University Compliance and Ethics

UCF

Compliance and Ethics Annual Report 2023

The 2022-23 University of Central Florida (UCF) Compliance and Ethics report provides a comprehensive look at the university-wide compliance and ethics program's 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 comprehensive view of the university-wide compliance and ethics program and the extensive activities achieved across the campus. This report includes the collaborative efforts of all compliance offices and compliance partners at UCF and includes information on the work performed during the 2022-23 fiscal year to meet various federal and state regulatory and compliance requirements. UCF's Comprehensive Compliance and Ethics Program complies with the Florida Board of Governors Regulation 4.003 and the Federal Sentencing Guidelines by implementing the elements of an effective program and industry best practices. With the support of the university president and Board of Trustees, as well as benefitting from the work of a prevalent and trusted compliance partner network, the program impacts all members of the university community and helps advise decision making across the campus.

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

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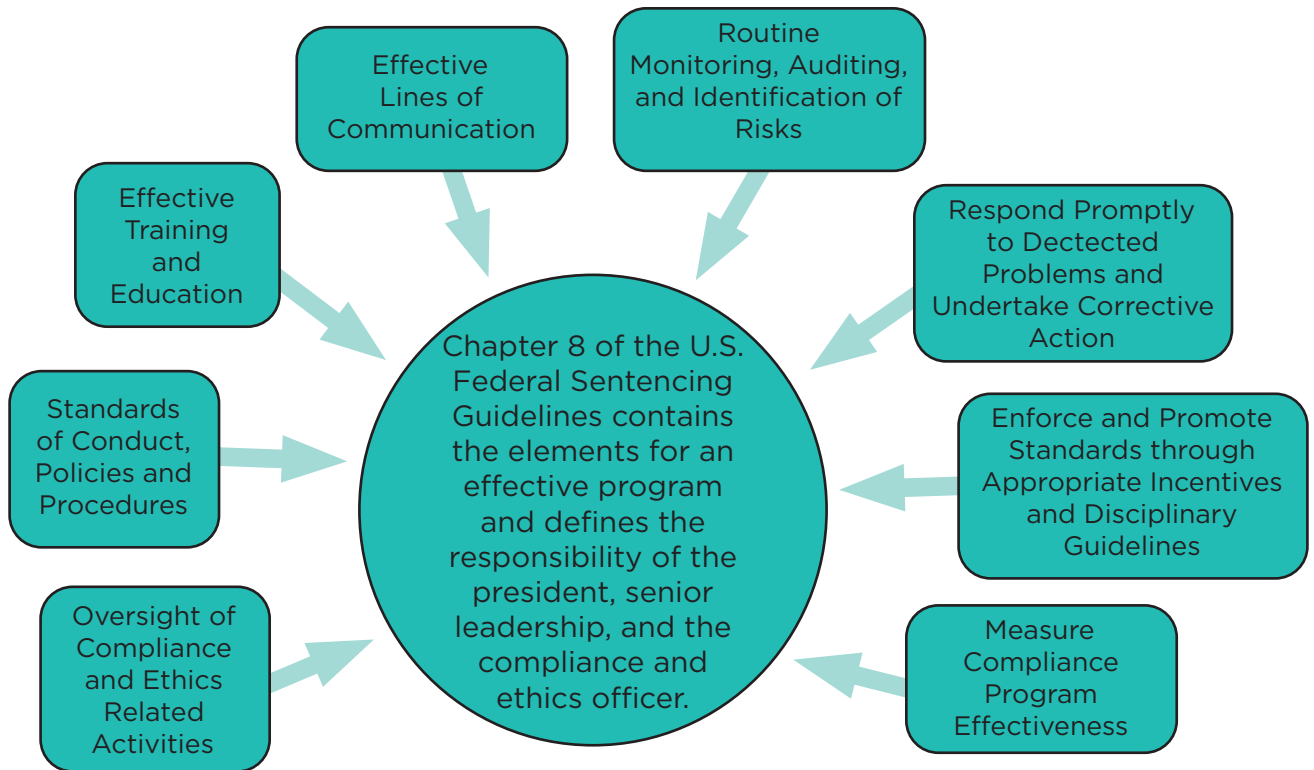# INTRODUCTION

Effective Lines of Communication

Routine Monitoring, Auditing, and Identification of Risks

Effective Training and Education

Respond Promptly to Dectected Problems and Undertake Corrective Action

Standards of Conduct, Policies and Procedures

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.

Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines

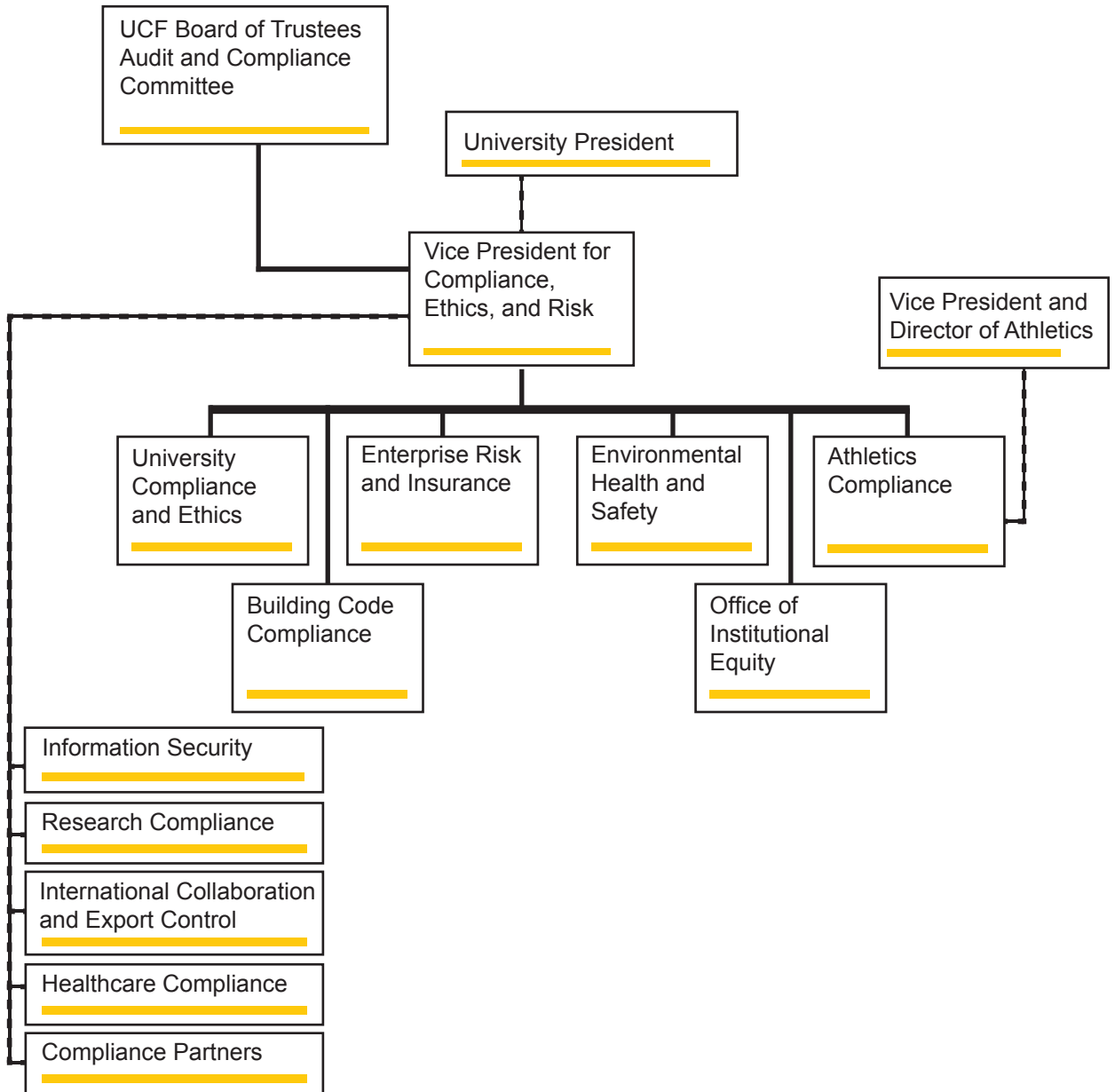Oversight of Compliance and Ethics Related Activities

Measure Compliance Program Effectiveness

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, is charged with assisting 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 30 members across various departments at the university who contribute to this report annually.
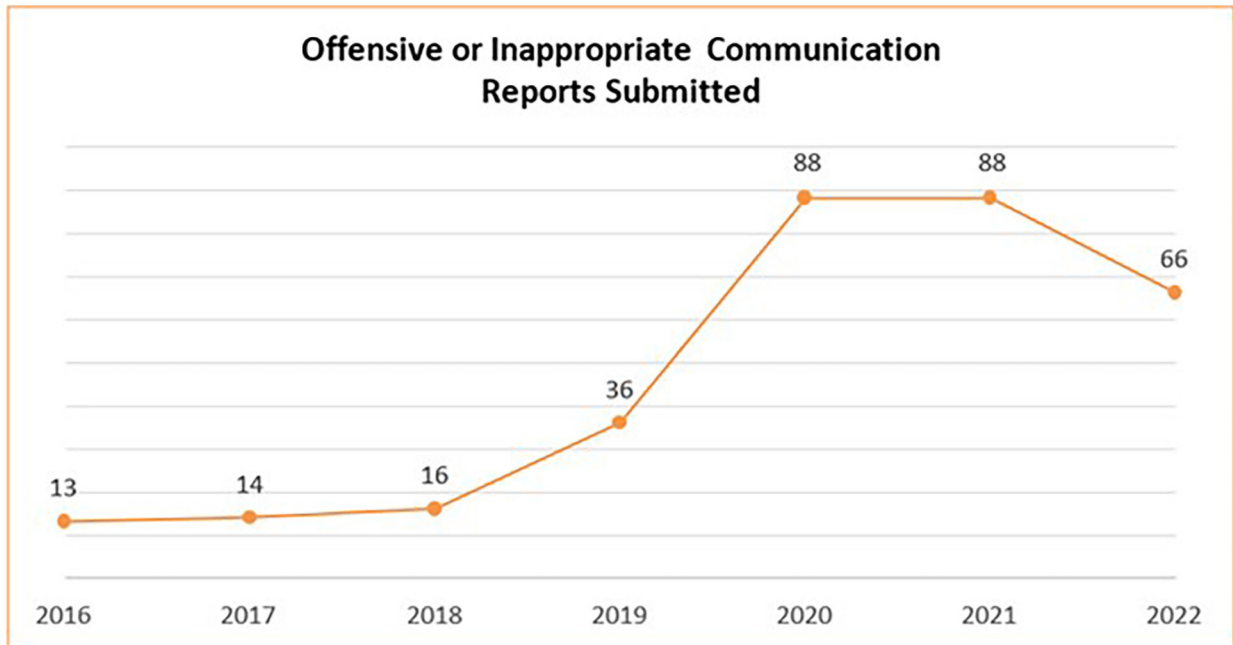
Compliance and Ethics Program Structure

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┌─────────────────────────┐
│ UCF Board of Trustees   │
│ Audit and Compliance    │
│ Committee               │
└─────────────────────────┘

                    ┌──────────────────────┐
                    │ University President │
                    └──────────────────────┘

        ┌─────────────────────┐              ┌─────────────────────┐
        │ Vice President for  │              │ Vice President and  │
        │ Compliance,         │              │ Director of Athletics│
        │ Ethics, and Risk    │              └─────────────────────┘
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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

In response to a trend identified in 2019, the office continues to monitor IntegrityLine reports containing the issue type Offensive or Inappropriate Communication to gauge the effectiveness of its training and awareness efforts with Human Resource to make UCF a better place to learn and work. During the 2022 calendar year, the number of reports with this issue type dropped from 88 reports in 2021, down to 66 reports suggesting that the workplace is improving in this area.

Offensive or Inappropriate Communication Reports Submitted

University Compliance and Ethics and Human Resources continue to evaluate opportunities to expand the education and awareness program with the overall goal to improve the workplace and support the university's strategic plan aspiration to make UCF a best place to learn and work.

