard operating procedures to standardize processes and improve consistency and efficiency of operations.

LEGAL AFFAIRS AND HEALTH CARE COMPLIANCE - COLLEGE OF MEDICINE:

- Updated COM Industry Relations policy.
- Updated COM HIPAA Privacy and Security Policies while developing a uniform set of HIPAA Privacy and Security policies for relevant component parts of the university.
- Developed a new COM policy on COM Clinical Services Compliance Program Overview requiring all COM employees to review, acknowledge receipt and agree to comply with the program.



OFFICE OF INSTITUTIONAL EQUITY:

- Implemented case management software (Legal Files) in October 2017 to capture all OIE matter activity (inquiries, complaints, ADA requests, search and hiring assistance, and requested trainings) and uploaded all open matters and reports as of July 1, 2017, to allow OIE to capture one year of data to establish a benchmark.
- Obtained Board of Trustee approval to update regulations UCF-3.001, UCF-3.0134, and UCF-5.010 to ensure consistency between the Nondiscrimination Policy and Regulations, as well to incorporate the office name change from the Equal Employment Opportunity and Affirmative Action Programs Office to the Office of Institutional Equity.
- Assisted with the development of a Facilities & Safety Workplace Language Policy, assisted with modifications to Housing and Residence Life's Emotional Support Animal Policy and related forms, assisted with UCF's Police Department's Light Duty Policy that is currently in development, and assisted with the development of an employee threat assessment process.
- Chaired the Pregnancy and Parental Status Policy committee, which began development of a university-wide policy.

OFFICE OF STUDENT RIGHTS AND RESPONSIBILITIES:

- Reviewed regulation UCF-5.006: Student Rights and Responsibilities.
- Updated parental notification procedure.
- Updated program verification form for UCF Policy 4-401.1.

PROCUREMENT AND BUSINESS SERVICES:

- Revised the UCF procurement manual, section 8.D.1.f to correlate with changes to Board of Governors' Procurement Regulation 18.001.
- Initiated a procedure to retain all emails pertinent to ITBs and ITNs in a PDF format on a server. This will ensure the emails are archived, which in turn will ensure dialog/conversations will be available for any legal need.

QUALITY MANAGEMENT AND IMPROVEMENT:

- Assisted in developing UCF policy 3-105 Keys.
- Released a Project Management Manual for F&S personnel.

REGISTRAR'S OFFICE:

- Updated and published the following: Undergraduate Catalog, Excess Credit Hour Surcharge process and procedures, FERPA Reference Guide for UCF, FERPA Guidelines for Students, FERPA Guidelines for Parents, and FERPA Guidelines for Faculty and Staff.





STUDENT ACCESSIBILITY SERVICES:

- Influenced by the Department of Justice, and in consultation with the Office of Institutional Equity and General Counsel, SAS shared the following policy statement to students seeking accommodations: Emotional support animals or other non-service animals are not considered a reasonable accommodation on campus in places other than university housing. Student Accessibility Services can explore other means of access and accommodations with the student instead of a non-service animal when the student presents concerns about attendance in the classroom or elsewhere on campus. Thus, the only animal with any entitlement in your building space would be a service dog trained to support a person in a specific way.

STUDENT FINANCIAL ASSISTANCE:

- Updated the Student Financial Assistance Policy and Procedures Manual regarding the overall administration of federal, state, and institutional financial aid programs. This is updated on an as needed basis depending upon changes to federal, state, and/or institutional financial aid programs.

STUDENT HEALTH SERVICES:

- Maintained 24 policies and procedures in support of compliance efforts.

UCF GLOBAL:

- The International Student and Scholar Services Team established a revised Curricular Practical Training (CPT) policy and procedure, as well as created new internal standard operating procedure guides for most major processes to ensure compliance and consistency.
- Revised policy to ensure compliance with immigration regulations and to improve the process for students, faculty, and staff.

UCF POLICE DEPARTMENT:

- Maintained approximately 30 internal policies related to compliance and ethics.



Government Reporting and Regulatory Activities. Supporting reports and activities related to government and regulatory agencies.

UNIVERSITY COMPLIANCE, ETHICS, AND RISK:

- Completed the 2017 State University System Enterprise Risk Management Survey and submitted report 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 the final response to the Department of Education Office for Civil Rights on two open cases.
- 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.

