University Compliance and Ethics

UCF

Compliance and Ethics Annual Report 2025

The University of Central Florida (UCF) Compliance and Ethics report for the 2024-25 Fiscal Year provides a comprehensive look at the university-wide activities and outcomes that demonstrate the university's steadfast commitment to a culture of compliance and ethics. Annually, we compile, analyze, and publish this report with the purpose of evaluating the effectiveness of the program and providing the UCF community, the UCF President, the UCF Board of Trustees, and the State of Florida Board of Governors a comprehensive view of the university-wide compliance and ethics program. UCF's Compliance and Ethics 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 report provides 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 and our collective efforts to maintain a compliance and ethics culture at UCF.

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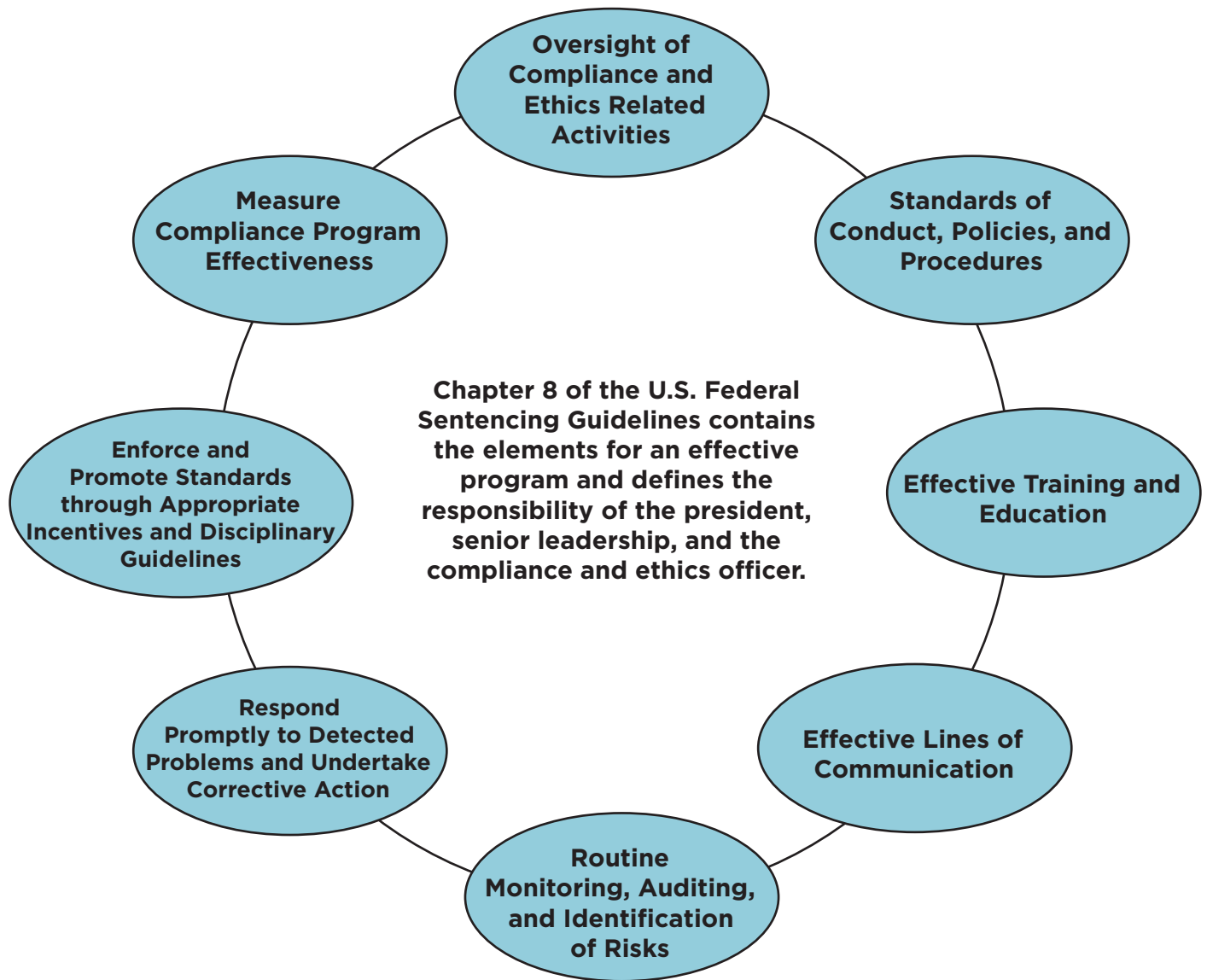Chief Compliance, Ethics, and Risk Officer

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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.

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

Office of Risk and Safety

Environmental Health and Safety

Athletics Compliance

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Research Compliance

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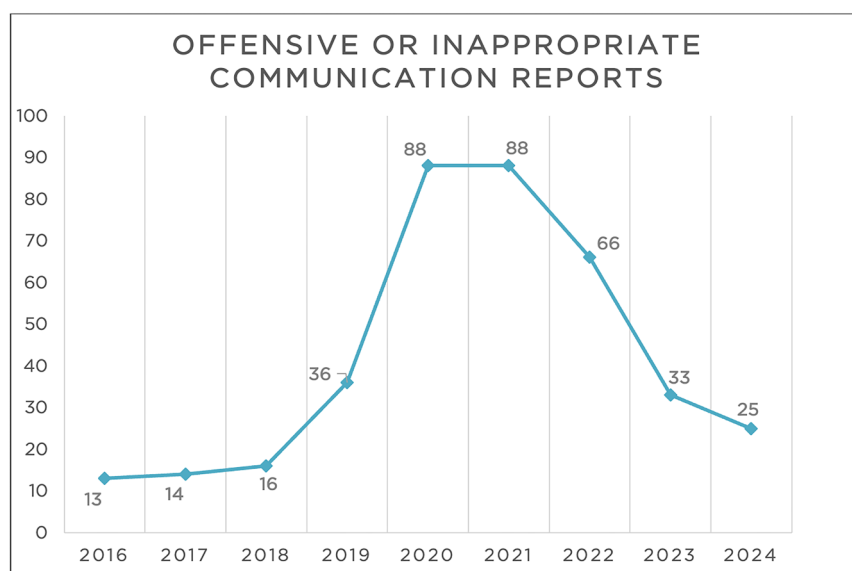
University Compliance and Ethics

This year, University Compliance and Ethics successfully transitioned the UCF IntegrityLine to a new third-party provider, offering a simplified web intake that reduces the time it takes to submit a report, and added an "Ask a Question" option for individuals to submit questions anonymously to the office. The new IntegrityLine system also provides features that improve efficiency and allow for more robust analytics and reporting.

OFFENSIVE OR INAPPROPRIATE COMMUNICATION REPORTS

Year	Value
2016	13
2017	14
2018	16
2019	36
2020	88
2021	88
2022	66
2023	33
2024	25

As part of its annual review of IntegrityLine reports, the office also saw the lowest number of Offensive or Inappropriate Communication reports (allegations of 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) submitted since 2019. This was also the first year since 2015 that the Offensive or Inappropriate Communication issue type was not in the top three highest reported issue types. This positive downward trend is directly tied to the office's efforts spanning several years supporting the university's strategic plan aspiration to be a best place to learn and work.

Speaking of efforts to be a best place to learn and work, the vice president for compliance, ethics, and risk, on behalf of the president, oversaw the 2024 Faculty and Staff Experience Survey administered by a third party, and a University Compliance and Ethics staff member served on the newly formed Survey Steering Committee. An advisory group made up of faculty and staff from across various colleges and units was also formed to provide feedback on the survey, and meetings were held with leadership to introduce the survey. The survey launched in October 2024 and remained open through mid-November 2024, where it was closed with a 51% response rate.

Environmental Health and Safety

During the course of ensuring safety and compliance with regulatory requirements, the office was able to identify opportunities for cost savings for the university. First, the Radiation Safety Officer discovered the university could qualify for a Nuclear Regulatory Commission Small Quantity Exemption for radioactive materials used and stored at a facility operated by the UCF Florida Space Institute in Culebra, Puerto Rico. With some realignment to meet the Nuclear Regulatory Commission's size standards, Environmental Health and Safety was able to restructure the licensing to take full advantage of the exemption. This reduced the Nuclear Regulatory Commission annual fee from $12,300 to just $1,000 while also continuing to maintain compliance.

Through the office's chemical management program, they were able to yield a savings of $43,654 for the university by redistributing unused chemicals to UCF researchers.

Financial Affairs

The UCF Treasury department successfully managed the issuance of debt for the Stadium Tower expansion project during this reporting year. This complex process took over a year to complete and required close coordination with Orange County leadership, the Division of Bond Finance, the Florida Board of Governors, and the UCF Board of Trustees. The department ensured full compliance with all county, university, and state-level requirements throughout the process. This was a unique and first-of-its-kind debt issuance in the State of Florida, and UCF achieved favorable interest rates along with unanimous approval from both the Board of Trustees and the Florida Board of Governors. It stands as a strong example of compliance, collaboration, and strategic financial execution.

Information Security Office

The Minimum IT Safeguards Initiative, a series of initiatives to ensure compliance, close gaps, and reinforce the security of IT systems and data across the university, proved to be a major success and significantly enhanced UCF's overall security posture. By spotlighting foundational system management practices, it effectively motivated teams to identify and close critical gaps. Key outcomes and insights included a catalyst for standardization, reinforcement of existing policies, and exposure of misaligned assumptions. This initiative not only strengthened technical safeguards but also elevated awareness, accountability, and collaboration across the IT community.

Student Health Services
The 2024 HIPAA Security Risk Assessment once again determined that Student Health Services was 100% compliant with the 64 mandatory safeguards required by the annual risk assessment. The department successfully met every requirement, demonstrating a steady and strong dedication to security and compliance by all employees and the departments they serve.

As an ambulatory health care organization, Student Health Services underwent a 2-day site visit whereby surveyors reviewed all policies and procedures assuring all 293 Accreditation Association for Ambulatory Health Care (AAAHC) standards were met. The office has been accredited by AAAHC since 2000 and places the upmost value on the quality of care provided to the UCF community. As an accredited facility, Student Health Services continually pursues and maintains compliance with the AAAHC Standards as well as with all local, state, federal and regulatory requirements.

