May 30, 2023 Audit and Compliance Committee
Board of Trustees
President's Boardroom, Millican Hall, Suite 308
May 30, 2023 1:00 PM - 2:00 PM EDT

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**Board of Trustees
Audit and Compliance Committee
May 30, 2023 | 1:00 p.m. – 2:00 p.m.**

President's Board Room | Millican Hall, Suite 308

Livestream: https://ucf.zoom.us/j/91699624851?pwd=YlYvQXdpQ2dKcFNyS2o3SnZXUnIxdz09
Meeting ID: 916 9962 4851 | Passcode: 874420

Conference Call Number: 1 (929) 205 6099 | Meeting ID: 916 9962 4851 |Passcode: 874420

AGENDA

1.	Call to Order and Welcome	Bill Christy, *Chair, Audit and Compliance Committee*
2.	Roll Call	Margaret Melli, *Executive Assistant* University Compliance, Ethics, and Risk
3.	Minutes of the February 23, 2023, meeting	Chair Christy *(Page 3)*
4.	Discussion *(60 Minutes)*	

	DISC–1	University Audit Plan Update Robert Taft, *Chief Audit Executive* *(Page 5)*
	DISC–2	University Compliance, Ethics, and Risk Update Rhonda L. Bishop, *Vice President, Compliance, Ethics, and Risk* *(Page 20)*

5.	New Business	Chair Christy
6.	Adjournment	Chair Christy

UNIVERSITY OF CENTRAL FLORIDA

**Board of Trustees
Audit and Compliance Committee Meeting
February 23, 2023
Live Oak Event Center**

MINUTES

CALL TO ORDER

Trustee Bill Christy, Chair of the Audit and Compliance Committee, called the meeting to order at 1:30 p.m. Vice Chair Tiffany Altizer, committee members Stephen King and Harold Mills were present. Committee members Joseph Conte and Danny Gaekwad attended virtually. Board Chair Alex Martins, Trustees Cardenas, Lopez, McAlpin, and Okaty were present, Trustee Miklos attended via teleconference.

MINUTES APPROVAL

The minutes of the November 16, 2022, Audit and Compliance Committee meeting were unanimously approved as submitted.

ACTION

Board of Governors' Performance-based Funding Data Integrity Certification Audit Report (AUDC-1)
Robert Taft, Chief Audit Executive reported on the results of the Board of Governors' Performance-based Funding Data Integrity Certification Audit. Vice Chair Altizer made a motion to accept the report, Trustee King seconded the motion; the report was unanimously accepted by the Committee.

Performance-based Data Integrity Certification Form (AUDC-2)
Taft gave an update on the Performance-based Data Integrity Certification Form. Vice Chair Altizer made a motion to approve the form, Trustee King seconded the motion; the form was unanimously approved by the Committee.

University Audit Department Charter (AUDC-3)
Taft presented the revised University Audit department's internal charter which included language based on the new Board of Governors' regulation 3.003, and updates on the processes and procedures performed by University Audit. Vice Chair Altizer made a

motion to approve the charter, Trustee Conte seconded the motion. The charter was unanimously approved by the committee.

<u>Audit and Compliance Committee Charter (AUDC-1)</u>
Rhonda Bishop, Vice President, Compliance, Ethics, and Risk presented the revised Audit and Compliance Committee Charter. The charter was updated for consistency with the current UCF Board Committee charter. Trustee Mills made a motion to approve the charter, Vice Chair Altizer seconded the motion. The charter was unanimously approved by the committee.

DISCUSSION

<u>Direct Support Organization External Audit Reports (DISC-1)</u>
Taft updated the committee on the Direct Support Organization external audit reports for the most current financial reporting period. All eight of the university's DSOs were issued an unmodified audit opinion.

<u>University Compliance, Ethics, and Risk Update (DISC-2)</u>
Bishop provided an overview of the university's Privacy Compliance Program and highlighted privacy activities included in the Compliance and Ethics Work Plan Status Report covering activities completed from October 1, 2022, to December 31, 2022.

ADJOURNMENT

Chair Christy adjourned the Audit and Compliance Committee meeting at 2:17 p.m.

Reviewed by: _____   _____
                  Bill Christy
                  Chair, Audit and Compliance Committee   Date

Respectfully submitted: _____   _____
                  Michael A. Kilbride   Date
                  Associate Corporate Secretary

Board of Trustees

Agenda Memo

Board of Trustees
Audit and Compliance Committee | May 30, 2023

DISC-1: University Audit Update

☐ **Information**   ☒ **Discussion**   ☐ **Action**

Meeting Date for Upcoming Action: _____

Purpose and Issues to be Considered:

This discussion will cover completed and proposed activities of the internal audit function, as well as management's plans for changes to objectives, key processes, and related internal control activities.

The attached document is intended to provide the committee with information regarding the work of University Audit to assist the committee in successfully completing their oversight duties.

Background:

Current Audit Activities

UCF Audit has six projects of note currently underway; these include the following:

- UCF Career Services – *In draft report status*
- Data Center Review – *Summary report in draft status, individual location reports issued*
- Limbitless Solution, Inc. (DSO) – *Audit fieldwork in progress*
- UCF Downtown – *Audit fieldwork in progress*
- College of Engineering and Computer Sciences – *Audit in the planning phase*
- Workday Post-Implementation Project – *Advisory service in the planning phase*

The committee can expect to receive the final reports for the Career Services and Data Center Review projects in the near future. Trustees are encouraged to reach out directly to Robert Taft, UCF's Chief Audit Executive, for any inquiries or questions regarding these reports.

Currently, there are no significant concerns identified for the ongoing projects that require immediate attention or notification to the committee.

Upcoming Projects

University Audit is actively assessing potential future audit projects within the rapidly changing environment, with a primary focus on aligning with the objectives outlined in the UCF Strategic Plan. Taking inspiration from the "big rocks" concept discussed during the May 18, 2023 board workshop, two initiatives are being closely monitored:

a) Workday implementation: The status of Workday implementation is being closely monitored, particularly UCF's ability to successfully complete its year-end close and provide necessary system access and reporting information to external auditors, including the Florida Auditor General and external auditors retained by each Direct Support Organization.

b) Performance-Based Objectives: The progress of UCF in enhancing results related to Performance-Based Objectives is an area of ongoing monitoring.

These initiatives demonstrate the commitment of University Audit to align with strategic objectives while adapting to the evolving landscape.

<u>Generative Discussion: Artificial Intelligence (AI) as an Emerging Risk and Opportunity</u>

The rapid advancements in technology, particularly with ChatGPT and GPT-4, have generated a significant amount of information and discussion regarding their potential impact on our daily lives. Attachment A provides valuable background information, including specific examples of how this technology is currently being utilized in the private sector. There are numerous other examples such as using AI for investment portfolio work, drug development and chip/material design.

Given the significance of these developments, Trustees will be encouraged to actively participate in a generative discussion during the upcoming meeting, focusing on the risks and opportunities associated with AI. Their expertise and perspectives will play a vital role in guiding UCF in evaluating the best path forward and identifying key considerations when adopting and monitoring these applications.

Recommended Action:
N/A

Alternatives to Decision:
N/A

Fiscal Impact and Source of Funding:
N/A

Authority for Board of Trustees Action:
N/A

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

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

Submitted by:
Robert Taft, Chief Audit Executive

Supporting Documentation:
Attachment A: University Audit Update

Facilitators/Presenters:
Robert Taft

University Audit Update

Robert J. Taft CIA, CCSA, CRMA, CIG, SFC
Chief Audit Executive

May 30, 2023

CURRENT PROJECTS

Career Services

Audit in Draft Report status

Data Center Review

Summary report in Draft Report status with all individual location reports issued

Limbitless (Direct Support Organization)

Audit fieldwork in progress

UCF Downtown

Audit fieldwork in progress.

College of Engineering and Computer Sciences

Audit in planning phase.

Workday Post-Implementation Project

Advisory Service in planning phase.

