University Compliance and Ethics

UCF

Compliance and Ethics Annual Report 2024

I am pleased to present the University of Central Florida (UCF) comprehensive Compliance and Ethics report for fiscal year (FY) 2023-2024. UCF's Compliance and Ethics Program (Program) was developed based on the Code of Ethics for Public Officers and Employees contained in Part III, Chapter 112, Florida Statutes; the Federal Sentencing Guidelines Manual, Chapter 8, Part B, Section 2.1; and as required by the Florida Board of Governors Regulation 4.003. These requirements set forth an effective compliance and ethics program for organizations and require not only promoting compliance with laws, but also advancing a culture of ethical conduct. This 2023-2024 report provides a comprehensive look at the university-wide activities and outcomes that demonstrate the university's unwavering commitment to a culture of compliance and ethics. This report is published annually to provide the UCF community, the UCF Board of Trustees, and the State of Florida Board of Governors a full view of the extensive university-wide compliance and ethics program activities achieved across the campus through the collaborative efforts of all compliance offices and compliance partners at UCF.

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

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INTRODUCTION

Compliance Program Elements

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- Effective Lines of Communication
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- Routine Monitoring, Auditing, and Identification of Risks

Chapter 8 of the U.S. Federal Sentencing Guidelines contains the elements for an effective program and defines the responsibility of the president, senior leadership, and the compliance and ethics officer.
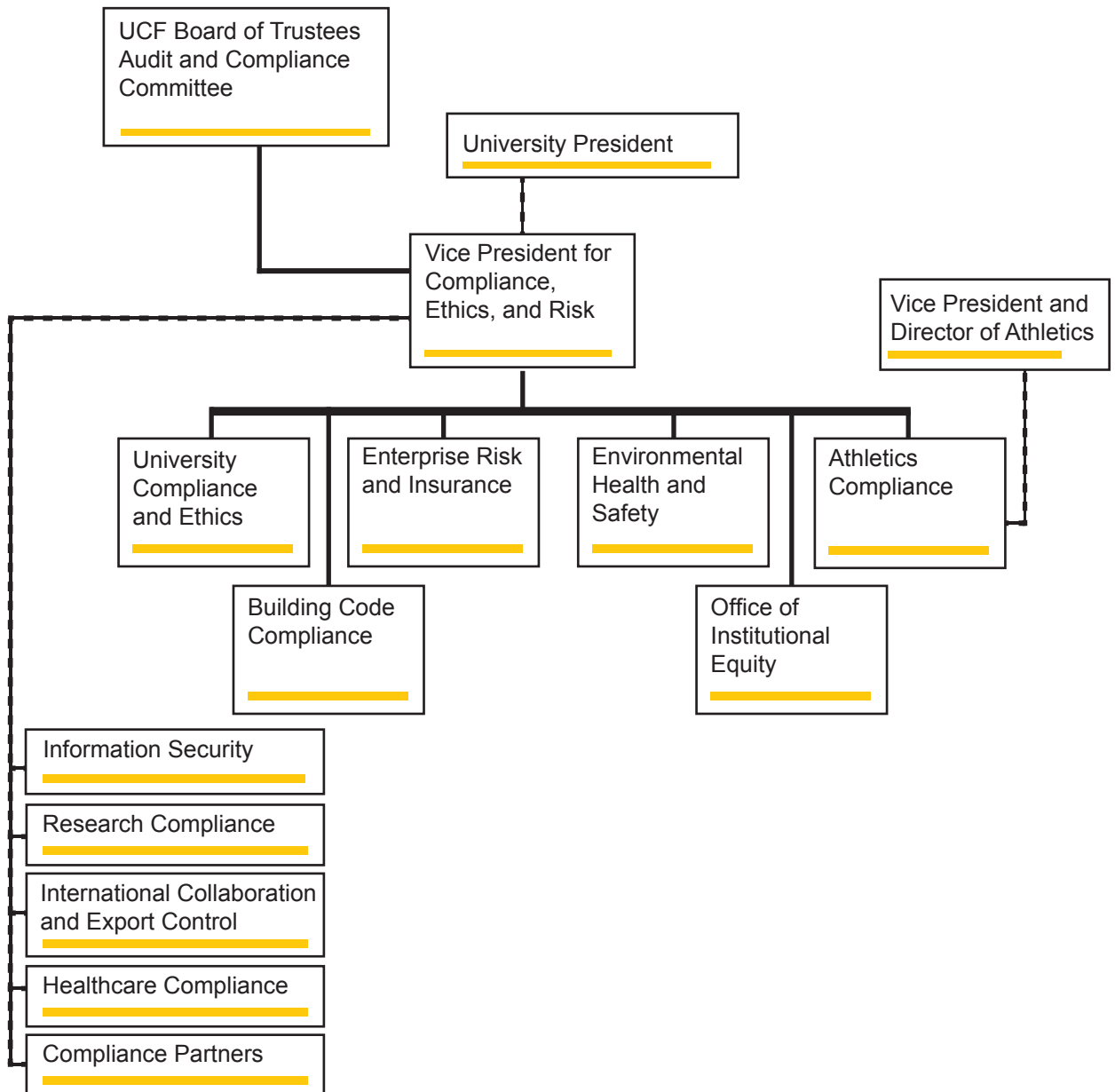
Board of Governors Regulation 4.003 requires that each State University System institution have a compliance and ethics program, defines the reporting relationship to the Board of Trustees and the university president, and includes annual and periodic reporting to the Board of Governors.

The vice president for compliance, ethics, and risk, who serves as the university's chief compliance and ethics officer, oversees the compliance offices and coordination of compliance partners who support targeted compliance efforts across campus. The Compliance and Ethics Advisory Committee, established in 2013, advises the vice president for compliance, ethics, and risk, on the implementation of the comprehensive compliance and ethics program and the mitigation of compliance and ethical risks at UCF. The advisory committee is chaired by the vice president for compliance, ethics, and risk, and is made up of more than 25 members across various departments at the university who contribute to this report annually.

Compliance and Ethics Program Structure

UCF Board of Trustees Audit and Compliance Committee

University President

Vice President for Compliance, Ethics, and Risk

Vice President and Director of Athletics

University Compliance and Ethics

Enterprise Risk and Insurance

Environmental Health and Safety

Athletics Compliance

Building Code Compliance

Office of Institutional Equity

Information Security

Research Compliance

International Collaboration and Export Control

Healthcare Compliance

Compliance Partners

University Compliance and Ethics

The office administered the 2024 Compliance and Ethics Culture Survey and benchmarked results from previous years and from the 2023 UCF IntegrityLine report revealing positive trends in support of the university's aspiration to be a best place to learn and work.

Survey and UCF IntegrityLine Trends

Please indicate a response to each item:	2018		2020		2022		2024		6-yr Trend (2024-2018)	4-yr Trend (2024-2020)	2-yr Trend (2024-2022)
	Count	% Yes	Count	% Yes	Count	% Yes	Count	% Yes			
A.) I have experienced or observed bullying in the workplace by a supervisor within the last 12 months. Workplace bullying is defined as "repeated, deliberate, disrespectful behavior, which harms the target."	287	17%	337	14%	263	13%	297	11%	-6%	-3%	-2%
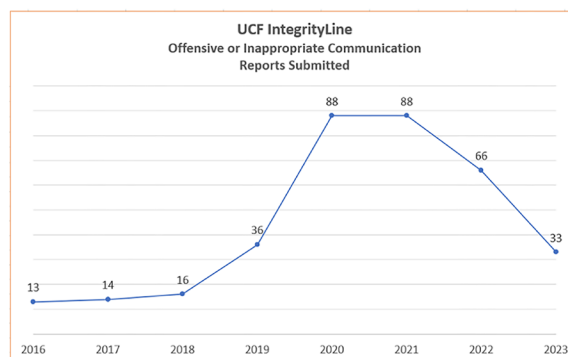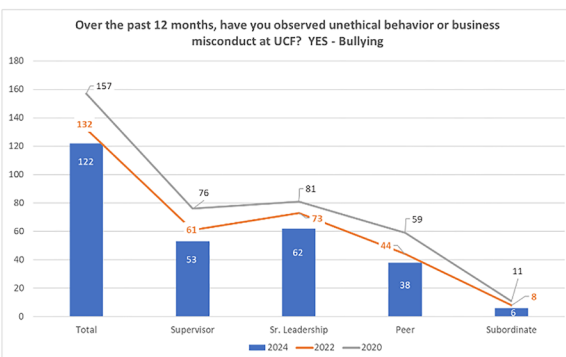
In response to the 2020 Compliance and Ethics Culture survey results addressing bullying and perceptions of leadership, University Compliance and Ethics implemented a series of initiatives including: created a supervisor toolkit, increased communications on our non-retaliation policy, improved closing the loop on closed investigations, leveraged leadership in compliance and ethics messaging, developed a new IntegrityLine video tutorial, collaborated with the Student Government Association Judicial Branch to introduce the IntegrityLine tutorial to students, revised the IntegrityLine intake and close out processes, added a "Case Corner" section to the *IntegrityStar* newsletter, included a video message from the president on the importance of the Code of Conduct in the Code training, and training efforts on civility in the workplace for handling concerns from employees. The 2024 Culture Survey results reflect:

- Reports of experienced or witnessed bullying decreased another 2% from 2022 with a 6% overall decrease since 2018. (11% reported bullying)
- Reports on observed bullying by group also decreased overall since 2020.

Additionally, IntegrityLine reports containing the issue type Offensive or Inappropriate Communications significantly decreased from 66 to 33 in 2023.

The office also identified positive trends related to employee perceptions of managers and senior leadership which are detailed in this report beginning on page 44.

Human Resources
This year Talent Acquisition developed strategic, collaborative recruitment sessions which fostered stronger relationships with hiring managers and Human Resource Business Centers. This new approach resulted in better alignment with departmental needs improving hiring outcomes and time to fill positions. By leveraging automation for candidate communication, the team enhanced the overall candidate experience, receiving positive feedback from applicants. These improvements not only helped in attracting top talent but also in maintaining a positive reputation among potential candidates.

Student Health Services
Student Health Services once again completed the required annual security risk assessment, which provides an extensive HIPAA Security Risk Analysis that allows Student Health Services to gain the best understanding of potential vulnerabilities, evaluate current controls to ensure information security, and enhance the effectiveness of the Student Health Services HIPAA security program. The assessment is conducted by an external entity and outcomes are measured by 'severity of risk' or low, medium, and high-risk areas based on HIPAA standards. The 2023 Security Risk Assessment determined that Student Health Services reached 100% compliance with the 63 mandatory safeguards required by the annual risk assessment.
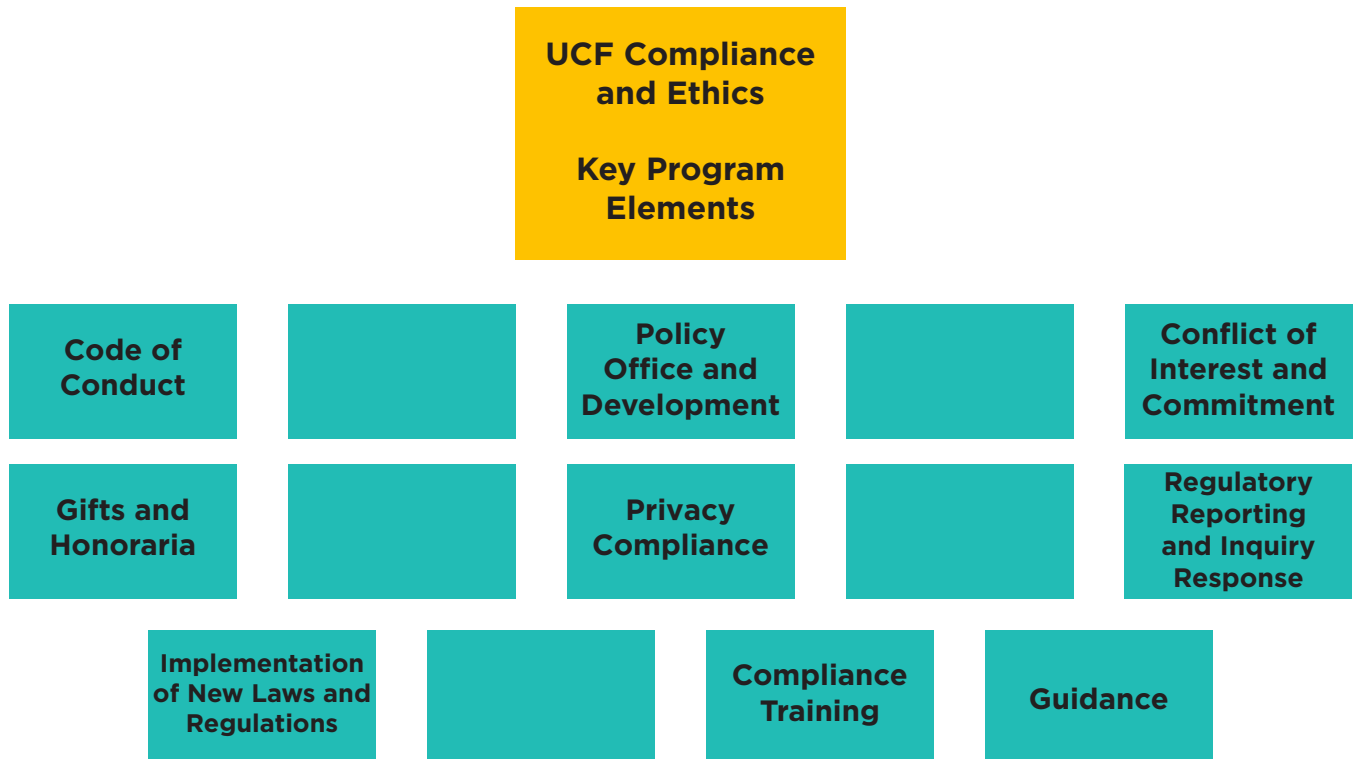
University Police Department
To ensure the university's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, commonly referred to as the Clery Act, the department, working with University Compliance and Ethics, concluded the Campus Security Authority (CSAs) identification project and implemented a campus-wide training program for the newly identified CSAs. During this time over 15,000 university job descriptions were reviewed, resulting in the identification, training, and tracking of approximately 2,615 CSAs. At the close of the 2023-2024 fiscal year, 98.97% of the employees enrolled in the mandatory CSA training completed the course.