UCF Public Safety
The UCF Police Department underwent a reaccreditation review in early 2025 and was unanimously recommended for reaccreditation by the Commission for Florida Law Enforcement Accreditation. This achievement followed a rigorous review of department policies and operations, reflecting the department's ongoing commitment to transparency, accountability, and excellence in service. Accreditation is a voluntary process renewed every three years.

BEST PLACE TO LEARN AND WORK

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	Foreign Influence	Policy Office and Development	IntegrityLine	Conflict of Interest and Commitment
IntegrityStar	Privacy Compliance	Youth Protection	Investigations	Compliance Training
Guidance	Implementation of New Laws and Regs	Regulatory Reporting and Response	Gifts and Honoraria	

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 28 members across various departments at the university who contribute to this report annually, 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 met 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 Athletics Title IX	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 Business Operations	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
Financial Affairs	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
College of Medicine 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
Information Security Office	Cybersecurity Identity and Access Management	Security Awareness Security Incident Response	Safeguarding Information Assets
Office of International Collaboration and Export Control	Export-controlled Technology and Restricted Research U.S. Export and Sanctions Regulation Compliance	Foreign Influence Reporting and Investigation	Foreign Influence Employment Screening and International Travel

Department	Compliance Activities		
Office of Nondiscrimination & Accommodations Compliance	Unlawful Discrimination, Harassment, and Retaliation	Equal Opportunity and Civil Rights Laws ADA Compliance and Accommodations	Title IX Digital Accessibility
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
Registrar's Office	FERPA Academic Records Excess Hours Surcharge	Enrollment Issuance of Diplomas Athletic Eligibility	State Authorization Compliance & Reciprocity Residency Classifications
Research Compliance Office	Research Reporting Requirements Effort Reporting and Certification Contract and Grant Assessment	Responsible Conduct of Research Institutional Review Board	Research Conflict of Interest Facility Security Research Animal Welfare
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 Public Safety	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, and Investigations) 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 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
Bright Futures Grades and Hours	Annual	Florida Department of Education
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
Expenditure Analysis	Annual	Florida Board of Governors
Federal Financial Aid State Audit	Annual	U.S. Department of Education
Fiscal Operations Report and Application to Participate in Campus Based Funding	Annual	U.S. Department of Education
Florida Flood Commodities	Annual	Florida Board of Governors

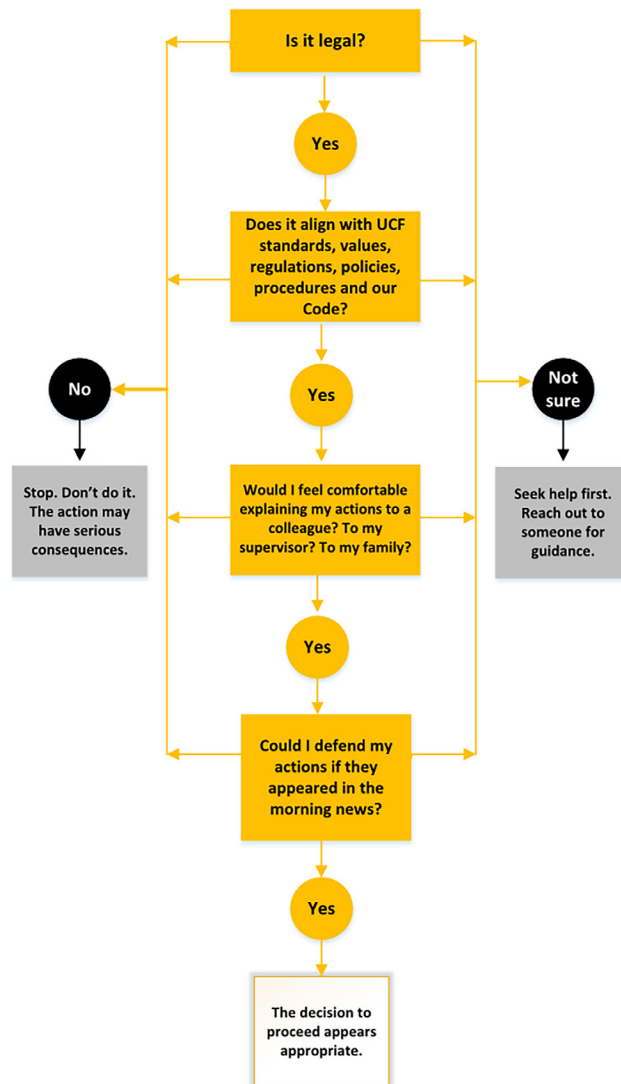| Report Name	Frequency of Submission	Agency
Florida Foreign Influence Act Disclosure - Denied Applicants	Annual	UCF Board of Trustees
Florida Foreign Influence Act Disclosure - Travel	Annual	UCF Board of Trustees
Infection Prevention / Risk Management Assessment Reports	Annual	Accreditation Association for Ambulatory Health Care
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
NCAA Academic Progress Report	Annual	National Collegiate Athletic Association
NCAA Graduation Success Rate Report	Annual	National Collegiate Athletic Association
National Science Foundation HERD Survey	Annual	U.S. National Science Foundation
Occupational Safety and Health Administration Form 300 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
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

Report Name	Frequency of Submission	Agency
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 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
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
Accreditation Association for Ambulatory Health Care Assessment	Every 3 Years	Accreditation Association for Ambulatory Health Care
Mandatory Re-Certification for Sworn Law Enforcement	Every 4 Years, based on officers' initial certification	Florida Department of Law Enforcement
Campus Master Plan	Every 5 Years	UCF Board of Trustees and Florida Board of Governors
Educational Plan Survey	Every 5 Years	Florida Board of Governors
Military Critical Technical Data Agreement (DD2345)	Every 5 Years	U.S. Defense Logistics Agency
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
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

Report Name	Frequency of Submission	Agency
Number of Employee Positions Posted 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

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 **Yes** **Not sure**

Stop. Don't do it. The action may have serious consequences.

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

Seek help first. Reach out to someone for guidance.

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:

- Athletics Admissions Committee
- Athletics Compliance Committee
- Audit Fraud Risk Committee
- Clery Compliance Advisory Council
- College of Medicine Clinical Services Compliance Committee
- College of Medicine Industry Relations Committee
- Emergency Funding Committee
- Executive Orders Working Group
- Fee Appeals Committee
- Health Sciences HIPAA Collaborative
- Homelessness Tuition Waiver Committee
- Institutional Animal Care and Use Committee
- Institutional Biosafety Committee
- Laboratory Safety Committee
- Laser Safety Committee
- Merchant Services Committee for Payment Card Industry Data Security Standards
- Online Eligibility Appeals Committee
- Radiation Safety Committee
- Removal of Medical Holds Committee

- Research Conflict of Interest Committee
- Residency Appeals Committee
- Security Incident Response Team
- Student Health Services Patient Advocate Reporting Committee
- UCF Chief Financial Officer Council
- UCF Health Faculty Physician Practice Ethics Committee
- UCF Health Faculty Physician Practice Patient Safety and Quality Committee
- UCF Hiring Process Optimization and Standardization Onboarding Journey Workgroup
- UCF Insitutional Review Board
- UCF Student Health Services Breach Determination Committee
- UCF Title IX Advisory Council
- UCF Title IX Response Team
- University Compliance and Ethics Advisory Committee
- University Compliance Training Workgroup
- University Policies and Procedures Committee

As part of the comprehensive program, University Compliance and Ethics developed several communication outlets to promote compliance and an ethical culture.

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.

Edition	Featured Articles and Materials	Recognition
July 2024 26th Edition	**Articles:** 1. 2023 UCF IntegrityLine Report 2. Reporting Misconduct at UCF 3. New Revisions to the Fair Labor Standards Act Overtime Pay Threshold **Case Corner:** Substantiated FERPA investigation from the 2023 UCF IntegrityLine Report **Privacy Points:** Use of Emerging Technologies **Image:** **Video:** Integrity| Ethics Defined – University of Texas at Austin, McCombs School of Business	*IntegrityStar* Award given to Brian Boyd, University Registrar, for his dedication to promoting compliance with the Family Educational Rights and Privacy Act of 1974 (FERPA), the United States federal law that protects student's records, privacy review, and disclosure rights

Edition	Featured Articles and Materials	Recognition
November 2024 27th Edition	**Articles:** 1. Celebrate 2024 Compliance and Ethics Week 2. 2024 Compliance and Ethics Culture Survey 3. Public Records and Records Management at UCF **Case Corner:** Substantiated investigation highlighting the requirements of 2-701 Drug-Free Schools and Workplace Policy **Privacy Points:** Meet our new Director, Privacy Compliance and the university's HIPAA Privacy and Security Officer **Image:** **Video:** 2024 Compliance and Ethics Week Preview Video	*IntegrityStar* Award given to Patricia Hall, Library Technical Assistant III, UCF Libraries, and Christina Alecse, Administrative Project Manager, Restores, College of Sciences, for their consistent support and participation in contributing to an ethical culture at UCF
April 2025 28th Edition	**Articles:** 1. New Streamlined IntegrityLine 2. Protecting Our Littlest Knights 3. Avoid, Deny, Defend Campaign **Case Corner:** Awareness article containing reports submitted to the IntegrityLine that were more appropriate to report to another university office **Privacy Points:** Recap of 2025 Data Privacy Day Activities **Image:** **Video:** Avoid, Deny, Defend Campaign **Video:** Understanding the IntegrityLine Process	*IntegrityStar* Award given to Chase Thompson, former University Compliance and Ethics intern, for his contributions to the university's comprehensive compliance and ethics program

University Compliance and Ethics distributed the UCF Employee Code of Conduct, office brochures, Speak Up wallet cards, and UCF IntegrityLine Speak Up earbuds to employees during faculty orientation, the UCF Benefits Fair, New Employee Orientations, and during several tabling events held outside the Student Union. For Data Privacy Day, the office also partnered with the School of Global Health Management and Informatics to host joint tabling events at the Student Union and the UCF Downtown campus. During these events the team shared best practices for data protection, provided informational handouts, distributed giveaways, and offered an infographic on Data Privacy.