Foreign Influence (required)

Tenure Process Review (required)

Direct Connect/Transfer Students

UCF Global

Business Services

Technology Transfer

Financial Aid

Software Licensing

PROJECTS ON "WATCH LIST"

- Impact on UCF Strategic Plan

- Management Requests

- Required Audits

DEPARTMENT INITIATIVES

1. Continued involvement with Workday implementation

2. Preparation for Quality Assurance Review

3. Evaluation of Audit Management Software

4. Participation in Power 5 Chief Audit Executive Symposium

5. Department Naming and Branding

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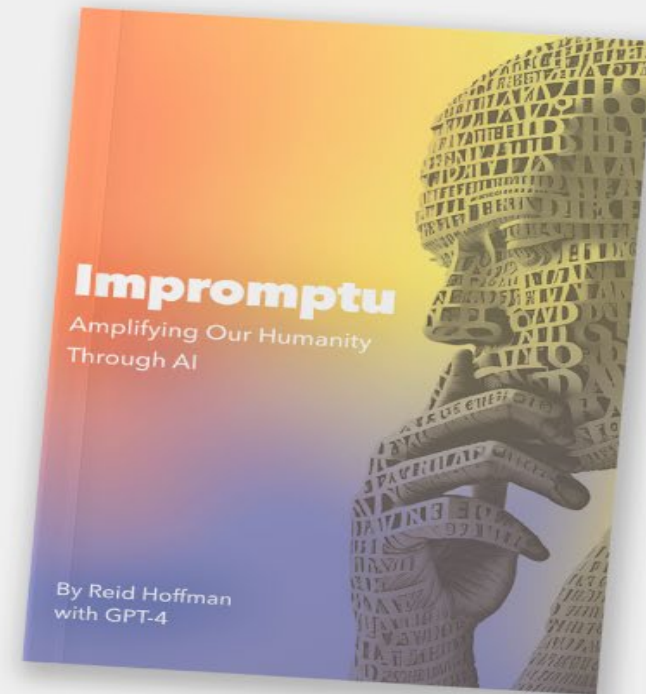# Artificial Intelligence (AI) as an Emerging Risk and Opportunity

"AI will not replace you, but the person using AI will."
ASU + GSV SUMMIT, April 2023

RECOMMENDED READING

Impromptu

Amplifying Our Humanity Through AI

Reid Hoffman with GPT-4

What is GPT-4?

1. GPT-4 is a Large Language Model that has been fine-tuned through a process called Reinforcement Learning through Human Feedback (RLHF) to enable more flowing, human-like conversations with its human users.

2. GPT-4 was developed by OpenAI, a research organization founded in 2015 with a mission to give millions of people direct, hands-on access to powerful new AI tools.

3. At the start of February 2023, OpenAI said ChatGPT had one hundred million monthly active users,

Impromptu: Amplifying Our Humanity Through AI by Reid Hoffman

ChatGPT vs. GPT-4

	ChatGPT	GPT-4
Model type	Generative text model specializing in dialogue	Multi-modal model accepting image and text input and generating text output
Training methods	• Transformer architecture • Trained on dialogue and human demonstration datasets • Trained using supervised fine-tuning + RLHF	• Transformer architecture • Trained on "public data" + "third party data" • Trained using ? + RLHF • Additionaldversarial training
Base model	GPT-3.5	?
Main applications*	• Generate text content • Text summarization • Chatbots • Write and debug code • Dialogue systems	• Generate text content • Text summarization • Chatbots • Write and debug code • Dialogue systems • Analyze and explain images
Availability	• Free limited online app • Paid ChatGPT Plus subscription • Paid API	• Online app only available through ChatGPT Plus subscription • API not yet available
Additional features		• More accurate (less prone to hallucination) • Safer (less prone to harmful responses) • Accepts text and images as input

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https://towardsdatascience.com/gpt-4-vs-chatgpt-an-exploration-of-training-performance-capabilities-and-limitations-35c990c133c5

* Many more applications exist.

IMPACT OF CHATGPT | CONTRACT NEGOTIATION AT WALMART

- "The retail giant uses a chatbot developed by Mountain View, California-based <u>Pactum AI Inc.</u>, whose software helps large companies automate vendor negotiations. Walmart tells the software its budgets and needs. Then the AI, rather than a buying team, communicates with human sellers to close each deal.

- Walmart <u>said</u> it has successfully reached deals with about 68% of suppliers approached, with an average savings of 3% on contracts handled via computer since introducing the program in early 2021.

- Pactun is researching how to conduct bot-to-bot negotiations….But there are obstacles to making that happen anytime soon. Machines still have trouble making assessments with limited information and can't draw in external details like vendor relationships."

tps://www.bloomberg.com/news/articles/2023-04-26/walmart-uses-pactum-ai-tools-to-handle-vendor-negotiations

IMPACT OF CHATGPT | CONSTRUCTION INDUSTRY

- "In 2019, Coastal Construction, one of Florida's largest general contractors, helped launch Togal.AI—which uses machine learning to calculate square footage of areas for bidding and takeoffs. In its first year of using this tool, Coastal cut 14,000 hours of work and saved nearly $1 million, "the biggest increase in efficiency for our preconstruction department in 20 years," says Thomas Murphy, Coastal's CEO and father to Patrick Murphy, Togal.AI's Founder and CEO.

- In April, Togal.AI launched its own OpenAI ChatGPT to further assist contractors' document management… TogalGPT is capable of reading documents in basically all formats and can search from virtually any relevant document uploaded. …is hoping the next breakthrough will be the ability to convert images on plans to text. (The) company is also working with Coastal Construction to launch CodeComply.AI to automatically scan plans to ensure compliance with building codes and expedite approvals."

https://www.bdcnetwork.com/lets-chat-about-ai-how-design-and-construction-firms-are-using-chatgpt

HOW COULD AI IMPACT THE UNIVERSITY FOR THE FUTURE?

Some initial thoughts per Gartner and other sources:

1. How and where people learn

2. Maintaining value and integrity of degrees and research

3. Intellectual property ownership

4. Economic development and career services partnerships (Orlando as an AI hub?)

5. Research grant/patent opportunities and targeted faculty recruitment

6. Program and certificate development (AI literacy)

7. Operational excellence/optimizing existing resources and productivity/ability of employees to handle more complex work

8. Customer service enhancements (chatbots and beyond!)

9. AI ethics

10. Data governance and security based on level and content of ChatGPT participation

HOW CAN INTERNAL AUDIT LEVERAGE CHATGPT?

As part of the audit planning process an inventory of conversations using ChatGPT has been developed:

1. What are common risks for a university <project name>?

2. What are common controls for a university <project name>?

3. What are common audit findings (or issues) for a university <project name>?

4. What are the desired personnel skill sets, educational background, experience levels and personality types for this <project name>?

5. What are the significant applicable laws or regulations applied for a university <project name>?

6. Write a strategic plan for the <project name> with at least three strategic objectives?

7. Provide some Key Performance Indicators with target performance ranges for the <project name>?

Additional Resources

1. **7 Jobs That Don't Exist Today but Will in the Next 5 Years Because of A.I.** (https://www.inc.com/megan-oconnor/7-jobs-that-dont-exist-today-but-will-in-next-5-years-because-of-ai.html

2. **Amazon Is Being Flooded with Books Entirely Written by AI** (https://futurism.com/the-byte/amazon-flooded-books-written-by-ai)

3. **AI 2041: Ten Visions for Our Future** (https://bookshop.org/p/books/ai-2041-ten-visions-for-our-future-kai-fu-lee/15911526?ean=9780593238295)

4. **Admissions Offices, Cautiously, Start Using AI** (https://www.insidehighered.com/news/admissions/2023/05/15/admissions-offices-cautiously-start-using-ai)

5. **How AI Knows Things No One Told It** (https://www.scientificamerican.com/article/how-ai-knows-things-no-one-told-it/)

6. **What every CEO should know about generative AI (**https://www.mckinsey.com/capabilities/mckinsey-digital/our-insights/what-every-ceo-should-know-about-generative-ai)

7. **Elon Musk founds new AI company called X.AI** (https://www.theverge.com/2023/4/14/23684005/elon-musk-new-ai-company-x)

Board of Trustees
Audit and Compliance Committee | May 30, 2023

DISC-2: University Compliance, Ethics, and Risk Update

☐ **Information**	☒ **Discussion**	☐ **Action**

Meeting Date for Upcoming Action: _____

Purpose and Issues to be Considered:

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

Background Information:

Annually, University Compliance, Ethics, and Risk performs an analysis on all UCF IntegrityLine reports submitted and closed during the calendar year and prepares a report on the outcomes including any trends identified. A report covering the data and trends from the IntegrityLine during the period of January 1, 2022, to December 31, 2022, is provided. Two data points of note are outlined below:

Reporting to the IntegrityLine has stabilized after increased reporting due to the pandemic and a high-profile case in 2020 with 270 reports received in 2022. While the number of reports received continued to increase in comparison to the 2018 and 2019 report years, the number of reports received demonstrate employees and students' willingness to raise concerns. Based on research by George Washington University, *Evidence on the Use and Efficacy of Internal Whistleblower Systems*, there is a strong correlation between increased reporting volumes and positive business outcomes.