DEPARTMENT OF SECURITY AND EMERGENCY MANAGEMENT:

- The office conducts a self-review each year as a part of the Emergency Management Accreditation Program. In addition, they monitor and review the status of the required UCF COOP plans to be accurate and submitted to the state within the annual deadline.

ENVIRONMENTAL HEALTH & SAFETY:

- In support of OSHA's Laboratory Standards (29 CFR 1910.1450) and Prudent Practices in the Laboratory Handling and Management of Chemical Hazards, EHS completed 105 laboratory inspections.
- Conducted a university-wide inventory of all high powered lasers to ensure compliance with state laws and regulations.
- Applied for, and was issued, a new radioactive materials license from the Nuclear Regulatory Commission for the Arecibo Observatory in Puerto Rico.
- Completed an annual audit of the UCF broad scope radiation license 4187-1.
- Conducted inspections of fire extinguishers, conducted fire drills, issued hot work permits, and corrected violations noted by the State Fire Marshal.

FINANCE & ACCOUNTING:

- Monitored and reviewed the annual Self-Assessment Questionnaire for all departments processing credit cards in order to maintain PCI DSS compliance.

INFORMATION SECURITY OFFICE:

- Processed 129 Digital Millennium Copyright Act (DMCA) violations in accordance with the requirements of the Higher Education Opportunity Act (HEOA).
- With continued improvements with SIEM, implemented better tracking of security incidents and potential compliance violations.

OFFICE OF RESEARCH, RESEARCH INTEGRITY COMPLIANCE:

- Completed the U.S. Department of Commerce survey "BIS Critical Facilities Assessment."



LANDSCAPE & NATURAL RESOURCES:

- Received a final report on the assessment of the university's storm sewer system, and initiated a project to address critical problems identified in the report.
- Worked with the Florida Department of Environmental Protection on the 5-year update of the university's National Pollution Discharge and Elimination System (NPDES) permit for UCF's municipal separate storm sewer system.

OFFICE OF INSTITUTIONAL EQUITY:

- Collaborated with an external resource and UCF Human Resources to prepare the annual affirmative action plans for the university in compliance with OFCCP regulations.

STUDENT ACCESSIBILITY SERVICES:

- The office responded to a complaint filed with the Department of Education Office of Civil Rights (OCR) in July 2017, alleging discrimination on the basis of disability as well as retaliation. OCR determined there was insufficient evidence to establish that the university violated Section 504 and Title II as alleged. The office continued to review its policies and procedures as a follow up to determine how to ensure that UCF remains as fully accessible as can be for students with disabilities.

STUDENT FINANCIAL ASSISTANCE:

- Conducted periodic quality control reviews of processes to ensure compliance with federal, state, and institutional financial aid processes. The university also undergoes a state audit of federal and state financial aid programs and processes.
- It was determined from the 2017 Florida Statewide Audit that out of 65 checks selected, UCF had 25 outstanding student checks and EFTs containing Title IV funds determined as unclaimed and not returned to the respective Title IV program in a timely manner. Finance and Accounting revised their processes to ensure the unclaimed checks are returned within the federal parameters. SFA now sends recorded messages advising students to either cash the check or contact Finance and Accounting for a re-issue of the check. These corrective actions have fully corrected this problem.





STUDENT HEALTH SERVICES:

- Internal audits were conducted for HIPAA, to include access and authorization audit, user access audit, and a provider sign-off audit.
- Followed the Florida Board of Pharmacy, F.S. 465.0155, Rule 64B16-27.300, to ensure the control and safe dispensing of drugs. The requirements are that each pharmacy establish a CQI program and committee. The CQI committee met quarterly and conducted a review of quality related events (QRE-medication errors). The pharmacy assured that, following a QRE, all reasonably necessary steps had been taken to remedy any problem for the patient. The review also considered the effects on quality of the pharmacy system due to staffing levels, workflow, and technological support.

UCF GLOBAL:

- International Student and Scholar Services (ISSS) executed regular SEVIS and PeopleSoft reports ensuring students are in good immigration standing in accordance with federal laws.
- Responded promptly to the crisis situation involving an international student who purchased high-powered firearms. Following standard procedures related to SEVIS recordkeeping facilitated the quick resolution of the issue.

UTILITIES AND ENERGY SERVICES:

- Continued to trend data from the Combined Heat and Power Plant's operator station to ensure exhaust gas temperatures and flow rates for emissions are within permit parameters. This data is submitted annually to Orange County's Department of Environmental Protection to support UCF's air permit documentation and compliance testing.
- Quarterly environmental meetings were held to review regulatory requirements to verify all systems were being maintained at or better than the federal, state, and local requirements.