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,
- 403(b) plan notice of eligibility, leave benefits, payroll and timesheets,
- 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,
- finance and procurement,
- crime updates and prevention,
- foreign influence screening and reporting,
- water quality, stormwater compliance information,
- environmental health and safety topics,
- cyber risks,
- conflicts of interest in research, research time and effort reporting, and
- conflict of interest and commitment disclosure.

Several compliance offices and partners also issued their own departmental newsletters.
- ❖ Facilities and Business Operations published both *The Digest* and *The Perseus Paper*.
- ❖ The Office of International Collaboration and Export Control published a newsletter that focused on the foreign influence screening process.
- ❖ The UCF Police Department published a magazine called *The Safety Scoop*.
- ❖ Student Health Services published a newsletter on HIPAA Privacy and Security.

Human Resources collaborated with subject matter experts, division and university communicators, and university leadership to develop communication plans and distribute compliance-related information via campus and public communications channels such as Campus News, Workday messaging and notifications, direct email campaigns, website pages and banners, and social media. This year the office also presented on Uniformed Services Employment and Re-employment Rights Act changes and new penalties under the Dole Act to ensure ongoing education and compliance. They also planned and coordinated the UCF Employee Benefits Fair and coordinated multiple "benefits highlight" presentations throughout the year.

The Office of Nondiscrimination & Accommodations Compliance developed and distributed the following infographics:
1. Responsible Person
2. Pregnancy
3. Let's Be Clear (Title IX) Frequently Asked Questions

The office of Student Financial Assistance provided staff with a suite of job aids, including an internally managed dashboard. This resource offered centralized access to essential tools and up-to-date information, including real-time regulatory updates, procedural guidance, and operational resources.

The UCF Police Department maintained a robust social media presence on Facebook, X, and Instagram. These social media platforms were used to share news, resources, emergency notifications, and safety information, while allowing engagement with stakeholders and creating relationships with those in our community. The department also leveraged both student and local media to showcase the good work done by officers and staff.

Response to New Legislation, Regulatory Agency Requests, and Non-routine External Reviews

University Compliance and Ethics collaborated with partner offices to respond to the Florida Board of Governors (BOG) Inspector General's August 2024 foreign gift disclosure inspection request, providing additional supporting documentation. The office also coordinated and submitted, on behalf of UCF, comments to the proposed edits to BOG Regulation 9.012. The office coordinated with the Office of International Collaboration and Export Control to submit two Foreign Influence Annual Reports to the BOG, one in September, and another in April, in response to data requests.

University Compliance and Ethics also coordinated with the Office of Military and Veteran Student Success to provide clarifications to the Department of Children and Families (DCF) on the structure of the Soldiers to Scholars program resulting in a final

determination that it longer required a license to DCF. The office also:

- Resolved a housing complaint with the United States Department of Education Office of Civil Rights in April 2025.
- Prepared and submitted a response to the National Institutes of Health (NIH) Office of Extramural Research inquiry.
- Prepared UCF's response to a Florida DOGE May 2025 request, related to the university's conflict of interest program.

Additionally, in response to new legislation this year, the vice president for compliance, ethics, and risk, formed working groups and oversaw the university's compliance efforts with the United States Executive Orders 14168, 14173, 14201, and subsequent Dear Colleague Letter, and 28 CFR Part 202, Access to U.S. Sensitive Personal Data and Government Related Data by Countries of Concern or Covered Persons.

Student Health Services underwent County Fire Marshall annual inspections with no violations found. The department also underwent a bi-annual review by the Florida Board of Pharmacy - Division of Medical Quality Assurance with no violations found. Annual reviews conducted by the State of Florida, County Health Department Food Services Inspector found no violations as well.
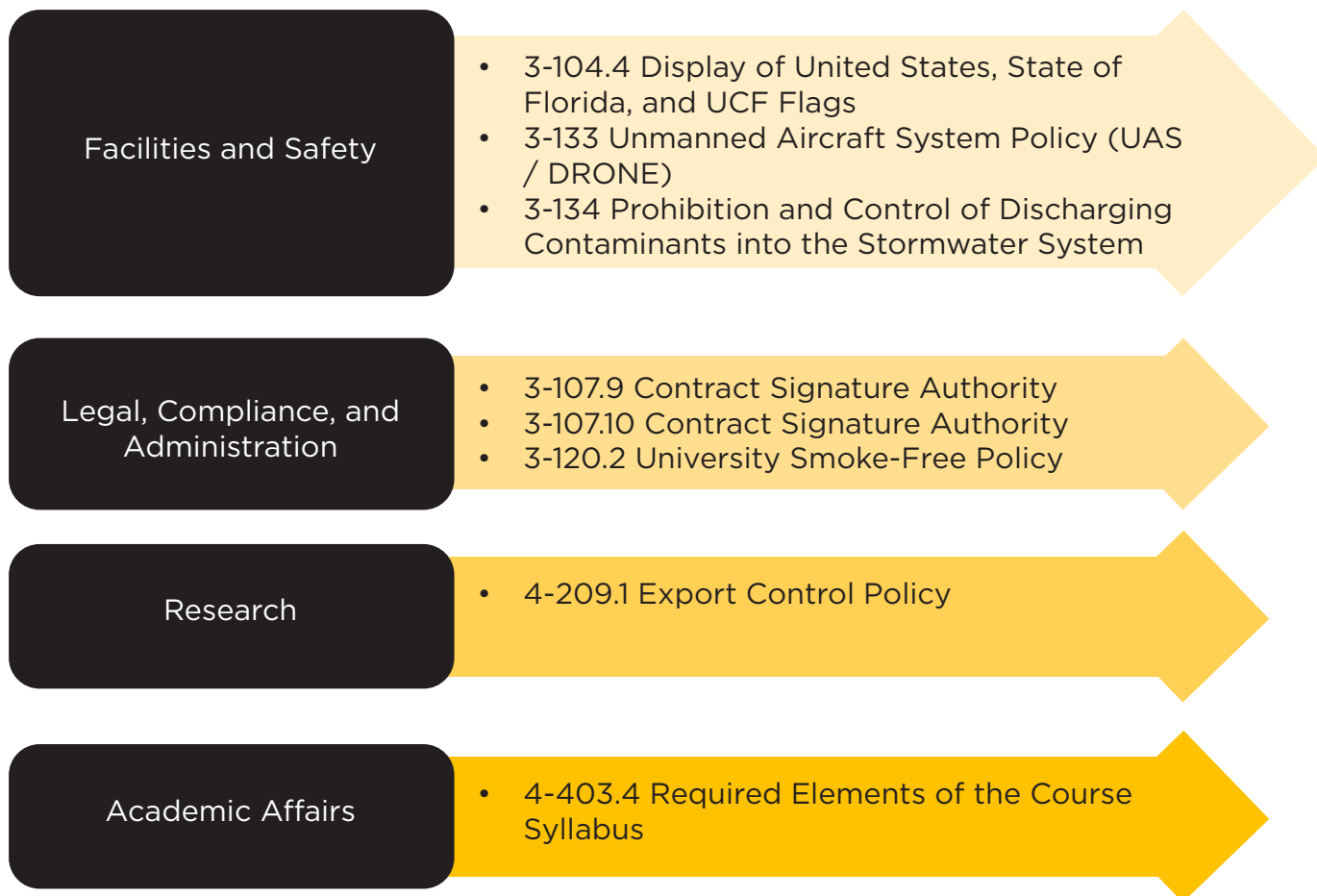
Policies and Procedures

University Compliance, Ethics, and Risk maintains the university's policy manual containing 132 policies and oversees the university's policy development and review process. This process includes identifying when new policies are required, reviewing policies for compliance, providing guidance on policy development, 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 two new policies and eight existing policies that were later approved by the president:

Human Resources and Employee Benefits	• 3-112.4 Additions to Salary of Exempt Employees for Special Events • 3-128.1 University Volunteers

Facilities and Safety	• 3-104.4 Display of United States, State of Florida, and UCF Flags • 3-133 Unmanned Aircraft System Policy (UAS / DRONE) • 3-134 Prohibition and Control of Discharging Contaminants into the Stormwater System
Legal, Compliance, and Administration	• 3-107.9 Contract Signature Authority • 3-107.10 Contract Signature Authority • 3-120.2 University Smoke-Free Policy
Research	• 4-209.1 Export Control Policy
Academic Affairs	• 4-403.4 Required Elements of the Course Syllabus

Additionally, the office updated the following on the online policy library:
- ❖ Eighty-five policies to be compliant with ADA digital accessibility requirements
- ❖ Standardized policy glossary (revised)
- ❖ Committee Meeting Dates
- ❖ Five-year Policy Review List

This year, University Compliance and Ethics reviewed and made updates to the UCF Employee Code of Conduct in coordination with university compliance offices and partners, and relevant university departments to reflect changes to policies and procedures, and in response to new regulatory requirements. The ADA compliant version of the revised Code of Conduct was published on the office's website in April 2025, and printed copies were provided to Human Resources to distribute to all new employees during orientation.

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 following chart summarizes departmental updates to local policies and university regulations during this fiscal year.

