



# University Compliance and Ethics

UNIVERSITY OF CENTRAL FLORIDA

## 2024-2025 Compliance and Ethics Work Plan Status October 1, 2024 – December 31, 2024

UCF's comprehensive compliance and ethics program is based on the elements of an effective compliance program as set forth in Chapter 8 of the Federal Sentencing Guidelines, and as required by Board of Governors Regulation 4.003 State University System Compliance and Ethics Programs. The Guidelines and Regulation establish the minimum standards for effective programs. Each year, University Compliance and Ethics submits an Annual Work Plan to the Audit and Compliance Committee of the Board of Trustees detailing the office's efforts that support an effective program. This report contains the activities committed to in the office's 2024-2025 Compliance and Ethics Annual Work Plan and includes the status of the activities during the period October 1, 2024, through December 31, 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**

- Developed materials and chaired the Compliance and Ethics Advisory Committee meeting in October. Discussions included the kickoff of the Faculty and Staff Experience Survey; 89% completion rate of the Code of Conduct Refresher Training; new restrictions from federal agencies with regard to foreign entities; and overall training throughout the university.

#### **CONDUCT QUARTERLY MEETINGS WITH COMPLIANCE PARTNERS AND SENIOR LEADERSHIP**

- Met with vice presidents, key administrators, the faculty athletics representative, and compliance partners to provide updates on compliance and ethics initiatives and discuss any concerns or issues.

#### **SERVE ON AND PROVIDE COMPLIANCE GUIDANCE TO THE TITLE IX WORKGROUP**

- Provided guidance and support to the Title IX coordinator and served on and provided 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**

- Met with and provided guidance to the Security Incident Response Team on a matter involving social engineering tactics targeting an employee's email account.

### **SERVE ON AND PROVIDE GUIDANCE TO THE CLERY COMPLIANCE ADVISORY COUNCIL**

- Provided guidance and support to the Clery compliance analyst and served on the Clery Compliance Advisory Council.
- Monitored legislative updates related to the Stop Campus Hazing Act, which amended the Clery Act and became effective upon signature of the president on December 23, 2024.

---

## **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**

- Developed and issued the November edition of the *IntegrityStar* newsletter. Articles included Celebrate 2024 Compliance and Ethics Week containing a video preview of the week's activities, the 2024 Compliance and Ethics Culture Survey, and Understanding Florida's Public Records Law and How to Comply. The edition also included FAQs related to the 2024 Compliance and Ethics Culture Survey.
  - The "Case Corner" section featured an investigation related to UCF Policy 2-701 Drug Free Schools and Workplace.
  - The "Privacy Points" section introduced the new Director, Privacy Compliance.

### **ADMINISTER AND PROMOTE THE UCF INTEGRITYLINE, REINFORCE EXPECTATIONS FOR NON-RETALIATION, AND CONTINUE COMMUNICATIONS DURING AND AFTER INVESTIGATIONS**

- Continued administration of the UCF IntegrityLine to include review and tracking of all reports, data compilation, trend review, and reporting.
- Promoted the UCF IntegrityLine in the November 2024 edition of the *IntegrityStar* newsletter including an article in the Case Corner section to encourage reporting; continued promoting the IntegrityLine in compliance videos; on the office's website; and on the websites of all compliance partners.
- Provided direct support and guidance to supervisors and employees involved in investigations.

### **MAINTAIN AND PROMOTE THE COMPLIANCE AND ETHICS WEBSITE**

- Promoted the compliance and ethics website in the University Compliance and Ethics pamphlets distributed during New Employee Orientation and the UCF Benefits Fair.
- Updated the website to include the November 2024 *IntegrityStar* edition.
- Published the 2024 Compliance and Ethics Week webpage.
- Uploaded the 2024 Compliance and Ethics Annual Report, 2024-2025 Annual Work Plan, updated links, and removed outdated documents.
- Updated the Gifts and Honoraria and Foreign Influence webpages to include additional guidance on gift restrictions from foreign countries of concern under Florida statute.
- Posted a new resource, Inside Activity Tree, and the revised Outside Activity, Financial Interest, and Potential Conflict Disclosure Matrix on the Conflict of Interest and Commitment webpage.

## **HOST TABLING EVENTS TO ENGAGE THE UNIVERSITY COMMUNITY IN THE COMPLIANCE AND ETHICS PROGRAM**

- Provided the UCF Employee Code of Conduct, the office brochure, Privacy Compliance brochure, Youth Protection Program brochure, Gifts and Honoraria brochure, UCF IntegrityLine Speak Up earbuds and wallet cards, Youth Protection Littlest Knights stress relievers, and Privacy Compliance web camera covers to employees during the 2024 UCF Benefits Fair.