The IntegrityLine report data supports the university's strategic plan initiative and efforts to be *A Best Place to Work and Learn*. By understanding the data and trends associated with employee and student concerns, University Compliance and Ethics can assess and implement strategies, including working with the appropriate offices or leaders, to address undesirable behaviors affecting culture and workplace satisfaction. Beginning in 2019, a spike in reports categorized as Offensive or Inappropriate Communication was noted and reported to the committee. This issue type includes concerns related to inflammatory, derogatory, unduly critical or insulting communication, including bullying, and employees' failure to treat one another with respect in accordance with the UCF Ethical Standards. This category continues to represent the majority of concerns raised to the IntegrityLine.

As previously reported to the committee, in response to this trend University Compliance and Ethics collaborated with Human Resources to develop a communication, education, and awareness campaign to increase civility in the workplace. Throughout 2020, 2021, and 2022, the office delivered significant training and education on this topic and monitored IntegrityLine reports as well as culture survey responses to gauge the effectiveness of the efforts. In January of 2022, University Compliance and Ethics launched training and panel discussions for supervisors regarding civility and respectful discourse in the workplace, how to communicate with employees who have concerns, and how to appropriately report and address concerns. Through these efforts we have for the first time since 2016 started to see this trend reverse direction with a reduction from 88 reports in 2021 to 66 reports for 2022. In comparison, data from NAVEX, the university's hotline provider, showed a continued increase in this category from 2021 to 2022. NAVEX reported the importance of watching this metric as it is considered an indicator of cultural and possibly mental health for an organization. University Compliance and Ethics will continue to raise awareness and provide education to supervisors and employees on expectations for healthy and respectful behaviors in the workplace.

The Compliance and Ethics 2022-23 Work Plan - Status of Activities Report contains a summary of projects and activities completed from January 1, 2023, through March 31, 2023. This report is provided to support the committee's federal and BOG Regulation 4.003 requirements to be knowledgeable of the Compliance and Ethics program and to exercise oversight with respect to its implementation and effectiveness. In addition, the Vice President for Compliance, Ethics, and Risk uses this report to fulfill the federal and BOG requirement to communicate the programs activities to the committee. At each meeting, activities or recent developments impacting the program are highlighted for the committee.

In support of the university's strategic plan initiative and efforts to be *A Leading Enterprise for Innovative Research and Creative Work*, highlighted for the committee are the efforts associated with mitigating risks associated with foreign influence. During the reporting period, University Compliance and Ethics, completed the state required reporting of gifts and contracts above $50,000 received from foreign sources to the BOG and the federal reporting of gifts and contracts received from foreign sources above $250,000 to the U.S. Department of Education. Of special note is that none of the gifts or contracts reported were from a country of concern.

SB 846 was signed into law by the governor the beginning of May and further defines the state's expectations regarding foreign influence. Applicable to UCF is that this new law prohibits the solicitation or acceptance of any gift, while in an official capacity, from a college or university based in a foreign country of concern, or from a foreign principal. In addition, the new law also prohibits the acceptance of any grant from or the participation in any agreement or partnership with any college or university based in a foreign country of concern, or with any foreign principal. We may only participate in these agreements if authorized by the BOG. The bill authorizes the BOG to impose statutory sanction and withhold performance funding for unapproved partnerships or agreements.

In response to the new law, a review of existing grants, agreements, or partnerships was completed. Based on this analysis, discussions are occurring to identify any grants or agreements that would warrant and meet the requirements for requesting an exception from the BOG. A risk-based analysis is being used consistent with our Foreign Influence Red Flags Program. Additionally, the BOG has revised BOG Regulation 9.012 to include language addressing the new requirements and provided us a draft for comment by May 31, 2023. The draft regulation includes that to request approval for an exception, the board of trustees must submit a request to the Board Office with the specified information. Additionally beginning in 2024, the Board of Trustees would be annually required to submit a report to the Board of Governors for approval relating to all grant programs, agreements, partnerships, and contracts between the state university and any colleges and universities based in a foreign country of concern and foreign principals with specified information required. If approved, University Compliance and Ethics would continue to assist the board in meeting this responsibility.

Lastly, the Vice President for Compliance, Ethics, and Risk has been invited to speak on UCF's Foreign Influence Red Flags Program at the upcoming June BOG meeting. This program was discussed in detail with the committee in August 2021. Additionally, Ms. Bishop will join a panel to discuss and answer questions regarding implementation of the foreign influence laws passed during the past few years covering foreign activity disclosure, travel, screening foreign researchers, foreign gift and contract reporting, international cultural agreements, and foreign travel.

Recommended Action:
N/A

Alternatives to Decision:
N/A

Fiscal Impact and Source of Funding:
N/A

Authority for Board of Trustees Action:
N/A

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

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

Submitted by:
Rhonda L. Bishop, Vice President for Compliance, Ethics, and Risk

Supporting Documentation:
Attachment A: UCF IntegrityLine Report 2022
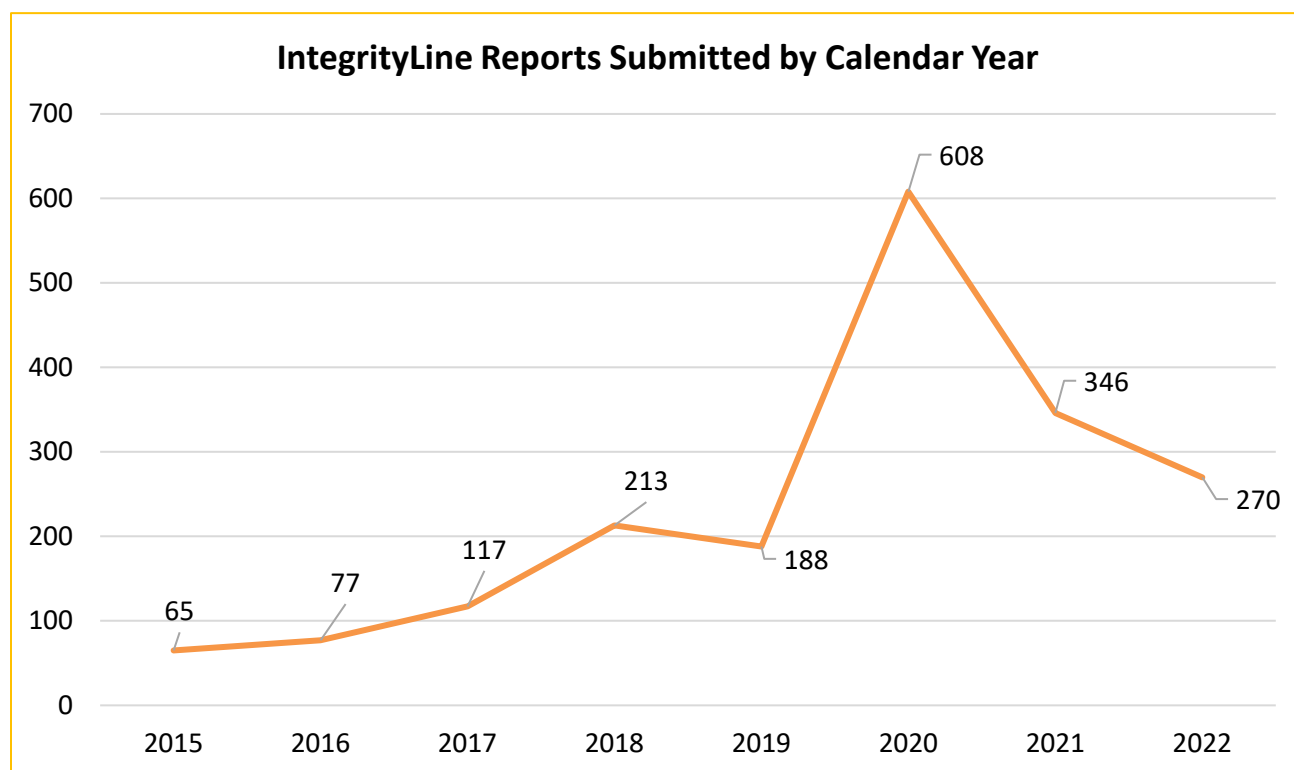Attachment B: Compliance and Ethics Work Plan Status January 1, 2023 - March 31, 2023

Facilitators/Presenters:
Rhonda L. Bishop

UCF IntegrityLine Report

January 1, 2022, to December 31, 2022
University Compliance and Ethics

IntegrityLine Reports Submitted by Calendar Year

Line chart showing IntegrityLine Reports Submitted by Calendar Year:
- 2015: 65
- 2016: 77
- 2017: 117
- 2018: 213
- 2019: 188
- 2020: 608
- 2021: 346
- 2022: 270

2022 IntegrityLine Reports Submitted

During the 2022 calendar year, the UCF IntegrityLine received a total of 270 reports. Of these reports 261 contained allegations of suspected misconduct or ethical concerns and nine reports were inquiries. Reports containing allegations of misconduct were triaged between University Compliance and Ethics and University Audit. Based on the nature of the report, it was either investigated by University Compliance and Ethics, the Office of Institutional Equity, University Audit, or referred to the appropriate compliance partner for review. Reports involving students under the UCF Golden Rule were referred to the Office of Student Rights and Responsibilities. Reports criminal in nature were referred to the UCF Police Department.