Information Security Office
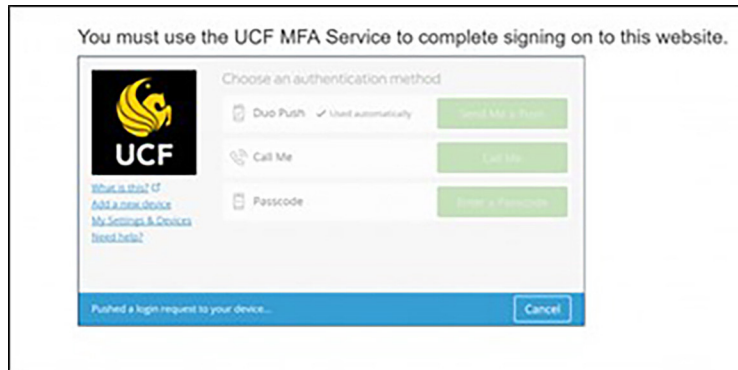
Defense against today's sophisticated cyber security threats require a design principle known as a zero-trust architecture which makes use of strong authentication systems that employ Multi-Factor Authentication (MFA). MFA protects the confidentiality, integrity, and availability of accounts when logging into online applications, reducing the risk from others accessing employee accounts. During the 2022-23 year, the expansion of MFA was successfully completed to include all UCF students, faculty, and staff using Microsoft Office 365 applications (Outlook, OneDrive, Teams, etc.), UCF WebCourses, and other university applications.

Facilities & Business Operations
During the 2022-23 fiscal year, Facilities & Business Operation completed several sizable projects to ensure compliance and the safety of the campus community, including reflection pond enhancements of lighting and pumps, LED pedestrian street lighting throughout campus, fire alarm upgrades on obsolete systems throughout the main campus, and campus-wide water conservation efforts by installing automatic lavatory fixtures. Water conservation efforts are critical to UCF remaining below its St. Johns River Water Management District permit thresholds while addressing future load growth and development.

Human Resources
Post-hurricane Ian, Human Resources implemented the Hurricane Ian Disaster & Leave Program, which provided eligible employees who faced severe hardships with additional time off to give them time to address their recovery needs thanks to accrued leave donated by other UCF faculty and staff members. Between October 4, 2022 and November 3, 2022, employees helped by this program received anywhere from 1 day to 3 weeks of paid time based on their needs.

Office of Institutional Equity
On June 21, 2021, UCF received a scheduling letter from the U.S. Department of Labor, Office of Federal Contract Compliance Programs (OFCCP) regarding a compliance evaluation. In anticipation of this audit, in March 2021, OIE formed an OFCCP Audit Prep work group. This work group was comprised of various campus partners, including Human Resources, Faculty Excellence-Personnel Administration, Office of the General Counsel, and others. The work group collaborated to collect, review, and compile data and documentation in response to auditor requests. Additionally, the vice president for compliance, ethics, and risk, the Office of Institutional Equity, and the Office of the General Counsel facilitated the interview process for key UCF staff with OFCCP auditors. On November 8, 2022, OFCCP informed the university that they found no apparent violations of Executive Order 11246, as amended; Section 503 of the Rehabilitation Act of 1973, as amended; the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended; or Executive Order 13496. The OFCCP Audit Prep work group transitioned to the Search & Screening Process work group and continues to meet regularly to monitor and review university employment practices and UCF's Affirmative Action Plan program to ensure compliance with federal, state, and local laws and regulations.

Student Health Services
Student Health Services 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 2022 Security Risk Assessment determined that there were no issues that needed to be addressed and that Student Health Services was a 100% compliant with the 63 mandatory safeguards required by the annual risk assessment. This was the first 100% compliance outcome for Student Health Services since the inception of risk assessments for the health center.
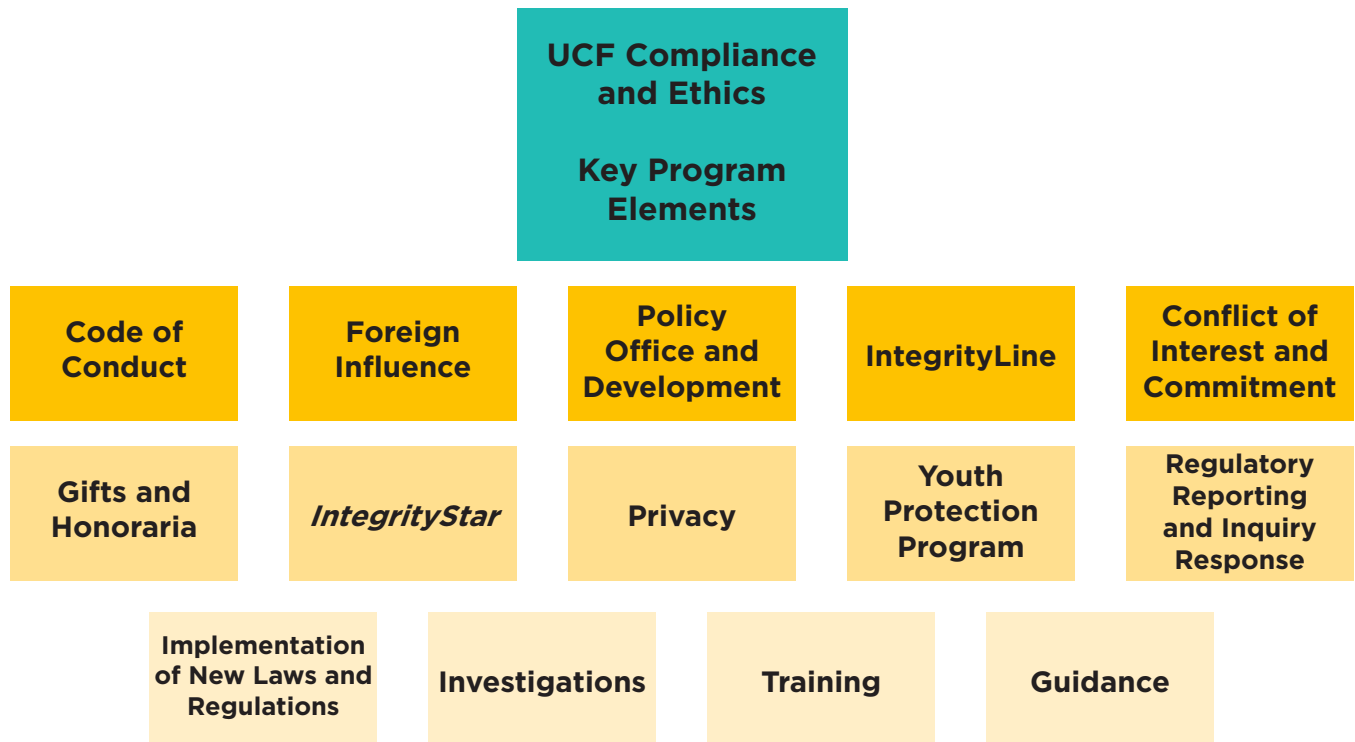
Comprehensive Annual Report

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.

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 Staff 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.

UCF Compliance and Ethics

Key Program Elements

Code of Conduct	**Foreign Influence**	**Policy Office and Development**	**IntegrityLine**	**Conflict of Interest and Commitment**
Gifts and Honoraria	*IntegrityStar*	**Privacy**	**Youth Protection Program**	**Regulatory Reporting and Inquiry Response**
Implementation of New Laws and Regulations	**Investigations**	**Training**	**Guidance**	

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 Workplace Safety Laboratory Safety	Chemical Safety Biological Safety Fire Safety Spill Prevention	Air Quality 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	
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

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 (CFA)
Annual Compliance Report	Annual	The Commission for Florida Law Enforcement, Accreditation (CFA)
Annual report of HIPAA breaches	Annual	U.S. Department of Health and Human Services
Annual Research Exemption Report	Annual	UCF Board of Trustees Chair, Florida Governor, Florida Legislature
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 Report	Annual	UCF Board of Trustees Audit and Compliance Committee and Florida Board of Governors
Expenditure Analysis (EA)	Annual	Florida Board of Governors
Federal Financial Aid State Audit	Annual	U.S. Department of Education
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

Report Name	Frequency of Submission	Agency
Infection Prevention/Risk Management Assessment Reports	Annual	Accreditation Association for Ambulatory Health Care
Institutional Biosafety Committee Registration	Annual	National Institutes of Health
Legislative Budget Request for Operations & Fixed Capital Outlay	Annual	Florida Board of Governors
NCAA Academic Progress Report	Annual	National Collegiate Athletics Association
NCAA Graduation Success Rate Report	Annual	National Collegiate Athletics Association
NRA Withholding Data	Annual	U.S. Internal Revenue Service
OSHA 300A	Annual	U.S. Department of Labor
Reconciliations of NRA Payments	Annual	U.S. Internal Revenue Service
Reporting to the Division of Bond Finance	Annual	Florida Division of Bond Finance
Review of Bias Based Policing	Annual	The Commission for Florida Law Enforcement, Accreditation (CFA)
Security Risk Assessment	Annual	Security Compliance Associates
Southern Association of Colleges and Schools Commission on Colleges (SACSCOC) Reporting	Annual	SACSCOC
The Office of Defense Trade Controls Compliance Registration	Annual	U.S. Department of State
UCF's Complaint Collection	Annual	UCF Academic Program Quality/SACSCOC
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 Institutional Effectiveness Assessment Report	Annual	UCF Operational Excellence and Assessment Support/ SACSCOC

Report Name	Frequency of Submission	Agency
University's Affirmative Action Plan	Annual	Office of Federal Contract Compliance Programs
University's Florida Equity Report	Annual	UCF Board of Trustees and Florida Board of Governors
Fiscal Operations Report and Application to Participate in Campus Based Funding (FISAP)	Annual	U.S. Department of Education
Annual Report on Possible Research Misconduct	Annual	U.S. Office of Research Integrity
Reporting of Financial Information to Debt Rating Agencies	Annual	Moody's, S&P, Fitch
Operating Budget, Capital Outlay Budget, & Carry Forward Spending Plan	Annual, with quarterly updates	UCF Board of Trustees and Florida Board of Governors
Federal Funding Accountability & Transparency (FFATA)	Monthly	FFATA Subaward Reporting System (FSRS)
Enrollment reporting to the National Student Loan Data System (NSLDS)	Monthly	U.S. Department of Education
Florida Violent Death Program	Monthly	Florida Department of Health
Juvenile Justice and Delinquency Prevention Act (JJDPA)	Monthly	Correctional Management and Communications Group, LLC
National Use-of-Force Data Collection	Monthly	Florida Department of Law Enforcement
Number of Employee Positions Posted and Total Number of Employees	Monthly	Florida Department of Economic Opportunity
OSHA 300	Monthly	U.S. Department of Labor
Reporting of Various Employee Data and Payroll Data Files	Monthly	State of Florida
Compliance and Ethics Program Plan	As Updated	UCF Board of Trustees and Florida Board of Governors
Continuing disclosure items to Municipal Securities Rulemaking Board's Electronic Municipal Market Access	Continuous	U.S. Security Exchange Commission

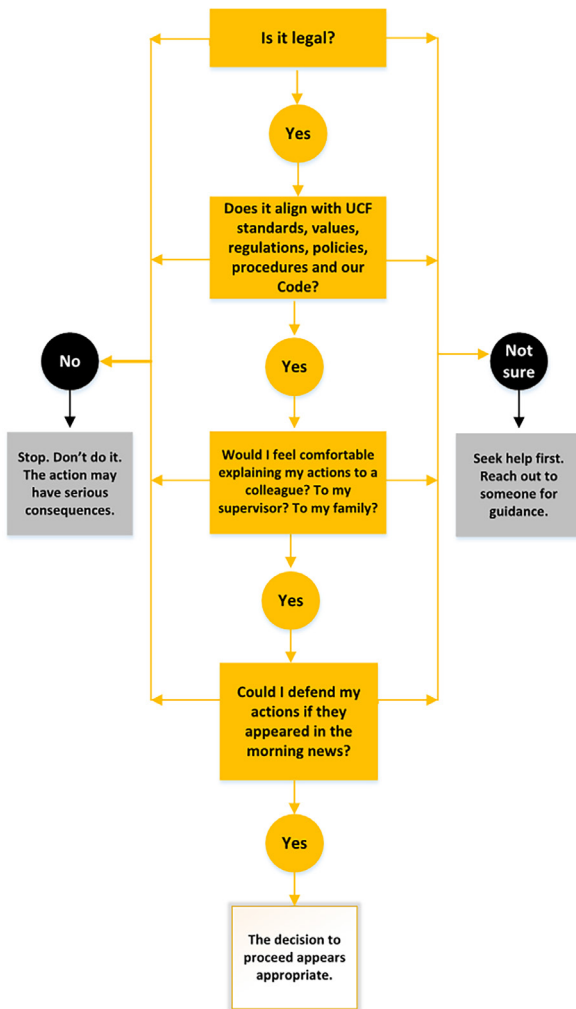| Report Name	Frequency of Submission	Agency
Incident / Adverse Incident Reporting	Continuous	Center for Family Services
Public Debt Disclosure Notifications to Bondholders	Continuous	Various Bondholders
NHTSA DRE Database	Per Incident	National Highway Traffic Safety Administration
U.S. Nuclear Regulatory Commission Pre-Award Compliance Review	Pre-Award	U.S. Nuclear Regulatory Commission
Annual Workers Compensation Report	Quarterly	Florida Division of Risk Management
Quarterly Budget to Actuals Reports	Quarterly	UCF Board of Trustees
Foreign Gifts and Contracts Reporting	Twice Annually	Florida Board of Governors and U.S. Department of Education
Community Outreach Report	Twice Annually	International Association of Campus Law Enforcement Accreditation (IACLEA)
Bright Futures Audit	Every 2 Years	Florida Department of Education
Exchange Visitor Program Redesignation	Every 2 Years	U.S. Department of State
SEVIS Recertification	Every 2 Years	U.S. Department of Homeland Security - Student and Exchange Visitor Program (SEVP)
UCF Board of Trustees Audit and Compliance Committee Charter	As Updated, At Least Every 3 Years	Florida Board of Governors
NASA Civil Rights Assurance Form 1206	Every 3 Years	National Aeronautics and Space Administration
Mandatory Re-Certification for Sworn Law Enforcement	Every 4 Years, based on officers' initial certification	Florida Department of Law Enforcement

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.