## **IDENTIFY ADDITIONAL OPPORTUNITIES TO DISSEMINATE COMPLIANCE AND ETHICS PROGRAM INFORMATION AND EDUCATIONAL MATERIALS**

- Partnered with the American Federation of State, County, and Municipal Employees (AFSCME) bargaining unit 1481 to distribute UCF Employee Code of Conduct print copies to UCF AFSCME employees during the 2024 UCF 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 / SPEAK UP AND POTENTIAL CONFLICTS – FLORIDA CODE OF ETHICS FOR PUBLIC OFFICERS AND EMPLOYEES TRAINING**

- New employees who took the online course and passed the final quiz:
  - Employee Code of Conduct / Speak Up! (English) = 669
  - Potential Conflicts – Florida Code of Ethics for Public Officers and Employees (English) = 388

## **LAUNCH TENTH ANNUAL COMPLIANCE AND ETHICS WEEK AWARENESS CAMPAIGN**

- Compliance and Ethics Week activities commenced November 4-12, 2024, offering employees an opportunity to complete short training modules on the Drug-Free Schools and Workplace Policy, privacy related to emerging technologies, and the *IntegrityStar* newsletter.
- The week also contained an engaging online scavenger hunt with the new Compliance and Ethics Week mascot “Beacon” throughout the office’s newly published website.
- A total of 142 employees participated as follows:
  - Drug-Free Schools and Workplace (video): 142 employees viewed
  - Privacy Related to Emerging Technologies (video): 133 employees viewed
  - *IntegrityStar* Newsletter (video): 132 employees viewed
  - Online Scavenger Hunt: 130 employees submitted entries
- Awarded one grand prize – Four tickets to an upcoming UCF men’s basketball game, and 60 miscellaneous prize packs to randomly selected employees.

## **PROMOTE GIFTS AND HONORARIA AND POTENTIAL CONFLICTS ONLINE TRAINING MODULES FOR CURRENT EMPLOYEES AND TRACK EMPLOYEE COMPLETION**

- Continued to promote the office’s online training modules to employees.
- Existing employees who took the online courses and passed the final quiz during this reporting period:

- Gifts and Honoraria = 3
- Potential Conflicts – Florida Code of Ethics for Public Officers and Employees (English) = 282

**DEVELOP AND LAUNCH MANDATORY ANNUAL CODE OF CONDUCT REFRESHER TRAINING FOR NON-STUDENT EMPLOYEES AND MONITOR COMPLIANCE FOR COMPLETION**

- The 2024 Code of Conduct refresher training containing customized modules (English and Spanish) addressing Intellectual Property, Privacy and Confidential Information, and Use of Social Media launched on September 9, 2024, with an October 9, 2024 deadline. Due to Hurricane Milton, the deadline was then extended to October 18, 2024.
  - Number of employees auto enrolled = 7,938
  - Number of employees completed the training by the October 18, 2024, extended deadline = 6,901 (89%)
  - Employees continued to receive automated email notifications and supervisors were notified of the delinquencies. By December 31, 2024, the completion rate reached 99.96%.

**MONITOR COMPLIANCE WITH COMPLETION OF THE YOUTH PROTECTION AND OVERNIGHT STAFF ONLINE TRAINING MODULES AS REQUIRED BY POLICY**

- Required Youth Protection training was completed by nine program staff during this reporting period.
- Overnight Youth Program Staff training was completed by two program staff responsible for supervising minors overnight, as required.

**LAUNCH SECOND ANNUAL DATA PRIVACY DAY AWARENESS CAMPAIGN**

- Began preparations for Data Privacy Day event scheduled January 28, 2025. Partnered with the School of Global Health Management and Informatics to engage faculty and students in developing content for the training and tabling event.

**IDENTIFY ADDITIONAL OPPORTUNITIES TO DEVELOP AND DELIVER COMPLIANCE AND ETHICS TRAINING**

- Hosted compliance and audit officials from the University of Kentucky and delivered a compliance and ethics program review with specific focus on conflict of interest and commitment and export control.
- Participated in UCF Learning and Development Community of Practice meetings where compliance related training was discussed.
- Assisted the UCF Police Department with incorporating their “Avoid, Deny, Defend” video into the New Hire Onboarding Training Program.
- Met with compliance offices and partners to discuss moving employee compliance related training from UCF WebCourses to Workday.
- Responded to 208 training related inquiries.

**ISSUE ADDITIONAL REGULATORY ALERTS AND UPDATES AS APPROPRIATE**

- Reconvened the Drug Free Schools and Communities Act Biennial Review Committee to conduct the required review of the university’s compliance efforts for fiscal years 2022-2024.