Comprehensive Annual Report

University Compliance and Ethics, under the direction of the vice president for compliance, ethics, and risk, is charged with implementing and sustaining the university's comprehensive compliance and ethics program, and the ongoing development of effective policies and procedures, education and training, monitoring, communication, risk assessments, and responding to reported issues. The office partners with responsible university personnel to monitor compliance and ensure appropriate corrective actions when necessary. The key program efforts by University Compliance and Ethics are listed below.

UCF Compliance and Ethics

Key Program Elements

- Code of Conduct
- Policy Office and Development
- Conflict of Interest and Commitment
- Gifts and Honoraria
- Privacy Compliance
- Regulatory Reporting and Inquiry Response
- Implementation of New Laws and Regulations
- Compliance Training
- Guidance

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

The following compliance offices and partners across the university provide targeted compliance activities as follows:

Department	Compliance Activities		
Athletics Compliance	NCAA Rules/ Regulations	NCAA Rules Education	Investigation and Reporting of NCAA Violations
Building Code Office	Florida Building Code

Occupancy Change Review | Construction Plan Review and Inspection | Construction Permitting

Routine and Emergency Building Inspections |
| **Environmental Health and Safety** | Radiation Safety

Laser Safety

Laboratory Safety | Chemical Safety

Biological Safety

Spill Prevention | Hazardous Waste Illicit Discharges

Industrial Wastewater

Storage Tank Compliance |
| **Facilities and Safety** | Operation and Maintenance of Buildings and Assets

Records Storage Destruction | Real Estate Management

Surplus Property Management

Sustainability | Planning, design, bid, permit, construction, and close-out of all construction projects

Utility and Energy Services |
| **Finance and Accounting** | Budget Analysis and Planning

Cash Investment Management

Procurement Services

Tax Compliance | Disbursement of Funds

Financial Reporting

Student Financial Services | Fixed Asset Accountability and Control

Collection and Recording of Revenues

DSO Compliance with Debt Covenants |
| **Health Affairs, Legal Compliance** | Clinical Services Compliance Program

UCF Health | UCF Health's Coding and Billing Activities | HIPAA Privacy for the College of Medicine and Faculty Practice |
| **Human Resources** | Benefits

Compensation | Employee Relations

Payroll | Employment Services and Records

Recruitment |
| **Inclusive Education Services** | Classroom and Campus Accessibility for Students with Unique Abilities | Florida Postsecondary Comprehensive Transition Program | |
| **Information Security Office** | Cybersecurity

Identity and Access Management | Security Awareness

Security Incident Response | Safeguarding Information Assets |

Department	Compliance Activities		
Office of International Collaboration and Export Control	Export-controlled Technology and Restricted Research	Foreign Influence Reporting and Investigation	U.S. Export and Sanctions Regulation Compliance
Office of Institutional Equity	Discrimination, Harassment, and Retaliation Protection of Civil Rights	Equal Opportunity and Affirmative Action ADA Compliance and Accommodations	Title IX Equitable Recruitment and Hiring
Office of Student Rights and Responsibilities	Student Conduct Academic Integrity	Golden Rule Student Handbook Dean's Certifications	Admission Clearance Process Remedial Measures for Student Related Title IX Incidents
Research Compliance Office	Research Reporting Requirements Effort Reporting and Certification	Responsible Conduct of Research Institutional Review Board	Research Conflict of Interest Facility Security Research Animal Welfare
University Registrar	FERPA Academic Records Excess Hours Surcharge	Enrollment Issuance of Diplomas Athletic Eligibility	State Authorization Compliance & Reciprocity Residency Classifications
Student Accessibility Services	Academic Accommodations	Classroom and Campus Accessibility for Students	Housing Accommodations
Student Financial Assistance	Student Financial Aid	Work Study Assignments	Federal Aid and Grants
Student Health Services	Alcohol and Other Drug Prevention and Treatment Programs	Infection Prevention/ Risk Management Assessments	Human and Health Services Regulations
UCF Global	SEVIS Records	U.S. Visa Issuance	English Proficiency Immigration Related Documentation
UCF Police Department	Criminal Activity and Reporting Continuity of Operations Violence Prevention	Access Control Threat Assessments Anti-terrorism	Comprehensive Emergency Management Plan Emergency Operations Management
Undergraduate Admissions	Student Admission and Enrollment		

Routine Regulatory Reporting

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

Report Name	Frequency of Submission	Agency
Academic Calendar and exceptions (DOE Rule 6A-10.019)	Annual	Florida Board of Governors
Analysis of Use of Force	Annual	The Commission for Florida Law Enforcement, Accreditation
Annual Complaint Collection (FERPA, IntegrityLine, OIE) and Appeal Complaint Documentation	Annual	Southern Association of Colleges and Schools Commission on Colleges
Annual Compliance Report	Annual	The Commission for Florida Law Enforcement, Accreditation and International Association of Campus Law Enforcement Accreditation
Annual report of HIPAA breaches	Annual	U.S. Department of Health and Human Services
Annual Security Report	Annual	U.S. Department of Education
Annual Statistical Summaries of Internal Affairs Investigations and Complaints	Annual	International Association of Campus Law Enforcement Accreditation
Annual VETS-4212 report	Annual	U.S. Department of Labor
Capital Improvement Plan	Annual	UCF Board of Trustees and Florida Board of Governors
Compliance and Ethics Annual Report	Annual	UCF Board of Trustees Audit and Compliance Committee and Florida Board of Governors
Consumer Confidence Report for Potable Water	Annual	U.S. Environmental Protection Agency
DAVID (Driver and Vehicle Information Database) Certification, Attestation	Annual Every 3 Years	Florida Highway Safety and Motor Vehicles
Expenditure Analysis	Annual	Florida Board of Governors

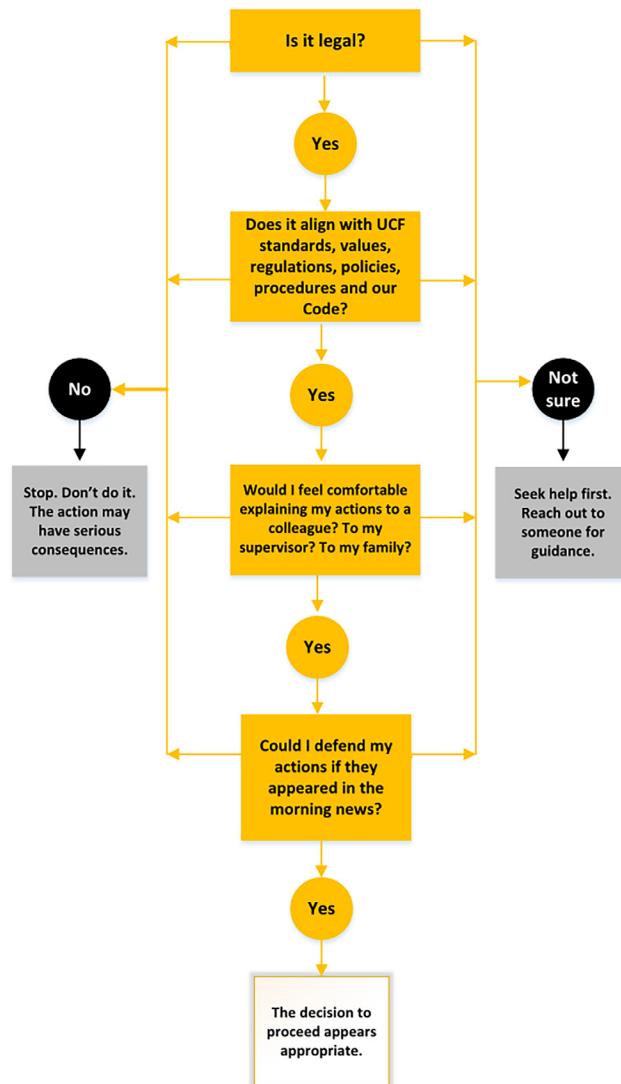| Report Name	Frequency of Submission	Agency
Florida Division of Emergency Management State and County Checklist for Continuity of Operations Planning	Annual	Florida Division of Emergency Management
Florida Flood Commodities	Annual	Florida Board of Governors
Florida Foreign Influence Act Disclosure Denied Applicants	Annual	UCF Board of Trustees
Florida Foreign Influence Act Disclosure Travel	Annual	UCF Board of Trustees and Florida Board of Governors
General License Device Registration	Annual	Florida Department of Health, Bureau of Radiation Control
Graham-Leach Bliley Act	Annual	UCF Board of Trustees
Infection Prevention/Risk Management Assessment Reports	Annual	Accreditation Association for Ambulatory Health Care
Institutional Biosafety Committee Registration	Annual	National Institutes of Health
Internal Revenue Service 1042-S Reporting	Annual	U.S. Internal Revenue Service
Legislative Budget Request for Operations & Fixed Capital Outlay	Annual	Florida Board of Governors
National Science Foundation HERD Survey	Annual	U.S. National Science Foundation
Occupational Safety and Health Administration Form and Form 300A	Annual Monthly	U.S. Department of Labor
Office of Inspector General Reporting	Annual	U.S. Department of Health and Human Services
Reporting of financial information to debt rating agencies	Annual	Moody's, S&P, Fitch
Reporting to the Division of Bond Finance	Annual	Florida Division of Bond Finance
Research Exemption Report	Annual	Florida Governor, Florida Senate, and Florida House of Representatives
Review of Bias Based Policing	Annual	The Commission for Florida Law Enforcement, Accreditation
Review of Pursuits	Annual	International Association of Campus Law Enforcement Accreditation

Report Name	Frequency of Submission	Agency
The Office of Defense Trade Controls Compliance Registration	Annual	U.S. Department of State
Tier II Emergency Industrial Planning and Community Right-to-Know Act Reporting	Annual	U.S. Environmental Protection Agency
Uniformed Crime Reporting	Annual	Florida Department of Law Enforcement
University and DSO Financial Statements	Annual	UCF Board of Trustees, Florida Board of Governors, and Florida Division of Financial Services and Auditor General
University's Affirmative Action Plan	Annual	Office of Federal Contract Compliance Programs
University's Florida Equity Report	Annual	Florida Board of Governors
Operating Budget, Capital Outlay Budget, & Carry Forward Spending Plan	Annual, with quarterly updates	UCF Board of Trustees and Florida Board of Governors
Compliance and Ethics Program Plan	As Updated	UCF Board of Trustees and Florida Board of Governors
Municipal Securities Rulemaking Board's Electronic Municipal Market Access Disclosures	Continuous	U.S. Security Exchange Commission
Public Debt Disclosure Notifications to Bondholders	Continuous	Various Bondholders
Material License 09-35487-01	Every 15 Years	U.S. Nuclear Regulatory Commission
Bright Futures Audit	Every 2 Years	Florida Department of Education
Exchange Visitor Program Redesignation	Every 2 Years	U.S. Department of State
Student and Exchange Visitor Program System Recertification	Every 2 Years	U.S. Department of Homeland Security
Mandatory Re-Certification for Sworn Law Enforcement	Every 4 Years, based on officers' initial certification	Florida Department of Law Enforcement
Radioactive License Renewal 4187-1 and 4187-2	Every 5 Years	Florida Department of Health and Human Services – Bureau of Radiation Control
Enrollment reporting to the National Student Loan Data System	Monthly	U.S. Department of Education

Report Name	Frequency of Submission	Agency
Florida Violent Death Program	Monthly	Florida Department of Health
Juvenile Justice and Delinquency Prevention Act	Monthly	Correctional Management and Communications Group, LLC
National Use-of-Force Data Collection	Monthly	Florida Department of Law Enforcement
Number of employee positions posted along with total number of employees	Monthly	Florida Department of Economic Opportunity
Various Employee and Payroll Data Reporting	Monthly	State of Florida
Drug Recognition Expert Database Reporting	Per Incident	National Highway Traffic Safety Administration
Annual Workers Compensation Report	Quarterly	Florida Division of Risk Management
Budget to Actuals Report	Quarterly	UCF Board of Trustees
Community Outreach Report	Twice Annually	International Association of Campus Law Enforcement Accreditation
Foreign Gifts and Contracts Reporting	Twice Annually	Florida Board of Governors and U.S. Department of Education
University Savings Report	Twice Annually	Florida Board of Governors and U.S. Department of Education

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

Is it legal?