To emphasize the importance of promoting a culture of ethics and compliance, the vice president for compliance, ethics, and risk personally delivered several sessions of in-person training on Ethical Leadership to employees during the year.

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:

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.

- Clery Compliance Advisory Council
- Clery Compliance Review Workgroup
- College of Medicine Clinical Services Compliance Committee
- College of Medicine Industry Relations Committee
- College of Medicine Supplemental Insurance Plan Committee
- Change Advisory Board
- Compliance Federal Trade Commission's Red Flags Compliance
- Data Governance Council
- Facilities & Business Operations Committee
- Health Sciences HIPAA Collaborative
- Hiring Search Compliance Workgroup
- Homeless Student Committee
- Student of Concern Team
- Residency Appeals Committee

- Human Resources Advisory Council
- Information Security and Privacy Advisory Committee
- Institutional Animal Care and Use Committee
- Institutional Biosafety Committee
- Institutional Safety Council
- Laboratory Safety Committee
- Merchant Services Committee for Payment Card Industry Data Security Standards (PCI DSS)
- NACUBO Tax Council
- National Association for Athletics Compliance Convention Committee
- National Association for Athletics Compliance Legislation and Governance Committee
- Critical Incident Stress Management Team
- Bicycle Micro Mobility Committee

- President's Cabinet
- Radiation Safety Committee
- Removal of Medical Holds Committee
- Security Incident Response Team
- State University System Inter-Institutional Committee on Finance & Accounting (ICOFA)
- Chief Financial Officer Council
- Student Health Services Performance Improvement Program Committee
- Student Health Services Patient Advocate Reporting Committee
- UCF 403(b) Investment Committee
- UCF Athletics Compliance Committee
- UCF Chief Financial Officer (CFO) Council
- Mobility 2030 Committee
- Fee Appeals Committee
- Campus Events Response Team
- Violence Against Women Cluster

- UCF Council on Accessibility
- UCF Data and Analytics Reporting Ecosystem Working Group
- UCF Emerging Issues and Crisis Response Team
- UCF Institutional Review Board
- UCF Student Health Services Breach Determination Committee
- UCF Tax Peer Group (UTPG)
- 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
- UCF NSPM-33 Committee
- Research Conflict of Interest Committee
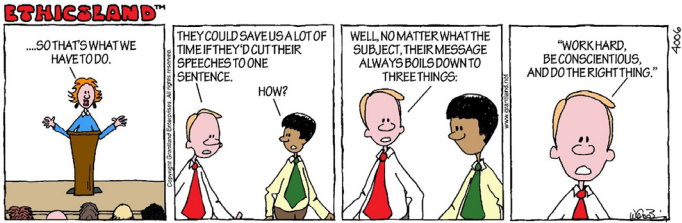- Traffic/Low Speed Vehicle Committee
- UCF Crisis Committee

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 2022	**Articles:** 1. NEW! UCF Policy 2-006 Digital Accessibility 2. Understanding UCF Policy 3-013 Non-student Hourly Other Personnel Services (OPS) Employment 3. Team Player **Audit Unlocked:** 90-second video to boost fraud awareness **Case Corner:** A case that was submitted anonymously by students that resulted in corrective action. **Cartoon:** **Video:** Compliance Brief: Respecting Others 2nd Edition	*IntegrityStar* Awardee Dr. Florian Jentsch, Department Chair and Professor, Department of Psychology, College of Sciences, for his consistent support of the university's compliance and ethics program. Dr. Jentsch has worked closely with the office on numerous initiatives and has served as an excellent faculty voice.

Edition	Featured Articles and Materials	Recognition
	Articles: 1. Compliance and Ethics Culture Survey Results 2. UCF 2021 IntegrityLine Report 3. Celebrate Compliance and Ethics Week **Audit Unlocked:** Fraud Awareness Training – It's not just for new employees **Case Corner:** Several cases substantiated and where the university took appropriate action. One case involves retaliation. **Cartoon:** **Video:** 2022 Compliance and Ethics Week – Ethical Superheroes Part 2	*IntegrityStar* Awardee Aubrey Jayanama, kNEXT Learning Management Lead, for her outstanding support of the university's compliance and ethics training program.
	Articles: 1. A Reminder on our Youth Protection Program 2. Requests for an Accommodation Based on a Disability, Religious Practice, or Pregnancy-Related Condition 3. Who is University Audit? **Case Corner:** Two cases that did not result in substantiated misconduct but instead resulted in a positive outcome **Privacy Points:** Tips to Safeguard Data When Traveling **Image:** **Video:** A Caring Adult Makes a Difference in a Child's Life (DHHS, Admin for Children and Families, Children's Bureau)	*IntegrityStar* Awardee Alison Cares, PhD, Associate Professor, Department of Sociology, College of Sciences, for her commitment to the prevention of violence against women, her consistent support of the work accomplished by OIE, and her contributions to the Title IX Program at UCF.

University Compliance and Ethics also distributed to employees the UCF Employee Code of Conduct, office brochure, privacy compliance pamphlet, Speak Up wallet cards, UCF IntegrityLine Speak Up earbuds, and a newly developed Gifts and Honoraria Brochure during faculty orientation, the UCF Benefits Fair, and during new employee orientations.

Compliance offices and partners also 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 (FERPA),
- ❖ 403(b) plan notice of eligibility,
- ❖ NCAA rules education,
- ❖ mandatory compliance training,
- ❖ the availability of the Annual Security and Fire Safety Guide (Annual Security Report),
- ❖ UCF Alert System testing,
- ❖ crime updates and prevention,
- ❖ foreign influence screening and reporting,
- ❖ water quality,
- ❖ stormwater compliance information,
- ❖ safety committee involvement,
- ❖ cyber risks,
- ❖ research compliance,
- ❖ conflict of interest and commitment disclosure,
- ❖ time and reporting practices,
- ❖ search, screening and hiring guidelines and procedures, and
- ❖ grading procedures.

Throughout 2022-23, the Office of Institutional Equity (OIE) provided multiple communications regarding compliance with the nondiscrimination laws and regulations. OIE participated in or hosted outreach or tabling events (i.e., Employee Benefits Fair, Safe Knight Week, etc.) for both employees and students in which OIE staff connected with 3,586 members of the university community. Information regarding OIE's role, the university's prohibition of discrimination, harassment and retaliation, and title IX coordinator was provided at all new faculty orientations and student orientations, the Faculty Handbook, HR Employee Resource Guide, as well as the undergraduate student and graduate student catalogs. OIE also continued to maintain its social media sites on Facebook and Twitter.

The Title IX campus-wide campaign initiative, Let's Be Clear, also continued throughout the year. The Let's Be Clear initiative expanded confidential reporting options, stream-lined Title IX reports and was supported by a partnership among various units including OIE, Student Success and Well Being, UCF Communications & Marketing, UCF Police Department (UCFPD) and Victim Services.

In support of the Digital Accessibility Policy's implementation and campus awareness, OIE led presentations regarding the policy's requirements to the Faculty Senate, Faculty Excellence's Chairs and Directors Council, and the Provost's Council, as well as multiple college/departments across campus. OIE also distributed communications reminding the university community of the policy and its upcoming compliance deadlines.

The University Police Department created the UCFPD Believes in Transparency website to provide information to the university community on applicable policies and understand how UCF police officers train and prepare for emergencies. The new website explains the steps the department takes to keep the UCF community safe and believes in the power of transparency as they protect and serve. They also provided a list of short and long-term goals and plan to expand this list following future discussions with the university community.

Many of the compliance offices and partners also 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 a 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 University Police Department published an internal magazine called the Safety Scoop highlighting departmental employees who have gone above and beyond the call of duty in addition to; and
- ❖ Student Health Services distributed an internal newsletter to HIPAA Privacy and Security Officers on a quarterly basis.

In compliance with the Florida Foreign Influence Act, University Compliance and Ethics coordinated with the Office of International Collaboration and Export Control to develop reporting templates and issued the following reports to the Board of Trustees in July 2022: *Florida Foreign Influence Act Disclosure – Denied Applicants 2022 and Florida Foreign Influence Act Disclosure – Travel 2022*.

Additionally, the University Compliance and Ethics staff met with the Florida Board of Governors Office of the Inspector General in September 2022 to discuss their Foreign Gifts Inspection, obtained requested supporting documentation from UCF Tech Transfer and submitted the additional documentation to the Board of Governors. Staff also responded to an inquiry by the Office of the Board of Governors Inspector General and Director of Compliance (BOG IG) regarding UCF's reporting to the Board regarding denied applicants and travel under Florida's Foreign Influence Act. In response to this data request, University Compliance and Ethics prepared and submitted the Certification of Foreign Influence Legislation Compliance (Non-Gifts-Related) on behalf of UCF and provided copies of the supporting materials prior to the November 8, 2022, deadline.

At the request of the BOG IG, the vice president for compliance, ethics, and risk participated in a meeting with their office, BOG General Counsel, SUS compliance and ethics officers and attorneys in December 2022 to discuss the BOG IG Foreign Gifts Inspection outcomes. The BOG IG distributed the final report and updated BOG guidance document following the meeting.

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

In response to the Board of Governor's February 28, 2023, Data Request, University Compliance and Ethics obtained information to prepare and submit the SB 846 Agreements of State Colleges and State Universities with Foreign Entities template on behalf of UCF prior to the March 3, 2023, deadline. Also, in response to the BOG's May 18, 2023, Data Request, the office coordinated with the appropriate offices to prepare and submit feedback to the draft amendment to BOG Regulation 9.012, Foreign Influence by the May 31, 2023, deadline. The office also responded to the BOG IG's June 13, 2023, invitation to provide feedback on the updated draft OIGC Notification Protocol by the June 28 deadline.

Upon invitation, the vice president for compliance, ethics, and risk presented to the Board of Governors UCF's Foreign Influence Red Flags Program during the June 22, 2023, and subsequently participated in a panel discussion at the Florida Board of Governors Audit and Compliance Committee meeting at USF.

The National Science Foundation, National Aeronautics and Space Administration and Department of Energy completed their audits of UCF's Section 504 Program and Title IX Program. OIE led the development and production of items provided to the federal agencies and will continue to lead on future production of materials.

The Office of Federal Contract Compliance Programs (OFCCP) initiated a compliance review of UCF pursuant to Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, and Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA). In 2022, OIE continued to coordinate with campus partners (i.e., Human Resources, Academic Affairs, and the Office of the General Counsel) to gather and produce requested items for the audit. On November 8, 2022, the OFCCP closed its compliance review finding that there were no apparent violations.

OIE revamped all its nondiscrimination policies and regulations to address language that was determined to be overbroad. This initiative was finalized during the 2022 Fall semester.

During 2022-23, the university participated in the Auditor General Financial Aid Audit. A portion of this audit included auditing the Registrar's Office timely reporting of withdrawals and separations from the university by students. There were no audit findings pertaining to this portion of the audit related to the Registrar's Office.

Student Accessibility Services had an external review completed by the Association on Higher Education and Disability (AHEAD) which led to several recommendations to improve departmental processes and overall accessibility on campus.