Clery, VAWA, and Title IX Compliance. Mitigating one of the university's most significant compliance risks.

- UCER conducted in-person Clery Act training for coaches and administrators in Athletics, law enforcement personnel, the Student Government Association Cabinet members, resident assistants with Housing and Residence Life, and all staff in the Office of Institutional Equity.
- UCER 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.
- The July 2017 edition of the *IntegrityStar* featured an article titled "University Policies on Amorous Relationships and Employment of Relatives" that highlighted UCF Policy 2-004 *Prohibition of Discrimination, Harassment and Related Interpersonal Violence*.
- The director of OIE served as chair and coordinated meetings with the university's Title IX Advisory Council, which met on a quarterly basis. OIE also continued to oversee periodic meetings with the Title IX Advisory Council's subcommittees (Athletics Subcommittee, Data Analysis Subcommittee, Marketing Subcommittee, Outreach & Prevention Subcommittee, and Policy Subcommittee).
- OIE provided in-person training highlighting UCF's Let's Be Clear campaign and informing employees of the university Policy 2-004.1 Prohibition of Discrimination, Harassment and Related Interpersonal Violence. The office was also asked to provide this training to several offices within SDES, as well as was invited to present at the fifth annual SDES Institute. OIE presented Title IX training at the 2017 New Faculty Orientation and the 2018 Summer Faculty Development Conference, as well as for athletics staff. Title IX training was also presented to supervisors during HR's Leadership Development Series.
- OIE oversaw and managed the implementation of required online Title IX training for all entering undergraduate and graduate students during 2017-18. Launched the on-line training for graduate students in 2017-18 (Haven Plus). Total number of students trained: 21,575. The follow-up survey was completed by 11,388 of those students trained.
- OSRR delivered Title IX trainings, prevention and outreach to student organizations and student leaders, and provided annual training to additional SDES staff on Title IX Compliance. Participants included 21,041 students and 358 staff members.



Conflict of Interest and Commitment. Ensuring compliance with state and federal requirements on disclosing and managing conflicts of interest and commitment.

UNIVERSITY COMPLIANCE, ETHICS, AND RISK:

- 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 2017-18 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 a 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 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).
- 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.

OFFICE OF RESEARCH, RESEARCH INTEGRITY COMPLIANCE:

- Reviewed Conflict of Interest Disclosure Forms related to research, as well as reviewed Significant Financial Interest disclosures related to research proposals.
- Developed and reviewed Monitoring Plans for identified conflicts of interest related to research.
- Conducted an annual review conflicts of interest under Monitoring Plans.
- Submitted the Research Conflict of Interest Committee Charter to the provost for approval.

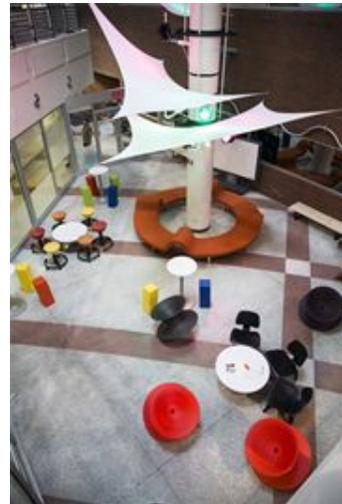


UCF IntegrityLine and Investigations. Responding to detected problems and undertaking corrective action.

UNIVERSITY COMPLIANCE, ETHICS, AND RISK:

- 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.
- Continued to provide recommendations for corrective actions and improvements of ethical conduct to the appropriate authorities following investigations or requests for guidance.





Research Compliance. Supporting the university's research compliance program.

UNIVERSITY COMPLIANCE, ETHICS, AND RISK:

- 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. Developed the report in partnership with the Research Integrity Compliance Office and submitted the report in February 2018.
- Served as a point of contact and source for guidance to research compliance on issues related to award management, scientific misconduct, export controls, conflict of interests, and development of policies and procedures.
- 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 Office of Research, Research Integrity Compliance Office to ensure all research faculty receive training in federal compliance requirements.

ENVIRONMENTAL HEALTH & SAFETY:

- EHS Research Safety Team trained individuals in mandatory research safety topics such as, lab safety, biosafety, radiation safety, laser safety, blood borne pathogens, and PI training, as well as provided training to individual laboratory groups.