Highest Number of Reports by Issue Type

| 24%

Offensive or Inappropriate Communication	The highest number of reports made to the IntegrityLine in 2022 were categorized as Offensive or Inappropriate Communication with 66 reports representing 24% of the total reports submitted. This issue type includes concerns related to inflammatory, derogatory, unduly critical or insulting communication, and failure to treat one another with respect in accordance with the UCF Ethical Standards.

| 16% Other Academic Affairs Matters	The second highest number of reports made to the IntegrityLine in 2022 were categorized as Other Academic Affairs Matters with 43 reports representing 16% of the total reports submitted. This issue type includes concerns related to grade disputes and other concerns regarding faculty that do not fit within any of the other categories.
12% Discrimination or Harassment	The third highest number of reports made to the IntegrityLine in 2022 were categorized as Discrimination or Harassment with 32 reports representing 12% of the total reports submitted. These reports involve allegations of non-compliance with UCF 2-004 Nondiscrimination Policy, which includes but is not limited to uninvited and unwelcome verbal or physical conduct directed at an employee because of his or her sex, religion, ethnicity or beliefs.

All Issue Types

Reports submitted to the UCF IntegrityLine in 2022 spanned a total of 20 issue types.

Primary Issue	Total Reports	Percentage of Reports (Rounded)
Offensive or Inappropriate Communication	66	24%
Other Academic Affairs Matters	43	16%
Discrimination or Harassment	32	12%
Environmental and Safety Matters	25	9%
Employee Misconduct	14	5%
Cheating / Plagiarism	11	4%
Conflict of Interest	10	4%
Other Financial Matters	10	4%
Inquiry	9	3%
Other	9	3%
Other Human Resource Matters	9	3%
Data Privacy / Integrity	8	3%
Fraud	5	2%
Sexual Harassment	5	2%
Alcohol / Drug Abuse	4	1%
Waste, Abuse, or Misuse of Institution Resources	4	1%
Academic Misconduct	2	0.7%
Research Misconduct	2	0.7%
Credentials Misrepresentation	1	0.4%
EEOC or ADA Matters	1	0.4%
Grand Total	**270**	

Closed Cases

University Compliance and Ethics closed 275 IntegrityLine cases during the 2022 calendar year. Closed cases include a combination of reports received in 2022 as well as those submitted in a previous year. Below are the outcomes for all cases closed in 2022.
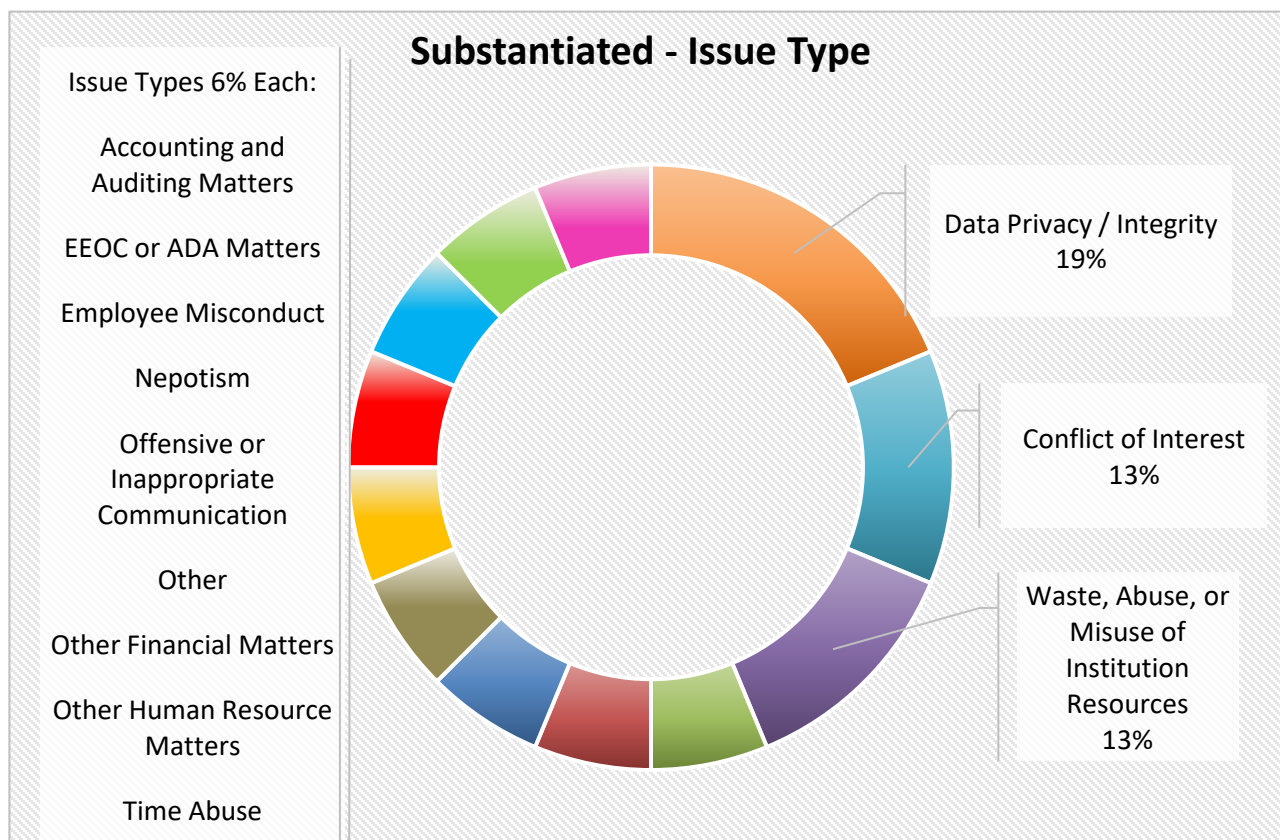

Closed Case Outcomes
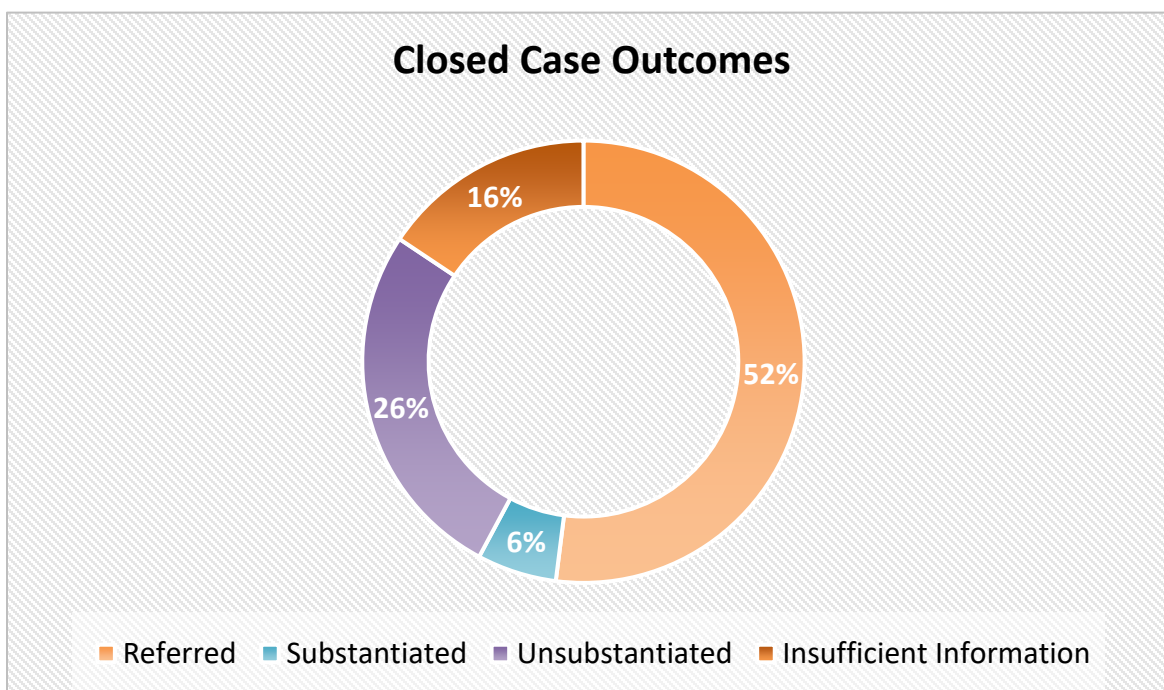
Closed Case Outcomes	Total
Referred	143
Substantiated	16
Unsubstantiated	73
Insufficient Information	43
Grand Total	**275**