Policies and Procedures

University Compliance, Ethics, and Risk maintains the university's policy manual containing 129 policies and oversees the university's policy development and review process, which includes identifying when new policies are required and distributing campus-wide communications when new or revised policies are posted for public comment and 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 11 new policies and 19 existing policies that were later approved by the president:

Policy Administration

- UCF Policy 2-001.6 University Policy Development

Human Resources and Employee Benefits Policies

- UCF Policy 3-003.4 Deductions from Salary of Exempt Employees
- UCF Policy 3-010.2 Eligibility for Overtime Compensation
- UCF Policy 3-014 Career Advancement Policy
- UCF Policy 3-132 UCF Identification Cards and Badges

Legal, Compliance, and Administration Policies

- UCF Policy 2-004.3 Nondiscrimination Policy
- UCF Policy 2-009.1 Gifts and Honoraria
- UCF Policy 2-012.2 Title IX Grievance Policy
- UCF Policy 2-012.3 Title IX Grievance Policy
- UCF Policy 2-014 Amorous Relationships Prohibition
- UCF Policy 2-015 Reporting Requirements Related to Nondiscrimination
- UCF Policy 2-016 Remedial Measures, Prevention, and Education Related to Nondiscrimination
- UCF Policy 2-017 Prohibition of Discrimination in University Training and Instruction
- UCF Policy 2-100.6 Florida Public Records Act: Scope and Compliance
- UCF Policy 2-700 Reporting Misconduct and Protection from Retaliation

Facilities and Safety Policies

- UCF Policy 3-117.2 Continuity of Operations (COOP)
- UCF Policy 3-125.1 Real Estate Management
- UCF Policy 3-126.1 Comprehensive Space Management
- UCF Policy 3-127 Security Cameras
- UCF Policy 3-130 Fire Prevention Policy

Research Policies

- UCF Policy 4-210.1 Distinguishing Gifts from Sponsored Awards
- UCF Policy 4-212 Time and Effort Certification on Sponsored Research, Training, and Service Awards
- UCF Policy 4-214.1 Proposal and Acceptance of Sponsored Awards for Research and Development
- UCF Policy 4-215.1 Use of Research Space by Third-Parties and UCF Employees for non-UCF Purposes
- UCF Policy 4-217 Controlled Unclassified Information Policy

Academic Affairs Policies

- UCF Policy 4-403.2 Required Elements of the Course Syllabus
- UCF Policy 4-409 Awarding Academic Credit

Technology and Communications Policies

- UCF Policy 4-002.5 Use of Information Technologies and Resources
- UCF Policy 4-005.2 Special Collections and University Archives
- UCF Policy 4-009.4 Cellular Telephone Acquisition and Use

To assist departments with policy related information the following updates were made to resources online:

- ❖ Standardized policy glossary (revised)
- ❖ Committee meeting dates
- ❖ Committee members
- ❖ Policy Template
- ❖ Five-year Policy Review List
- ❖ Draft Policy Submission Cover Memo Form

In collaboration with the Faculty Senate the policy submission process was revised to provide transparency into the policy development and review process. This process was updated to include submission to the university's Faculty Senate and College Policy Liaisons for input as part of the development of a draft policy.

In response to Florida House Bill 7 (HB 7) Individual Freedom and Board of Governors (BOG) Regulation 10.005, the vice president for compliance, ethics, and risk formed, co-chaired, and led weekly meetings of the HB 7 Implementation Workgroup. The workgroup developed a university policy that was later suspended, along with the university regulation, as a result of court action.

In addition to the university-wide policies maintained in the University Policy Library, many departments maintain internal departmental policies, procedures, and handbooks specific to their areas of compliance that supplement university policies. These compliance offices and partners also 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	HIPAA Standard Operating Procedures
	IntegrityLine Intake and Close Out Procedures
	Manager's Checklist: Speaking with Employees about their Concerns and Evaluation of Employee's Concern
	Youth Protection Insurance Enrollment Form for UCF Youth Programs
	Youth Protection Incident Report Form
	Squire Registration Help Guide for Program Sponsors
	Youth Protection Safety Plan Template
	Youth Protection Consent to Use Electronic Communications Form
	Youth Protection Housing Guidelines
Academic Services for Student-Athletes	UCF Student-Athlete Handbook
	Standard Operating Procedures
Athletic Compliance Office	Athletics Compliance Policies and Procedures Manual
College of Medicine Health Affairs Legal/Compliance	College of Medicine Code of Ethics and Conduct
	HIPAA Privacy and Security Policies Manual (Phase 1&2)
Division of Finance	Investment Program Policy
	1 Regulation
Environmental Health & Safety	76 Safety Policies, Forms, Procedures, and Manuals
Facilities and Business Operations	4 Policies and Procedures
Human Resources	Salary Administration Guidelines
	Standard Operating Procedures for Human Resources processes in Workday
	Workday Recruiting Standard Operating Procedures
	2 Regulations
	Primary Recruiter Offer Guide and Checklist

Compliance Office / Partner	Related New or Updated Materials
Inclusive Education Services	Inclusive Education Services Handbook
Information Security Office	Updated information on security standards
Office of Institutional Equity	4 Regulations
	Search and Screening Guidelines
	Standard Operating Procedures on Recordkeeping
	Investigative Procedures
Office of International Collaboration and Export Control	Conflict of Interest Review Procedures for Foreign Influence Red Flags
	Sponsored Programs Export Control Assessment Procedure
	Travel Approval Petition
Office of Research Compliance	Exemption Monitoring Plan Form
	Huron Conflict of Interest Reporting System Guides
	NSF RCR Standard Operating Procedures
	HRPP-QIA Standard Operating Procedures
	Direct Cost on Sponsored Project Guidelines
Police Department	5 General Orders
Registrar's Office	Undergraduate and Graduate Catalogs
	Residency Reclassification Affidavit
	State Authorization Compliance and Reciprocity Guidelines
	FERPA resources for students, parents, faculty, and staff
	How to Share Restricted Information Guidelines
	Student Complaints: Alleged FERPA Violations Procedures
	Excess Hours Guidelines
Student Care Services	1 Regulation
Student Conduct and Academic Integrity	8 Regulations
UCF Financial Aid	Internal Policies and Procedures
Student Health Services	13 Policies
	Performance Improvement Manual
UCF Global	Internal Procedures Manual

Training and education are key components of an effective compliance and ethics program. Training courses are developed to communicate various regulatory requirements, university regulations, policies, and procedures, as well as expectations for standards of conduct. During this fiscal year, over 116,000 training courses were completed, which again is a notable increase from the 95,238 courses completed last year and the 79,612 course completions reported in 2021. University Compliance and Ethics also responded to 589 training related inquires and 105 general compliance and ethics related inquiries.

Training Courses Completed In Past 5 Years
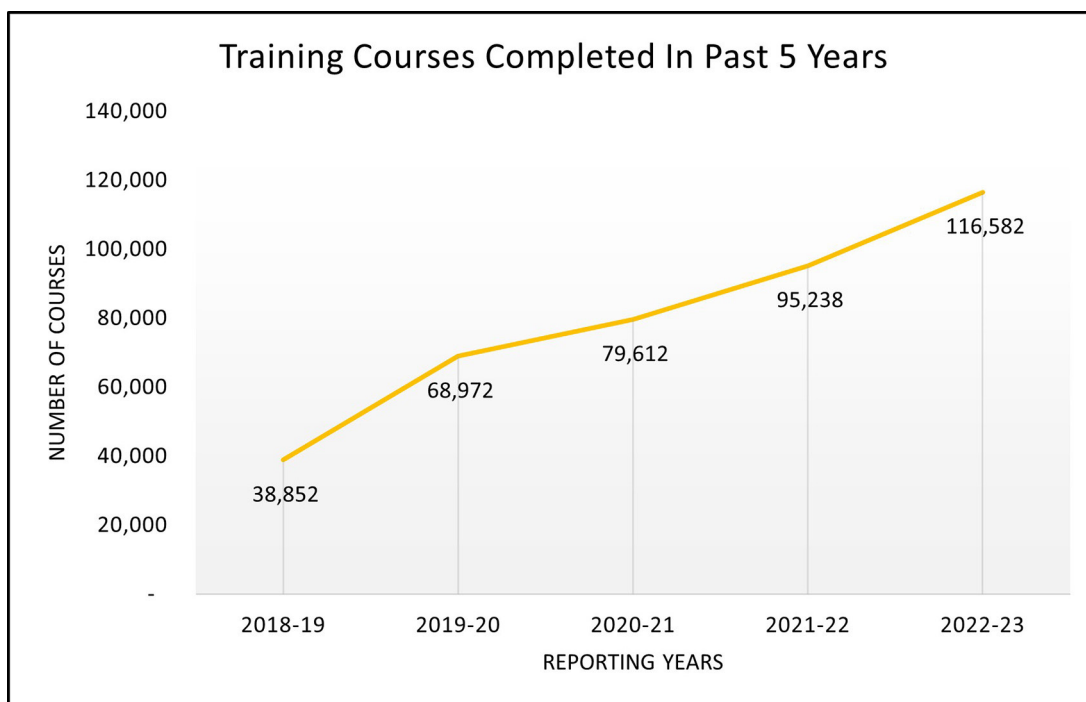
Please see the chart below for specific compliance training delivered by the various compliance offices and partners with the total number of employees who completed the training.

Department	Topic	Delivery	No. Trained
University Compliance and Ethics	Ethical Leadership	In-person	8
	Gifts and Honoraria Training	Online	18
	Huron COI Training for Disclosers	In-person	345
	Huron COI Training for Supervisors	In-person	97
	Huron COI Training for COI Coordinators	In-person	30
	Potential Conflicts - Florida Code of Ethics for Public Officers and Employees	Online	3,499
	UCF Employee Code of Conduct Refresher Training with Certifications	Online	7,175
	New Hire UCF Employee Code of Conduct/Speak Up! Training	Online	3,671
	Mini Superheroes: Respect	Online	114
	Mission Impossible II: Misuse of Resources	Online	116
	Mini Superheroes: Retaliation	Online	115
	Protection of Vulnerable Persons	Online	63
	Youth Protection Training	Mixed	723
Athletics Compliance Office	Campus Entity Specific NCAA Rules Education Sessions	In-person	20
	Coaches & Sport Specific Staff NCAA Rules Education	In-person	60
	Department-Specific NCAA Rules Education Sessions	In-person	75
	Staff NCAA Rule of the Week	Online	405
	Student Manager NCAA Rules Education	In-person	50
	Student-athlete NCAA Rules Education	In-person	400
College of Medicine Health Affairs/Legal Compliance	COM Clinical Services Compliance Program Overview	In-person	204
	COM Code of Ethics and Conduct	In-person	205
	COM HIPAA	Online	1,456
	COM Industry Relations	Online	213
	Fraud, Waste and Abuse in Delivery and Payment of Health Care Services	Online	175
Department of Security Management	Milestone Video Management	Online	36
Environmental Health & Safety	Aerial Lift Safety Training & Practical	Mixed	14
	Animal Exposure in a Research Setting	Online	189
	Biological Safety Practical	In-person	254
	Biological Safety Training	Online	363
	Biological Safety Annual Refresher	Online	289
	Bloodborne Pathogens	Mixed	14
	Bloodborne Pathogens for Healthcare and Laboratories	Online	517

Department	Topic	Delivery	No. Trained
Environmental Health & Safety	Concepts in Safety	In-person	14
	Confined Space Awareness	In-person	14
	Confined Space Entry	In-person	13
	Controlled Substances	Online	54
	Department of Transportation Materials of Trade	Online	15
	Electrical Safety	In-person	37
	Ergonomics	In-person	6
	Fall Protection	In-person	64
	Forklift Safety Training & Practical	In-person	1
	Hands Only Adult CPR	In-person	57
	Hazard Communication	In-person	19
	Hot Work & Fire Extinguisher Training	In-person	43
	Housekeeping Refresher	In-person	79
	Lab Fire Safety & Fire Extinguisher Training	In-person	20
	Laboratory Hazardous Waste Handling and Processing	Online	165
	Laboratory PI and Manager Training	Online	253
	Laboratory Safety Practical	Online	1,323
	Laboratory Safety Training	Online	838
	Laboratory Safety Annual Refresher Training	Online	762
	Ladder Safety	In-person	5
	Laser Safety Training	Online	244
	Laser Safety Refresher Training	Online	10
	Lock Out Tag Out	In-person	37
	Mechanical Room Safety at UCF	Online	67
	NIH Guidelines	Online	3
	Radiation Safety (X-Ray) Training	Online	19
	Radiation Safety Awareness	Online	17
	Radiation Safety Practical	In-person	5
	Radiation Safety Training	Online	79
	Respiratory Training	In-person	55
	Sealed Source Training	Online	4
	Think About Your Sink	Online	383
	University Driving Awareness	Online	44
Division of Finance	Chart of Accounts	Online	1
	Colors of Money	Online	43
	Expenditures 101	Online	32
	Expense Report Basics	Online	46
	Expenses in Workday	Online	52
	Finance Business Center Onboarding	Online	19