OFFICE OF RESEARCH, RESEARCH INTEGRITY COMPLIANCE:

- Revised the non-resident alien export control review process in coordination with UCF Global.
- Processed self-disclosures of faculty violations of the EAR/ITAR, specifically faculty ITAR exports to China.
- Implemented a process to run a monthly report that identifies SFI disclosures at proposal. When reviewing prior months, it was determined that a disclosure of a Significant Financial Interest (SFI) related to a research proposal was not reviewed prior to award. A retrospective review was conducted, the investigator's existing Monitoring Plan was deemed appropriate as written, and the report was submitted to the funding agency.
- Monitored time and effort certification statements. Monitored financial bi-annual reconciliation for service center rates and rate renewal proposals.
- Conducted research misconduct assessments, inquiries, and investigations.
- Conducted an internal audit of randomly selected IRB approved human subject research protocols by non-IRB staff. Results were submitted to the IRB for program evaluation.



Athletics Compliance. Providing oversight and management of the athletics compliance program.

UNIVERSITY COMPLIANCE, ETHICS, AND RISK & THE ATHLETICS COMPLIANCE OFFICE:

- Provided quarterly updates to the president and to the vice president and executive chief of staff.
- Participated in and provided oversight of compliance with regard to the UCFAA at the following meetings: UCF Board of Directors meetings, Athletics Directors Town Hall meeting, NCAA Compliance Liaison meetings, and American Athletic Conference Compliance Administrators meetings.
- Served as members of the National Association for Athletics Compliance, as well as attended the organization's annual conference.
- Assigned compliance advisors to every sport, holding regular meetings with each group.
- Worked with Undergraduate Admissions to support and implement admissions policies and procedures for student-athletes.
- Distributed compliance brochures to all UCF boosters and season ticket holders.
- Revised Bylaws 11-17 of the policies and procedures manual based on meetings with involved departments.
- Revised the Athletics Department JumpForward Policy.
- Worked with the NCAA to provide waivers for several UCF student-athletes under varying circumstances in order for those student-athletes to maintain NCAA eligibility. All waivers were granted.
- Participated in an external audit of the Telephone Monitoring policy, as well as conducted internal monitoring on admissions, recruiting, financial aid, and playing and practice seasons.
- Conducted student-athlete exit interviews and an athletics department effectiveness survey.
- Investigated and reported all claims of NCAA violations.

REGISTRAR'S OFFICE:

- Calculated and submitted the university's Academic Progress Report (APR) and the Graduate Success Rate report to the NCAA.



SUCCESS STORIES



UNIVERSITY COMPLIANCE ETHICS AND RISK:

- Successfully met all 19 regulation components of the Board of Governors regulation 4.003 State University System Compliance and Ethics Programs.
- The second compliance and ethics culture survey revealed a 22 percent increase in employee awareness of UCER and the UCF IntegrityLine. Awareness of the office increased from 47 percent in 2016 to 69 percent in 2018, while awareness of the UCF IntegrityLine increased from 45 percent to 67 percent. Additionally, employees reported greater familiarity with the university'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, while 83 percent had reported not experiencing or observing a violation in the last 12 months, and 94 percent stated that they were not asked to bend, break, or circumvent laws, regulations, or university policies or regulations. These successful results were largely due to the outreach efforts conducted by the office.

ENVIRONMENTAL HEALTH AND SAFETY:

- EHS significantly improved its building inspection process by using software and mobile devices, resulting in the doubling of inspections from an annual basis to a biannual basis.

HUMAN RESOURCES:

- Successfully on-boarded and supported the merger of the Arecibo Observatory within the university, ensuring and managing compliance with complex Puerto Rican Internal Revenue Code and the Commonwealth's employment laws while ensuring no significant operational failure.

OFFICE OF INSTITUTIONAL EQUITY:

- In January 2018, the office spearheaded and launched the Let's Be Clear campaign to raise awareness of the university's prohibition of sex discrimination/violence, available reporting options and resources, and reporting requirements for employees. This campaign and parallel training across campus led to an overall increase in reporting. The success of the campaign is attributable to the collaboration of numerous staff members in Student Development and Enrollment Services (SDES), Communications and Marketing, UCER, University Police and Victim Services, and the OIE.
- Working with SDES, the office successfully transitioned investigations of Title IX related incidents involving student respondents from the Office of Student Rights and Responsibilities to the Office of Institutional Equity. Both offices will continue to review and refine the process to improve reporting and investigation timelines.
- The Title IX Response Team was initiated to support case related communications with campus partners. This team is comprised of members from the Office of Institutional Equity, the Office of Student Rights and Responsibilities, the Office of Student Conduct, University Police, Student Care Services, and Housing and Residence Life.