---

#### **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**

- Chaired the University Policies and Procedures Committee. Provided coordination of the committee and management of the online Policies and Procedures Manual.
- Reviewed and edited policies and procedures prior to submission for approval to the committee. Worked directly with departments, provided guidance, and revised five policies.
- Updated ADA digital compliance on 85 policies posted to the online policy library.

##### **SERVE AS MEMBERS OF THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA) COLLABORATIVE TO DEVELOP UNIVERSITY POLICIES AND PROCEDURES ON HIPAA COMPLIANCE**

- Continued to serve on and attend meetings for the UCF Health Sciences HIPAA Collaborative. Reviewed draft Information Blocking Rule and Reproductive Healthcare Privacy Policy and provided feedback for discussion.

---

#### **5. *Conduct Internal Monitoring and Compliance Reviews***

---

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

##### **MANAGE UNIVERSITY-WIDE CONFLICT OF INTEREST AND COMMITMENT PROGRAM**

- Since the launch of the 2024-25 Potential Conflict of Interest or Commitment, Outside Activity or Employment AA-21 disclosure year, completed 466 reviews in the Huron COI system. There were 422 disclosures closed with no conflicts identified, 42 requiring monitoring plans, and two unapproved conflicts requiring resolution.
- Foreign influence red flag reviews were completed for each positive response to financial interests and outside activities disclosed with foreign entities. Completed 12 red flag reviews with no resulting issues.
- Ensured compliance with foreign influence inquiry COI procedures requiring red flag review for any employee who failed to disclose within 90-days. Completed one review that identified no red flags.
- Reviewed 32 disclosed employment of relatives for potential conflicts.
- Received and completed two HR-11 Report of Potential Conflict of Interest or Commitment, Outside Activity or Employment disclosures containing potential conflicts of interest. No conflicts identified.
- Reviewed and provided feedback on one research exemption and coordinated with the provost, president, and Chair of the Board of Trustees for their approval as required by state statute.
- Received and completed 15 reviews of potential conflicts associated with attendance at conferences or events sponsored by vendors or receiving discounts or gifts.
- Completed 48 conflict of interest reviews requested by employees and departments.

- Received and completed two supplier review requests for compliance with university regulation and state ethics laws.
- With the Office of International Collaboration and Export Control and Research Compliance Office, met with members of Rosen college to discuss AA-21 reporting requirements, outlining the distinction between inside and outside activities. Provided copies of the newly developed Inside Activity Decision Tree and revised Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.
- With the Office of the General Counsel evaluated two potential conflicts with political activities. Both were cleared with no conflicts.

#### **MANAGE UNIVERSITY-WIDE YOUTH PROTECTION PROGRAM**

- Youth program registrations approved by the department resulted in nine UCF organized and hosted youth programs and 11 third-party programs, serving a total of 1,084 minors during this reporting period. One registration was cancelled after approval at the request of the program sponsor.
- Processed and approved 12 in-person youth program registrations.
- Processed five registration access requests, approving three appropriately submitted by program sponsors and redirected two that were incorrectly submitted by program staff. Provided additional guidance and education to the program staff regarding the registration process.
- Met monthly with the Squire Youth Program Registration system vendor to improve efficiency in the registration and review process. Collaborated with the Athletics Compliance Office to improve policy compliance across third-party athletic youth programs.
- Participated in monthly Higher Education Protection Network (HEPNet) Resource Committee meetings.
- Met with UCF Housing and Residence Life Conference Services team to discuss requirements for overnight youth programs.
- Met with UCF Human Resources to discuss background check requirements.
- Participated in the Big 12 Youth Protection Network meeting.
- Responded to 73 Youth Protection Program related inquiries.

#### **MANAGE AND PROVIDE OVERSIGHT OF THE UNIVERSITY'S FOREIGN INFLUENCE PROGRAM**

- 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 and Research Compliance Office to discuss foreign influence red flags, inquiries, and subsequent investigations.
- With the Office of International Collaboration and Export Control, met with UCF Advancement staff to provide additional guidance on Florida Statutes Sections 286.101, 288.860, and BOG regulation Foreign Influence. Evaluated and provided guidance on a potential prospect.
- Updated the office's website to include guidance on gift restrictions from foreign countries of concern under Florida Statutes Section 286.101 on the webpages for Gifts and Honoraria and Foreign Influence.