Department	Topic	Delivery	No. Trained
Division of Finance	Purchase Card Training for Approvers	Online	4
	Purchase Card Training for Cardholders	Online	105
	Procurement Training	In-person	90
	Property Custodian Training	Online	1
	Red Flags - ID Theft Prevention	Online	155
	Special Travel Scenarios & NRA Travel Training	Mixed	56
	UCF Travel Guidelines	Online	1
	Unauthorized Procurement Actions	Online	13
	Understanding UCF's Budget All	Online	24
Human Resources	"LIL" Chats for Supervisors (various topics)	Mixed	60
	Change Management Fundamentals	Mixed	40
	Civility at Work - Non-supervisor Version	Mixed	10
	Conflict Resolution with the TKI	In-person	44
	Constructive Conversations	Mixed	42
	Copyright for Images & Video	Mixed	19
	Emotional Intelligence	Mixed	64
	Emotional Intelligence 2.0	Mixed	21
	Fostering a Civil Workplace	Mixed	8
	Giving & Receiving Feedback	Mixed	65
	Hiring & Appointments	Mixed	44
	I-9/E-Verify Compliance	In-person	36
	Increasing Effectiveness Through Problem Solving	In-person	7
	Kognito at-risk for Faculty and Staff	Online	3,256
	Leader Readers Book Club	Mixed	21
	Leadership Charging Zone (various topics)	Mixed	54
	Navigating Change (and the stress that comes with it)	Mixed	50
	New Employee Orientation	Mixed	760
	Parental Leave Training	Mixed	53
	Performance Appraisal: Supervisors	Mixed	109
	Performance Management 1.0	Mixed	37
	Project Management (various topics)	Mixed	127
	Respectful Dialogue Discussions (various topics)	Mixed	125
	Special Pay & Salary Adjustments	Mixed	44
	Temporary Pay & Bonuses	Mixed	46
	The Practical Coach (TM)	Mixed	25
	UCF Annual Notices to Employees	Online	8,487
Information Security Office	Information Security Awareness Onboarding Training	Online	3,662
	PCI/Credit Card Info Security	Online	30
	2022 Annual Security Awareness Training	Online	8,927

Department	Topic	Delivery	No. Trained
Office of Institutional Equity	Accessibility Open Lab	In-person	13
	Being a Responsible Knight (includes Title IX content)	In-person	3,586
	New Faculty Search Process Training	Online	128
	New Faculty Search Process Training	In-person	146
	Digital Accessibility at UCF	In-person	110
	Document Accessibility	In-person	105
	Let's Be Clear Module (Graduate Students)	Online	2,351
	Let's Be Clear Module (Undergraduate Students)	Online	11,545
	New Faculty Orientation	In-person	102
	PDF Accessibility	In-person	94
	Search Process & Affirmative Action Program	In-person	60
	Unity Star Training	Online	57
	Search Committee Training	Online	989
	Title IX Compliance Track (SUNY Student Conduct Institute)	Online	10
	Title IX Training	In-person	1,870
	UCF Actions to Prevent and Correct Discrimination	Online	3,860
	Video Accessibility	In-person	65
	Compliant Search Process	In-person	35
	ADA Training	In-person	60
	OPS Policy Update	In-person	40
Office of International Collaboration and Export Control	Export Control Researcher Training	Mixed	143
	Export Controls (Sponsored Programs)	In-person	37
	Foreign Influence Screening Process	Mixed	61
	Introduction to Export Controls (General Students, Staff, Unit Personnel)	In-person	47
	Visual Compliance Screening Training	In-person	5
Office of Research Compliance	Animal Facility Managers	Online	1
	Animal Facility Technician	Online	9
	Biomedical Responsible Conduct of Research	Online	543
	Clinical Research: An Introduction	Online	28
	Clinical Trials Agreements (CTAs)	Online	3
	Clinicians - Information Privacy & Security (IPS)	Online	1
	Communicating Research Findings	Online	172
	Comprehensive CIP Course for Advanced Learners	Online	7
	Conflict of Interest	Online	1,447
	Family Educational Rights and Privacy Act (FERPA)	Online	3
	Field/Animal Researcher/Technicians/Students	Online	44
	GCP - Social and Behavioral Research Best Practices for Clinical Research	Online	85

Department	Topic	Delivery	No. Trained
Office of Research Compliance	GCP for Clinical Investigations of Devices	Online	4
	GCP for Clinical Trials with Investigational Drugs and Biologics (ICH Focus)	Online	9
	GCP for Clinical Trials with Investigational Drugs and Medical Devices (U.S. FDA Focus)	Online	54
	Human Subjects Research - Group 1 Biomedical Research Investigators and Key Personnel	Online	591
	Human Subjects Research - Group 2 Social/Behavioral Research	Online	3,976
	Humanities Responsible Conduct of Research	Online	102
	IACUC Voting Members	Online	3
	Institutional Official: Animal Care and Use	Online	4
	Institutional/Signatory Official: Human Subject Research	Online	19
	IRB Administration	Online	18
	Lab Animal Researcher/Technicians/Students	Online	93
	Office of Welfare Administration/Staff	Online	4
	Physical Science Responsible Conduct of Research	Online	147
	Research and HIPAA Privacy Protections	Online	193
	Researchers - Information Privacy & Security (IPS)	Online	21
	Responsible Conduct of Research for Administrators	Online	54
	Responsible Conduct of Research for Engineers	Online	247
	Revised Common Rule	Online	83
	Social and Behavioral Responsible Conduct of Research	Online	1,641
	Students and Instructors - Information Privacy & Security (IPS)	Online	17
	Working with Fish in Research Settings	Online	6
Registrar's Office	FERPA: Faculty and Staff Training	Online	5,903
	Student Records I and II	Online	499
Student Accessibility Services	Disability Barriers Workshop	In-person	32
	Barriers Be Gone Escape Room Activity	In-person	47
	Foundation of Digital Accessibility	In-person	12
	SARC Peer Tutor and Supplemental Instruction Training	In-person	38
	Reframing Disability and Disability Language	Online	15
	Active Minds mental health speaker with Kai Roberts	In-person	52
Student Care Services	Student of Concern Team	In-person	25
Student Conduct & Academic Integrity	Student Conduct Review Board	In-person	37
	FTIC Family & Guest Orientation Crucial Conversations Presentation	In-person	1,500

Department	Topic	Delivery	No. Trained
Student Health Services	AlcholEDU	Online	11,105
	Kognito	Online	33
	Biohazard Waste Training	Mixed	201
	Bomb Threat	Mixed	201
	Chemical Exposure in the Workplace	Mixed	201
	De-escalation of Patients/Persons	Online	35
	Ergonomics Training	Mixed	197
	Mandate Reporting for Child and Elder Abuse Training	Online	33
	OSHA Fire Safety	Mixed	197
	SHS HIPAA (Including Code of Conduct, Confidentiality, Security of PHI)	Mixed	201
	SHS OSHA Bloodborne Pathogens	Mixed	201
	SHS Radio Operations	Mixed	201
	SHS Risk Management Training	Mixed	197
UCF Global	Annual Tax Preparation Workshop	In-person	60
	Federal Immigration Regulations on F/J Visas	Online	2,150
	International Health and Safety	In-person	180
	Immigration 101	In-person	15
	Immigration 102 International	In-person	10
UCF Public Safety	Campus Security Authority Clery Act Training	Mixed	553
	Ethics and Professionalism	In-person	9
	Sexual Harassment Awareness Training	In-person	9
	Social Media Conduct	In-person	9
	Autism Awareness	In-person	4
	Responding to First Amendment Protected Events	In-person	4
	Rite Training	In-person	3
	SAFE Place Training	In-person	3
	Fair & Impartial Policing	In-person	4
	Knights in the Know Training	Mixed	215
	Knights Safety	In-person	127
	Green Dot	In-person	541
University Audit	Fraud Awareness	Online	3.798
Training Courses Completed from July 1, 2022 through June 30, 2023			**116,582**

The Drug Free Schools and Communities Act passed in 1986 and amended in 1989 as part of the reauthorization of the Higher Education Act, requires all higher education institutions that receive federal funding to execute a drug and alcohol abuse prevention program and annually notify all students and employees, in writing, of the program. Human Resources provided the notice of the drug and alcohol abuse prevention program in the Employee Annual Notices and this year, requested assistance from University Compliance and Ethics to move toward reaching 100% completion by all employees. University Compliance and Ethics implemented steps to bring the acknowledgements for the 2022 Annual Employee Notices into compliance and jointly planned the launch of the 2023 Annual Employee Notices with Human Resources. By the end of the fiscal year, the 2022 acknowledgement was completed by 97% of all employees and the 2023 acknowledgement completions were at 99.82%.

University Compliance and Ethics also identified additional opportunities to improve compliance and ethics training by working with the university's kNEXT Training Team to develop automated notifications to the HR Business Centers reminding them to track and follow up on required new hire onboarding compliance training. The New Hire Training Program consists of seven compliance training courses developed by several compliance offices and compliance partners. This Program is required to be completed by all new employees within 30 days of their start date. University Compliance and Ethics monitors completion of the Program by new employees and communicates delinquencies with Divisions as needed.

The Athletics Compliance Office continued to revise its rules education efforts in multiple facets:
1. Meeting with each sport's staff individually on a monthly basis during the academic year rather than a large group setting;
2. Meeting with each sport's team/student-athletes on a monthly basis;
3. Meeting with each department within Athletics individually to provide rules education tailored to specific areas, which developed stronger relationships with each team and department; and
4. Providing timely "hot topic" education sessions to staff. In total, staff conducted 211 education sessions in 2022-23.

The Name, Image, Likeness (NIL) staff member who is part of the Athletics Compliance team assisted with the communication of NIL state & NCAA legislation to key stakeholders including coaches, staff, boosters, and businesses. Additionally, the Sr. Associate Athletic Director for Compliance was asked to represent UCF in the NCAA NIL working group special meeting during the summer of 2023.

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 Human Resources, Benefits and Leave Administration managed the transition of the Family Medical Leave Act plan year from a fixed to rolling time frame and distributed to all employees a 60-day notice required by the U.S. Department of Labor. The Classification and Compensation unit team members had open and candid discussions with employees regarding position and pay decisions and how those decisions may cause concerns regarding equity.

The Employee Relations and HR Compliance unit also developed a refined and robust guide to educate and promote compliance to the newly formed SET teams on topics such as common employment laws, applicable collective bargaining agreements, university regulations, policies, and best practices.

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), which included promotional materials on bathroom stall doors across the campuses; campus-wide announcements; and the Let's Be Clear website that includes a reporting form for students, employees and community members. Also, OIE implemented mandatory search committee training for anyone participating in the faculty search process. In fall 2022, OIE's Employment Equity Team initiated an interdisciplinary work group to develop a new search committee training program that met UCF-specific requirements and made available using UCF's learning management system, which increased learner engagement, and maximized the resources available. This eliminated the expense associated with the contracted vendor and allowed an unlimited number of employees the ability to complete the training. During the 2022-23 year, 981 employees completed the mandatory search committee training.

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, 250 new reports were submitted through the UCF IntegrityLine. This is a slight decrease from the 297 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 sixty (260) IntegrityLine cases were investigated and closed during the fiscal year.

University Compliance and Ethics also received 12 new reports of potential misconduct made directly to the office and nine cases that were under review were completed and closed. Privacy Compliance also worked with the University Registrar on 15 Family Educational Rights and Privacy Act related reports/issues, reviewed and resolved two data privacy concerns submitted by students, and investigated five HIPAA concerns.

University Compliance, Ethics, and Risk oversees the university's foreign influence compliance program and works with the Research Compliance Office and the Office of International Collaboration and Export Control to determine when to initiate a foreign influence investigation. Under the foreign influence assessment process inquiries that are found to have potential foreign influence compliance issues are investigated. This year, the offices jointly investigated eight cases, where one was substantiated. The remainder of the cases remained open.