OFFICE OF STUDENT RIGHTS AND RESPONSIBILITIES:

- Four Title IX peer educator positions were sustained by funding from the Parent & Family Fund Grant. Title IX peer educators primarily served the role of student educators, through outreach events and education program implementation on Title IX related matters, particularly interpersonal violence. In addition, peer educators served the purpose of program, design, and implementation planning, as well as a student voice for campus Title IX related initiatives and policies. Title IX peer educators have been a crucial component in expanding and understanding the student perspective and experience within the Office of Student Rights and Responsibilities, and by participating as hearing officers during student panel hearings.
- Staff members successfully led Student Development and Enrollment Services efforts to intervene and offer accommodations and support for students involved in Title IX related incidents. The group focused on creating and executing a prevention outreach and education plan for students through workshops and campus events.





QUALITY MANAGEMENT AND IMPROVEMENT:

- Quality Management and Improvement successfully facilitated the implementation of e-Builder project management software with the Facilities and Safety department. Working closely with Facilities Planning & Construction and other stakeholders, the e-Builder implementation team built automated processes and standard forms to aid compliance with the project management process.
- The office also documented business practices via a Project Management Manual that was developed and is now utilized by Facilities Planning & Construction.

REGISTRAR'S OFFICE:

- During the 2017-18 academic year, the office successfully implemented an online records release form, which allows students to authorize the release or access to student record data to a "delegate(s)" (e.g. parents) that only the student can specify. This release form, by being electronic, allowed for a single and centralized release, rather than having separate forms within different offices, and it minimizes exposure to fraudulent releases. The new form will also aid in minimizing the incentive for students to share his or her password with parents or other individuals.

RESOURCE MANAGEMENT:

- Resource Management (Surplus Property) was selected as one of the winners of the 2018 Prudential Productivity Award, given out by Florida TaxWatch to acknowledge individuals and organizations that reduce costs and improve service for taxpayers. The group reviewed approximately 400 state-wide submissions, and awarded UCF one of its 24 cash awards.
- The disposal process for university-owned surplus was redesigned by the surplus property team, which provided a significant direct costs savings for the university. Since the launching of this program in 2015, over \$1.7 million in university assets have been successfully transferred between departments within the university.



STUDENT ACCESSIBILITY SERVICES:

- The university received notice in May 2018 that the Federal Department of Education Office of Civil Rights (OCR) had concluded its investigation of the disability discrimination and retaliation complaint filed by a former student against the university. The OCR responded with a finding of no discrimination or retaliation on behalf of the university. Work done by the Office Student Accessibility Services staff, along with the office's deliberate processes aided in this successful outcome.

STUDENT HEALTH SERVICES:

- In conformance with the Information Systems (IS) Audit and assurance standards established by the Information Systems Audit and Control Association (ISACA), the Health Insurance Portability and Accountability Act (HIPAA) audit was conducted by the Office of University Audit in April 2018 on four separate university departments, with Student Health Services being one of them. The office was assessed an overall risk rating of low risk, meaning that appropriate controls have been substantially implemented and require minimal work to reach operational effectiveness.

UCF GLOBAL:

- By following through on standard SEVIS reporting and recordkeeping procedures, UCF Global contributed to the quick resolution of a crisis situation involving an international student who had purchased high-powered firearms.

UTILITIES AND ENERGY SERVICES:

- The combined heat and power plant passed air compliance testing for the fifth consecutive year, with no violations since its inception.
- The office produced and distributed a Consumer Confidence Report with no water violations for the third consecutive reporting year, as well as exceeded all Orange County Fire Department maintenance requirements for all fire hydrants on campus.





ITEM: INFO-3

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

SUBJECT: University Compliance, Ethics, and Risk Report

DATE: November 30, 2018

PROPOSED COMMITTEE ACTION

Information only.