Closed Cases – Investigations with Substantiated and Unsubstantiated Findings

In 2022, a total of 89 of the 275 cases were closed after an investigation was conducted by University Compliance and Ethics, the Office of Institutional Equity, or University Audit with the following outcomes.
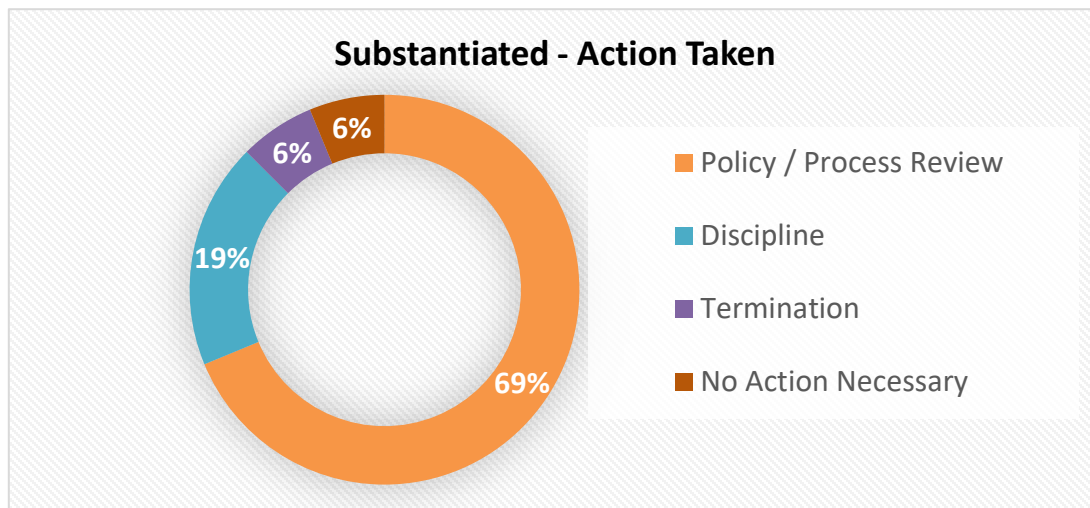
Substantiated Cases

Sixteen cases investigated resulted in a substantiated finding (representing 6% of all closed cases) where investigations yielded evidence to support the complaint and a finding that misconduct occurred. The substantiated cases spanned a range of topics, with the highest in the category of Data Privacy / Integrity.

Substantiated - Issue Type

Issue Types 6% Each:

Accounting and Auditing Matters

EEOC or ADA Matters

Employee Misconduct

Nepotism

Offensive or Inappropriate Communication

Other

Other Financial Matters

Other Human Resource Matters

Time Abuse

Data Privacy / Integrity 19%

Conflict of Interest 13%

Waste, Abuse, or Misuse of Institution Resources 13%

Primary Issue	Total
Data Privacy / Integrity	3
Conflict of Interest	2
Waste, Abuse, or Misuse of Institution Resources	2
Accounting and Auditing Matters	1
EEOC or ADA Matters	1
Employee Misconduct	1
Nepotism	1
Offensive or Inappropriate Communication	1
Other	1
Other Financial Matters	1
Other Human Resource Matters	1
Time Abuse	1
Grand Total	**16**

Substantiated Cases – Action Taken

For the 16 cases investigated that resulted in substantiated findings, the university took the appropriate action. Those actions included policy / process reviews, disciplinary action, and termination.

Substantiated - Action Taken

Donut chart showing action taken percentages:
- Policy / Process Review: 69%
- Discipline: 19%
- Termination: 6%
- No Action Necessary: 6%

Action Taken	Total
Policy / Process Review	11
Discipline	3
Termination	1
No Action Necessary	1
Grand Total	**16**

Unsubstantiated Cases

The remaining 73 cases (26% of closed cases) investigated by University Compliance and Ethics, University Audit, or the Office of Institutional Equity yielded insufficient or no evidence to support that misconduct occurred and were closed with an unsubstantiated outcome. Despite the unsubstantiated finding, 32 of the cases resulted in recommendations for improvements such as a review in a policy, process, or training due to identified weaknesses.

Closed Cases – Referred or Insufficient Information

One hundred and eighty-six (186) cases were not investigated by University Compliance and Ethics, University Audit, or the Office of Institutional Equity. Those cases were either referred out of the system or to another office or closed due to insufficient information.

Referred

A total of 143 cases (52% of all closed cases) were referred as follows:

- **Eighty-five** cases were referred to the UCF Police Department, Student Conduct, or another college or department to address through the appropriate university process and closed out in the IntegrityLine system. These cases span the range of issues involving student misconduct such as alleged alcohol or drug abuse, grade disputes, COVID-19 policy violations, and interpersonal conflicts. Once the report is referred to the appropriate office, it is closed in the IntegrityLine system with a message posted back to the complainant.

- **The remaining 58** cases were referred to a college or department to conduct an internal review and report back their findings.
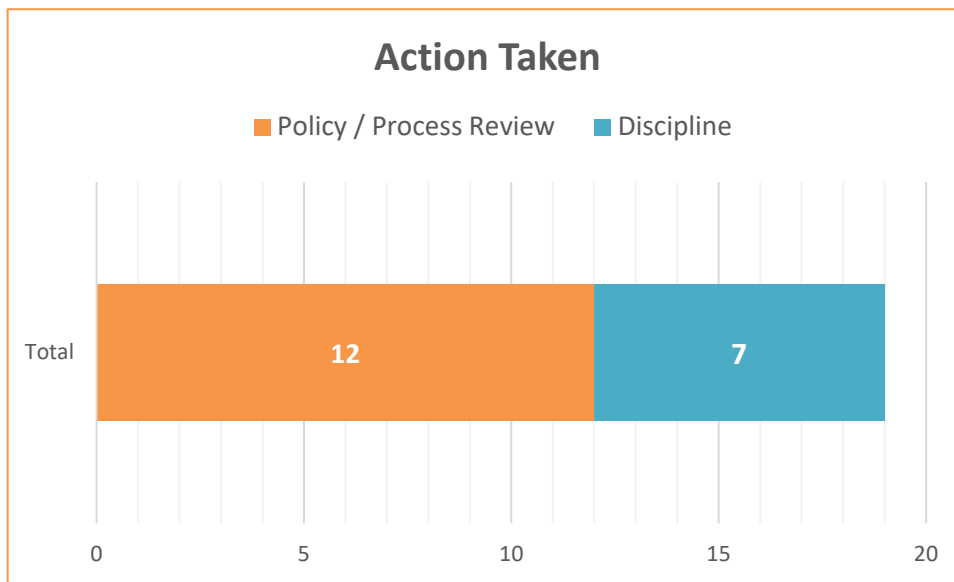
Referred - Substantiated