Yes

Does it align with UCF standards, values, regulations, policies, procedures and our Code?

No — Stop. Don't do it. The action may have serious consequences.

Yes

Not sure — Seek help first. Reach out to someone for guidance.

Would I feel comfortable explaining my actions to a colleague? To my supervisor? To my family?

Yes

Could I defend my actions if they appeared in the morning news?

Yes

The decision to proceed appears appropriate.

The following university committees, councils, workgroups, and teams exist to support UCF's compliance and ethics efforts and programs. University Compliance and Ethics, compliance offices, or compliance partner staff either chair or serve as members on these groups:

- Clery Compliance Advisory Council
- Clery Compliance Review Workgroup
- College of Medicine Clinical Services Compliance Committee
- College of Medicine Industry Relations Committee
- UCF Health Ethics Committee
- Identity Theft Committee
- Data Governance Council
- Health Sciences HIPAA Collaborative
- University Compliance Training Workgroup
- Audit Fraud Risk Committee
- President's Cabinet
- Radiation Safety Committee
- Removal of Medical Holds Committee
- Security Incident Response Team
- Student Health Services Performance Improvement Program Committee
- Student Health Services Patient Advocate Reporting Committee
- Laser Safety Committee
- UCF Crisis Committee
- Capital Projects Planning Committee
- Digital Accessibility Planning Committee
- UCF National Security Presidential Memorandum 33 Committee

- Information Security and Privacy Advisory Committee
- Institutional Animal Care and Use Committee
- Institutional Biosafety Committee
- Parking and Transportation Advisory Committee
- Laboratory Safety Committee
- Merchant Services Committee for Payment Card Industry Data Security Standards
- UCF Chief Financial Officer Council
- UCF Council on Accessibility
- UCF Emerging Issues and Crisis Response Team
- UCF Institutional Review Board
- UCF Student Health Services Breach Determination Committee
- UCF Tax Peer Group
- UCF Title IX Advisory Council
- UCF Title IX Response Team
- University Compliance and Ethics Advisory Committee
- University Policies and Procedures Committee
- UCF Search and Screening Workgroup
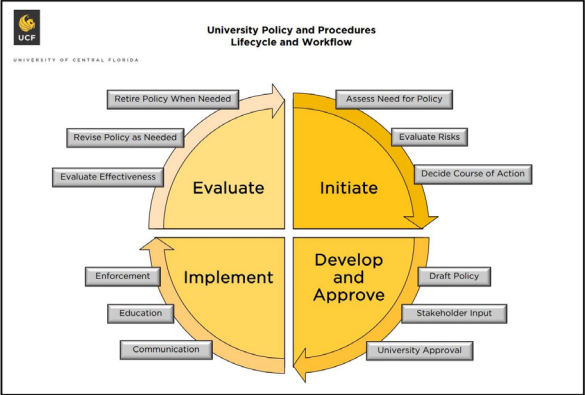- Research Conflict of Interest Committee

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

IntegrityStar *UCF Compliance & Ethics Newsletter*

The UCF *IntegrityStar* newsletter, published each semester, is distributed campus-wide to all employees. Each edition focuses on a different compliance topic, and includes articles written by University Compliance and Ethics and/or compliance offices and partners. This year's newsletters provided information on several compliance and ethics related topics, as well as a new "Privacy Points" section featuring guidance on data privacy related topics.

Edition	Featured Articles and Materials	Recognition
July 2023	**Articles:** 1. 2022 UCF IntegrityLine Report 2. UCF's Policy Development Process 3. Time and Effort Reporting Policy **Case Corner:** A case that was submitted anonymously by students that resulted in corrective action. **Privacy Points:** Controlled Unclassified Information Policy **Image:** Policy Lifecycle and Workflow **University Policy and Procedures Lifecycle and Workflow** — Retire Policy When Needed, Revise Policy as Needed, Evaluate Effectiveness, Evaluate, Assess Need for Policy, Evaluate Risks, Decide Course of Action, Initiate, Enforcement, Education, Communication, Implement, Develop and Approve, Draft Policy, Stakeholder Input, University Approval **Video:** 2022 IntegrityLine Report - Respect Awakens	*IntegrityStar* Award given to Dr. Manoj Chopra, Associate Dean, Academic Affairs, and Professor of Civil Engineering, College of Engineering and Computer Science (CECS), for his commitment to the university's process for evaluating and investigating concerns raised through the UCF IntegrityLine and his support of the university's Comprehensive Compliance Program.

Edition	Featured Articles and Materials	Recognition
November 2023	**Articles:** 1. The Importance of Employee Compliance Training at UCF 2. Celebrate 2023 Compliance and Ethics Week 3. Understanding the Clery Act Requirements at UCF **Case Corner:** Student report concerning a third party posing as an employee **Privacy Points:** Safeguarding Data **Video:** 2023 Compliance and Ethics Week Preview Video	*IntegrityStar* Award given to Millicent Downer, Human Resources Director for the Administration and Finance Division, for her support and contributions to the university's comprehensive compliance program, specifically in the area of meeting the Clery Act requirements.
March 2024	**Articles:** 1. Your Feedback Matters: UCF Compliance and Ethics 10 Minute Culture Survey 2. April is Child Abuse Prevention Month 3. Athletics Compliance at UCF **Case Corner:** Cases handled by leadership in support of the university's aspiration to be a best place to learn and work. **Privacy Points:** Recap of 2024 Data Privacy Day Activities **Image:** CULTURE **Video:** A Caring Adult Makes a Difference in a Child's Life (DHHS, Admin for Children and Families, Children's Bureau)	*IntegrityStar* Award given to Melissa Dagley, Ed.D., Executive Director – UCF Stem, for her continuous support of the university's Youth Protection Program.

Many of the compliance offices and partners issued their own departmental newsletters. For example:

→ The Academic Services for Student Athletes (ASSA) department published a monthly ASSA Almanac;

→ The Athletics Compliance Office utilized the Athletics booster newsletter to provide relevant information to boosters, and fans. They also sent mobile text messages that included "Rules of the Week" to Athletics Association staff and student-athletes;

→ Facilities and Business Operations (FBO) published an FBO Digest and newsletter that included compliance related information;

→ Human Resources distributed the Thursday HR Newsletter to the HR Business Centers communicating compliance topics and updates;

→ UCF IT communicated information security best practices through the UCF IT newsletter;

→ The Office of International Collaboration and Export Control published a newsletter that focused on the foreign influence screening process;

→ The Student Success and Well-Being Communique published division wide;

→ The University Police Department published an internal magazine called the Safety Scoop highlighting departmental employees who have gone above and beyond the call of duty; and

→ Student Health Services distributed an internal newsletter to HIPAA Privacy and Security Officers on a quarterly basis.

Compliance offices and partners communicate expectations within their respective areas of expertise and to the UCF Community through monthly meetings, emails to departmental staff, and sending campus-wide communications on various compliance topics. This year these notifications pertained to the following topics:

- updated policies and regulations,
- annually required notices on the Drug Free Campus Schools Act and the Family Educational Rights and Privacy Act,
- gifts and honoraria,
- 403(b) plan notice of eligibility,
- leave benefits,
- employment of relatives,
- NCAA rules education,
- mandatory compliance training,
- the availability of the Annual Security and Fire Safety Guide (Annual Security Report),
- UCF Alert System testing,
- Title IX,
- Golden Rule Student Handbook,
- HIPAA privacy,
- immigration compliance,
- freedom of speech,
- crime updates and prevention,
- foreign influence screening and reporting,
- water quality,
- stormwater compliance information,
- environmental health and safety topics,
- cyber risks,
- research compliance,
- conflict of interest and commitment disclosure,
- time and reporting practices,
- search, screening and hiring guidelines and procedures, and
- grading procedures.

Facility Operations, in collaboration with Environmental Health and Safety, launched "Safety Shop Talks" to promote safety awareness for all Facilities Operations personnel.

Human Resources hosted an ongoing series of regular meetings to communicate with and train the HR Community of Practice on a range of HR-related subjects. The department also conducted outreach to various departments and colleges by facilitating discussions on hiring practices and Workday Recruiting. The Payroll Department continued to keep the departments updated on several topics such as:

1. Conversion of Bi-Weekly Time-sheets, which enabled employees to input their time into the Workday system and managers approve the time in the Workday system for easier processing.

2. Reimplementation of the cost structure to departments for on-demand payroll payments.
3. Overpayment Recovery outlining the procedures for recovering overpayments to maintain financial integrity.
4. Provided guidelines for requesting on-demand payroll to ensure proper authorization and processing.

The Office of Research Compliance conducted outreach on the following:

- UCF's Research Conflict of Interest program at several Office of Research EXCIT meetings;
- Conflicts of Interest in Research and the Huron COI system at the Institutional Review Board (IRB) and Awards Management Office staff meetings;
- Conflicts of Interest in Research to the INTREPID cohort. INTREPID is a five-year program at UCF (funded by the NIH) designed to increase the number of minority researchers engaged in aging research;
- Research Integrity presentation to PhD in Public Affair students;
- Research compliance issues to university administrators and faculty monthly during the EXCIT meetings;
- Time and effort certification training to departmental administrators and faculty;
- Service Center compliance awareness topics to university community;
- Research misconduct workshop to College of Graduate Studies doctoral candidates; and
- Conflict of Interest workshop to College of Graduate Studies doctoral candidates.

UCF Public Safety and Police engaged with the community regularly during the fiscal year through their robust social media presence on Facebook, X (formerly known as Twitter), and Instagram. These social media platforms were used to share news, resources, emergency notifications, and safety information. The department leveraged both student and local media to showcase the good work UCF police officers and staff do. The department also updated its website to make information and resources about safety at UCF more accessible and user-friendly.

Response to Regulatory Agency Requests and Non-routine External Reviews

In compliance with the Florida Foreign Influence Act, University Compliance and Ethics responded to the BOG Inspector General's August 9, 2023, data request, prepared and submitted the response confirming UCF does not have agreements with universities meeting the specified criteria located in a foreign country of concern by the August 22, 2023, deadline. The office collaborated with partner offices to respond to the BOG Inspector General's September 2023 foreign gift disclosure inspection request, providing additional supporting documentation for the purchase orders that were audited. University Compliance and Ethics prepared and submitted on behalf of UCF in response to the Board of Governors' September 6, 2023, data request, a description of the UCF

policies, procedures, and processes that were revised related to Board of Governors Regulation 9.012, Foreign Influence, by the March 8, 2024, deadline. In response to the Board of Governors' March 14, 2024, data request, University Compliance and Ethics oversaw the data collection and compilation of the number of students domiciled in a foreign country of concern prior to receiving a graduate assistantship in the 2021-2022, 2022-2023, and 2023-2024 academic years, and submitted the response on behalf of UCF by the deadline of April 5, 2024.

In response to a September 2023, letter from the United States Department of Education (DOE) requesting resolution to a FERPA complaint, the office performed an investigation and submitted to the DOE the findings and management's corrective actions. The DOE responded in December 2023 indicating satisfaction with the university's response with no further action required.

In support of the university's Higher Learning Commission accreditation application, University Compliance and Ethics oversaw the collection and submission of an investigation summary containing investigations spanning 10 years. Also prepared the evaluative narrative with supporting materials demonstrating the university's compliance with applicable and regulatory requirements.

With the University of Central Florida entering the Big 12 Athletics Conference, the Athletics Compliance Office was required to undergo an external audit. The office utilized information received from that audit to enhance policies and procedures during the reporting period.

The Information Security Office participated in external audits conducted by Crowe, LLP, Clifton Larson Allen, and the State of Florida Attorney General. The office is awaiting results from all three entities.

Human Resources served as the primary contact for the UCF Florida State Retirement audit, which included rehired retirees, and payroll and workers compensation data. In relation to worker's compensation, Human Resources supported a portion of the State of Florida, Division of Risk Management Evaluation of UCF Risk Management Program. The results showed the university to be in compliance and no recommendations were made. It was determined that UCF has a strong overall program.

Human Resources also coordinated the response regarding bonus payments for the 2023 State of Florida Auditor General UCF Operational Audit, with a result of no findings, demonstrating compliance with state and university guidelines.