Supporting documentation: Attachment A: 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 A

University Compliance, Ethics, and Risk Report

Audit and Compliance Committee Meeting
November 30, 2018



Agenda

- University Compliance, Ethics, and Risk Program Update
- 2018-19 Compliance and Ethics Annual Work Plan Updates

Program Update

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

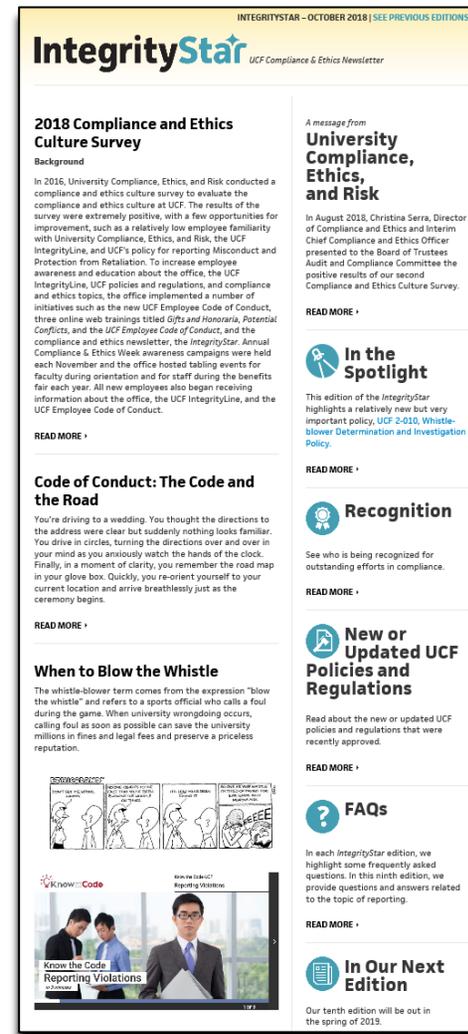
2018-19 Work Plan Status

Element 3. Conduct Effective Training and Education

IntegrityStar, October 2018

Articles:

- C&E Culture Survey Results
- Code of Conduct
- Whistle-blower Policy
- When to Blow the Whistle
- Recognition



2018-19 Work Plan Status

Element 3. Conduct Effective Training and Education

- Potential Conflicts - Florida Code of Ethics for Public Officers and Employees
 - Annual E-mail Reminder, October 2018
 - Potential Conflicts and Gifts and Honoraria training
- National Compliance and Ethics Week
 - Annual E-mail, November 2018
 - UCF Employee Code of Conduct training
 - In 2018, 372 employees completed