Compliance Office / Partner	Related New or Updated Materials
University Compliance and Ethics	Conflict of Interest and Commitment Inside Activity Decision Tree
	Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix
	Youth Program Safety Plan Template
	Four Office Educational Brochures
Athletics Compliance	Athletics Compliance Policies and Procedures Manual
Environmental Health and Safety	140 Department Safety Policies, Forms, Procedures, and Manuals
Facilities and Business Operations	Eight Internal Policies and Six Manuals
Financial Affairs	Purchase Order Terms and Conditions
	Procurement Manual and Purchasing Forms
	Standard Consulting Agreement and Standard Purchasing Agreement
	Supplier Registration Manual
	Cobblestone Supplier Procedures
College of Medicine Health Affairs, Legal Compliance	Three Internal Policies
	HIPAA Privacy and Security Policies Manual
Human Resources	FLSA Job Aids and Tracking Documents
	Five Regulations
Information Security Office	Security Standards Information
Office of International Collaboration and Export Control	Standard Operating Procedures for Foreign Influence Screening
	Sponsored Programs Export Control Assessment Procedures
Office of Nondiscrimination & Accommodations Compliance	All Office Procedures, Brochures, Forms, and Report Templates
	Title IX Investigator Checklist
	One Regulation
Office of Student Rights and Responsibilities	Golden Rule Student Handbook
	Fifteen Regulations
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
	State Authorization for Providing Online Courses Guidelines
Research Compliance Office	Outside Consulting FAQs
	Reference Guide for Supervisors – Completing AA-21 Reviews
	CITI Training Help Guides
	NSPM-33 Operational Plan
Student Accessibility Services	Internal Reasonable Accommodations Guidance
Student Financial Assistance	Internal Policies and Procedures

Compliance Office / Partner	Related New or Updated Materials
Student Health Services	Thirteen Internal Policies
	Performance Improvement Manual
UCF Global	Internal Procedures Manual
UCF Public Safety	Fifty-one General Orders
Undergraduate Admissions	Eight Regulations

Training and Education

Various regulatory requirements and university policies mandate the university to provide compliance and ethics training to employees, volunteers, and students. In addition to these mandatory trainings, the university offers a series of optional courses to assist individuals in understanding other regulatory requirements, university regulations, policies, and procedures, as well as expectations for standards of conduct. During this fiscal year, more than 241,000 training courses were completed, which includes both mandatory and optional training. During this report year, University Compliance and Ethics responded to 492 training related inquiries.

The following chart contains training delivered by the various compliance offices and partners with the total number of individuals who completed the training.

Department	Topic	Delivery
University Compliance and Ethics	2024 Code of Conduct Refresher Training	Online
	Data Privacy Day & HIPAA: A Partnership for the Protection of Health Information Training	Online
	Drug-Free Schools and Workplace Policy	Online
	Ethical Leadership	In-person
	Gifts and Honoraria	Online
	IntegrityStar Newsletter	Online
	New Hire Employee Code of Conduct / Speak Up!	Online
	Overnight Youth Program Staff Training	Online
	Potential Conflicts - Florida Code of Ethics for Public Officers and Employees	Online
	Privacy Related to Emerging Technologies	Online
	Protection of Vulnerable Persons	Online
	Youth Protection Training	Online
Total Number University Compliance and Ethics Trained: 16,198		

Department	Topic	Delivery
Athletics Compliance	Campus Entity Specific NCAA Rules Education Sessions	In-person
	Coaches & Sport Specific Staff NCAA Rules Education	In-person
	Staff NCAA Rule of the Week	Email
	Student Manager NCAA Rules Education	In-person
	Student-athlete NCAA Rules Education	In-person
Total Number Athletics Compliance Trained: 890		
Environmental Health and Safety	Aerial Lift Safety Training & Practical	Mixed
	Animal Exposure in a Research Setting	Online
	Biological Safety Training & Practical	Online
	Bloodborne Pathogens for Healthcare and Laboratories	Online
	Bloodborne Pathogens for Trades	In-person
	Concepts in Safety	In-person
	Confined Space Awareness & Confined Space Entry	In-person
	Controlled Substances	Online
	Electrical Safety	In-person
	Ergonomics	In-person
	Fall Protection	In-person
	Forklift Safety Training & Practical	In-person
	Hands Only Adult CPR	In-person
	Hazard Communication	In-person
	Hazardous Waste Handling and Processing	Online
	Laboratory PI and Manager Training	Online
	Laboratory Safety Training & Practical	Online
	Laser Safety Training	Online
	Lock Out Tag Out	In-person
	Mechanical Room Safety at UCF	Online
	Radiation Safety (X-Ray) Training	In-person
	Radiation Safety Awareness	Online
	Radiation Safety Training & Practical	Mixed
	Respiratory Training	Mixed
	Sealed Source Training	Online
	Think About Your Sink	Online
	University Driving Awareness	Online
Total Number Environmental Health and Safety Trained: 6,286		
Financial Affairs	Colors of Money	Online
	Expenditures 101	Online
	Expense Report Basics	Online
	Financial Wellness Series 2024	Online
	Procurement Essentials	Online

Department	Topic	Delivery
Financial Affairs	Procurement Essentials Program	Online
	Red Flags - ID Theft Protection	Online
	UCF Purchasing Card Training for Cardholders	Online
	UCF Purchasing Card Training Program	Online
	UCF Travel Guidelines	Online
	Unauthorized Procurement Actions	Online
	Understanding UCF's Budget All	Online
Total Number Financial Affairs Trained: 1,026		
College of Medicine Health Affairs, Legal Compliance	COM Clinical Services Compliance Program Overview	In-person
	COM Code of Ethics and Conduct	In-person
	COM HIPAA	Online
	COM Industry Relations	Online
	Fraud, Waste and Abuse in Delivery and Payment of Health Care Services	Online
Total Number College of Medicine Health Affairs, Legal Compliance Trained: 2,574		
Human Resources	Benefits Overview for HRBC's	In-person
	Civility at Work	In-person
	Emotional Intelligence	In-person
	Emotional Intelligence for Individuals and Team Insights	In-person
	Employee Relations Leaders Guide	In-person
	Giving & Receiving Feedback	In-person
	Hiring & Appointments	In-person
	Kognito at-Risk-for Faculty and Staff	Online
	New Employee Orientation	In-person
	One HR Community of Practice	In-person
Total Number Human Resources Trained: 6,855		
Information Security Office	DoD CUI Training	Online
	DoD Cyber Awareness Training	Online
	GLBA (Gramm-Leach-Bliley Act) Training	Online
	Information Security Awareness	Online
	PCI / Credit Card Info Security	Online
	Phishing / Awareness	Online
	Privileged User Training	Online
Total Number Information Security Office Trained: 91,672		
Office of International Collaboration and Export Control	Export Control Researcher Training	Mixed
	Export Controls (Sponsored Programs)	In-person
	Foreign Influence Screening Process	Mixed

Department	Topic	Delivery
Office of International Collaboration and Export Control	Foreign Influence Threat Awareness Training	Mixed
	Introduction to Export Controls	In-person
	Visual Compliance Screening Training	In-person
Total Number Office of International Collaboration and Export Control Trained: 371		
Office of Nondiscrimination & Accommodations Compliance	Being a Responsible Knight	In-person
	Let's Be Clear Module	Online
	New Faculty Orientation	In-person
	Nondiscrimination & Accommodations Compliance	Online
	Search Committee Training	Online
	Title IX Training	In-person
	UCF Actions to Prevent and Correct Discrimination	Online
Total Number Office of Nondiscrimination & Accommodations Compliance Trained: 51,781		
Office of Student Rights and Responsibilities	FTIC Family & Guest Orientation Crucial Conversations Presentation	In-person
	Honor Your Knighthood Academic Integrity Module	Online
	Student Conduct Review Board	In-person
	Student of Concern Team	In-person
Total Number Office of Student Rights and Responsibilities Trained: 22,535		
Registrar's Office	FERPA: Faculty and Staff Training / Renewal Training	Online
	Student Records I and II	Online
Total Number Registrar's Office Trained: 6,556		
Research Compliance Office	Animal Biosafety and Lab Animal Researcher / Technicians / Students and IACUC Voting Members	Online
	Animal Facility Managers and Animal Facility Technicians	Online
	Basic Introduction to Biosafety; Initial Biosafety Training; Biosafety Officer Training - Basic / Initial; and Biosafety Retraining	Online
	Biomedical Responsible Conduct of Research; OSHA Bloodborne Pathogens; and Shipping and Transport of Regulated Biological Materials	Online
	Clinical Research: An Introduction and Clinical Trial Agreements	Online
	Communicating Research Findings and Compensation Reporting	Online
	Community-Engaged and Community-Based Participatory Research	Online
	Comprehensive CIP Course for Advanced Learners	Online
	Conflict of Interest and Dual Use Research of Concern	Online
	CRC Advanced; CRC Finance Modules; and CRC Foundations	Online
	Export Compliance - Department Administrators; Level 1; and Research Administrators	Online
	Emergency and Incident Response to Biohazard Spills and Releases	Online
	Family Educational Rights and Privacy Act (FERPA)	Online

Department	Topic	Delivery
Research Compliance Office	FDA Inspections: From Site Preparation to Response	Online
	Field Animal Researcher / Technicians / Students and Office of Animal Welfare Administration / Staff and USDA Permits	Online
	GCP – Social and Behavioral Research Best Practices for Clinical Research and GCP for Clinical Investigations of Devices	Online
	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
	GDPR for Research and Higher Ed	Online
	Hazard Communication and Personal Protective Equipment	Online
	Human Gene Transfer and NIH Recombinant DNA Guidelines	Online
	Human Subjects Research- Group 1.Biomedical Research Investigators and Key Personnel and Human Subjects Research- Group 2.Social / Behavioral Research Investigators and Key Personnel	Online
	Responsible Conduct of Research - Humanities; Physical Science; and Social and Behavioral	Online
	Institutional Biosafety Committee Member Training; Institutional Official: Animal Care and Use; and Institutional / Signatory Official: Human Subject Research	Online
	IRB Administration and IRB Protocol Review	Online
	Information Privacy & Security - Marketers; Researchers; Students and Instructors	Online
	Nanotechnology and Select Agents, Biosecurity, and Bioterrorism	Online
	Principal Investigators & Researchers Export Control	Online
	Protocol Registration and Results Summary Disclosure in ClinicalTrials.gov	Online
	Research and HIPAA Privacy Protections	Online
	Responsible Conduct of Research for Administrators and Responsible Conduct of Research for Engineers	Online
	Working with Fish in Research Settings and Working with Rabbits in Research Settings	Online
Total Number Research Compliance Office Trained: 10,202		
Student Accessibility Services	Accessibility by Design	Online
	Disability Access and Housing Accommodations for Staff / Student Employees	In-person
	FYE Orientation Leaders Training on Accessibility	In-person
	Escape Room Activity	In-person
Total Number Student Accessibility Services Trained: 476		
Student Health Services	AlcoholEDU	Online
	Biohazard Waste Training	Mixed