Nineteen of the 58 cases reviewed internally by a college or department resulted in a **substantiated** finding with the following issue types:
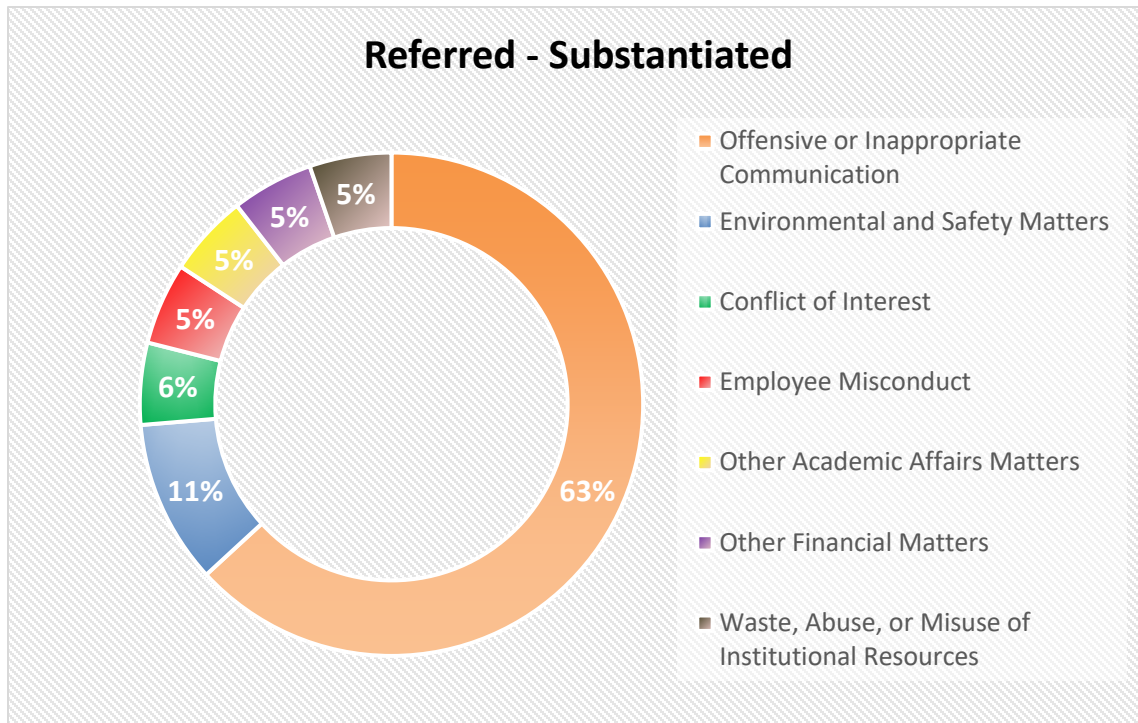
Primary Issue	Total
Offensive or Inappropriate Communication	12
Environmental and Safety Matters	2
Conflict of Interest	1
Employee Misconduct	1
Other Academic Affairs Matters	1
Other Financial Matters	1
Waste, Abuse, or Misuse of Institutional Resources	1
Grand Total	**19**

Referred – Substantiated – Action Taken

The actions taken for the 19 referred investigations that were **substantiated** were as follows:

Action Taken

Legend: ■ Policy / Process Review   ■ Discipline

| Total | Policy / Process Review: 12 | Discipline: 7 |

(Bar chart with x-axis from 0 to 20; orange segment "12" for Policy / Process Review and blue segment "7" for Discipline)

Referred - Unsubstantiated

The remaining 39 referred cases were **unsubstantiated**. However, 17 required improvements due to identified weaknesses which included policy or process reviews.

Insufficient Information

For 43 cases (16% of all closed cases), questions were posted to the complainant requesting additional information with no response. These cases were closed due to insufficient information.

2022 IntegrityLine Trends

In 2019 the office identified a spike in the number of reports submitted to the IntegrityLine regarding Offensive or Inappropriate Communication. These types of concerns relate to inflammatory, derogatory, unduly critical, or insulting communication, including bullying, and employee's failure to treat one another with respect in accordance with the UCF Ethical Standards. As a result, the office collaborated with Human Resources to develop a communication, education, and awareness campaign to increase civility in the workplace. Throughout 2020, 2021, and 2022, the office delivered significant training and education on this topic and monitored IntegrityLine reports as well as culture survey responses to gauge the effectiveness of the efforts.

In 2020, likely as a result of the increased awareness efforts and marketing the IntegrityLine, the office saw an even sharper rise in the reports submitted regarding Offensive or Inappropriate Communication. By 2021, the reports leveled out with the same number reported the prior year with a total of 88 reports. This year, for 2022 there is a dip to 66 reports regarding Offensive or Inappropriate Communication. The dip suggests that the workplace is improving in this area.

Offensive or Inappropriate Communication Reports Submitted

Year	Reports
2016	13
2017	14
2018	16
2019	36
2020	88
2021	88
2022	66
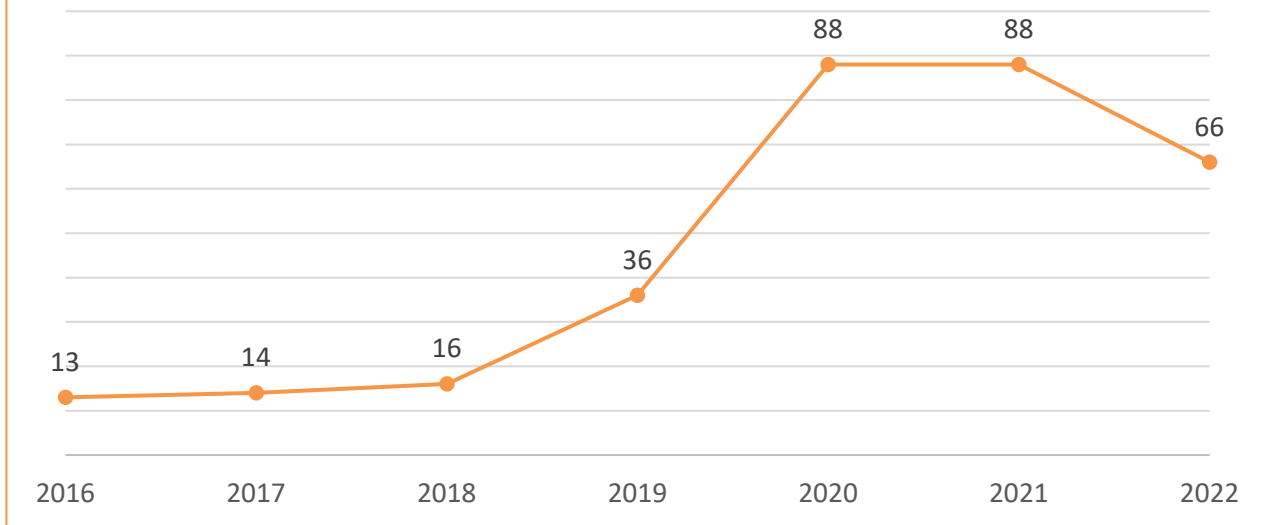
University Compliance and Ethics and Human Resources continue to evaluate opportunities to expand the education and awareness program with the overall goal to improve the workplace and support the university's strategic plan aspiration to make UCF a best place to learn and work.

University Compliance, Ethics and Risk Office

2022-23 Work Plan Status
January 1, 2023 – March 31, 2023

UCF's comprehensive compliance and ethics program is based on the elements of an effective compliance program as set forth in Chapter 8 of the Federal Sentencing Guidelines, and as required by Board of Governors Regulation 4.003 State University System Compliance and Ethics Programs. The Guidelines and Regulation establish the minimum standards for effective programs. Each year, University Compliance and Ethics submits an Annual Workplan to the Audit and Compliance Committee of the Board of Trustees detailing the office's efforts that support an effective program. This report contains the activities committed to in the office's 2022-23 Compliance and Ethics Annual Work Plan and includes the status of the activities during the period January 1, 2023, through March 31, 2023.

1. *Provide Oversight of Compliance and Ethics and Related Activities*

Promote accountability among UCF employees for compliance with applicable federal, state, and local laws and regulations, and appoint knowledgeable individuals responsible for developing and implementing a comprehensive compliance and ethics program.

COORDINATE AND CONDUCT BI-MONTHLY MEETINGS OF THE UNIVERSITY COMPLIANCE AND ETHICS ADVISORY COMMITTEE
- ➢ Developed materials and chaired the Compliance and Ethics Advisory Committee meeting in January and March.
- ➢ Updates included the bi-annual Foreign Gifts and Contract Information report submission to the Board of Governors and the US Department of Education; topics covered during the annual SUS Compliance and Ethics Consortium meeting; the 2022 Annual Security Awareness training and InfoSec awareness campaigns; updates on research program requirements to remain in compliance with the National Security Presidential Memo-33. Additional updates included the release of the 2023 Annual Notice to all employees; and the challenges of artificial intelligence and academic integrity.

CONDUCT QUARTERLY MEETINGS WITH COMPLIANCE PARTNERS AND SENIOR LEADERSHIP
- ➢ Met with vice presidents, key administrators, the faculty athletics representative, and compliance partners to provide updates on compliance and ethics initiatives and discuss any concerns or issues.

SERVE ON AND PROVIDE COMPLIANCE GUIDANCE TO THE TITLE IX WORKGROUP
- ➢ Provided guidance and support to the Title IX coordinator and served on and provided compliance guidance to the Title IX workgroup.

SERVE ON AND PROVIDE GUIDANCE TO THE SECURITY INCIDENT RESPONSE TEAM AND CO-CHAIR THE

INFORMATION SECURITY AND PRIVACY ADVISORY COMMITTEE
➢ Continue to lead (co-chair) the Information Security and Privacy Advisory Committee and serve as a partner of the Data Governance Council.

SERVE AS MEMBERS OF AND PROVIDE GUIDANCE TO THE CLERY ACT COMPLIANCE COMMITTEE
➢ Provided guidance and support to the Clery Compliance Analyst and served on the Clery Act Compliance Committee.
➢ Assisted Clery Compliance Analyst with re-launching the Campus Security Authority identification project.