2018-19 Work Plan Status

Element 3. Conduct Effective Training and Education

- National Compliance and Ethics Week

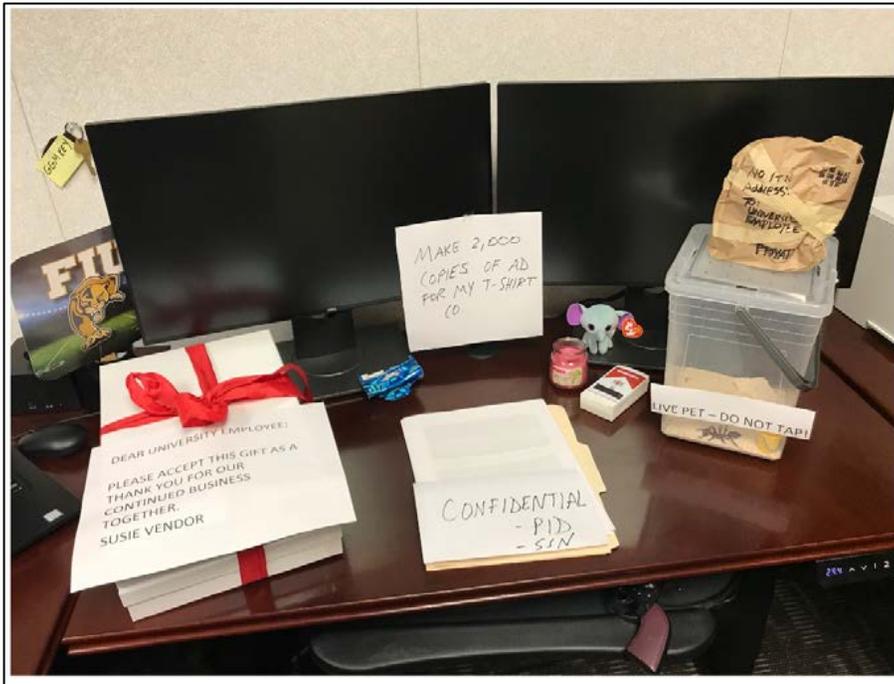


2018-19 Work Plan Status

Element 3. Conduct Effective Training and Education

- National Compliance and Ethics Week

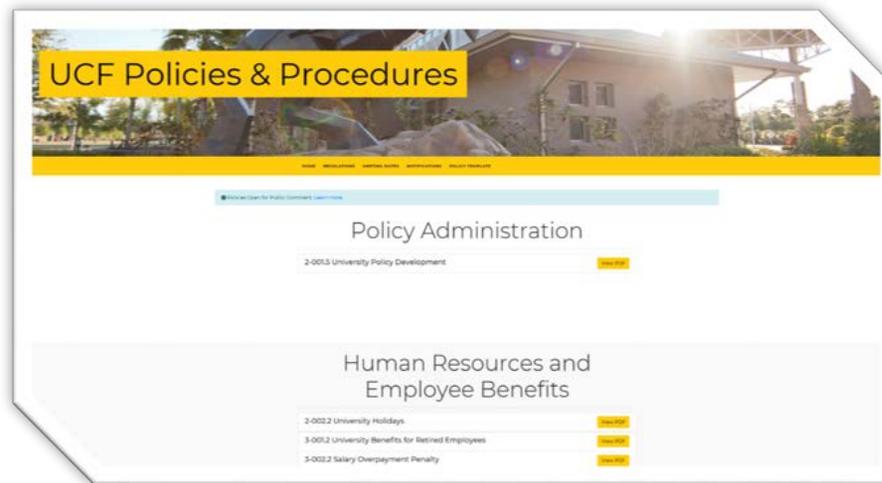
Compliance and Ethics Week Photo Hunt



2018-19 Work Plan Status

Element 4. Revise and Develop Policies and Procedures

- University Policies and Procedures Committee and policy development



- New Policy Webpage
- New “all campus” email distribution of approved policies

2018-19 Work Plan Status

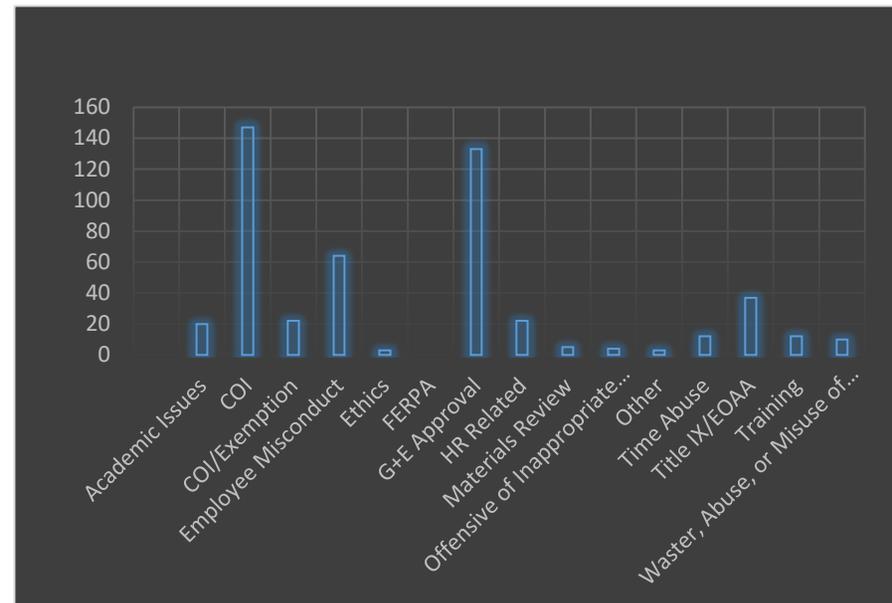
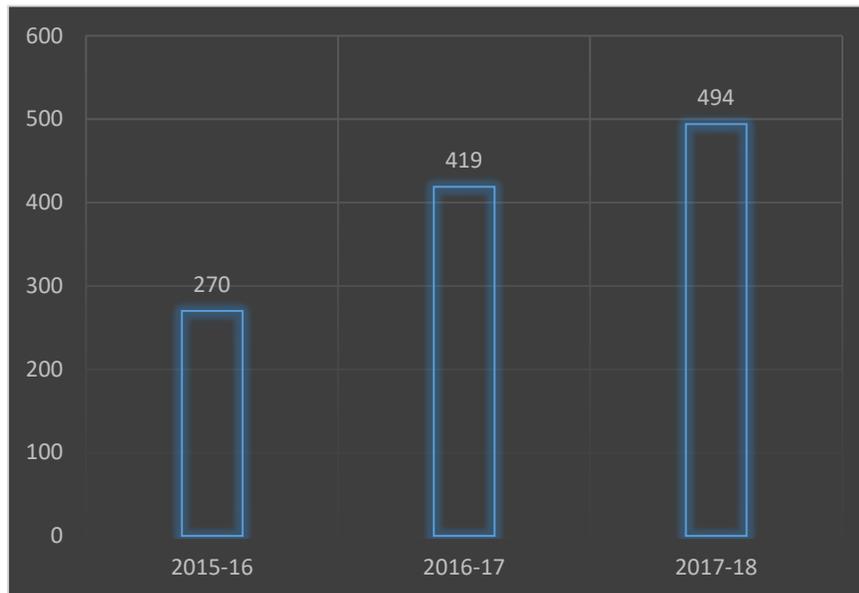
Element 5. Conduct Internal Monitoring and Compliance Reviews