Department	Topic	Delivery
Student Health Services	Chemical Exposure in the Workplace	Mixed
	De-escalation of Patients / Persons	Online
	HIPAA (Including Code of Conduct, Confidentiality, and Security of PHI)	Mixed
	OSHA Bloodborne Pathogens	Mixed
	OSHA Fire Safety	Mixed
	Radio Operations	In-person
	Risk Management Training	Mixed
Total Number Student Health Services Trained: 19,629		
UCF Global	Annual Tax Preparation Workshop	In-person
	Federal Immigration Regulations F / J Visas	Mixed
	International Health and Safety	In-person
Total Number UCF Global Trained: 1,506		
UCF Public Safety	Campus Security Authority Clery Act Training	Online
	Impaired Driving	In-person
	Milestone Video Management	Online
	Security Camera Standards	Online
	Traffic Safety	In-person
Total Number UCF Public Safety Trained: 2,889		
Total Number Individuals Trained from July 1, 2024 - June 30, 2025: 241,446		

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

→ Led a UCF Knights Pre-Law Association Speaker Meeting, offering an overview of the office and the university's compliance and ethics program.
→ Hosted and provided an overview of the compliance and ethics program to officials from the University of Kentucky, focusing on conflict of interest, commitment, and export control.
→ Coordinated with the UCF Police Department to integrate their "Avoid, Deny, Defend" video into the New Hire Onboarding Training Program and to facilitate the development of annual Protection of Vulnerable Persons training campaign for all public safety personnel.
→ Led Compliance Training Workgroup meetings to discuss migrating employee compliance training to Workday, including accessibility, platform integration, launch dates, and consistency in training and sanctions.
→ Met with individual compliance offices and partners to plan the migration of employee training from UCF WebCourses to Workday.
→ Prepared and submitted a faculty training summary to the UCF Faculty Senate Budget & Administrative Committee, detailing required and optional training, frequency, and regulatory drivers.
→ Participated in and spoke at the UCF Faculty Senate Budget & Administrative Committee meeting on March 12 and a subsequent subcommittee meeting.
→ Provided training on state ethics laws to the Facilities / Planning, Design, and Construction department and to Business Services Administration.
→ Reviewed and updated content for several training courses, including the Employee Code of Conduct / Speak Up! training, and developed a tutorial for the new IntegrityLine system.
→ Trained Student Health Services staff on the Intersection of FERPA and HIPAA, developed and launched an annual student HIPAA training WebCourse for multiple departments, and an annual student and volunteer alumni HIPAA training WebCourse for the Burnett School of Medicine.
→ Joined and participated in the Onboarding Training Workgroup to align required compliance training with the new employee onboarding dashboard in development.
→ Provided Professional and Personal Boundaries training to the President's Leadership Council.

The College of Medicine Health Affairs and Legal Compliance team provided staff guidance on arrangements between healthcare providers and partners for fraud and abuse laws and implications. The unit provided guidance on potential conflicts, including receipt of donations by Health and Medical Industry, the university's policy on Gifts and Honoraria, and the university's regulation on Conflict of Interest and Commitment. The unit also maintained the UCF College of Medicine Code of Ethics and Conduct and the UCF College of Medicine Clinical Services Compliance Program.

Human Resources trained over 20 HR Business Partners on key information associated with employment laws, university regulations, university policies, and Collective Bargaining Agreements as well as promoted the Compliance and Ethics "Managers Checklist" which outlines reporting requirements. They continued to clarify guidance and

provide support to Human Resources units regarding proper procurement procedures, expense card, and travel-related transactions in partnership with the division Finance Business Center and disseminated relevant compliance related information to the Human Resources (HR) Community of Practice on at least a weekly basis. The office coordinated meetings, which provide compliance related information to the One HR Community of Practice and various subsets of human resources professionals. Additionally, the team supported units to develop function-specific training and resources related to compliance for the broader HR Community of Practice.

The Information Security Office offered additional training to assist with achieving compliance when handling personal information, and training for personnel requesting elevated access to transactions and functions across systems to better safeguard data. The office also coordinated with the kNEXT Training team to integrate trainings completed within the KnowBe4 platform into employees' learning summary within Workday. Cybersecurity awareness training was also promoted through participation in the state university system Cyber Bowl Challenge. Simulated phishing campaigns were held monthly for employees and students to provide real-world examples of messages that can lead to malware or compromised credentials. Automatic remedial training was implemented for individuals who failed the monthly simulations, with escalated training the more times they failed throughout the year.

The Office of Nondiscrimination & Accommodations Compliance collaborated with the Access and Community Engagement Division to launch the Digital Accessibility Lab, providing training for employees and students on digital accessibility standards. The office also continued to provide outreach to departments, providing training for mandatory reporting obligations under Title IX and other training within the office's portfolio.

Student Financial Assistance maintained a comprehensive, year-round training program administered by the designated training specialist. These sessions functioned as an extension of the university's required training and were tailored to address the specific demands of the financial aid landscape.

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 supervisor, or through university administrative or central offices are encouraged to use the UCF IntegrityLine, a secure

and anonymous reporting system administered by an independent third party. Reports submitted through the UCF IntegrityLine are sent to University Compliance and Ethics.

All reports are reviewed, investigated when appropriate, and responded to as discreetly and promptly as possible.

University Compliance and Ethics continued administration of the UCF IntegrityLine to include review and tracking of all reports, data compilation, trend review, and reporting, and provided direct support and guidance to supervisors and employees involved in investigations. During this fiscal year, 208 new reports were submitted through the UCF IntegrityLine, a decrease from the 277 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 Nondiscrimination & Accommodations Compliance, or referred to the appropriate compliance partner for review. A total of 258 IntegrityLine cases and 16 cases which came directly to University Compliance and Ethics were investigated and closed during the fiscal year. The office performed an intake review of 42 additional cases but determined they did not rise to the level of an investigation following the initial inquiry phase.
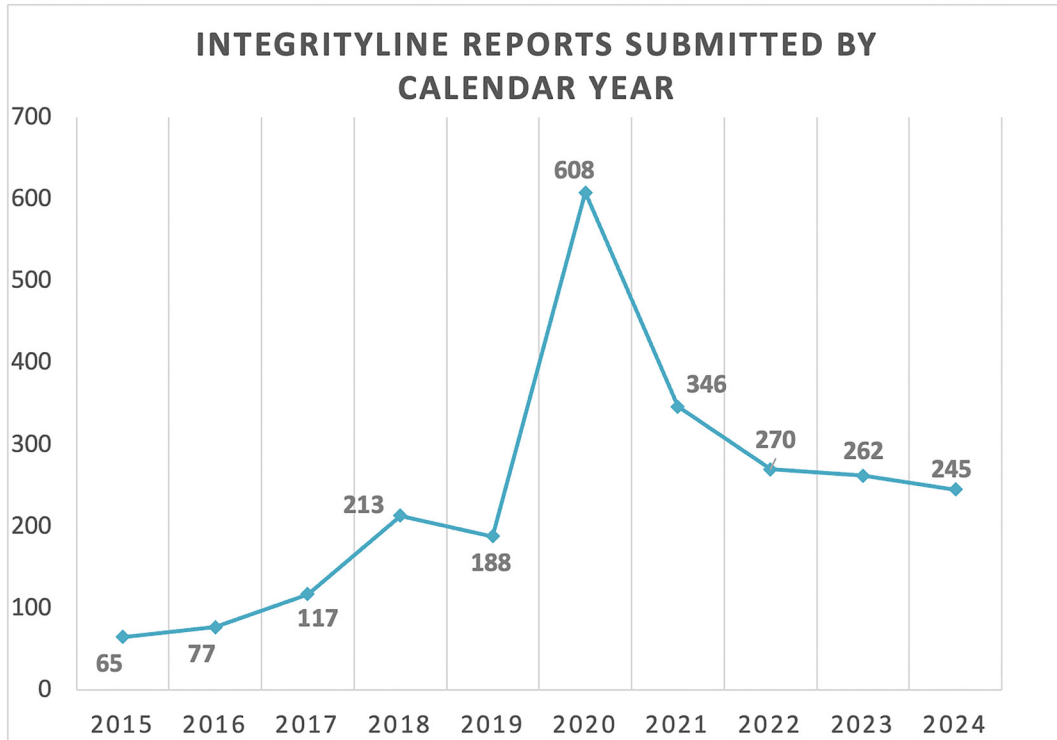
Additionally, the office prepared and issued the following annual report covering the 2024 calendar year.

UCF IntegrityLine Report
January 1, 2024, to December 31, 2024
University Compliance and Ethics

During the 2024 calendar year, the UCF IntegrityLine received a total of 245 reports. Of these reports 239 contained allegations of suspected misconduct or ethical concerns and six 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 Nondiscrimination & Accommodations Compliance, 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
2024	245

Highest Number of Reports by Issue Type

|	
16% Other Academic Affairs Matters	The highest number of reports made to the IntegrityLine in 2024 were categorized as Other Academic Affairs Matters with 40 reports representing 16.33% of the total reports submitted. These reports are submitted by students concerning their class or professors and include such issues as class assignments, grades, or other academic related concerns that are more appropriately handled by the colleges.
15% Other Human Resources Matters	The second highest number of reports made to the IntegrityLine in 2024 were categorized as Other Human Resources Matters with 36 reports representing 14.69% of the total reports submitted. These reports contain Human Resources related issues such as performance appraisals, interpersonal type matters, and other concerns that should be addressed by leadership's open-door policy and may include assistance from Human Resources.
12% Employee Misconduct	The third highest number of reports made to the IntegrityLine in 2024 were categorized as Employee Misconduct with 30 reports representing 12.24% of the total reports submitted. These reports include allegations of employee noncompliance with 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 2024 spanned a total of 22 issue types.