UCF IntegrityLine Report
January 1, 2022, to December 31, 2022
University Compliance and Ethics

IntegrityLine Reports Submitted by Calendar Year
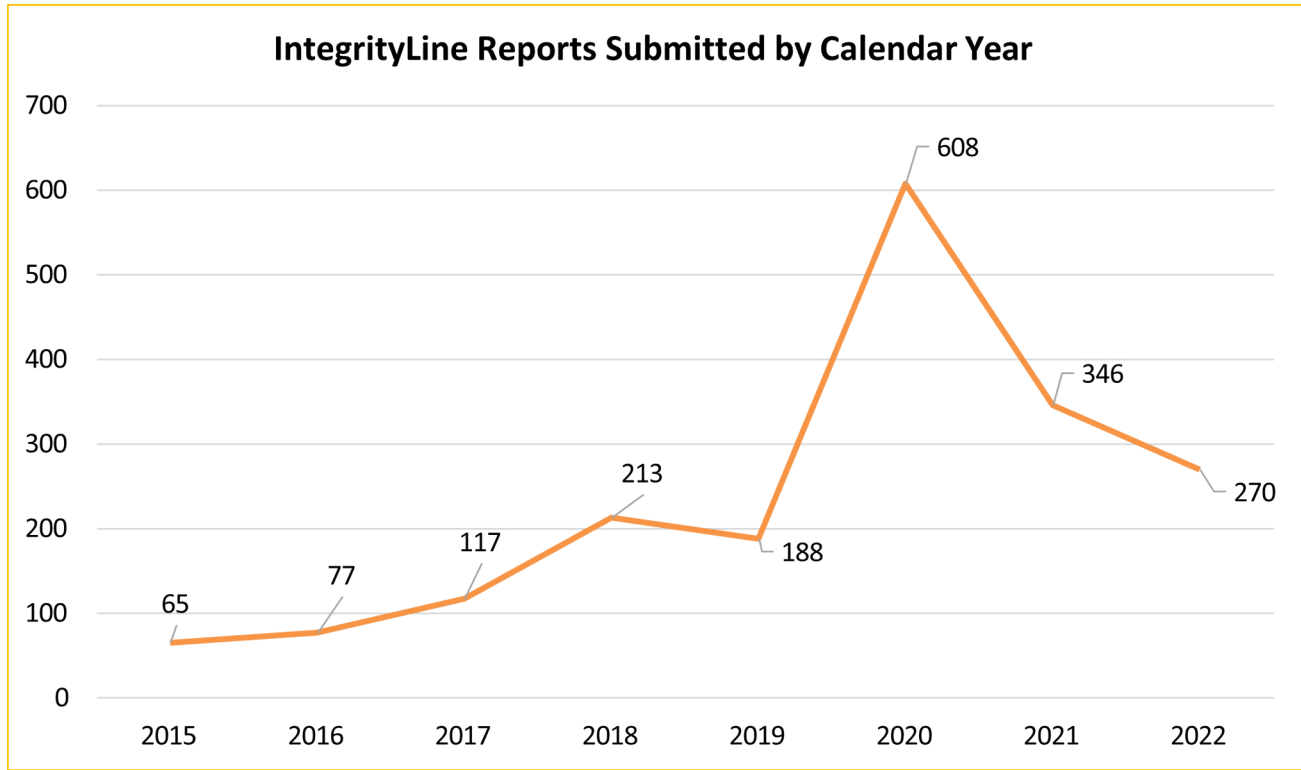
2022 IntegrityLine Reports Submitted

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

Highest Number of Reports by Issue Type

24% Offensive or Inappropriate Communication	The highest number of reports made to the IntegrityLine in 2022 were categorized as Offensive or Inappropriate Communication with 66 reports representing 24% of the total reports submitted. This issue type includes concerns related to inflammatory, derogatory, unduly critical or insulting communication, and failure to treat one another with respect in accordance with the UCF Ethical Standards.
16% Other Academic Affairs Matters	The second highest number of reports made to the IntegrityLine in 2022 were categorized as Other Academic Affairs Matters with 43 reports representing 16% of the total reports submitted. This issue type includes concerns related to grade disputes and other concerns regarding faculty that do not fit within any of the other categories.
12% Discrimination or Harassment	The third highest number of reports made to the IntegrityLine in 2022 were categorized as Discrimination or Harassment with 32 reports representing 12% of the total reports submitted. These reports involve allegations of non-compliance with UCF 2-004 Nondiscrimination Policy, which includes but is not limited to uninvited and unwelcome verbal or physical conduct directed at an employee because of his or her sex, religion, ethnicity or beliefs.

All Issue Types

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

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

Closed Cases

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

Closed Case Outcomes
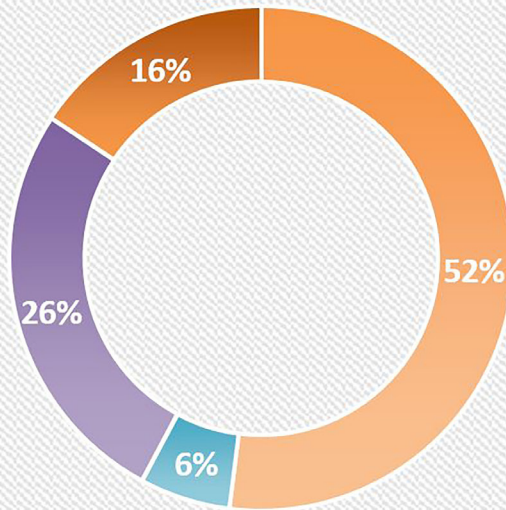
Legend: Referred, Substantiated, Unsubstantiated, Insufficient Information

52%, 6%, 26%, 16%

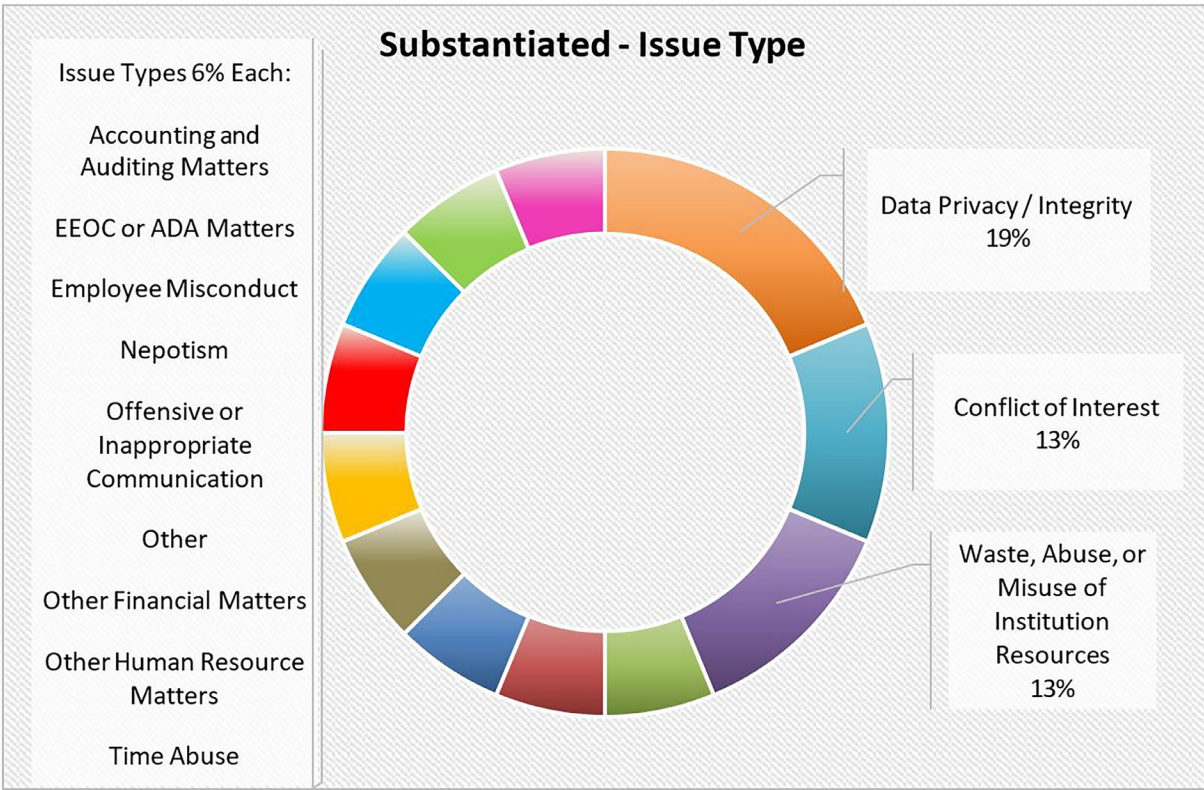| Closed Case Outcomes	Total
Referred	143
Substantiated	16
Unsubstantiated	73
Insufficient Information	43
Grand Total	**275**

Closed Cases – Investigations with Substantiated and Unsubstantiated Findings

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

Substantiated Cases

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

Substantiated - Issue Type

Issue Types 6% Each:

Accounting and Auditing Matters

EEOC or ADA Matters

Employee Misconduct

Nepotism

Offensive or Inappropriate Communication

Other

Other Financial Matters

Other Human Resource Matters

Time Abuse

Data Privacy / Integrity 19%

Conflict of Interest 13%

Waste, Abuse, or Misuse of Institution Resources 13%

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

Substantiated Cases – Action Taken

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

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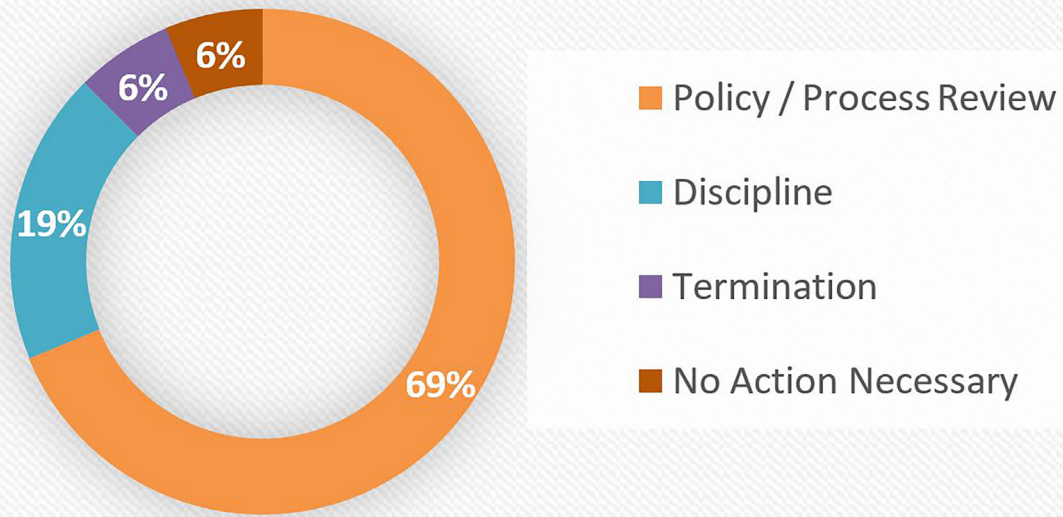
Action Taken	Total
Policy / Process Review	11
Discipline	3
Termination	1
No Action Necessary	1
Grand Total	16

Unsubstantiated Cases

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

Closed Cases – Referred or Insufficient Information

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

Referred

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

- **Eighty-five** cases were referred to the UCF Police Department, Student Conduct, or another college or department to address through the appropriate university process and closed out in the IntegrityLine system. These cases span the range of issues involving student misconduct such as alleged alcohol or drug abuse, grade disputes, COVID-19 policy violations, and interpersonal conflicts. Once the report is referred to the appropriate office, it is closed in the IntegrityLine system with a message posted back to the complainant.
- **The remaining 58** cases were referred to a college or department to conduct an internal review and report back their findings.

