



University Compliance, Ethics and Risk Office

Compliance and Ethics Annual Work Plan 2023-2024

University Compliance, Ethics, and Risk provides oversight and guidance to university-wide ethics, compliance, and enterprise risk management activities, and fosters a culture that embeds these disciplines in all university functions and activities. University Compliance and Ethics, under the direction of the vice president for compliance, ethics, and risk, chief compliance and ethics officer, is charged with implementing and sustaining the compliance and ethics program and provides centralized and coordinated oversight through the ongoing development of effective policies and procedures, education and training, monitoring, communication, risk assessment, and response to reported issues as required by Chapter 8 of the Federal Sentencing Guidelines and Board of Governors Regulation 4.003. These guidelines and regulation set forth the requirements of an effective compliance and ethics program and require promoting compliance with laws and a culture of ethical conduct. The compliance and ethics program focuses on projects that will mitigate risks to the resources and reputation of UCF as well as the careers and professional reputations of its employees.

The following work plan lists the required elements and the activities that will be conducted from July 1, 2023, to June 30, 2024.

1. Provide Oversight of Compliance and Ethics and Related Activities

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

- Coordinate and conduct bi-monthly meetings of the University Compliance and Ethics Advisory Committee
- Conduct quarterly meetings with compliance partners and senior leadership
- Serve on and provide compliance guidance to the Title IX workgroup
- Serve on and provide guidance to the Security Incident Response Team and Co-Chair the Information Security and Privacy Advisory Committee
- Serve as members of and provide guidance to the Clery Compliance Advisory Counsel

2. Develop Effective Lines of Communication

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

- Prepare and distribute *IntegrityStar*, the compliance and ethics newsletter
- Administer and promote the UCF IntegrityLine, reinforce expectations for non-retaliation, and continue communications during and after investigations
- Coordinate timely responses to regulatory and other external agencies
- Maintain and promote the compliance and ethics website
- Disseminate compliance and ethics program information and educational materials during tabling events such as new faculty orientation and the benefits fair

3. Conduct Effective Training and Education

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

- Deliver and track new employee completion of mandatory Code of Conduct and Potential Conflicts – Florida Code of Ethics for Public Officers training
- Provide ethical leadership training
- Launch ninth annual Compliance and Ethics Week awareness campaign
- Promote Gifts and Honoraria and Potential Conflicts online training modules for current employees and track employee completion
- Issue annual memo on Vulnerable Persons Act
- Develop and launch mandatory annual Code of Conduct training with certifications for non-student employees and monitor compliance for completion
- Monitor compliance of completion of the Youth Protection online training module as required by policy
- In partnership with the Information Security Office, deliver mandatory security and privacy awareness training, track employee completion, and look for other avenues to raise security and privacy posture
- Identify additional opportunities to develop and deliver compliance and ethics training
- Issue additional regulatory alerts and updates as appropriate

4. Revise and Develop Policies and Procedures

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

- Chair the University Policies and Procedures Committee, provide oversight of the policy process, and provide guidance on policy development
- Update and publish revised UCF Employee Code of Conduct
- Serve as members of the HIPAA Collaborative to develop university policies and procedures on HIPAA compliance

5. Conduct Internal Monitoring and Compliance Reviews

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

- Manage university-wide Youth Protection Program

- Manage and provide oversight of the university's Foreign Influence Program
- Develop and manage university-wide Privacy Program
- Continue compliance partner reporting
- Review the UCF IntegrityLine and department database for trends and risk areas and address appropriately

6. Respond Promptly to Detected Problems and Undertake Corrective Action

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

- Receive and evaluate UCF IntegrityLine reports and allegations of misconduct made directly to the office; conduct investigations
- Provide recommendations for corrective actions and improvement of ethical conduct

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

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

- Develop and promote compliance and ethics incentive opportunities through various campaigns, such as National Compliance and Ethics Week
- Work with Human Resources to incorporate compliance and ethics as a performance measure when developing new employee appraisal template
- Promote awareness of UCF regulations, policies and procedures, and regulatory requirements
- Promote accountability and consistent discipline

8. Measure Compliance Program Effectiveness

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

- Develop and issue the Compliance and Ethics Annual Report
- Develop, measure, and track department process improvement efforts using the university assessment process

9. New Regulations and Special Projects

- Oversee compliance efforts with National Institute of Standards and Technology 800-171 (NIST) federal requirements
- Continue to partner with Human Resources to ensure compliance with employee acknowledgement of the Employee Annual Notices
- To ensure compliance and transparency serve as a member of the workgroup charged with evaluating the reporting of research expenditures to the NSF HERD survey.