Primary Issue	Total Reports	Percentage of Reports
Other Academic Affairs Matters	40	16.33%
Other Human Resource Matters	36	14.69%
Employee Misconduct	30	12.24%
Discrimination or Harassment	29	11.84%
Offensive or Inappropriate Communication	25	10.20%
Environmental and Safety Matters	15	6.12%
EEOC or ADA Matters	12	4.90%
Other Financial Matters	8	3.27%
Credentials Misrepresentation	6	2.45%
Inquiry	6	2.45%
Other	6	2.45%
Retaliation	6	2.45%
Alcohol / Drug Abuse	4	1.63%
Conflict of Interest	4	1.63%
Waste, Abuse, or Misuse of Institution Resources	4	1.63%
Data Privacy / Integrity	4	1.63%
Research Misconduct	3	1.22%
Cheating / Plagiarism	2	0.82%
Sexual Harassment	2	0.82%
Academic Misconduct	1	0.41%
Fraud	1	0.41%
Time Abuse	1	0.41%
Grand Total	**245**	

Closed Cases
During the 2024 calendar year, University Compliance and Ethics closed a total of 248 reports which included seven inquiries and 241 cases alleging misconduct. Closed cases include a combination of cases received in 2024 as well as those submitted in a previous year. Below are the outcomes for the 241 cases closed in 2024.

Closed Case Outcomes
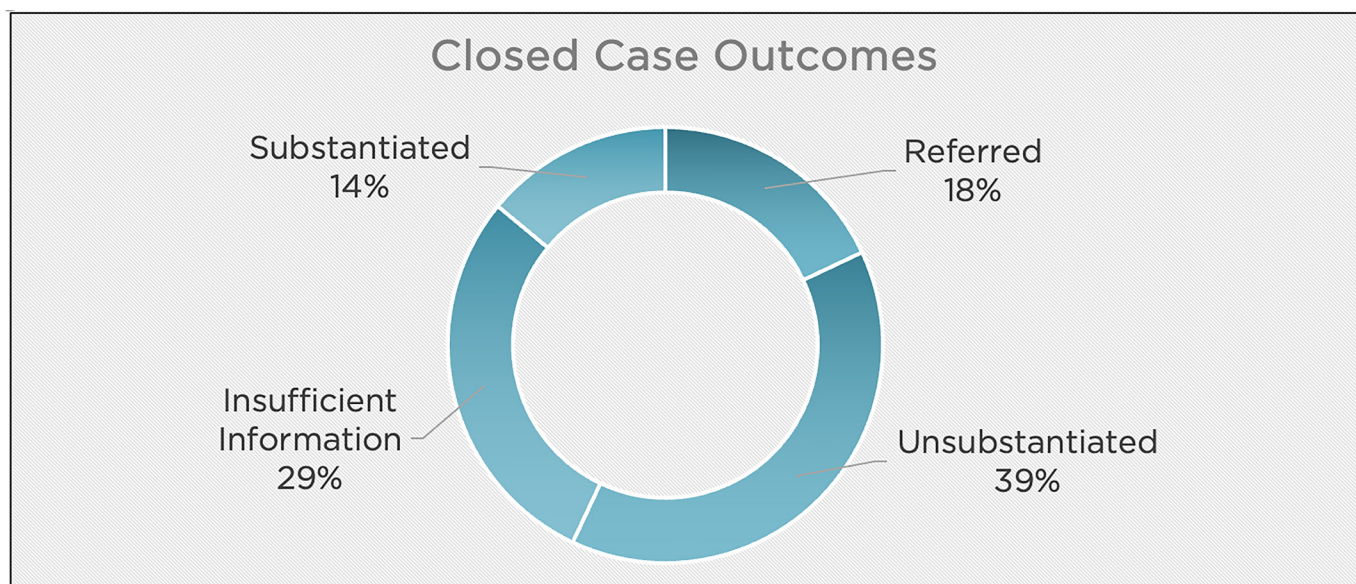
Closed Case Outcomes	Total	Percentage
Referred	44	18%
Unsubstantiated	94	39%
Insufficient Information	69	29%
Substantiated	34	14%
Grand Total	**241**	

Closed Cases – Investigations with Substantiated and Unsubstantiated Findings

A total of 93 of the 241 cases were closed after an investigation was conducted by University Compliance and Ethics, the Office of Nondiscrimination & Accommodations Compliance, or University Audit. Additionally, University Compliance and Ethics oversaw and guided 35 investigations in conjunction with colleges and departments, providing guidance on appropriate corrective action when needed. A total of 128 cases were investigated. The following are the outcomes of the investigations.

Substantiated Cases
Thirty-four cases investigated resulted in a substantiated finding (representing 14% of all closed cases that alleged misconduct) where investigations yielded evidence to support the allegation and a finding that misconduct occurred. The substantiated cases spanned a range of topics, with the highest number being Employee Misconduct and Offensive or Inappropriate Communication, at 20% each.
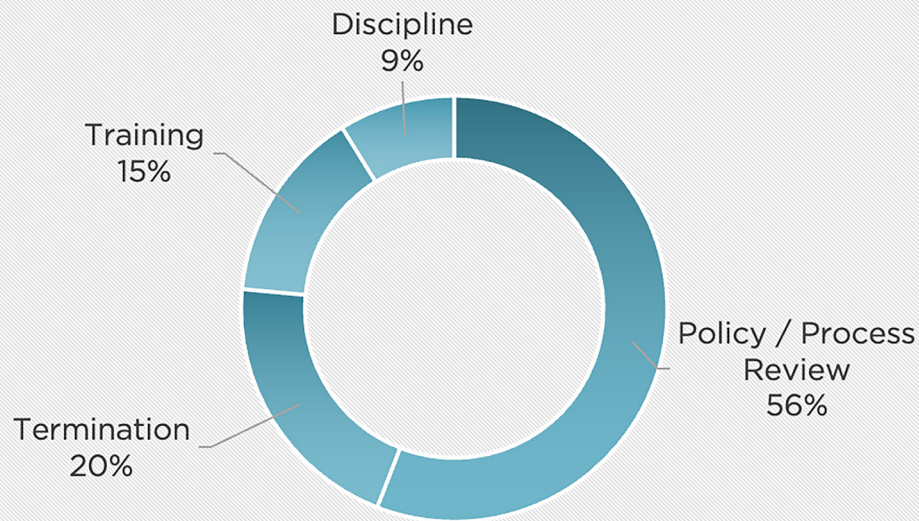
Substantiated Cases - Issue Type
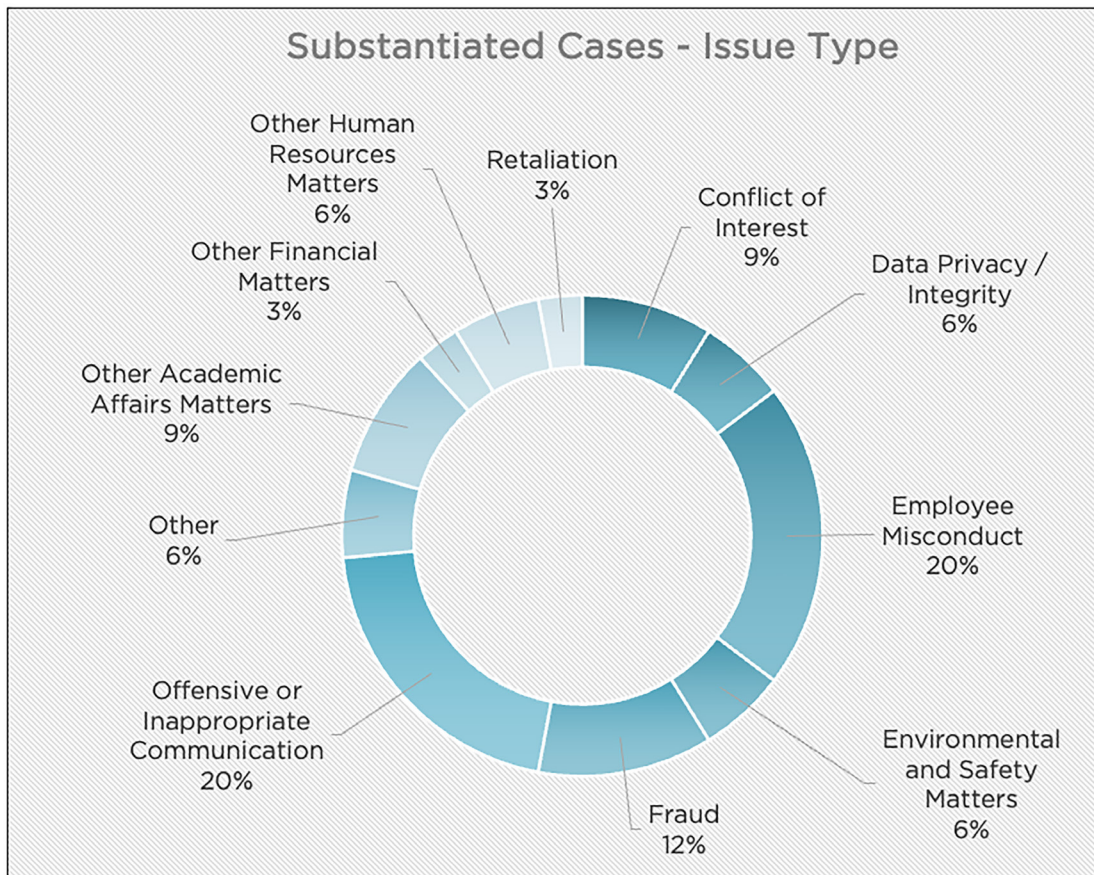
Substantiated Cases - Issue Type	Total
Employee Misconduct	7
Offensive or Inappropriate Communication	7
Fraud	4
Conflict of Interest	3
Other Academic Affairs Matters	3
Data Privacy / Integrity	2
Environmental and Safety Matters	2
Other	2
Other Human Resources Matters	2
Other Financial Matters	1
Retaliation	1
Grand Total	**34**

Substantiated Cases – Action Taken

For the 34 cases investigated that resulted in substantiated findings, the university took appropriate actions. Those actions included policy / process reviews, training, disciplinary action, and termination.