> **Referred - Substantiated**
> Nineteen of the 58 cases reviewed internally by a college or department resulted in a **substantiated** finding with the following issue types:

Referred - Substantiated

- Offensive or Inappropriate Communication — 63%
- Environmental and Safety Matters — 11%
- Conflict of Interest — 6%
- Employee Misconduct — 5%
- Other Academic Affairs Matters — 5%
- Other Financial Matters — 5%
- Waste, Abuse, or Misuse of Institutional Resources — 5%
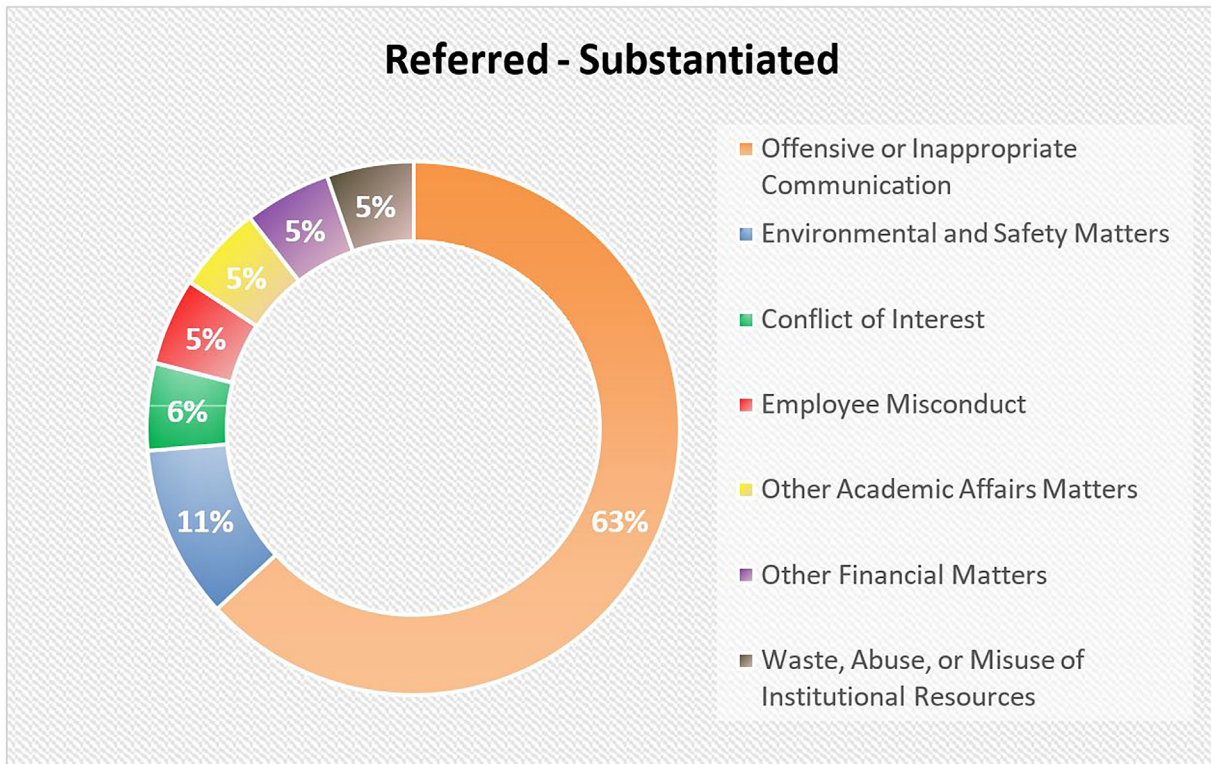
Primary Issue	Total
Offensive or Inappropriate Communication	12
Environmental and Safety Matters	2
Conflict of Interest	1
Employee Misconduct	1
Other Academic Affairs Matters	1
Other Financial Matters	1
Waste, Abuse, or Misuse of Institutional Resources	1
Grand Total	**19**

Referred - Substantiated - Action Taken
The actions taken for the 19 referred investigations that were substantiated were as follows:
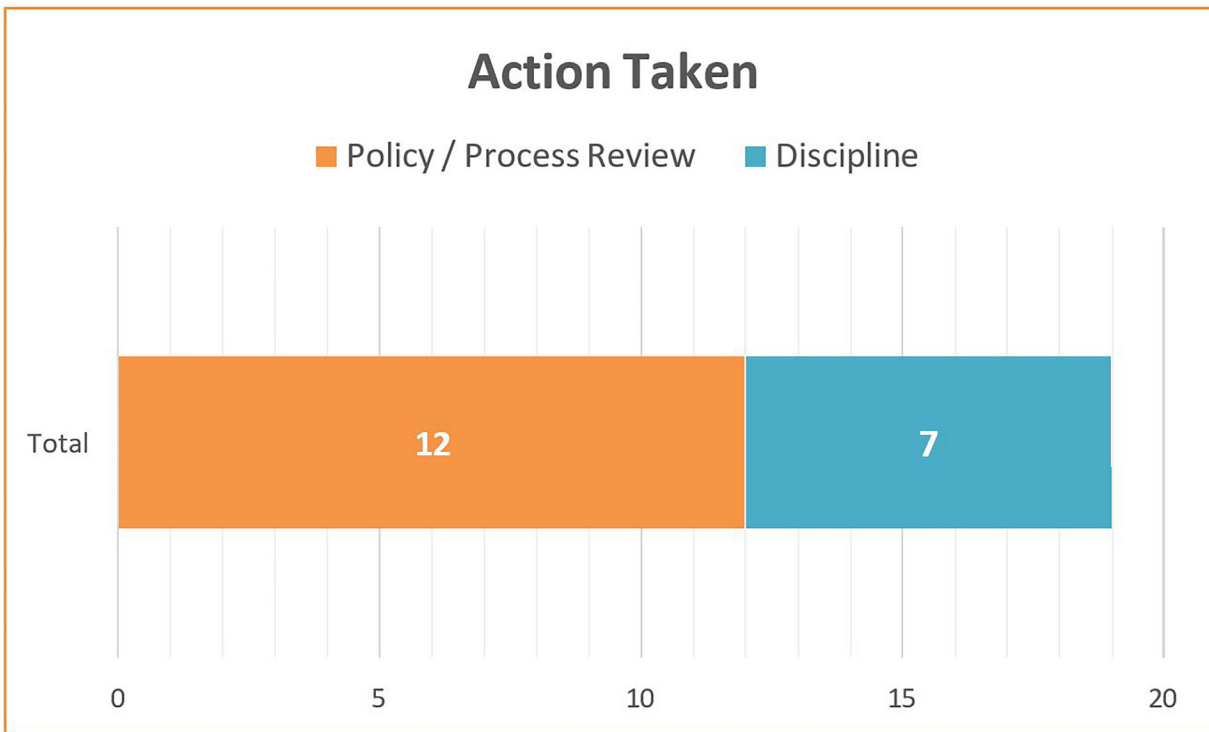
Referred - Unsubstantiated
The remaining 39 referred cases were unsubstantiated. However, 17 required improvements due to identified weaknesses which included policy or process reviews.

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

2022 IntegrityLine Trends

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

In 2020, likely as a result of the increased awareness efforts and marketing the IntegrityLine, the office saw an even sharper rise in the reports submitted regarding Offensive or Inappropriate Communication. By 2021, the reports leveled out with the same number reported the prior year with a total of 88 reports. This year, for 2022 there is a dip to 66 reports regarding Offensive or Inappropriate Communication. The dip suggests that the workplace is improving in this area.
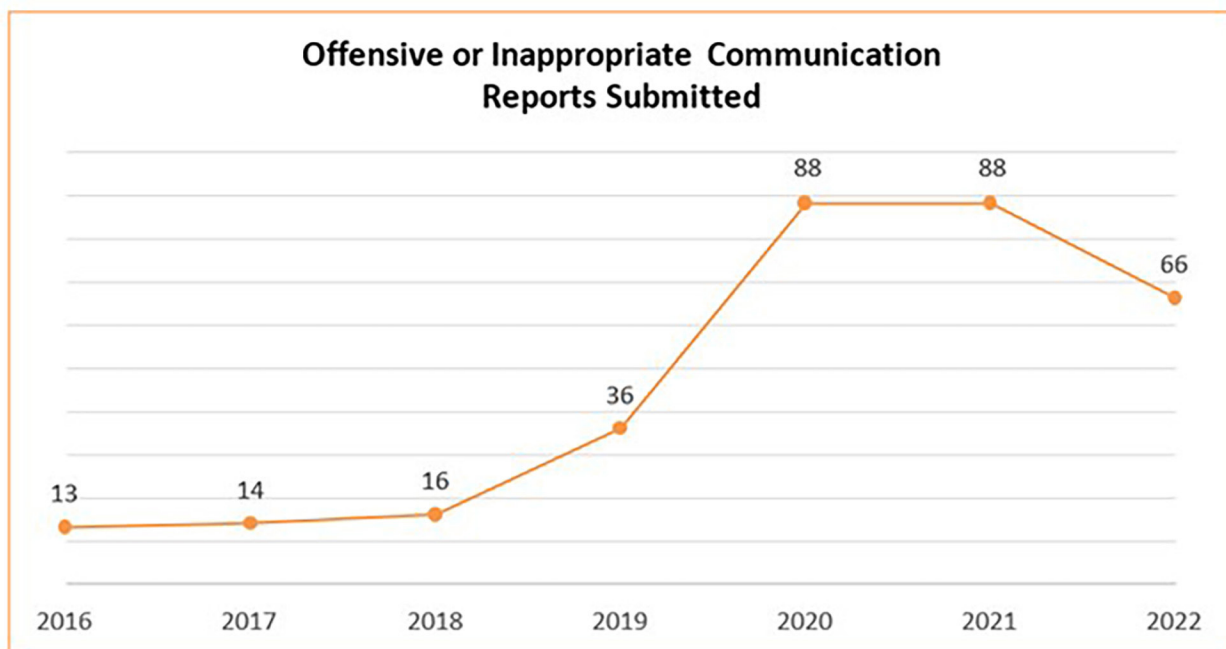
University Compliance and Ethics and Human Resources continue to evaluate opportunities to expand the education and awareness program with the overall goal to improve the workplace and support the university's strategic plan aspiration to make UCF a best place to learn and work.

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	No. Reports Reviewed	Substantiated
Athletics Compliance	NCAA	10	8
College of Medicine Health Affairs Legal/ Compliance	HIPAA Incident	20	20
	Billing and Coding	1	1
Office of Institutional Equity	Discrimination, Harassment, Retaliation, Inappropriate Amorous Relationships, and/or Failure to Report Discrimination-related Concerns	89	32
Research Compliance Office	Research Misconduct	5	4
Student Health Services	Patient Advocate Cases - Financial Concerns	5	4
	Patient Advocate Cases - Clinical Care Provided	3	3
	Patient Advocate Cases - Customer Services	17	17
	Incorrect labeling of lab specimens, lost specimens, lab procedures	1	1
	Transport to a higher level of care	11	11
	Near Miss or Situations having a potential claim against UCF SHS	4	4
	Falls	1	1
	Equipment Failure	1	1
	Building security issues	1	1
	Employee Injury	1	1
	Baker Acts	14	14
	Medication Error	9	9
UCF Public Safety	Standard of Conduct GO 201	9	5
	Traffic Crash	7	2
Registrar's Office	FERPA	11	9
Total Compliance Office / Partner Reports Reviewed and Substantiated		**216**	**144**

Outside Activity, Conflict of Interest and Commitment Disclosure Reporting
University Compliance and Ethics closed outside activity submissions in the legacy conflict of interest and commitment disclosure system in August 2022 and focused efforts on the transition to the new disclosure system launched in October 2022. For the 2021-2022 conflict of interest and commitment disclosure report year 100% compliance was achieved with required employee submission. To assist with the transition to the new system the office developed and implemented a communication and implementation plan which included multiple communications to employees to prepare them for the launch of the new disclosure system. Training sessions on how to use the new system were offered for disclosers, reviewers, and COI Coordinators.

University Compliance and Ethics also hosted virtual COI Office Hours to provide employees 1-1 assistance with preparing their disclosure. User guides and guidance materials were developed and posted to the office website and the disclosure system. For the 2022-23 disclosure year, one hundred percent completion was achieved by February 7, 2023.

The office also completed 54 foreign influence red flag reviews as part of the COI disclosure review process. A total of 74 reviews were conducted (slight decrease from the 78 completed last year but an increase from the 57 the year prior) of potential conflicts of interest associated with attendance at conferences or events sponsored by vendors or receiving discounts or gifts.

University Compliance and Ethics also reviewed and provided feedback on 14 research exemption requests (decrease from 31 the year prior but slight increase from the 13 the prior year) and coordinated with the provost, president, and Chair of the Board of Trustees for their approval as required by state statute.

Youth **Protection** Program

Youth Protection Program
This year, a total of 153 submitted registrations (131 in-person/ 10 virtual) were processed, approving 141 and sending one registration back to the program sponsor for additional information, and cancelling 12 registrations upon request by the program sponsor. The office oversaw a total of 133 youth programs operated during this fiscal year: UCF hosted programs: 42 (32%); third-party hosted programs: 91 (68%). Of the 133 youth programs, 35 were overnight programs (26%) and a total of approximately 20,000 minors served during the year. A total of 564 Youth Protection Program related inquiries were received and addressed as well.

The office worked with Enterprise Risk and Insurance to create a check list for third-party programs to review insurance requirements and communicate any deficiencies during the registration review process.