University Compliance, Ethics, and Risk maintains the university's policy manual containing 130 policies and oversees the university's policy development and review process, which includes identifying when new policies are required and distributing communications when new or revised policies are posted for public comment and campus-wide communications when policies become effective. The vice president for compliance, ethics, and risk chairs the University Policies and Procedures Committee, which reviews all policies and makes recommendations to the president for approval. Individual policy owners are required to review university policies annually for updates, and each university policy is reviewed by the committee every five years prior to approval by the president.

This report year the University Policies and Procedures Committee reviewed the following new policy and 10 existing policies that were later approved by the president:

Legal, Compliance, and Administration Policies

- UCF Policy 2-005.2 Youth Protection
- UCF Policy 2-102.5 Contract Review
- UCF Policy 2-105.3 Identity Theft Prevention
- UCF Policy 2-107.8 Contract Signature Authority

Facilities and Safety Policies

- UCF Policy 3-109.3 Building Code Compliance

Academic Affairs Policies

- UCF Policy 4-403.3 Required Elements of the Course Syllabus
- UCF Policy 4-407.1 Academic Program Review
- UCF Policy 4-410 Comprehensive Post Tenure Review

Student Affairs Policies

- UCF Policy 6-001.2 Financial Assistance for Students

Additionally, the office updated the following resources available on the UCF Policies and Procedures website:

- ❖ Standardized policy glossary (revised)
- ❖ Committee meeting dates
- ❖ Committee members
- ❖ Policy Template
- ❖ Five-year Policy Review List

This year, University Compliance and Ethics performed a comprehensive review of the UCF Employee Code of Conduct in coordination with university compliance offices and partners, and relevant university departments and updated to reflect changes to policies and procedures. The ADA compliant version of the revised Code of Conduct was published on the office's website in April 2024 and printed copies were provided to Human Resources to distribute to all new employees during orientation, other university offices upon request, and in each prize-pack awarded to employees for their participation in the 2024 Compliance and Ethics Culture Survey.

In addition to university-wide policies and the UCF Employee Code of Conduct, many departments maintain internal policies, procedures, and handbooks specific to their areas of compliance. These compliance offices and partners provide updates to university regulations for their respective compliance area. The chart below summarizes departmental updates made during this fiscal year.

Compliance Office / Partner	Related New or Updated Materials
University Compliance and Ethics	Potential Conflict of Interest or Commitment, Outside Activity or Employment HR-11 Form
	Youth Protection Insurance Instructions for UCF Youth Programs
	Squire Registration Help Guide for Program Sponsors
	Four Office Educational Brochures
Academic Services for Student-Athletes	UCF Student-Athlete Handbook
	Standard Operating Procedures
Athletics Compliance Office	Athletics Compliance Policies and Procedures Manual
College of Medicine Health Affairs / Legal Compliance	One Policy
	HIPAA Privacy and Security Policies Manual
Division of Finance	Travel Manual
	Procurement Manual and Purchasing Forms
	Prospective Supplier Questionnaire
	One Regulation
Environmental Health & Safety	137 Department Safety Policies, Forms, Procedures, and Manuals
Facilities and Business Operations	Two Regulations

Compliance Office / Partner	Related New or Updated Materials
Human Resources	Salary Administration Guidelines
	Standard Operating Procedures for Human Resources Processes in Workday and the SET Model
	FLSA Job Aids and Tracking Documents
	Forty Internal Guides and Matrices
	Two Regulations
Inclusive Education Services	Inclusive Education Services Handbook
Information Security Office	Security Standards Information
Office of Institutional Equity	Title IX Reporting Forms
	Search and Screening Guidelines, Checklists, and Minutes Template
	Recruitment Plan and Candidate Pool Evaluation Forms
	Amorous Relationship Form
	Pregnancy Accommodations Intake Form
Office of International Collaboration and Export Control	Standard Operating Procedures for Foreign Influence Screening
	Sponsored Programs Export Control Assessment
	Standard Operating Procedures for International Cultural Agreements
Office of Research Compliance	UCF Guide to Navigating Conflicts of Interests in Employee Startups
	Huron Conflict of Interest Reporting System Guides
	NSF RCR Standard Operating Procedures
	HRPP-QIA Standard Operating Procedures
	Research Compliance Brochure
	Cost Share on Sponsored Project Guidelines
	Direct Cost on Sponsored Project Guidelines
Public Safety and Police	Twenty-Five General Orders
	Security Camera Standards
Registrar's Office	Undergraduate and Graduate Catalogs
	Residency Reclassification Affidavit
	FERPA Resources for Students, Parents, Faculty, and Staff
	How to Share Restricted Information Guidelines
	Student Complaints: Alleged FERPA Violations Procedures
	Excess Hours Guidelines
Office of Student Rights and Responsibilities	Golden Rule Handbook
	Fourteen Regulations
UCF Financial Aid	Internal Policies and Procedures
Student Health Services	Thirteen Policies
	Performance Improvement Manual
UCF Global	Internal Procedures Manual

Various regulatory requirements and university policies mandate the university to provide compliance and ethics training to employees. In addition to these mandatory trainings, the university offers a series of optional courses to assist employees in understanding other regulatory requirements, university regulations, policies, and procedures, as well as expectations for standards of conduct. During this fiscal year, more than 161,000 training courses were completed, which includes both mandatory and optional training. This is a notable increase from the 116,000 courses completed last year and the 95,238 course completions reported in 2022. During this report year, University Compliance and Ethics responded to 714 training related inquiries, which was an increase from 589 last reporting year.

Training Courses Completed In Past 6 Years
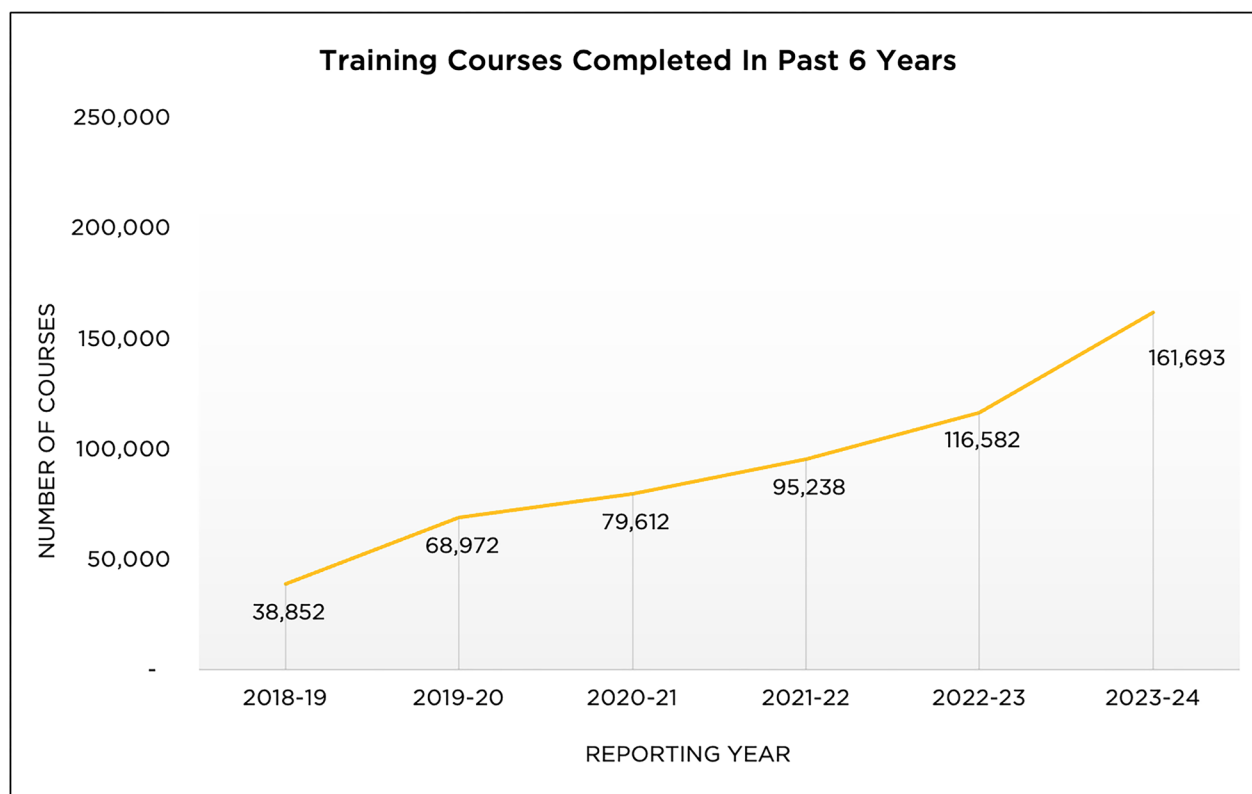
Please refer to the following chart for specific compliance training delivered by the various compliance offices and partners with the total number of employees who completed the training.

Department	Topic	Delivery	No. Trained
University Compliance and Ethics	Ethical Leadership	In-person	12
	Gifts and Honoraria Training	Online	19
	Potential Conflicts - Florida Code of Ethics for Public Officers and Employees - English & Spanish Versions	Online	4,062
	UCF Employee Code of Conduct Refresher Training with Certifications	Online	7,531
	New Hire UCF Employee Code of Conduct/Speak Up! Training - English & Spanish Versions	Online	4,198
	ABCs of Compliance and Ethics: Accountability	Online	166
	ABCs of Compliance and Ethics: Behaving Ethically	Online	164
	ABCs of Compliance and Ethics: Accountability	Online	159
	Data Privacy Day - Privacy[at]UCF	Online	43
	Protection of Vulnerable Persons	Online	23
	Youth Protection Training	Online	494
	Overnight Youth Program Staff Training	Online	96
Athletics Compliance Office	Campus Entity Specific NCAA Rules Education Sessions	In-person	50
College of Medicine Health Affairs / Legal Compliance	COM Clinical Services Compliance Program Overview	In-person	288
	COM Code of Ethics and Conduct	In-person	258
	COM HIPAA	Online	1,767
	COM Industry Relations	Online	290
	Fraud, Waste and Abuse in Delivery and Payment of Health Care Services	Online	207
Department of Security Management	DNA Fusion	In-person	50
	Security Camera Standards	Online	100
	Milestone Video Management	Online	100
Environmental Health & Safety	Animal Exposure in a Research Setting	Online	160
	Biological Safety Practical	In-person	459
	Biological Safety Training	Online	786
	Bloodborne Pathogens and Bloodborne Pathogens for Healthcare and Laboratories	Mixed/ Online	662
	Concepts in Safety	In-person	155
	Confined Space Awareness	In-person	155
	Confined Space Entry	In-person	52
	Controlled Substances	Online	40
	Electrical Safety	In-person	132
	Ergonomics	In-person	201
	Fall Protection	In-person	79
	Hands-Only Adult CPR	In-person	79

Department	Topic	Delivery	No. Trained
Environmental Health & Safety	Hazard Communication	In-person	61
	Hearing Conservation	Mixed	155
	Laboratory PI and Manager Training	Online	142
	Laboratory Safety Practical	Online	909
	Laboratory Safety Training	Online	1,844
	Laser Safety Training	Online	246
	Lock Out Tag Out	In-person	132
	Mechanical Room Safety at UCF	Online	141
	Radiation Safety (X-Ray) Training	Online	25
	Radiation Safety Awareness and Sealed Source Training	Online	36
	Radiation Safety Practical	In-person	91
	Radiation Safety Training	Online	91
	Respiratory Training	In-person	46
	Think About Your Sink	Online	487
Financial Affairs	Colors of Money	Online	42
	Expenditures 101	Online	50
	P-card Training for Cardholders and Purchasing Foundations	Online	10
	Procurement Essentials Program	Online	244
	Purchasing Card Training Program	Online	53
	Red Flags: Identity Theft Prevention	Online	154
	Travel Policy/Guidelines	Online	93
	Unauthorized Procurement Actions	Online	228
	Understanding UCF's Budget All	Online	18
Human Resources	"LIL" Chats for Supervisors (various topics) and Employee Relations Leaders Guide	Mixed	21
	Benefits Overview for HRBCs	In-person	96
	Civility at Work - Non-supervisor Version and Fostering a Civil Workplace - Supervisor Version	Mixed	63
	Conflict Resolution with TKI	In-person	48
	Copyright for Images & Video	Mixed	32
	Effective Delegation	Mixed	24
	Emotional Intelligence and Emotional Intelligence 2.0	Mixed	50
	Giving & Receiving Feedback	Mixed	98
	Kognito At-Risk for Faculty and Staff Replaced with: Supporting Students in Distress	Online	3,035
	Leadership is Everyone's Business	Mixed	44
	Leadership Roundtable: Cultivating Engagement at UCF	Mixed	21