Substantiated - Action Taken

Discipline
9%

Training
15%

Policy / Process
Review
56%

Termination
20%

Substantiated Cases - Action Taken	Total
Policy / Process Review	19
Termination	7
Training	5
Discipline	3
Grand Total	**34**

Unsubstantiated Cases

The remaining 94 cases (39% of closed cases that alleged misconduct) investigated yielded insufficient or no evidence to support misconduct occurred and were closed with an unsubstantiated outcome. Despite the unsubstantiated finding, 66 of the cases resulted in recommendations for improvements such as a review of a policy, process, or training due to identified weaknesses.

Closed Cases – Referred or Insufficient Information

One hundred and thirteen (113) 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 44 cases (18% of all closed cases) were referred to the UCF Police Department, Student Conduct and Academic Integrity, 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 69 cases (29% 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.

2024 IntegrityLine Trends

OFFENSIVE OR INAPPROPRIATE COMMUNICATION REPORTS
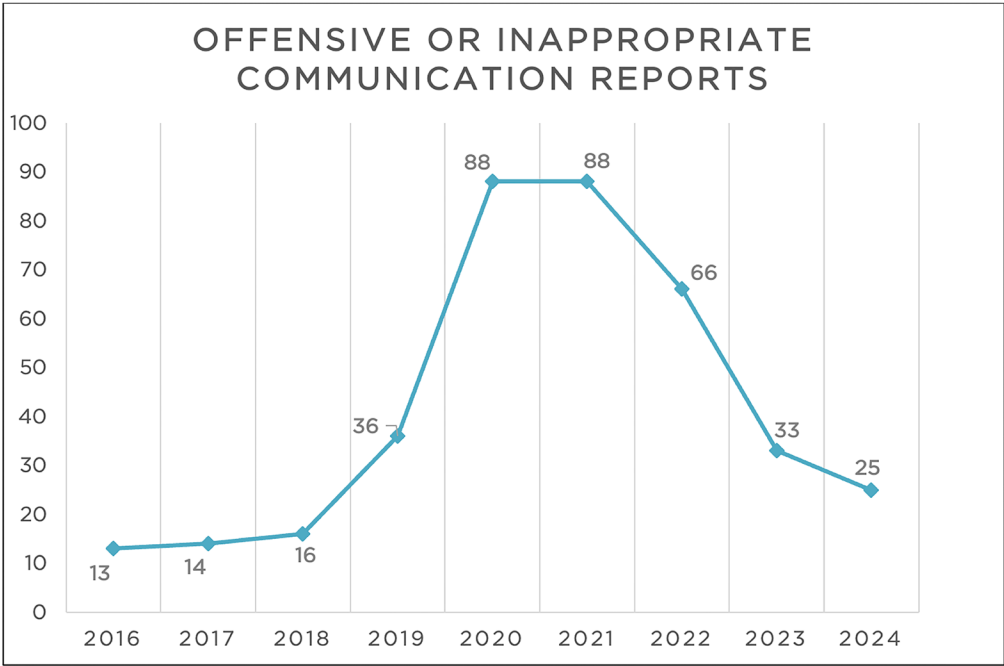
IntegrityLine reports containing issue type Offensive or Inappropriate Communication which relate to allegations of inflammatory, derogatory, unduly critical, or insulting communication, including bullying, and employee's failure to treat one another with respect in accordance with the UCF Ethical Standards continued to decrease, from 33 reports in 2023, down to 25 in 2024. This is the first year since 2015 that this issue type was not in the top three highest reported issue types. This positive downward trend is directly tied to the office's efforts spanning several years supporting the university's strategic plan aspiration to be a best place to learn and work.

This year we also saw a significant increase in student reports categorized as Other

Academic Affairs Matters which contain concerns related to class assignments, grades, or other academic related concerns that are not misconduct and are more appropriately handled by the colleges. This issue type was the highest reported in 2024 with 40 total reports, up from the 26 reports submitted in 2023. University Compliance and Ethics assisted each student in finding the appropriate contact to address their concern; however, efforts are being made to ensure that students can locate these resources first, without having to reach out to the IntegrityLine and be redirected.

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	10	10
Environmental Health and Safety	Maximum Occupancy	1	0
Facilities and Business Operations	Internal Policy	23	23
College of Medicine Health Affairs, Legal Compliance	HIPAA Incident	5	4
	Billing and Coding	2	2
Office of International Collaboration and Export Control	Foreign Influence	3	0
Office of Nondiscrimination & Accommodations Compliance	Unlawful Discrimination, Harassment, Retaliation, Inappropriate Amorous Relationships, Failure to Report Discrimination Related Concerns and / or Search and Hire Violations	184	7
Registrar's Office	FERPA	19	18
Research Compliance Office	Research Related Misconduct	6	3
UCF Public Safety	Internal General Orders	34	22
Total Compliance Office / Partner Reports Reviewed and Substantiated		**287**	**89**

Outside Activity, Conflict of Interest and Commitment Disclosure Reporting

In August 2024, University Compliance and Ethics closed outside activity reporting for the 2023-2024 report year achieving 100% compliance with required submissions. The 2024-2025 reporting successfully launched later in the same month. Of the 4,329 users required to disclose, 4,207 submitted by September 11, achieving a 97.18% compliance rate with the 30-day deadline, an increase from the 88.4% achieved in the first year. A delinquent follow up process was implemented and by November 2024, a 100% completion rate was received.

Throughout the year new users were added to the system with a total of 4,454 disclosures and 283 amendments submitted during the disclosure period. Disclosures with at least one new outside activity were reviewed by the office, for a total of 704, with 75 potential conflicts identified requiring a monitoring plan or annual update. Four disclosures were unapproved due to conflicts that could not be mitigated, and 16 disclosures were still under review at the end of the fiscal year. The office also responded to 433 separate requests for assistance with reporting outside activities and conflicts of interest and reviewed 120 new disclosed relatives for potential conflicts.

Foreign influence red flag reviews were also completed for each positive response to financial interests and outside activities disclosed with foreign entities. A total of 61 red flag reviews were conducted with no resulting issues. To ensure compliance with foreign influence inquiries, conflict of interest procedures requiring red flag review for any employee who failed to disclose within 90 days were conducted, which included one review that identified no red flags.

University Compliance and Ethics collaborated with the Office of Research Administration Systems and Business Services to provide the Procurement Services unit of Financial Affairs with Huron Conflict of Interest system access to evaluate potential conflicts in the procurement bid process.

In coordination with the Office of International Collaboration and Export Control and Research Compliance Office, University Compliance and Ethics developed a new Inside Activity Decision Tree, revised the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix, and met with members of Rosen College to discuss the new materials. The office also worked with the Office of the General Counsel to evaluate two potential conflicts with political activities. Both were cleared with no conflicts. Also, at the request of the Office of Nondiscrimination & Accommodations Compliance, University Compliance and Ethics reviewed two Amorous Relationship Disclosure Forms for potential conflicts, which were approved with conditions.

The following conflict of interest and commitment activities were also conducted by University Compliance and Ethics:

- Reviewed and provided feedback on 23 research exemptions and coordinated review and approval by the provost, president, and Chair of the Board of Trustees.
- Received and completed 69 gift reviews for potential conflicts and four supplier review requests.
- Reviewed 12 HR-11 Report of Potential Conflict of Interest or Commitment, Outside Activity or Employment disclosures with no conflicts identified.

Youth Protection Program

A total of 811 Youth Protection Program related inquiries were received and addressed by University Compliance and Ethics during the reporting year, which is a substantial increase from 703 last year. The office processed and approved a total of 137 submitted registrations, of which 135 were in-person programs with two containing a hybrid online portion, and two fully virtual programs. The office oversaw compliance with university requirements for a total of 183 youth programs that had operated during this fiscal year, which included:

- ❖ UCF hosted programs: 48 (26%);
- ❖ Third-party hosted programs: 135 (74%);
- ❖ Of the 183 youth programs, 41 were overnight programs (22%); and
- ❖ A total of approximately 10,385 minors were served during the year.

University Compliance and Ethics continued to identify and address process improvements with youth program registration requirements during the year. With the removal of the campus liaison requirement, program sponsors were able to submit registration access requests directly to register new programs with the office. During this reporting period, reviews were conducted on 33 registration access requests, approving 16 that were appropriately submitted by program sponsors. The remaining 17 were denied as they were submitted by program staff who did not require access to register a program. Additional guidance and education were provided to program staff related to the registration process.

Other program improvements during the year included review and revisions to the UCF Athletics Handbook to include mandatory reporting of child abuse, finalization of youth program site visit procedures to be implemented in Fall 2025, and monthly meetings with the Squire Youth Program Registration system vendor to improve efficiencies in the registration and review process.

University Compliance and Ethics also conducted the following activities in relation to Youth Protection to promote a safe and educational experience for minor participants:

- » Collaborated with the Florida Department of Children and Families and delivered in-person training to the Soldiers to Scholars youth program staff.
- » Met with UCF and Valencia Downtown campus leadership to provide an overview of the program and guidance on the requirements.
- » Conducted a two-day onsite visit to the Soldiers to Scholars facility to meet with staff to review program requirements.
- » Met separately with the Florida Department of Children and Families and with UCF Human Resources to discuss state requirements for background checks.
- » Collaborated with the Athletics Compliance Office to improve policy compliance

across third-party athletic youth programs.
- » Met with UCF Housing and Residence Life Conference Services team to discuss requirements for overnight youth programs.
- » Met with the Office of Risk and Safety to update requirements related to the transportation of minors and insurance requirements.
- » Met with UCF departments and third-party program sponsors to provide direct guidance on Youth Protection Program Requirements.
- » Added required background check authorization forms to the Human Resources portal within Squire.
- » Coordinated with UCF Environmental Health and Safety to provide basic first aid and CPR training to UCF hosted youth program staff.

Additionally, and to ensure the university is aligned with youth program industry best practices and standards, University Compliance and Ethics staff participated in monthly Higher Education Protection Network (HEPNet) Resources Committee and Big 12 Youth Protection Network monthly meetings.

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 worked with the Office of Research and the UCF Foundation to strengthen their process for identifying foreign sources through an engagement with Dun & Bradstreet, subsequently meeting with UCF Advancement staff to provide additional guidance on Florida Statutes Sections 286.101, 288.860, and BOG Regulation 9.012 Foreign Influence. In response to a preliminary injunction, compliance processes initially established to comply with F.S. 288.860 were evaluated and modified as necessary.

