



# University Compliance, Ethics and Risk Office

## Compliance and Ethics Annual Work Plan 2021-22

University Compliance, Ethics, and Risk provides centralized and coordinated oversight of UCF’s ethics, compliance, and risk mitigation efforts 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. These guidelines set forth the requirements of an effective compliance and ethics program for organizations and require not only promoting compliance with laws, but also promoting 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, 2021, to June 30, 2022.

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 (SIRT) and the Information Security Awareness Advisory Board
	Serve as members of and provide guidance to the Clery Act Compliance Committee
2. Develop Effective Lines of Communication	
Create communication pathways that allow the dissemination of education and	Prepare and distribute <i>IntegrityStar</i> , the compliance and ethics newsletter

<p>regulatory information and provide a mechanism for reporting compliance activities or concerns</p>	<p>Administer and promote the UCF IntegrityLine, reinforce expectations for non-retaliation, and continue communications during and after investigations</p>
	<p>Coordinate timely responses to regulatory and other external agencies</p>
	<p>Maintain and promote the compliance and ethics website</p>
	<p>Disseminate compliance and ethics program information and educational materials during tabling events such as new faculty orientation and the benefits fair</p>
<p><b>3. Conduct Effective Training and Education</b></p>	
<p>Educate the UCF community on its compliance responsibilities and regulatory obligations, and on the university compliance and ethics program</p>	<p>Deliver and track new employee completion of mandatory Code of Conduct and Potential Conflicts – Florida Code of Ethics for Public Officers training</p>
	<p>Provide ethical leadership training through Human Resources and Advancement</p>
	<p>Launch seventh annual Compliance and Ethics Week awareness campaign</p>
	<p>Provide support to Clery Compliance Analyst on launch of Campus Security Authority (CSA) identification process and launch of new online training course</p>
	<p>Promote Gifts and Honoraria and Potential Conflicts online training modules for current employees and track employee completion</p>
	<p>Issue annual memo on Vulnerable Persons Act</p>
	<p>Develop and launch mandatory annual Code of Conduct training with certifications for non-student employees and monitor compliance for completion</p>
	<p>Monitor compliance of completion of the Youth Protection online training module as required by policy</p>
	<p>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 (PegaSec, Phishing Tests, etc.)</p>

	Identify additional opportunities to develop and deliver compliance and ethics training
	Issue additional regulatory alerts and updates as appropriate
<b>4. Revise and Develop Policies and Procedures</b>	
Revise or develop university regulations along with policies and procedures that reflect UCF's commitment to ethical conduct and compliance with applicable laws and regulations	Chair the University Policies and Procedures Committee and provide guidance on policy development
	Continue to enforce UCF Policy 2-001 University Policy Development, which requires annual policy reviews by department and mandatory five-year reviews by the University Policies and Procedures Committee
	Serve as members of the HIPAA Collaborative to develop university policies and procedures on HIPAA compliance
<b>5. Conduct Internal Monitoring and Compliance Reviews</b>	
Identify and remediate noncompliance through proactive review and monitoring of risk areas	Manage university-wide conflict of interest and commitment process
	Manage university-wide Youth Protection Program (YPP)
	Develop and manage university-wide Privacy Program
	Continue compliance partner reporting
	Collaborate with the director of enterprise risk and insurance management to conduct a formal compliance risk assessment
	Review the UCF IntegrityLine and department database for trends and risk areas and address appropriately
	Review and provide guidance on the Annual Security Report in compliance with the Clery Act
<b>6. Respond Promptly to Detected Problems and Undertake Corrective Action</b>	
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
<b>7. Enforce and Promote Standards through Appropriate Incentives and Disciplinary Guidelines</b>	
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
	Promote awareness of UCF regulations, policies and procedures, and regulatory requirements
	Promote accountability and consistent discipline
<b>8. Measure Compliance Program Effectiveness</b>	
Evaluate the overall compliance and ethics culture of UCF and the performance of the University Compliance, Ethics, and Risk office	Develop and issue the University Compliance, Ethics, and Risk Annual Report
	Implement improvement measures identified in the five-year compliance and ethics program review
	Launch fourth Compliance and Ethics Culture Survey to benchmark results against prior year's results in 2016, 2018, and 2020
	Develop, measure, and track department process improvement efforts using the university assessment process
<b>9. New Regulations and Special Projects</b>	
	Oversee compliance efforts with National Institute of Standards and Technology 800-171 (NIST) federal requirements
	Oversee compliance efforts with the acceptance of CARES Act funding
	Oversee compliance efforts with European Union General Data Protection Regulation (GDPR)
	Working with the Office of Research Compliance, customize Huron software to accommodate online outside activity and conflict of interest and commitment reporting

	Oversee compliance efforts with the implementation of HB 7017 Foreign Influence
	Working with Human Resources, continue to evaluate and develop a communication, education, and awareness campaign to address increased reports of offensive or inappropriate communication