Department	Topic	Delivery	No. Trained
Human Resources	Navigating Change (and the stress that comes with it)	Mixed	26
	New Employee Orientation	Mixed	936
	One HR Community of Practice	In-person	310
	One HR Leaders Series	In-person	36
	Parental Leave Training	Mixed	33
	Performance Appraisals: Supervisors	Mixed	109
	Performance Management 1.0	Mixed	54
	Respectful Dialogue Discussions (various topics)	Mixed	214
	Special Pay & Salary Adjustments and Temporary Pay & Bonuses	Mixed	11
	The Practical Coach (TM)	Mixed	112
Information Security Office	Information Security Awareness	Online	12,511
	PCI/Credit Card Info Security	Online	319
	Phishing Awareness	Online	95,000
Office of Institutional Equity	Accessibility Open Lab and Video Accessibility	Mixed	17
	New Faculty Search Process Training	Mixed	143
	Digital Accessibility at UCF, Document Accessibility, and PDF Accessibility	In-person	91
	New Faculty Orientation	In-person	221
	Search Process & Affirmative Action Program	In-person	68
	Search Committee Training	Online	517
	Title IX Training	Online	2,540
	UCF Actions to Prevent and Correct Discrimination	Online	4,250
	Compliant Search Process	In-person	23
	ADA Training	In-person	118
Office of International Collaboration and Export Control	Export Control Researcher Training	Mixed	180
	Export Controls (Sponsored Programs)	In-person	23
	Foreign Influence Screening Process	Mixed	95
	Foreign Influence Threat Awareness Training	Mixed	11
	Visual Compliance Screening Training	In-person	12
Office of Research Compliance	Animal Facility Technicians and Working with Fish in Research Settings	Online	15
	Biomedical Responsible Conduct of Research	Online	550
	Clinical Research: An Introduction and Clinical Trials Agreements (CTAs)	Online	74
	Communicating Research Findings	Online	223
	Comprehensive CIP Course for Advanced Learners	Online	10
	Conflict of Interest	Online	1,202
	Field/Animal Researcher/Technicians/Students and Lab Animal Researcher/Technicians/Students	Online	170

Department	Topic	Delivery	No. Trained
Office of Research Compliance	GCP - Social and Behavioral Research Best Practices for Clinical Research and GCP for Clinical Investigations of Devices	Online	102
	GCP for Clinical Trials with Investigational Drugs and Biologics (ICH Focus) and GCP for Clinical Trials with Investigational Drugs and Medical Devices (U.S. FDA Focus)	Online	92
	Human Subjects Research - Group 1 Biomedical Research Investigators and Key Personnel	Online	659
	Human Subjects Research - Group 2 Social/Behavioral Research	Online	4,882
	Humanities Responsible Conduct of Research	Online	129
	IACUC Voting Members and Institutional Official: Animal Care and Use	Online	10
	Institutional/Signatory Official: Human Subject Research	Online	29
	IRB Administration and Office of Welfare Administration/Staff	Online	14
	Physical Science Responsible Conduct of Research	Online	216
	Research and HIPAA Privacy Protections and Family Educational Rights and Privacy Act (FERPA)	Online	271
	Researchers - Information Privacy & Security (IPS)	Online	23
	Responsible Conduct of Research for Administrators	Online	57
	Responsible Conduct of Research for Engineers	Online	356
	Revised Common Rule	Online	94
	Social and Behavioral Responsible Conduct of Research	Online	1,565
	Students and Instructors - Information Privacy & Security (IPS) and Clinicians - Information Privacy & Security (IPS)	Online	26
Registrar's Office	FERPA: Faculty and Staff Training	Online	6,063
	Student Records I and II	Online	476
Student Accessibility Services	Disability Barriers Workshop and Reframing Disability and Disability Language	In-person	40
	Barriers Be Gone Escape Room Activity	In-person	87
	First Year Experience Orientation Leaders Training on Accessibility	In-person	70
	Accessibility by Design	Online	58
Student Health Services	Biohazard Waste Training	Mixed	170
	Bomb Threat	Mixed	130
	Chemical Exposure in the Workplace	Mixed	160
	De-escalation of Patients/Persons	Online	130
	Ergonomics Training	Mixed	160

Department	Topic	Delivery	No. Trained
Student Health Services	Mandate Reporting for Child and Elder Abuse Training	Online	30
	OSHA Fire Safety	Mixed	160
	SHS HIPAA (Including Code of Conduct, Confidentiality, Security of PHI)	Mixed	150
	SHS OSHA Bloodborne Pathogens	Mixed	160
	SHS Radio Operations	Mixed	130
	SHS Risk Management Training	Mixed	160
UCF Global	International Health and Safety	In-person	350
UCF Public Safety	Campus Security Authority Clery Act Training	Mixed	2,402
Training Courses Completed from July 1, 2023 through June 30, 2024			161,693

During this fiscal year, University Compliance and Ethics reviewed and updated all of the office's training modules. The office obtained Spanish translations of the two mandatory new employee courses (i.e., Employee Code of Conduct/Speak Up! and Potential Conflicts) and began tracking completion separately for the translated courses. At the request of the Compliance and Ethics Advisory Committee, the office created and led a Compliance Training Workgroup consisting of individuals from all compliance offices and partner offices to identify efficiencies in training across the university. A shared calendar was developed for use by the workgroup to schedule training and the group discussed transitioning employee compliance related training from other Learning Management System platforms to Workday.

In addition to the office's courses, University Compliance and Ethics attended the following to further deliver compliance and ethics training:

→ Office of Research's Exchanging Ideas and Tips (EXCIT) meeting to discuss privacy compliance versus the use of artificial intelligence and large language models
→ UCF Learning & Development Community of Practice workgroup meetings to contribute compliance related information
→ UCFAA staff meeting to deliver custom conflict of interest training
→ Staff Advisory Council training on state ethics laws
→ English Language Institute gifts training
→ UCFAA Camp Summit to deliver Youth Protection Program updates and policy requirements to athletic coaches and operations managers

The Athletics Compliance Office continued to revise its rules education efforts using multiple mediums including:

1. Meeting with each sport's staff individually on a monthly basis during the academic year;
2. Meeting with each sport's team/student-athletes periodically throughout the year;
3. Meeting with each department within athletics individually to provide rules education tailored to specific areas; and
4. Providing timely "hot topic" issues to athletics staff through Workday. In total, staff conducted 312 documented education sessions and meetings in 2023-2024.

The College of Medicine Health Affairs/Legal Compliance unit maintains a College of Medicine Code of Ethics and Conduct and Clinical Services Compliance Program overview, which is distributed to and agreed upon by each new employee within the College of Medicine. During this report year they reviewed and provided guidance to college staff on the following topics: arrangements between healthcare providers/ partners for fraud and abuse law implications, arrangements with the health/medical industry to include donations by the industry, and the validity of subpoenas for medical records.

The Learning and Development Community of Practice led by Human Resources met regularly with university training administrators to discuss best practices and collaboration on training efforts. Human Resources continued to promote and encourage all employees to participate in university trainings offered by University Compliance and Ethics, University Audit, and the Office of Institutional Equity. They also supported the HR Business Centers by conducting in-person trainings on recruiting and FLSA updates.

The Office of Student Financial Assistance has a year-round training schedule that is facilitated by the office's training specialists. This training is in addition to any university required training. Due to the fluid nature of financial aid regulations, the office determines the need to develop trainings to introduce new regulatory requirements as well as provide refreshers on long standing regulations.

The Office of Institutional Equity continued to utilize the campus-wide Let's Be Clear campaign bringing awareness to the university's prohibition of sex-based discrimination and harassment (including sexual violence) and began updating all promotional materials throughout the university. OIE facilitated the successful implementation of HR Business Center faculty search process training, which was delivered in September and October 2023. This training reviewed the federal and state laws and regulations, the university guidelines the searches must comply with, and the HR Business Center's role in ensuring search compliance.

Reported Concerns and Investigations

Effective compliance and ethics programs have established processes for responding promptly to detected problems and undertaking corrective actions. When members of the university community become aware of or have reason to suspect activities and business are not conducted in an honest, ethical, and lawful manner, UCF expects members of the university community to make good faith reports of suspected misconduct.
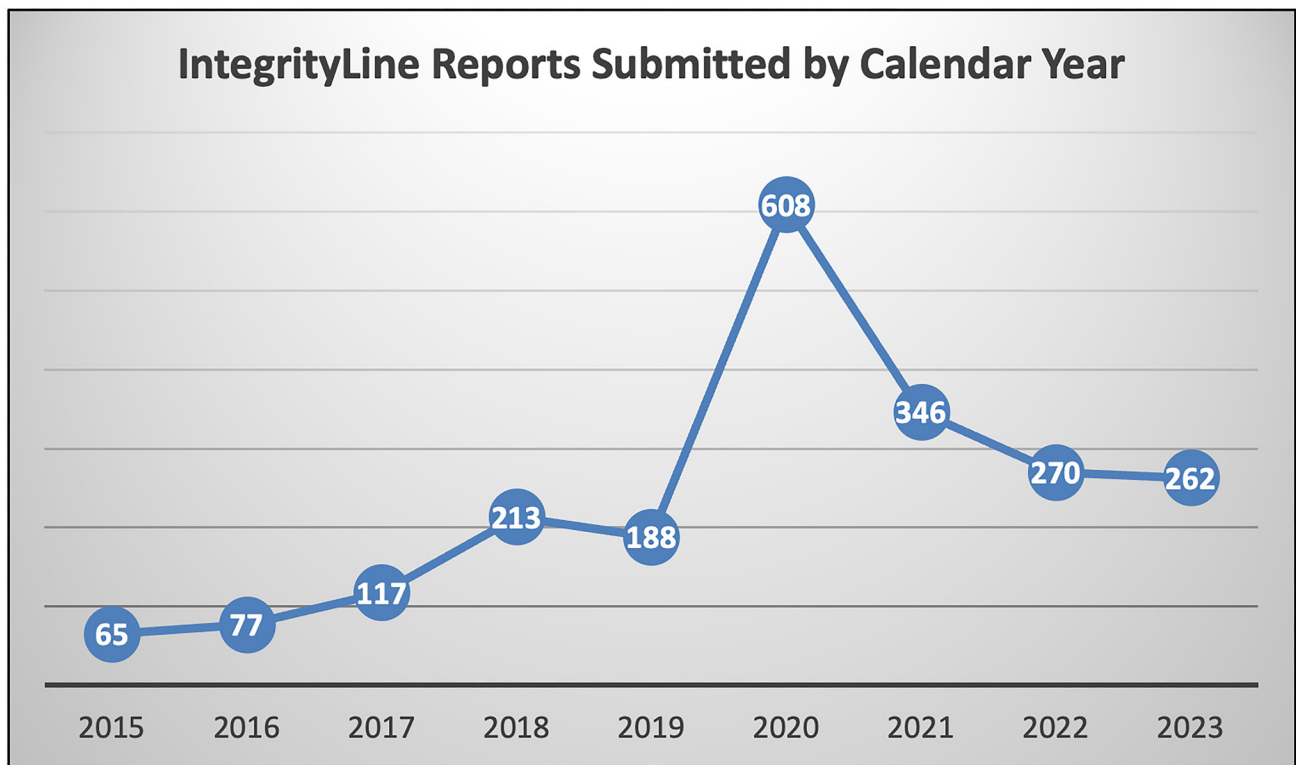
Employees who are reluctant to report concerns to their direct supervisor are encouraged to use the UCF IntegrityLine, a secure and anonymous reporting system administered by an independent third party.

During this past fiscal year, 277 new reports were submitted through the UCF IntegrityLine. This is a slight increase from the 250 reports received last year. Submitted reports were triaged with University Audit. Based on the nature of the report, it was either investigated by University Compliance and Ethics, University Audit, the Office of Institutional Equity, or referred to the appropriate compliance partner for review. Two hundred and seventy-two (272) IntegrityLine cases were investigated and closed during the fiscal year, which was an increase from 260 closed cases the previous year.

University Compliance and Ethics received 17 new reports of potential misconduct made directly to the office and 17 cases that were under review were completed and closed. The office conducted an intake review of 16 potential cases that did not rise to the level of an investigation following the initial inquiry phase. Privacy Compliance also worked with the University Registrar on 12 Family Educational Rights and Privacy Act related reports/issues.

During the 2023 calendar year, the UCF IntegrityLine received a total of 262 reports. Of these reports 253 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.

IntegrityLine Reports Submitted by Calendar Year

Year	Reports
2015	65
2016	77
2017	117
2018	213
2019	188
2020	608
2021	346
2022	270
2023	262

Highest Number of Reports by Issue Type

17% Discrimination or Harassment	The highest number of reports made to the IntegrityLine in 2023 were categorized as Discrimination or Harassment with 44 reports representing 16.79% 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.
13% Offensive or Inappropriate Communication	The second highest number of reports made to the IntegrityLine in 2023 were categorized as Offensive or Inappropriate Communication with 33 reports representing 12.60% 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.
10% Employee Misconduct	The third highest number of reports made to the IntegrityLine in 2023 were categorized as Employee Misconduct with 27 reports representing 10.31% of the total reports submitted. This issue type involves any employee conduct that violates university regulation, policy, procedure, and/or the UCF Code of Conduct that does not fit within one of the other issue types.

All Issue Types

Reports submitted to the UCF IntegrityLine in 2023 spanned a total of 20 issue types.