Privacy Compliance
During this year, University Compliance and Ethics completed the following privacy compliance activities in support of its Privacy Compliance Program:
- → Reviewed and approved privacy language in 57 contracts, performed 45 research-related ancillary reviews, and resolved a Business Associate Agreement issue with Information Technology and Information Security.
- → Processed Data Subject Access Requests.
- → Proposed edits to university policy to address AI recording technology, finalized revisions to the University Email Policy, and identified and corrected a gap in vendor agreement routing.
- → Addressed multiple student concerns related to personally identifiable information, FERPA, unsolicited texts, and confidential matters for students in UCF Abroad.
- → Worked with the Registrar' Office, UCF Global, Information Security, and the Office of the General Counsel on various issues, including data transfers, policy edits, and contract reviews.

→ Provided guidance to various departments on SMS texting, data storage, consent procedures and data retention, communicating with patients and advised on secure messaging platforms.
→ Worked with outside legal counsel to evaluate a potential General Data Protection Regulation notification request.
→ Hired a new director of privacy compliance in October.
→ Submitted a letter of support to the National Science Foundation for a faculty member's privacy software proposal and gave insight into the ongoing Privacy DataMap initiative.
→ Assessed the privacy page for accuracy and relevance of content for the Office of Research and Cyberinfrastructure Team.
→ Drafted data retention and confidentiality language for the UCF Psychology Research Participation System.
→ Advised Psychology Department staff on consent procedures and authorization verification for record release, ensuring adherence to the Family Educational Rights and Privacy Act and institutional guidelines.
→ Co-crafted a Remediation Peer Consent form in response to a Family Educational Rights and Privacy Act complaint.
→ Contributed to the development of the "Guidelines for Privacy and Retention of Research Records" to support secure and policy-aligned data management.
→ Provided guidance on Business Associate Agreements for existing contracts that access health data. Provided template and assistance in routing process.

Jeanne Clery Campus Safety Act (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.

University Compliance and Ethics also monitored legislative updates related to the Stop Campus Hazing Act, which amended the Clery Act and became effective upon signature of the president of the United States on December 23, 2024. In response, a workgroup was formed by the Clery compliance analyst, which University Compliance and Ethics staff joined to provide guidance on implementation of the new regulatory requirements. The following activities were also completed in collaboration with the Clery compliance analyst:
° Provided content to update the university's Anti-Hazing at UCF website.
° Contributed to the development of a new regulation that includes requirements of the Stop Campus Hazing Act.
° Provided guidance on format and implementation of the Campus Hazing Transparency Report to be published in December 2025.
° Met with the Division of Student Success and Well-being to discuss the university's anti-hazing training modules and communication campaigns.

Monitoring Activities by Compliance Offices and Partners
Athletics Compliance reviewed its internal policies and procedures in comparison to the

National Association for Athletics Compliance reasonable standards, as well as the Big 12 conference rules to ensure its practices met or exceeded industry standards and were up to date with current NCAA and conference rules. They also monitored the Academic Services for Student-Athletes activities to ensure compliance with athletics compliance.

The College of Medicine Health Affairs Legal team directed and oversaw UCF Health Physician Practice coding and billing audits conducted by external consultants and assisted with reviews of coding and billing practices. The team 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 assisted the UCF Institutional Review Board with HIPAA Authorization reviews, conducted Business Associate Agreement reviews for departments, and provided guidance on HIPAA related matters.

UCF's Financial Affairs implemented new Workday reporting tools and began developing metrics to measure key financial performance indicators. While these were not traditional compliance audits, they represented a significant step forward in financial monitoring efforts. The metrics will be reported regularly to the UCF Board of Trustees for both the university and each of the direct support organizations, improving transparency and enabling more effective oversight of compliance with regulatory requirements. The division also conducts the following reviews throughout the year:
- Self-Assessment Questionnaire submitted annually by departments processing credit cards to maintain Payment Card Industry Data Security Standard compliance,
- Payments to independent contractors to identify potential worker misclassifications,
- Department financial statements to identify any non-reported unrelated business income activities,
- Vendor creation in Workday to ensure employees and students are not established as suppliers without additional reviews by the tax department, and
- Salary information for all administrative employees to ensure compliance with salary cap limitations pursuant to Florida Statutes 1012.975 and 1012.976.

The Procurement Services unit within Financial Affairs conducted periodic reviews of purchase orders over $25,000 for compliance with applicable law. They also reviewed sole source agreement requests and waivers of competition requests before approval to ensure they were properly justified.

Facilities and Business Operations conducted assessments to maintain compliance with federal and state regulations, including:
1. Florida Department of Environmental Protection water quality and stormwater permits,
2. St. Johns River Water Management District Consumptive Use and Impervious Surface permits,
3. Sunshine 811 compliance (Underground Facility Damage Prevention),
4. 49 CFR Part 192 compliance for gas pipelines,
5. Federal Administrative Code Chapter 62-604 for transmission facilities, and

6. Combined Heat and Power plant emissions via the Orange County Environmental Product Declaration and Environmental Health and Safety.

The department also engaged an external audit firm to review questionable billing by a contractor. The audit identified overcharges, resulting in returned funds and a moratorium on new work with that contractor. An external assessment team was also hired to provide Custodial Assessment that addressed zone cleaning and team cleaning practices, along with equipment and chemical standardization.

Facilities and Business Operations transitioned all safety compliance tracking to Workday, enabling monthly reporting on compliance statuses. This new process ensured that employees were automatically assigned necessary trainings.

Human Resources continued to manage the Constituent Staging process that monitored new hires entered into Workday, comparing the data to Peoplesoft Campus Solutions, and either created a new ID or reused a previous ID for the new hire. This prevents duplicate employee IDs from being created and keeps the system from reassigning an old employee ID in error, giving the new hire access to someone else's data. A multitude of queries were run on a bi-weekly basis to identify potential payroll errors and gather vital information for reporting. Over 998 hire requests were also reviewed to ensure hiring practices were consistent and legal, over 85 background checks with criminal charges were reviewed to mitigate the risk associated with negligent hiring, and internal audits of job postings on the UCF Careers portal were conducted to ensure consistency with university guidelines.

The Information Security Office launched the Minimum IT Safeguards Initiative, which evaluated foundational policies, procedures, and implemented technical measures required to protect restricted information known as Federal Contract Information. Phase 1 of the initiative included seven departments and colleges. From preliminary assessment to final assessment, significant progress was made by all IT teams involved.

The Office of International Collaboration and Export Control conducted three foreign influence assessments. No violations of federal law or state law were identified as part of these assessments.

Throughout the year, the Research Compliance Office performed the following:
- Service rate assessments for Service Centers assigning costs to sponsored awards,
- Legal and compliance assessments for sponsored contracts, grants, material transfer agreements, contract administrators and subcontracts,
- Assessed property purchased and loaned under sponsored awards,
- Facility Security Office Assessment,
- Intellectual property and conflict of interest assessments for 15 Courtesy appointments,
- Reviews on 35 Human Research Protection Program – Quality Improvement Assessments, of which 12 had findings that were reported to the Institutional Review Board for action,
- Reviewed monitoring plans for approximately 81 disclosers to ensure compliance,

- Conducted follow-ups to ensure required Conflicts of Interest in Research training was completed, and
- Monitored compliance with Responsible Conduct of Research training requirements for National Science Foundation and select National Institutes of Health awards.

Student Financial Assistance utilized a suite of queries to monitor operational processes and validate data accuracy. These tools supported compliance by identifying discrepancies, guiding timely corrections, and reinforcing adherence to institutional and federal standards.

UCF Global conducted monitoring of F and J visa students and scholars using institution reports and SEVIS to ensure compliance with all relevant laws. The department also conducted reviews on H-1B visa personnel files bi-weekly to ensure H-1B compliance.

During the year, the Registrar's Office distributed automatic grading communications to instructors upon their approval of each grade roster. This was done to guard against fraud and alert on any unauthorized or unexpected access to grade rosters. Queries were conducted to audit and identify late changes to grade rosters that have already been approved. Patterns were monitored for possible misconduct.

Enforcing and Promoting Standards Through Incentives and Discipline

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 of Trustees 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 continued its 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 Brian Boyd – University Registrar, Patricia Hall – Library Technical Assistant III, Christina Alecse, Administrative Project Manager, and Chase Thompson, former student intern for University Compliance and Ethics (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.

2024 Compliance and Ethics Week

2024 Compliance and Ethics Week
Promoting a Culture of Ethics, Compliance, and Accountability

Promoting a Culture of Ethics, Compliance, and Accountability

Training

o Drug-Free Schools and Workplace

o Privacy Related to Emerging Technologies

o *IntegrityStar* Newsletter

Activity

o University Compliance and Ethics Website Scavenger Hunt – Find Beacon

Compliance and Ethics Week, held November 4-12, included short training modules and an engaging online scavenger hunt with the new Compliance and Ethics Week mascot "Beacon" throughout the office's newly published website. Employees who participated submitted entries to win prizes. The office awarded one grand prize – Four tickets to an upcoming UCF men's basketball game, and 60 miscellaneous prize packs to randomly selected employees.

Other compliance offices and partners that offered incentives throughout the year included:
- Facilities and Business Operations launching a Safety Splash Program where employees could earn points for completion of training, timely report submissions, safety suggestions, and proactive safety actions. The points could then be redeemed for prizes offered by the office. The Program also included a Safety Employee of the Year Award with public recognition and a gift.
- UCF Public Safety recognized employees by issuing 30 quarterly and annual awards to various personnel and units within the department.

Appropriate Discipline
University Compliance and Ethics continued to provide recommendations for appropriate discipline for substantiated misconduct cases to ensure accountability and consistency in corrective actions. The office also continued to serve as the point of contact and source for guidance to research compliance related to scientific misconduct, export controls, conflicts of interest, and development of policies and procedures. Discipline across the university consisted of improvement plans and remedial training to termination of employment.