#### **DEVELOP AND MANAGE UNIVERSITY-WIDE PRIVACY PROGRAM**

- Reviewed, provided guidance, and approved privacy related language in 12 contracts and performed six research-related ancillary reviews.
- Identified and corrected a gap in the kNEXT team's routing of vendor agreements to Privacy Compliance.
- Addressed a student concern regarding unsolicited text messages from vendors.
- Met with UCF Global and the Office of the General Counsel to discuss Reciprocal Student Exchange Agreements with five European universities.
- Worked with the Office of the General Counsel and outside legal counsel to evaluate a potential General Data Protection Regulation notification request.
- Met with and provided guidance to Parking Services regarding SMS texting.
- Met with the Office of the General Counsel and the Office of Information Security to discuss process improvements in reviewing contracts in Cobblestone.
- Received and responded to a student concern regarding personally identifiable information requests with the University Registrar.

#### **CONTINUE COMPLIANCE PARTNER REPORTING**

- Compliance partners continued to provide updates on their program activities during committee meetings and through separate meetings and discussions when significant issues and challenges arose.

---

### **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**

- Provided administration and oversight of the UCF IntegrityLine to include review and tracking of all reports until completion, data compilation, trend review, and reporting. Received 55 new reports through the UCF IntegrityLine and one new directly report to the office alleging misconduct.
- Triaged incoming IntegrityLine reports with University Audit. When appropriate, reports were referred to a compliance partner, investigated by this office, University Audit, or the Office of Institutional Equity. During this time, 60 IntegrityLine cases were investigated and closed.
- Performed intake of eleven potential cases that did not rise to the level of an investigation following the initial inquiry phase.
- Responded to three public records requests for IntegrityLine and investigation records.

#### **PROVIDE RECOMMENDATIONS FOR CORRECTIVE ACTIONS AND IMPROVEMENT OF ETHICAL CONDUCT**

- Continued providing recommendations for corrective actions and improvements of ethical conduct following investigations or requests for guidance.

---

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

---

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

### **DEVELOP AND PROMOTE COMPLIANCE AND ETHICS INCENTIVE OPPORTUNITIES**

- Recognized *IntegrityStar* Award winners Patricia Hall, Library Technical Assistant III, and Christina Alecse, Administrative Project Manager, for their active participation in contributing to an ethical culture at UCF, in the November 2024 edition of the *IntegrityStar*.

### **PROMOTE AWARENESS OF UCF REGULATIONS, POLICIES AND PROCEDURES, AND REGULATORY REQUIREMENTS**

- Highlighted in the November 2024 edition of the *IntegrityStar* a total of five new and revised UCF policies and five new and revised regulations that had been implemented since the last edition.
- Distributed two campus-wide emails to employees alerting them of the approval of five new, revised, and emergency policies.

### **PROMOTE ACCOUNTABILITY AND CONSISTENT DISCIPLINE**

- Continued to provide recommendations for appropriate discipline for substantiated cases to ensure accountability and consistency in corrective actions.
- Continued serving as the point of contact and source for guidance to research compliance related to scientific misconduct, export controls, conflict of interest, and development of policies and procedures.

---

## **8. Measure Compliance Program Effectiveness**

---

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

### **DEVELOP AND ISSUE THE COMPLIANCE AND ETHICS ANNUAL REPORT**

- The annual report for 2023-2024 including the activities of our compliance partners and programs across the university was presented during the Audit and Compliance Committee of the Board of Trustees December 2024 meeting and submitted to the BOG as required by BOG Regulation.

### **DEVELOP, MEASURE, AND TRACK DEPARTMENT PROCESS IMPROVEMENT EFFORTS USING THE UNIVERSITY ASSESSMENT PROCESS**

- Prepared and submitted the 2023-2024 results report identifying improvements to the Compliance and Ethics Culture Survey response rate and the 2024-2025 plan focused on improving IntegrityLine case closure rates.



---

## 9. *New Regulations and Special Projects*

---

### **IMPLEMENT NEW UCF INTEGRITYLINE SYSTEM**

- Met with investigative partner offices to develop and finalize IntegrityLine issue types. Provided the list to the third-party vendor for customization in the new system.
- Met with current vendor to discuss transition action steps and timeline.
- Began testing phase in the new system to identify potential gaps and minimize customizations.

### **OVERSEE THE EXECUTION OF THE FACULTY AND STAFF EXPERIENCE SURVEY AND SERVE ON THE STEERING COMMITTEE**

- Reviewed and provided feedback on the survey instrument, website, and tested the online survey.
- The survey launched on October 28 and remained open through November 15.
- Promoted the survey in the November *IntegrityStar* newsletter and on the University Compliance and Ethics website.
- Directly emailed employees who reported the ModernThink survey emails as phishing, reassuring them that the link was safe and encouraging their participation.
- The survey closed with a 51% response rate. ModernThink will provide results to UCF in Spring, 2025.