2.   *Develop Effective Lines of Communication*

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

PREPARE AND DISTRIBUTE *INTEGRITYSTAR*, THE COMPLIANCE AND ETHICS NEWSLETTER
➢ Developed and issued the March 2023 edition of the IntegrityStar featuring articles highlighting April as Child Abuse Prevention Month and providing reminders on the university's Youth Protection Program, Requests for Accommodations Based on Disability, Religious Practice, or Pregnancy Related Condition, and an overview of the office of University Audit.
➢ The edition also included a Child Abuse Prevention Month video, and FAQs related to frequently asked questions our office receives on the Youth Protection Program requirements.
➢ The "Case Corner" article covered a case involving the Youth Protection Program that resulted in corrective action and improvements in the Program to keep minors safe on our campus.

ADMINISTER AND PROMOTE THE UCF INTEGRITYLINE, REINFORCE EXPECTATIONS FOR NON-RETALIATION, AND CONTINUE COMMUNICATIONS DURING AND AFTER INVESTIGATIONS
➢ Continued administration of the UCF IntegrityLine to include review and tracking of all reports, data compilation, trend review, and reporting.
➢ Continued promoting the IntegrityLine in compliance videos; on the office's website; and on the websites of all compliance partners.
➢ Provided direct support and guidance to supervisors and employees involved in investigations.

COORDINATE TIMELY RESPONSES TO REGULATORY AND OTHER EXTERNAL AGENCIES
➢ Responded to an inquiry by the National Science Foundation regarding a Small Business Innovation Research grant awarded to a former student.
➢ In response to the Board of Governor's February 28, 2023, Data Request, obtained information to prepare and submit the SB 846 Agreements of State Colleges and State Universities with Foreign Entities template on behalf of UCF prior to the March 3, 2023, deadline.
➢ Continued to monitor the UCF Office of Military and Veteran Student Success' submission of completed Corrective Action Plan items to the Department of Defense (DoD) in

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response to their findings from the 2022 Institutional Compliance Program review in relation to the Voluntary Education Programs Memorandum of Understanding (MOU) signed in 2019. DoD policy requires educational institutions that wish to participate in the Tuitional Assistance program to sign an MOU. As part of the MOU, UCF agrees to heightened oversight and compliance with rules specific to service members and their families. The DoD review included submitting a self-assessment in April 2022, a Corrective Action Plan in August 2022, a revised plan in October 2022, and evidence of completion of all action items by January 25, 2023. On February 20, 2023, the DoD issued a letter to the president confirming UCF had satisfactorily completed the Institutional Compliance Program review with no further action required.

➢ On behalf of the president and Board of Trustees, prepared the annual research exemption report and submitted the report in February 2023 to the governor and legislature as required by state statute.

➢ As required by Section 117 of the Higher Education Act, compiled a list of all UCF gifts and contracts with foreign entities and reported nine foreign gifts and contracts exceeding $250,000 to the U.S. Department of Education and 13 foreign gifts and contracts exceeding $50,000 to the Florida Board of Governors by the January 2023 due date.

MAINTAIN AND PROMOTE THE COMPLIANCE AND ETHICS WEBSITE

➢ Updated the website to include the March 2023 edition of the IntegrityStar, revisions to the Training page, Enterprise Risk and Insurance content and forms, Board of Trustees Audit and Compliance Committee approved revised Charter, Youth Protection resources, removed outdated files, added user friendly buttons to important links for better visibility, and updated the Our Staff page.

➢ Hired a work-study student employee to assist the office with updating the theme of the University Compliance and Ethics website.

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3.   *Conduct Effective Training and Education*

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

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

➢ Number of new employees during this reporting period who took the online course and passed the final quiz:
   o   Employee Code of Conduct / Speak Up! = 894
   o   Potential Conflicts – Florida Code of Ethics for Public Officers and Employees = 788

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

➢ Continue to promote the online training modules to employees.

➢ Total number of existing employees who took the online courses and passed the final quiz during this reporting period:
   o   Gifts and Honoraria = 4
   o   Potential Conflicts – Florida Code of Ethics for Public Officers and Employees = 61

o   Protection of Vulnerable Persons = 26

ISSUE ANNUAL MEMO ON VULNERABLE PERSONS ACT
➢ Annual memo was distributed March 2023.

DEVELOP AND LAUNCH MANDATORY ANNUAL CODE OF CONDUCT TRAINING WITH CERTIFICATIONS FOR NON-STUDENT EMPLOYEES AND MONITOR COMPLIANCE FOR COMPLETION
➢ The 2022 Code of Conduct refresher training containing customized modules (English and Spanish) addressing Gifts and Honoraria, Misuse of Resources, and Discrimination and Harassment launched on September 26, 2022, with a completion deadline of October 26, 2022.
o   Number of employees auto enrolled on September 26, 2022: 7,374
o   Number of employees completing the training by the deadline: 5,913
o   Implemented follow up process for delinquent training. By December 31, 2022, there were 7,012 (99.43%) completed.
o   Reached 100% completion by March 31, 2023, with 7,175 completed (199 employees were removed due to separation from the university).

MONITOR COMPLIANCE WITH COMPLETION OF THE YOUTH PROTECTION ONLINE TRAINING MODULE AS REQUIRED BY POLICY
➢ Required Youth Protection training was completed by 126 program staff working with minors during this reporting period.
➢ Implemented a mandatory Overnight Youth Program Staff training during this reporting period. Seventeen program staff supervising minors overnight completed the training.

IN PARTNERSHIP WITH THE INFORMATION SECURITY OFFICE, DELIVER MANDATORY SECURITY AND PRIVACY AWARENESS TRAINING, TRACK EMPLOYEE COMPLETION, AND LOOK FOR OTHER AVENUES TO RAISE SECURITY AND PRIVACY POSTURE
➢ The inaugural annual mandatory security and privacy course was launched on November 30, 2022.
o   Total employees auto enrolled on 11/30/22: 12,809
o   Total employee completions by 3/31/23: 4,187 (67%)

IDENTIFY ADDITIONAL OPPORTUNITIES TO DEVELOP AND DELIVER COMPLIANCE AND ETHICS TRAINING
➢ Worked with the kNEXT Training Team to develop automated notifications to the HR Business Center Leaders reminding them to track completion of required new hire compliance training. Notifications began March 1, 2023.
➢ Updated the comprehensive compliance and ethics training plan with input from compliance offices and partners.
➢ Provided the UCF Employee Code of Conduct, office brochure, privacy compliance pamphlet, and Speak Up wallet cards to Human Resources for distribution at New Employee Orientation.

ISSUE ADDITIONAL REGULATORY ALERTS AND UPDATES AS APPROPRIATE
➢ Finalized the Drug and Alcohol Prevention Program Biennial Review Report in accordance with the Drug Free Schools and Communities Act. Scheduled meeting with the Biennial Review Committee for April 2023 to discuss the final report.

4.   *Revise and Develop Policies and Procedures*

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

CHAIR THE UNIVERSITY POLICIES AND PROCEDURES COMMITTEE AND PROVIDE GUIDANCE ON POLICY DEVELOPMENT
- ➤ Chaired the University Policies and Procedures Committee. Provided coordination of the committee and management of the online Policies and Procedures Manual.
- ➤ Reviewed and edited policies and procedures prior to submission for approval to the committee. Worked directly with departments, provided guidance, and revised four policies.
- ➤ Updated resources on the online University Policy Library.

SERVE AS MEMBERS OF THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA) COLLABORATIVE TO DEVELOP UNIVERSITY POLICIES AND PROCEDURES ON HIPAA COMPLIANCE
- ➤ Continued to serve on the UCF Health Sciences HIPAA Collaborative. The Collaborative reviewed three draft policies during this reporting period.

5.   *Conduct Internal Monitoring and Compliance Reviews*

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

MANAGE UNIVERSITY-WIDE CONFLICT OF INTEREST AND COMMITMENT PROCESS
- ➤ Launched the 2022-23 outside activity and financial interest reporting using the new Huron COI system on October 31, 2022, with a November 30, 2022, deadline:
  - o Of the 4,514 users required to disclose, 4,139 submitted by November 30 achieving a 91.7% compliance rate with the 30-day deadline.
  - o Implemented the delinquent follow up process and by year end, reached 98% completion rate.
  - o 100% completion achieved by February 7, 2023.
- ➤ Thus far, reviewed and approved 875 AA-21 disclosures in the new Huron COI system.
- ➤ Foreign influence red flag reviews were completed for each positive response to financial interests and outside activities with foreign entities. During this review period, completed 25 red flag reviews. Two contained at least one red flag or potential risk that resulted in additional awareness provided to the employee.
- ➤ Completed 80 employment of relative reviews.
- ➤ Received and responded to 82 separate requests for assistance with outside activity and conflict of interest support.
- ➤ Completed 18 reviews of potential conflicts of interest associated with attendance at conferences or events sponsored by vendors or receiving discounts or gifts.
- ➤ Reviewed two research exemption requests prior to coordinating with the provost, president, and Chair of the Board of Trustees for approval as required by state statute.