Primary Issue	Total Reports	Percentage of Reports (Rounded)
Discrimination or Harassment	44	16.79%
Offensive or Inappropriate Communication	33	12.60%
Employee Misconduct	27	10.31%
Other Academic Affairs Matters	26	9.92%
Other Human Resource Matters	23	8.78%
Environmental and Safety Matters	22	8.40%
Sexual Harassment	19	7.25%
EEOC or ADA Matters	9	3.44%
Inquiry	9	3.44%
Alcohol / Drug Abuse	7	2.67%
Data Privacy / Integrity	7	2.67%
Waste, Abuse, or Misuse of Institution Resources	7	2.67%
Conflict of Interest	6	2.29%
Other	5	1.91%
Other Financial Matters	5	1.91%
Cheating / Plagiarism	4	1.53%
Fraud	4	1.53%
Research Misconduct	2	0.76%
Retaliation	2	0.76%
Time Abuse	1	0.38%
Grand Total	**262**	

Closed Cases

During the 2023 calendar year, University Compliance and Ethics closed a total of 285 reports which included eight inquiries and 277 cases that alleged misconduct. Closed cases include a combination of cases received in 2023 as well as those submitted in a previous year. Below are the outcomes for the 277 cases closed in 2023.

Closed Case Outcomes
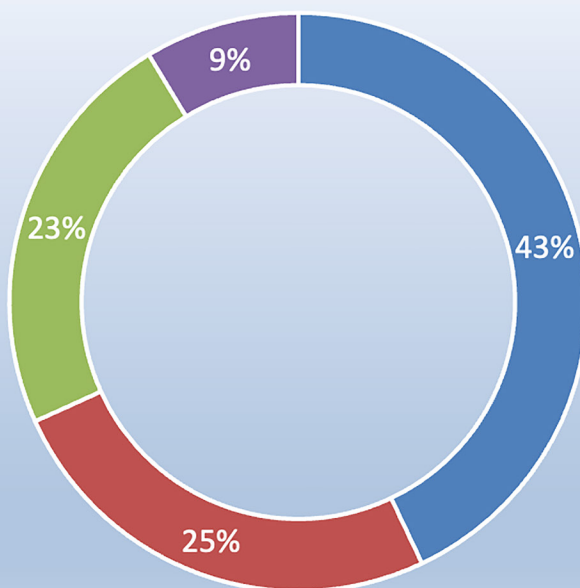
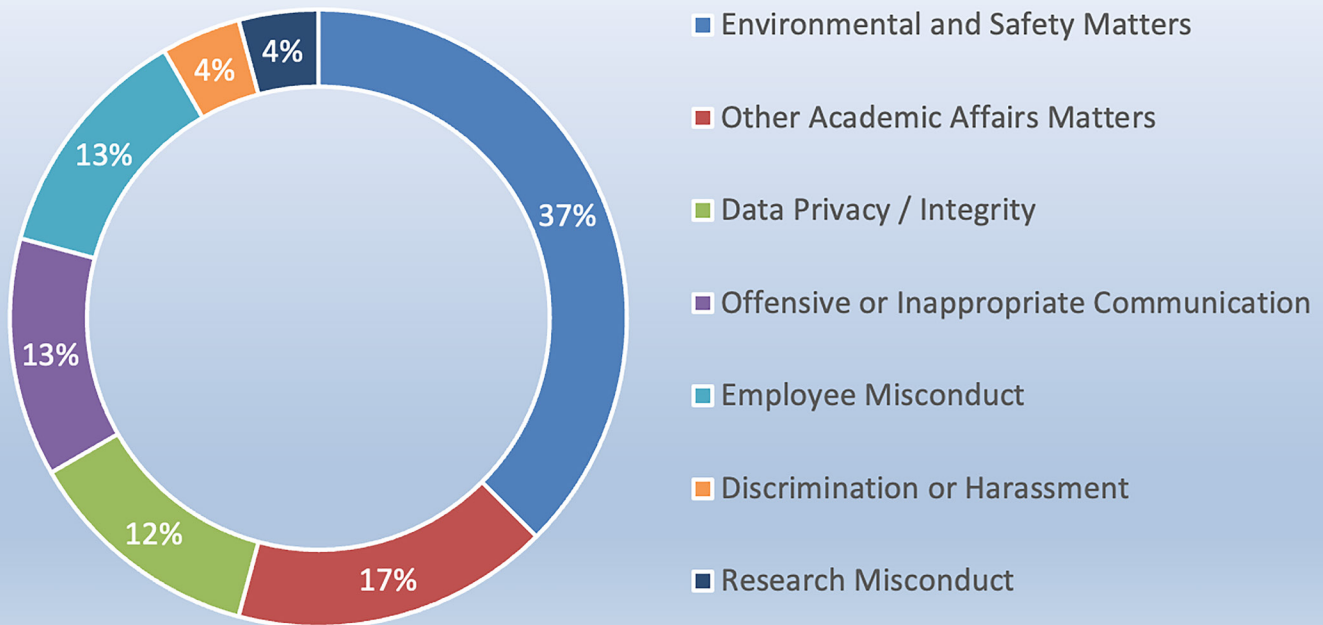| Closed Case Outcomes	Total
Unsubstantiated	119
Referred	70
Insufficient Information	64
Substantiated	24
Grand Total	**277**

Closed Cases – Investigations with Substantiated and Unsubstantiated Findings

In 2023, a total of 84 of the 277 cases were closed after an investigation was conducted by University Compliance and Ethics, the Office of Institutional Equity, or University Audit. Additionally, University Compliance and Ethics oversaw and guided 59 investigations in conjunction with colleges and departments, providing guidance on appropriate corrective action when needed. The following are the outcomes of the investigations.

Substantiated Cases
Twenty-four cases investigated resulted in a substantiated finding (representing 9% of all closed cases that alleged misconduct) 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 Environmental and Safety Matters.

Substantiated - Issue Type

Legend:
- Environmental and Safety Matters — 37%
- Other Academic Affairs Matters — 17%
- Data Privacy / Integrity — 12%
- Offensive or Inappropriate Communication — 13%
- Employee Misconduct — 13%
- Discrimination or Harassment — 4%
- Research Misconduct — 4%

Primary Issue	Total
Environmental and Safety Matters	9
Other Academic Affairs Matters	4
Data Privacy/Integrity	3
Offensive or Inappropriate Communication	3
Employee Misconduct	1
Discrimination or Harassment	1
Research Misconduct	1
Grand Total	**24**

Substantiated Cases – Action Taken

For the 24 cases investigated that resulted in substantiated findings, the university took the appropriate action. Those actions included policy / process reviews, training, disciplinary action, and termination.

Substantiated - Action Taken
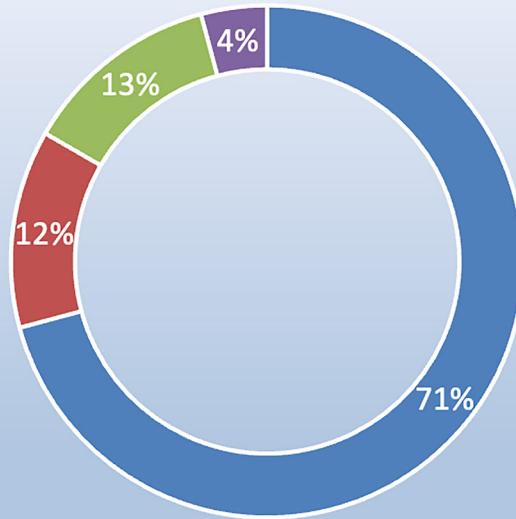
Action Taken	Total
Policy / Process Review	17
Discipline	3
Termination	3
Training	1
Grand Total	**24**

Unsubstantiated Cases

The remaining 119 cases (43% of closed cases that alleged misconduct) investigated yielded insufficient or no evidence to support that misconduct occurred and were closed with an unsubstantiated outcome. Despite the unsubstantiated finding, 63 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 thirty-four (134) cases were not investigated. Those cases were either referred out of the system or to another office or closed due to insufficient information.
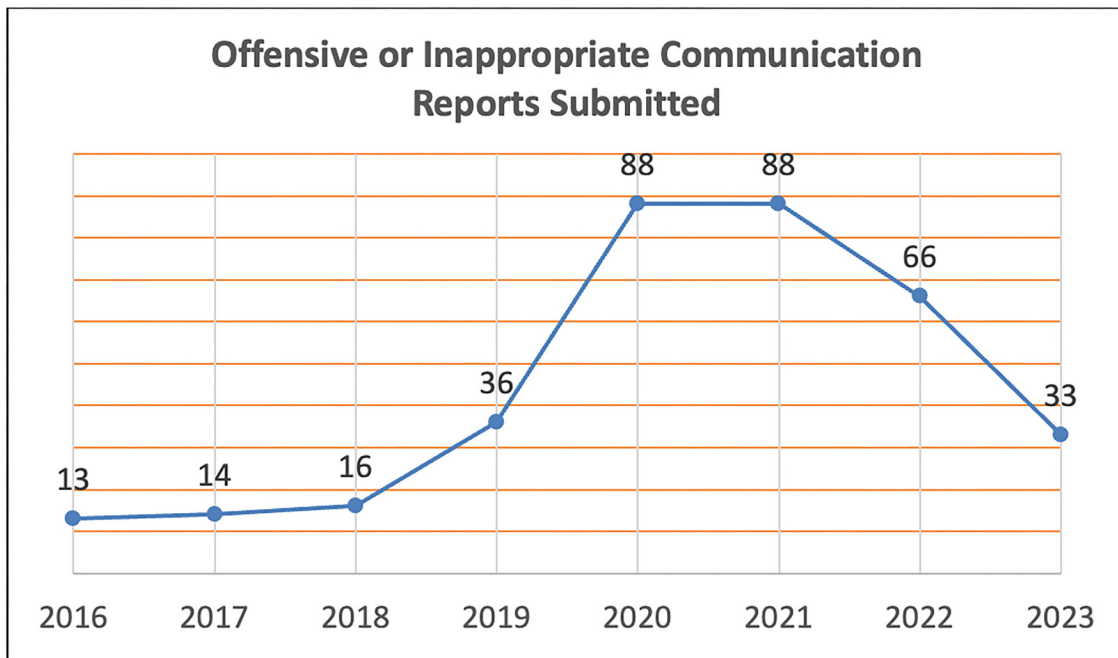
Referred
A total of 70 cases (25% of all closed cases that alleged misconduct) were referred to the UCF Police Department, Student Conduct, or another college or department to address through the appropriate university process and closed out in the IntegrityLine system. These cases span the range of issues involving student misconduct such as alleged alcohol or drug abuse, grade disputes, 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.

Insufficient Information
For 64 cases (23.10% of all closed cases that alleged misconduct), questions were posted to the complainant requesting additional information with no response. These cases were closed due to insufficient information.

2023 IntegrityLine Trends

Since 2019 the office has monitored IntegrityLine reports with the issue type Offensive or Inappropriate Communication. These types of reports 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. In collaboration with Human Resources, the office developed a communication, education, and awareness campaign to increase civility in the workplace. Throughout 2020, 2021, 2022, and 2023, the office delivered training and education on this topic and monitored IntegrityLine reports as well as culture survey responses to gauge the effectiveness of the efforts. We are pleased to report that IntegrityLine reports with this issue type significantly dropped from 66 in 2022, down to 33 reports in 2023 indicating a very positive trend in this area.

Offensive or Inappropriate Communication Reports Submitted

2016	2017	2018	2019	2020	2021	2022	2023
13	14	16	36	88	88	66	33

We 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.

Other Compliance Offices and Partners Reported Concerns and Investigations
Compliance offices and partners conduct internal reviews / investigations when reports are made directly to the department when appropriate, and when referred to them by University Compliance and Ethics or University Audit. The compliance offices and partners below reported the following reviews during this report year:

Compliance Office / Partner	Type	Reviewed	Substantiated
Athletics Compliance	NCAA	26	18
	UCF Policy Violation	1	1
College of Medicine Health Affairs / Legal Compliance	HIPAA Incident	5	4
	Billing and Coding	1	1
Office of Institutional Equity	Unlawful Discrimination, Harassment, Retaliation, Inappropriate Amorous Relationships, Failure to Report Discrimination-related Concerns and/or Search and Hire Violations	67	13
Office of International Collaboration and Export Control	Foreign Influence	1	1
Research Compliance	Research Misconduct	6	3
Police Department	Standard of Conduct GO 201	20	13
	Officer Involved Traffic Crash	9	2
	Radio Transmission Violations	1	1
	Biased-Free Policing	5	0
Registrar's Office	FERPA	7	4
Total Compliance Office / Partner Reports Reviewed and Substantiated		**149**	**61**

Compliance and Ethics Culture Survey

Every two years beginning in 2016, University Compliance and Ethics has conducted a Compliance and Ethics Culture Survey to gauge the overall ethical culture at UCF. The survey provides insights into UCF's Compliance and Ethics Program, of which culture is a key piece. The office benchmarks the results against prior years' results and uses the data to identify opportunities for improvements to the Program.