Several process improvements were also identified and addressed during the year. Staff worked with its contracted vendor to enhance both the registration and review process in the Squire Registration Portal by adding features that would ensure a more thorough and accurate submission and review of submitted registrations. A new training for all youth program staff supervising minors overnight was developed and required to be completed prior to the program start date.

Foreign Influence
University 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. Activities related to foreign influence included:

» Initiated and oversaw UCF's engagement with Dun & Bradstreet to evaluate the university's 12,000+ suppliers to identify those with a foreign parent. Provided results to UCF Procurement Services to ensure accurate foreign source reporting under Florida statute.
» Revised foreign source reporting procedures based on newly revised BOG guidance and re-distributed the procedures to impacted departments as well as a reminder of the January 2023 reporting deadline.

Privacy Compliance
During this year, the office completed the following privacy compliance activities in support of its Privacy Compliance Program:
- Reviewed and responded to 72 data subject access requests.
- Reviewed 74 contracts, along with eight reciprocal student exchange agreements.
- Reviewed and processed 48 Vendor Risk Management requests.
- Performed 35 Institutional Review Board Research-related ancillary reviews.
- Updated UCF's online Privacy Notice and UCF's Personal Data Map.

In collaboration with partner offices, Privacy Compliance also:
- Worked with IT representatives to address concerns with vulnerability assessment results related to HIPAA for the Communications Disorders Clinic and Physical Therapy Clinic.
- Helped revise the UCF Business Associate Agreement (BAA) template and an IRB Guidance Document on Data Security Best Practices.
- Contributed to the Office of the General Counsel's Office Procurement Contracts Checklist.
- Audited FERPA training and provided feedback to the University Registrar.

With new and pending privacy legislation with extraterritorial impact to UCF (California Privacy Rights Act, Virginia Consumer Data Protection Act, Connecticut Data Privacy Act, Colorado Privacy Act, and Utah Consumer Privacy Act), Privacy Compliance also performed an analysis on the university's risk exposure and met with the Office of the General Counsel to establish the university's approach to compliance with the new laws. Privacy Compliance established periodic meetings with departments that access personal information to ensure processes and procedures are followed and evolve in accordance with new laws, regulations, and industry best practices.

Additionally, in response to a Registered Student Organization (RSO) personal data concern, created a Security and Privacy Guidance Document for RSOs to help safeguard personal data.

Drug Free Schools Biennial Review
University Compliance and Ethics also reconvened and chaired the Drug Free Schools and Communities Act Biennial Review Committee in August 2022, to conduct the required review of the university's compliance efforts during fiscal years 2020-22 and updated the biennial review report to reflect those efforts. The committee met in April 2023 and finalized the report.

Clery Act Compliance
University Compliance and Ethics maintained oversight for the university's Clery Compliance program, providing guidance and support to the Clery Compliance

Analyst, also 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. Additionally, during this fiscal year, the office initiated with the Clery Compliance Analyst, a new approach to the Campus Security Authority (CSA) identification project. This project involves a review of all university job descriptions to identify those positions meeting the reporting requirements of a CSA. During the reporting period a review was completed on 569 job descriptions within two Divisions, identifying 485 employees in 233 job codes as a CSA. The office and Clery Compliance Analyst also began working with the kNEXT Team to create CSA tags in Workday for identified CSA positions.

Monitoring Activities by Compliance Offices and Partners

During this fiscal year, OIE received a total of 2,773 matters, of which 2,733 of these matters were closed during the year. These reviews consisted of 377 inquiries related to discrimination, harassment, retaliation, inappropriate amorous relationships, failure to report concerns, policy and procedure questions, requests for OIE data, and requests for OIE's academic program review for the Florida Board of Governor's form. In addition to these inquiries, the Office received 88 ADA inquiries, 75 ADA accommodation requests, 35 accessibility inquiries, 52 pregnancy accommodation requests, 70 religious accommodation requests, 213 remedial measures matters, 1,359 search and hiring inquiries, 46 requests for OIE history/background checks, 67 public records requests, and 275 training matters.

During this fiscal year, OIE continued development and implementation of the Digital Accessibility Policy, training related to it, and expansion of the university's Site Improve license for scanning websites.

The College of Medicine (COM) Health Affairs Legal/Compliance team directed and oversaw all UCF Health coding and billing audits conducted by external consultants throughout the fiscal year. The department also conducted an annual review of payments made to COM faculty, physicians, residents, and researchers by companies in the health care sector, if any, as listed on Centers for Medicare and Medicaid Services' Open Payments database.

The Division of Finance distributes annually to departments processing credit cards a Self-Assessment Questionnaire (SAQ) that was required in order to maintain PCI DSS compliance. The SAQ process was monitored and reviewed by the Finance and Accounting Merchant Services team. Expenditures and tax compliance reviews were also conducted on payments to independent contractors to identify potential worker misclassification. The Financial Affairs unit reviewed departmental financial statements to identify any non-reported unrelated business income activities and vendor creation 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, and University Compliance and Ethics. The Division also reviewed salary information for all administrative employees to ensure compliance with salary cap limitations pursuant to Florida Statutes 1012.975; 1012.976.

Utilities and Engineering Services unit within Facilities and Business Operations continued to trend data from the combined heat and power plant's operator station to ensure exhaust gas temperatures and flow rates for emissions were within permit parameters. This data was submitted to Orange County's Department of Environmental Protection to support UCF's air permit documentation and compliance testing.

Despite increased campus water demands, Utility and Engineering Services continued to maintain the St. Johns River Water Management District (SJRWMD) Consumptive Use Permit below the permit's threshold of 256.5 million gallons per year. The department protected precious regional resources by switching water sources to non-potable use for evaporative cooling; partnered with Facilities Operations to invest in fixture efficiency; and instituted conservation measures, where feasible. Monthly inspections of stormwater pond infrastructure including inflow and outflow structures and quarterly inspections of stormwater curb inlets for effective functionality were also conducted.

Talent and Acquisition:

- Reviewed over 1137 hire requests to ensure hiring practices were consistent and legal;
- Processed and reviewed over 30 background checks with criminal charges to mitigate the risk associated with negligent hiring;
- Conducted internal audits of job postings on the UCF Careers portal to ensure consistency with university guidelines, the EEOC, and consistency with UCF posting template;
- Partnered with OIE and Faculty Excellence to conduct an internal audit of the Affirmative Action Plan and any identified positions with goals; and
- Partnered with various areas on a business process review of the recruit to hire process for OPS, USPS, A&P and Faculty requisitions and identified process improvements.

The Information Security Office continued efforts to assess, report and provide system owners with mitigation methods for vulnerabilities and compliance related issues on Internet facing and data center systems. They conducted vulnerability scans of devices using UCF's network, as well as End Point Detection, to defend the university's network from cyber-related attacks. The Information Security Office also conducted monthly phishing campaigns to increase awareness and compliance with best practices related to phishing.
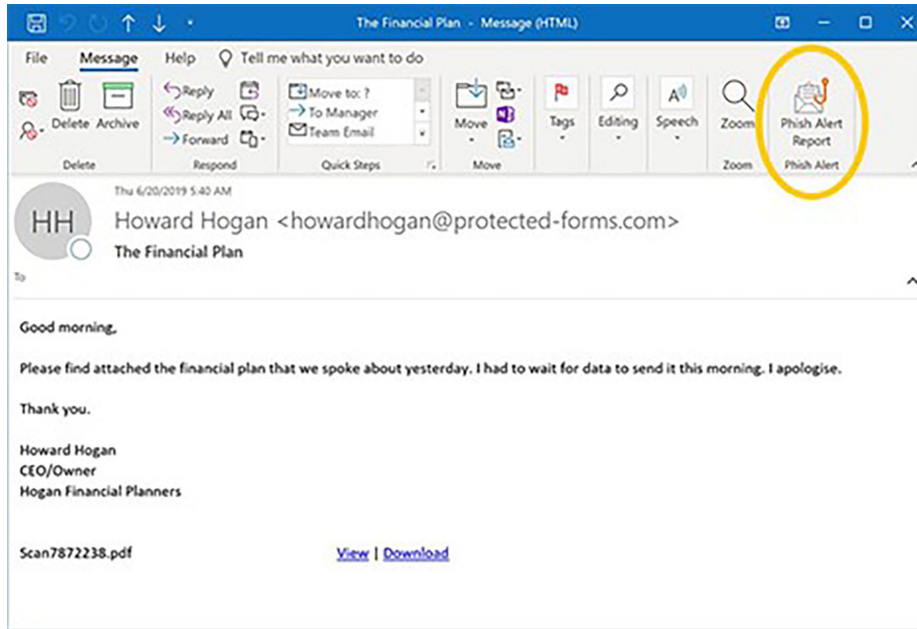
The Office of International Collaboration and Export Control conducted one export control assessment and six foreign influence assessments. No violations of federal law or state law were identified as part of these seven assessments and no corrective action was needed. Also, in accordance with the office's standard process, on-site monitoring of a lab subject to an export control technology control plan was conducted. No foreign influence red flags or export control violations were identified.

The Office of Research Compliance conducted annual reviews of Monitoring Plans for approximately 65 disclosers to ensure compliance. Follow-ups were performed to ensure conflict of interest training and Responsible Conduct of Research (RCR) training was also completed. The office continued to monitor compliance with RCR training requirements for NSF and select NIH awards. The outcome showed institutional compliance with federal research training requirements. An internal audit was also conducted on allowable costs assessments on random sponsored projects, and property and subrecipient monitoring assessments for UCF's Arecibo Observatory Large Facility were also audited.

UCF Global's International Student & Scholar Services team continued to conduct monitoring of F and J visa students and scholars using institution reports and SEVIS to ensure compliance with all relevant laws. UCF Global's Employment and Taxation unit reviewed H-1B personnel files bi-weekly to ensure compliance. UCF Global also completed PCI compliance reviews to ensure safekeeping of financial transaction records.

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. University Compliance and Ethics, in consultation with the 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 has 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 recognized by receiving the *IntegrityStar* Award and are featured in an article in the *IntegrityStar* newsletter. This year we recognized: (photos appear below, from left to right) Dr. Florian Jentsch, Department Chair and Professor, Department of Psychology, College of Sciences; Aubrey Jayanama, kNEXT Learning Management Lead; and Alison Cares, PhD, Associate Professor, Department of Sociology, College of Sciences. All three individuals received a framed *IntegrityStar* Award and were publicly recognized at a UCF Board of Trustees meeting.
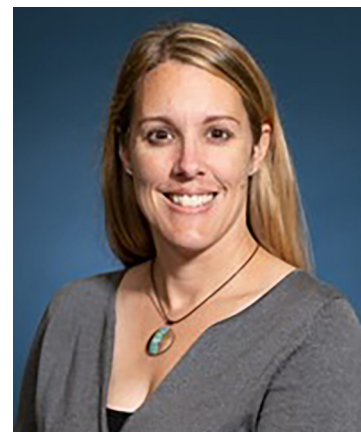
The office also engages employees annually to offer incentives for participating in its Compliance and Ethics Week awareness campaign. This year 117 employees participated, and 75 employees were randomly selected to win a prize. Activities commenced during the week November 7-11, 2022, and included two engaging activities for employees to win prizes:
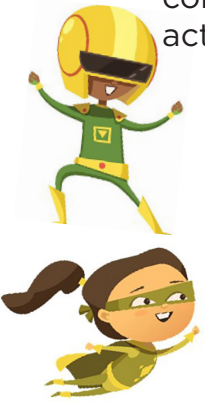
- ❖ Training - Developed and published three training videos with a superhero theme relating to various ethics topics: Mission Impossible II (Misuse of Resources), Mini Superheroes (Respect), and Mini Superheroes (Retaliation). A total of 345 videos were viewed.
- ❖ Create your own superhero activity: Employees could create their own ethical superhero and/or submit a photo of themselves dressed as an ethical superhero. A total of 9 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 the UCF Police Department issued a total of 27 awards to department employees for their outstanding service during the year.

Appropriate Discipline
University Compliance and Ethics provided guidance to supervisors and members of the senior leadership team on appropriate disciplinary action up to and including termination when misconduct, noncompliance, or criminal conduct is identified. The office monitored the completion of recommended corrective actions and escalated any issues as appropriate to senior leadership, the president, and the Board's Audit and Compliance Committee. 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.

In addition to the actions addressed by University Compliance and Ethics, during this fiscal year Human Resources also provided daily counsel regarding disciplinary action to supervisory staff, and the Information Security Office suggested remedial training related to information security matters.