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MANAGE UNIVERSITY-WIDE YOUTH PROTECTION PROGRAM

➢ Processed 22 submitted registrations (20 in-person/ 2 virtual), approving 12 and conditionally approving 10 that required revision of minor deficiencies.
➢ Revised the Insurance Enrollment form for UCF Youth Programs. Posted the form on the Resources page on the Youth Protection webpage.
➢ Worked with Enterprise Risk and Insurance to create a check list for third-party programs to review insurance requirements and communicate any deficiencies during the registration review process.
➢ Worked with the Squire vendor to enhance both the registration and review process by adding features that would ensure a more thorough and accurate submission and review of submitted registrations.

MANAGE AND PROVIDE OVERSIGHT OF THE UNIVERSITY'S FOREIGN INFLUENCE PROGRAM

➢ Continued oversight of the university's foreign influence compliance program including monitoring efforts with the Florida Foreign Influence Act, conducting regular meetings with the Office of International Collaboration and Export Control, Research Compliance Office and University Compliance and Ethics, to discuss foreign influence red flags, inquiries, and subsequent investigations.

DEVELOP AND MANAGE UNIVERSITY-WIDE PRIVACY PROGRAM

➢ Processed 17 Data Subject Access Requests.
➢ Reviewed, provided guidance, and approved 16 contracts, along with four Reciprocal Student Exchange agreements.
➢ Reviewed and processed 10 Vendor Risk Management requests.
➢ Reviewed and resolved two data privacy concerns submitted by students.
➢ Performed four research related ancillary reviews.
➢ Followed up with IT representatives to address concerns with vulnerability assessment results related to HIPAA for the Communications Disorders Clinic and Physical Therapy Clinic.
➢ Worked with the University Registrar on two Family Educational Rights and Privacy Act related reports/issues.
➢ Reviewed and investigated two HIPAA concerns.
➢ Reviewed and responded to three IntegrityLine cases.
➢ Followed up with HR on Workday case regarding use and sharing of employee photos.
➢ Active member and partner within UCF's Data Governance Council functioning as data privacy subject matter expert and advising on data safeguards, relevant laws, and best practices.
➢ Participated in the Chief Information Officer team meetings to provide privacy updates and guidance and keep pace with IT-related projects involving data of concern.
➢ Met with peer privacy officers and practitioners to discuss industry challenges and solutions during events hosted by EDUCAUSE, the Information Systems Security Association of Central Florida, and others.
➢ Updated UCF's online Privacy Notice after working with the Web Development & Digital Strategy team.
➢ Updated UCF's Personal Data Map.

CONTINUE COMPLIANCE PARTNER REPORTING

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- Compliance partners continued to provide updates on their program activities during committee meetings and through separate meetings and discussions when significant issues and challenges arose.

REVIEW THE UCF INTEGRITYLINE AND DEPARTMENT DATABASE FOR TRENDS AND RISK AREAS AND ADDRESS APPROPRIATELY
- Prepared the UCF IntegrityLine Report for calendar year 2022. In response to a trend identified in 2019 related to a spike in the number of reports submitted to the IntegrityLine regarding Offensive or Inappropriate Communication the office collaborated with Human Resources to develop a communication, education, and awareness campaign to increase civility in the workplace.
  - Throughout 2020, 2021, and 2022, the office delivered significant training and education on this topic while monitoring the IntegrityLine reports and culture survey responses to gauge the effectiveness of the efforts.
  - In 2020, likely due to increased awareness efforts and marketing of the IntegrityLine, there was a sharper rise in the reports submitted regarding this issue type. By 2021, the reports leveled out with the same number reported the prior year with a total of 88 reports. In 2022 there was a dip to 66 reports regarding Offensive or Inappropriate Communication suggesting that the workplace is improving in this area.

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

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

RECEIVE AND EVALUATE UCF INTEGRITYLINE REPORTS AND ALLEGATIONS OF MISCONDUCT MADE DIRECTLY TO THE OFFICE; CONDUCT INVESTIGATIONS
- Provided administration and oversight of the UCF IntegrityLine to include review and tracking of all reports until completion, data compilation, trend review, and reporting.
- During this reporting period, received 69 new reports through the UCF IntegrityLine and five new reports which came directly through our office alleging misconduct.
- Coordinated triage of reports with University Audit. When appropriate, reports were referred to a compliance partner, investigated by this office, University Audit, or the Office of Institutional Equity. During this time, 77 IntegrityLine cases and five cases which came directly to our office were investigated and closed.
- During this reporting period, responded to two public records requests for IntegrityLine and investigation records.

PROVIDE RECOMMENDATIONS FOR CORRECTIVE ACTIONS AND IMPROVEMENT OF ETHICAL CONDUCT
- Continued providing recommendations for corrective actions and improvements of ethical conduct following investigations or requests for guidance.

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

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

DEVELOP AND PROMOTE COMPLIANCE AND ETHICS INCENTIVE OPPORTUNITIES
  ➢ Highlighted in the March 2023 edition of the IntegrityStar Alison Cares, PhD, Associate Professor of Sociology, for her outstanding contributions and support of the university's Title IX compliance and education program.

PROMOTE AWARENESS OF UCF REGULATIONS, POLICIES AND PROCEDURES, AND REGULATORY REQUIREMENTS
  ➢ Highlighted in the March 2023 edition of the IntegrityStar a total of four new and revised UCF policies and seven new and revised regulations that had been implemented since the last edition. Also included were three repealed regulations.
  ➢ Distributed one campus-wide email to employees alerting them of the approval of the new and revised policies.

PROMOTE ACCOUNTABILITY AND CONSISTENT DISCIPLINE
  ➢ Continue to provide recommendations for appropriate discipline for substantiated cases to ensure accountability and consistency in corrective actions.
  ➢ Continued serving as the point of contact and source for guidance to research compliance related to scientific misconduct, export controls, conflict of interest, and development of policies and procedures.

8. *Measure Compliance Program Effectiveness*

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

DEVELOP, MEASURE, AND TRACK DEPARTMENT PROCESS IMPROVEMENT EFFORTS USING THE UNIVERSITY ASSESSMENT PROCESS
  ➢ The 2021-22 results report, and 2022-23 assessment plan were submitted for review and approved by the Divisional Review Committee.

9. *New Regulations and Special Projects*

OVERSEE COMPLIANCE EFFORTS WITH NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY 800-171 (NIST) FEDERAL REQUIREMENTS
  ➢ Continue as a Team Lead within NIST Privacy Workforce Public Working Group Team 3.

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OVERSEE COMPLIANCE EFFORTS WITH THE ACCEPTANCE OF CARES ACT FUNDING
- ➢ Continued monitoring the requirements associated with the acceptance of CARES Act funding and the plan for addressing each.

PARTNERED WITH HUMAN RESOURCES TO ENSURE COMPLIANCE WITH EMPLOYEE ACKNOWLEDGMENT OF THE EMPLOYEE ANNUAL NOTICES
- ➢ Due to the requirements contained in The Drug Free Schools and Communities Act passed in 1986 and amended in 1989 as part of the reauthorization of the Higher Education Act, all higher education institutions that receive federal funding must execute a drug and alcohol abuse prevention program for its campus community and annually notify all students and employees, in writing, of the program. Human Resources has met the employee notice requirement by including the drug and alcohol abuse prevention program in the Employee Annual Notices. This year, Human Resources requested assistance from University Compliance and Ethics to ensure 100% completion by all employees.
- ➢ 2022 Annual Employee Notices:
  - o Upon receipt of this project, the office identified delinquents from 2022. The 2022 Annual Employee Notice was transitioned to Workday prompting auto enrollment of 1,448 delinquent employees who immediately began receiving email reminders.
  - o As of March 31, 2023, 932 employees completed the acknowledgement, bringing the compliance rate to 83% (268 employees were removed due to separation from the university).
- ➢ 2023 Annual Employee Notices:
  - o Assisted Human Resources with the course set up in Workday and drafted automated notification language.
  - o The 2023 Employee Annual Notice launched on March 28, 2023, with a deadline of completion by April 27, 2023.
  - o Number of employees auto enrolled: 7,411
  - o By March 31, 2023, just three days from launch, 3,580 employees completed the acknowledgment (48% completion).

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