The office of Operational Excellence and Assessment Support facilitates our survey and performs the analysis of responses. All faculty, staff, and student employees were invited through a series of emails to participate via a link to the online survey from March 4, 2024, through April 5, 2024. The 2024 survey was available in English and Spanish.

2024 Compliance and Ethics Culture Survey

Historical Response Rates

The table below displays the number of UCF employees invited to participate and the number of survey respondents for each survey administration year.

Administration Year	UCF Employees Invited (Count)	Respondents (Count)	Response Rate (Percent)
2018	8,892	1,700	19.1%
2020	13,492	2,365	17.5%
2022	12,268	2,171	17.7%
2024	12,825	3,251	25.3%

Table 1. Response Rates and Respondent Distribution by UCF Employee Role

Role	Population Count	Survey Respondents	Response Rate
Faculty Member	3,513	856	24.4%
Executive Leadership*	32	63	100.0%
Professional Staff	2,450	1,555	63.5%
Technical, Clerical, Service Personnel	1,661	292	17.6%
Student Employee	5,169	446	8.6%
No response		39	
Total	12,825	3,251	25.3%

*Population counts for employee role were obtained from the HR office. Respondents self-identified their role on the survey. Please note that as the survey was anonymous, some self-identification could be different from that on official files

The following describes my job title or job duties:	2018 Count	2018 Col %	2020 Count	2020 Col %	2022 Count	2022 Col %	2024 Count	2024 Col %
No Responses	60	4%	7	0.3%	25	1%	39	1%
Faculty Member	424	25%	635	27%	618	28%	856	26%
Executive Leadership [1]	144	8%	23	1%	50	2%	63	2%
Professional Staff	756	44%	683	29%	1,090	50%	1,555	48%
Technical, Clerical, Service Personnel	239	14%	767	32%	275	13%	292	9%
Student Employee	77	5%	250	11%	113	5%	446	14%
Total	1,700	100%	2,365	100%	2,171	100%	3,251	100%

1 For the 2018 survey instrument, this option was listed as "Administrator (e.g. Senior Leaders, Deans, Directors)."
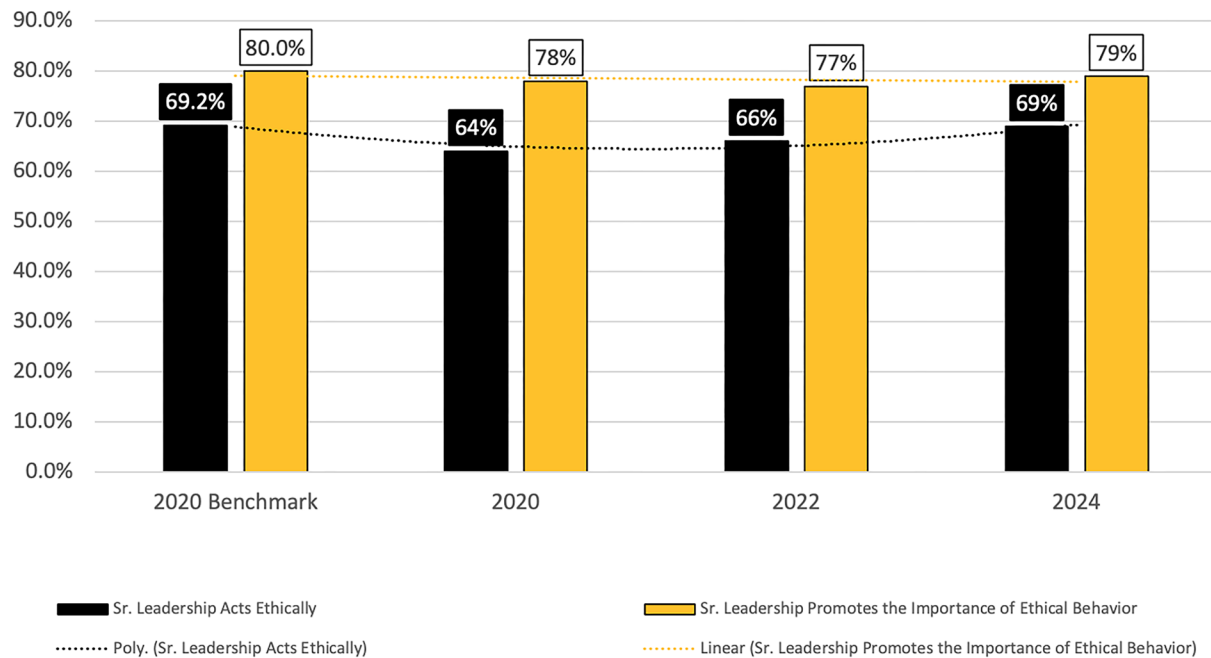
Initiatives this year, to increase participation, included:

- UCF Marketing and Communications distributing email communications,
- Faculty Senate encouraging faculty participation, and
- University Compliance and Ethics directly contacting student employees to encourage participation.
- The office also hosted a tabling event offering a QR Code for the survey and promoted a prize drawing.

As a result of the additional efforts, University Compliance and Ethics achieved a 25.3% response rate, an increase from the 17.7% rate in 2022.

The most significant trends found in the 2024 results are the positive trends related to employee perceptions of managers and senior leaders:

Perceptions of Senior Leadership

Chart legend:
- ■ Sr. Leadership Acts Ethically
- ■ Sr. Leadership Promotes the Importance of Ethical Behavior
- .... Poly. (Sr. Leadership Acts Ethically)
- .... Linear (Sr. Leadership Promotes the Importance of Ethical Behavior)

Data values by category:
- 2020 Benchmark: 69.2%, 80.0%
- 2020: 64%, 78%
- 2022: 66%, 77%
- 2024: 69%, 79%

- There was a 3% increase in employees responding that they believe our senior leadership team acts ethically at all times (69% responded favorably), bringing UCF in line with the 2020 corporate benchmark of 69.2%.

- There was a 2% increase in the belief that senior leadership promotes the importance of ethical behavior throughout the university (at 79%), just below the 2020 benchmark of 80%.

Perceptions of Managers
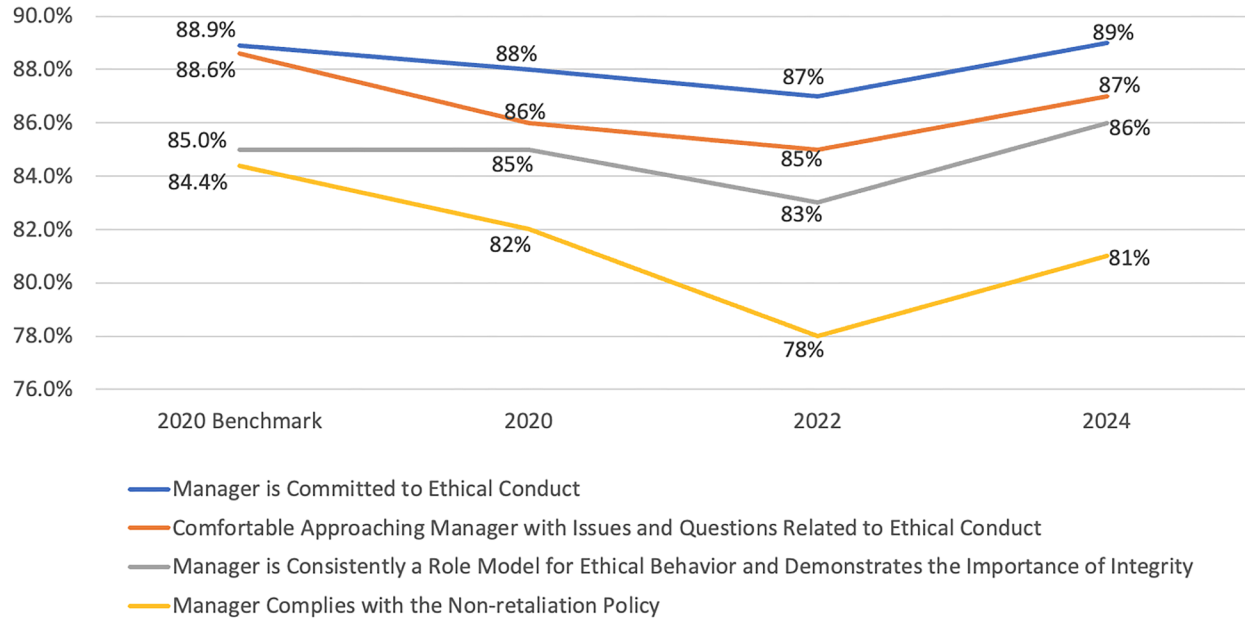
- Two percent (2%) more employees reported believing their manager is committed to ethical conduct (89%), which is in line with the 2020 corporate benchmark of 88.9%.

- There was another 2% increase in reported comfort of employees approaching their manager with issues or questions related to ethical conduct (87%), bringing UCF close to the 88.6% benchmark.

- Three percent (3%) more employees reported that their manager is consistently a role model for ethical behavior and demonstrates the importance of integrity and ethical behavior (86%) above the 85% benchmark.

- Three percent (3%) more employees believe their manager complies with the non-retaliation policy with 81% reporting favorably, compared to the 84.4% benchmark.
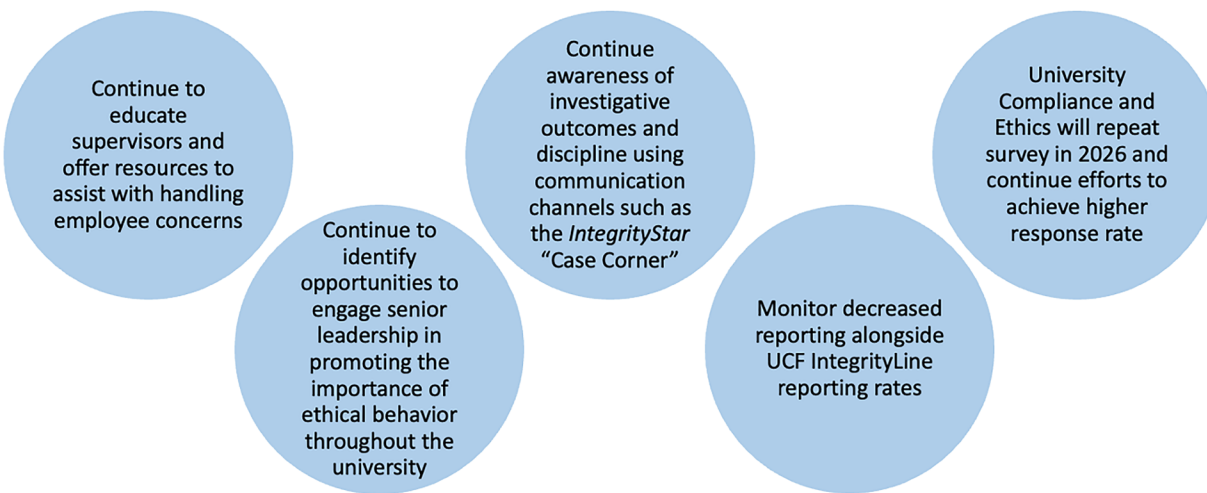
Misconduct and Reporting

Observed Misconduct, Asked to Commit Misconduct, Reported It, and Satisfaction with Outcome
6-Yr Trend
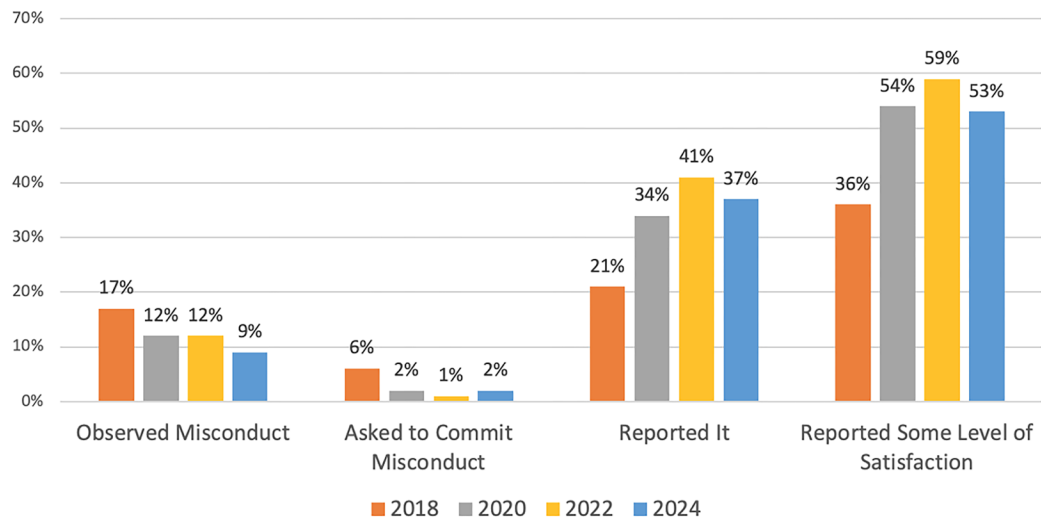
Six Year Trends
- Employees responding that they had observed misconduct over the last 12 months decreased overall 8% in the last six years.