- Manage university-wide conflict of interest and commitment process
 - 2,882 submissions, 98.5%
 - 1,008 at least one activity reported
 - Completed 775 reviews

2018-19 Work Plan Status

Element 5. Conduct Internal Monitoring and Compliance Reviews

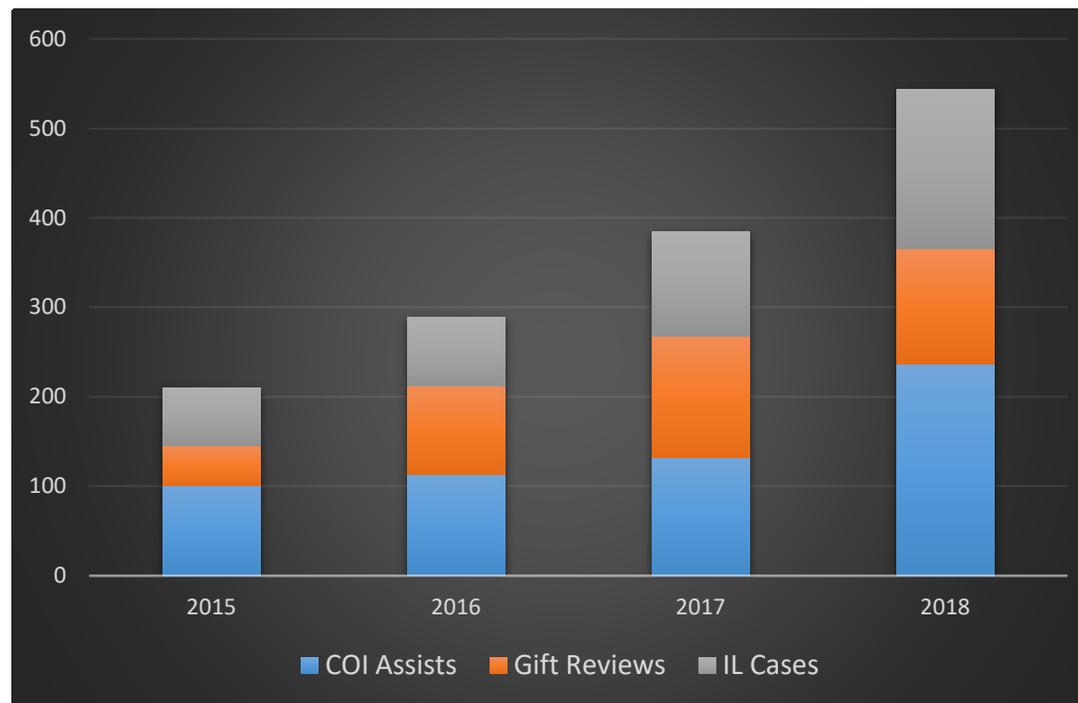
- Review IL and department database for trends



2018-19 Work Plan Status

Element 5. Conduct Internal Monitoring and Compliance Reviews

- Review IL and department database for trends



2018-19 Work Plan Status

Element 9. New Regulations and Special Projects

- European Union General Data Protection Regulation compliance
 - Data inventory
 - Outside legal counsel
 - Draft compliance manual
 - Draft privacy notices
 - Requires named Data Protection Officer

Questions?