- Even though there was a 1% increase from 2022, employees responding that they were asked to commit misconduct is down 4% overall in the last six years.

- Of those employees who responded that they observed misconduct or were asked to commit misconduct, only 37% (96 employees) responded that they reported it to UCF. This is a dip from the 41% in 2022. However, this is a 16% overall increase from 2018.

- Satisfaction levels dipped 6% from 2022, but the six-year trend still represents a 17% increase from 2018.

Next Steps

Continue to educate supervisors and offer resources to assist with handling employee concerns

Continue to identify opportunities to engage senior leadership in promoting the importance of ethical behavior throughout the university

Continue awareness of investigative outcomes and discipline using communication channels such as the *IntegrityStar* "Case Corner"

Monitor decreased reporting alongside UCF IntegrityLine reporting rates

University Compliance and Ethics will repeat survey in 2026 and continue efforts to achieve higher response rate

The decreased reporting noted in this year's responses will be monitored alongside the UCF IntegrityLine annual reporting rates. University Compliance and Ethics will repeat the Compliance and Ethics Culture Survey in 2026, and the office will continue efforts to achieve a higher response rate to ensure the most accurate results.

Outside Activity, Conflict of Interest and Commitment Disclosure Reporting
University Compliance and Ethics provides oversight and management of the university's conflicts of interest and commitment reporting process. The office closed the 2022-2023 outside activity report year on August 7, 2023, with 100% compliance. The 2023-2024 report year was launched on August 14, 2023, reaching 100% completion by December 2023. A total of 58 foreign influence red flag reviews were completed as part of the COI disclosure review process.

The office reviewed 90 new disclosed relatives for potential conflicts and responded to 400 separate requests for assistance with reporting outside activities and conflicts of interest. Additionally, the office received and completed a total of 74 reviews of potential conflicts associated with attendance at conferences or events sponsored by vendors and receiving discounts or gifts. The office also reviewed and provided feedback on 37 research exemption requests and coordinated with the provost, president, and Chair of the Board of Trustees for their approval as required by state statute.

Youth Protection Program

A total of 703 Youth Protection Program related inquiries were received and addressed by University Compliance and Ethics during the reporting year, which is a substantial increase from 564 last year. The office processed and approved a total of 152 submitted registrations (all in-person with 11 having a virtual component). Five registrations were later canceled at the request of the program sponsor. The office oversaw a total of 140 youth programs operated during this fiscal year, which included:

- ❖ UCF hosted programs: 41 (29%);
- ❖ Third-party hosted programs: 99 (71%);
- ❖ Of the 140 youth programs, 37 were overnight programs (26%); and
- ❖ A total of approximately 17,355 minors served during the year.

University Compliance and Ethics continued to identify and address process improvements with youth program registration requirements during the year. Staff worked with the contracted vendor to add features in the Squire Registration Portal to ensure a more thorough and accurate submission and registration review. The office also developed and implemented a new training for youth program staff supervising minors overnight.

Other program improvements during the year included revising the university's Youth Protection policy (2-005) to clarify the definition of "minor" and removing the campus liaison requirement for third-party organizations. Language was added to the background check section related to the certification form process for third-party programs and the requirement of the completion of overnight staff training for program staff supervising minors overnight. The revised policy also included updated camp insurance instructions for UCF hosted programs. Youth Protection Program language and resources were revised and published on the Youth Protection Program webpage to coincide with the policy updates.

Foreign Influence

The vice president for compliance, ethics, and risk 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. The offices completed a review of processes established for drone security standards under Florida Statute 934.50, resulting in a new Unmanned Aircraft System Policy and also collaborated on a newly drafted International Engagement Policy.

Privacy Compliance

During this year, University Compliance and Ethics completed the following privacy compliance activities in support of its Privacy Compliance Program:

- Processed a total of 64 Data Subject Access Requests, 35 Vendor Risk Management requests, and performed 13 Research-related ancillary reviews.
- Reviewed, provided guidance, and approved privacy related language in 65 contracts.
- Worked with the university registrar on 12 Family Educational Rights and Privacy Act related reports/issues.
- Met with Communications Disorders Clinic and Physical Therapy Clinic representatives to support their HIPAA Security Program Review with a third-party assessor.
- Initiated a work group to address privacy and compliance risks resulting from the email migration project. Met with department leaders who employ student employees to gather information to inform the mitigation strategy that will be incorporated in university policy and procedures.
- Discussed AI recording technology with Information Security and the Office of the General Counsel and drafted language for inclusion in university policy.
- Drafted Emerging Technology article published in the Privacy Points section of the *IntegrityStar*.

University Compliance and Ethics launched the office's inaugural Data Privacy Day awareness campaign, celebrated annually on January 28, to promote awareness about data privacy and educate individuals on how to secure their personal information.

- On January 26,2023, a tabling event was held at the Student Union where students and employees had the opportunity to learn more about the office, ask questions about data privacy, enter a prize drawing, and receive UCF swag.
- On January 29, 2023, our office delivered a live webinar, titled "Privacy[at]UCF" that explored how privacy compliance assists the campus community, explained what privacy is versus security, and provided tips to protect data at home and at work.

Clery Act Compliance

University Compliance and Ethics provides oversight for the university's Clery Compliance program, providing guidance and support to the Clery compliance analyst, and serving on the Clery Act Compliance Committee. The office reviewed and revised the Annual Security Report for compliance with Clery Act requirements prior to campus-wide distribution by October 1.

During this fiscal year, the office, with the Clery compliance analyst, completed the Campus Security Authority (CSA) identification project discussed on page 8.

Monitoring Activities by Compliance Offices and Partners

During the fiscal year, the College of Medicine, Health Affairs Legal Office directed and oversaw UCF Health coding and billing audits conducted by external consultants, assisted with reviews of UCF Health coding and billing practices, and conducted an annual review to identify payments to College of Medicine faculty, physicians, residents, and researchers by companies in the health care sector, as listed on Centers for Medicare and Medicaid Services' Open Payments database. The office also assisted with HIPAA incidents investigations, management, and notifications as appropriate, assisted the UCF Institutional Review Board with HIPAA Authorization reviews, conducted Business Associate Agreement reviews for departments, and provided guidance related to HIPAA matters.

UCF's Division of Finance distributed self-assessment questionnaires to UCF departments that processed credit card payments to maintain PCI DSS compliance. The process was monitored and reviewed by the Merchant Services Team. Payments to independent contractors were reviewed to identify potential worker misclassifications and department financial statements were reviewed to identify any non-reported unrelated business income activities. The vendor creation process was monitored throughout the year to ensure employees and students were not established as suppliers of the university without additional reviews by the tax department.

During this report year, the Information Security Office developed a vulnerability management dashboard to provide all departments with visibility into the vulnerabilities on their systems. The office continued to conduct vulnerability scans of devices on the UCF network, as well as End Point Detection to defend from cyber-related attacks. Support related to Gramm-Leach-Bliley Act and Payment Card Industry was provided to the appropriate areas of the university as needed.

The Office of International Collaboration and Export Control conducted one export control assessment and four foreign influence assessments, prompting a voluntary disclosure to the U.S. Department of Commerce, additional training to the applicable faculty member, and one foreign influence corrective action plan. In accordance with the office's standard process, the team conducted an on-site monitoring of a lab subject to an export control technology control plan and identified no foreign influence red flags or export control violations.

During the reporting period the Office of Research Compliance completed 34 Human Research Protection Program quality improvement assessments. Eighteen findings were reported to the IRB for action. The most common findings were the use of an unapproved/unstamped IRB-approved consent form. The office conducted annual reviews of Monitoring Plans for approximately 83 Disclosers to ensure compliance. Follow-ups to ensure Conflict of Interest training and Responsible Conduct of Research training were completed. The outcome was institutional compliance with federal research training requirements. Research Compliance also monitored compliance with Responsible Conduct of Research training requirements for NSF and select NIH awards

that resulted in the same outcome. Internal audits on allowable costs assessments on random sponsored projects were conducted and monitoring and auditing of sponsored legal agreement clauses and compliance factors for selected sponsored awards were also conducted.

Student Health Services participated in a peer review to improve the care and services provided. The standards reviewed addressed 22 different areas of operation and practice, to include credentialing and privileging of the clinical staff, required annual training, incident/adverse event reporting, risk management, clinical records, and security/privacy/confidentiality. Level 2 background checks were also conducted on all pharmacy, lab, and select administrator staff (or similar titled persons) responsible for day-to-day operations of the facility.

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

In the 2023-2024 year the Human Resources Compensation team periodically conducted ad hoc reviews as requested by partner offices, open records requests, or HR Business Centers on compensation actions or decisions. The Human Resources Information Systems (HRIS) unit continued to manage the Constituent Staging process that monitors new hires entered into Workday, compares the data to Peoplesoft Campus Solutions, and either creates a new ID or reuses a previous ID for the new hire. The Payroll Services team continued to run a multitude of queries on a bi-weekly basis to identify potential payroll errors and gather vital information for reporting.

During the fiscal year, the Human Resources Talent Acquisition unit:

- Reviewed over 1,277 hire requests to ensure hiring practices were consistent and legal.
- Processed and reviewed over 62 background checks with criminal charges to mitigate the risk associated with negligent hiring.
- Conducted internal reviews of job postings on the UCF Careers portal to ensure consistency with university guidelines, the EEOC, and consistency with the UCF posting template.
- Partnered with the Office of Institutional Equity to conduct an internal review of the Affirmative Action Plan and any identified positions with goals.
- Partnered with various areas on a business process review of the recruit to hire process for OPS, USPS, and A&P requisitions and identified process improvements.
- Conducted internal OPS policy review to evaluate OPS employees, ensuring they were classified in the correct job profile and had accurate employment end dates entered.

Complying with all applicable laws, university regulations, policies, procedures, and standards of conduct is an expectation of all members of the university community. The compliance and ethics program is promoted and enforced consistently through the application of appropriate incentives and, when necessary, appropriate disciplinary measures resulting from instances such as employees engaging in misconduct or noncompliance and failing to take reasonable steps to prevent or detect misconduct, noncompliance, and criminal conduct. The vice president for compliance, ethics, and risk, in consultation with the university president and the Board's Audit and Compliance Committee, provides guidance and recommendations for appropriate incentives and disciplinary measures to encourage a culture of compliance and ethics. When failures in compliance and ethics are identified, the program requires that issues be addressed in a timely manner through appropriate measures, including education or disciplinary action.
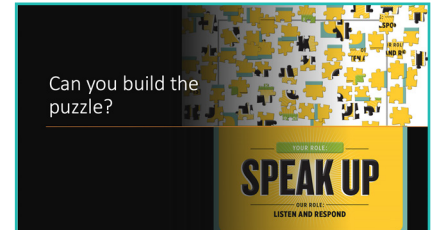
Incentives

University Compliance and Ethics implemented a process for identifying and recognizing employees who exemplify the expectations of the compliance and ethics program and the values of the university. Three times per year, employees are presented with the *IntegrityStar* Award signed by the vice president for compliance, ethics, and risk and recognized in an article in the *IntegrityStar* newsletter. This year we recognized Dr. Manoj Chopra, Associate Dean, Academic Affairs, and Professor of Civil Engineering, College of Engineering and Computer Science (CECS), Millicent Downer, Human Resources Director for the Administration and Finance Division, and Melissa Dagley, Ed.D., Executive Director – UCF Stem, College of Sciences (pictured below from left to right). All three individuals received a framed *IntegrityStar* Award and were publicly recognized at a UCF Board of Trustees meeting.

The office engages employees annually to offer incentives for participating in its Compliance and Ethics Week awareness campaign. This year 180 employees participated, and 66 employees were randomly selected to win a prize. Activities commenced during the week November 6-13, 2023, and included two engaging activities for employees to win prizes:

- ❖ Training - Developed and published three training videos on the ABCs of Compliance and Ethics relating to various ethics topics: Accountability, Behaving Ethically, and Civil Discourse. A total of 489 videos were viewed.

- ❖ Speak Up Logo Puzzle: Employees had the opportunity to put together a digital puzzle of the IntegrityLine Speak Up logo. A total of 162 entries were submitted.

Complimentary to the incentives offered by University Compliance and Ethics, Environmental Health & Safety recognized two individuals for achieving regulatory compliance in their respective areas and held an awards banquet for internal recognition. Similarly, the UCF Police Department issued a total of 24 awards to department employees for their outstanding service during the year.

Appropriate Discipline
The vice president for compliance, ethics, and risk provided guidance to supervisors and members of the senior leadership team on appropriate disciplinary action up to and including separation when misconduct, noncompliance, or criminal conduct was identified. As part of this process, University Compliance and Ethics collaborated with Human Resources, the Office of Contract Compliance and Administrator Support, and the Office of the General Counsel to ensure that supervisors provided disciplinary action consistently and in compliance with applicable laws, regulations, and policies. These efforts serve to ensure that the Program remains effective, and that the university is taking steps to prevent the reoccurrence of misconduct, noncompliance, or criminal activity.