



University Compliance and Ethics

UNIVERSITY OF CENTRAL FLORIDA

2024-2025 Compliance and Ethics Work Plan Status July 1, 2024 – September 30, 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 July 1, 2024, through September 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.

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 a supplier.

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.
- Reviewed and edited the Annual Security Report which was distributed university-wide prior to the October 1, 2024, deadline.

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 July edition of the *IntegrityStar* newsletter. Articles included the 2023 UCF IntegrityLine Report, Reporting Misconduct at UCF with accompanying image and video from the University of Texas at Austin on integrity, and the New Revisions to the Fair Labor Standards Act Overtime Pay Threshold. The edition also included FAQs related to the Fair Labor Standards Act updates.
 - The “Case Corner” section featured a substantiated case from the 2023 UCF IntegrityLine Report.
 - The “Privacy Points” section provided guidelines and best practices when using emerging technologies for university business.

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 July 2024 edition of the *IntegrityStar* newsletter; 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.

COORDINATE TIMELY RESPONSES TO REGULATORY AND OTHER EXTERNAL AGENCIES

- As required by Section 117 of the Higher Education Act and Florida statute 1010.25, compiled a list of all UCF gifts and contracts with foreign entities and reported 17 foreign gifts and contracts that, in aggregate, exceeded \$250,000 to the Federal Department of Education, and 68 foreign gifts and contracts in aggregate that exceeded \$50,000 to the Board of Governors (BOG) by the July 31, 2024, deadline.
- In compliance with the Florida Foreign Influence Act, coordinated with the Office of International Collaboration and Export Control the issuance of the following reports to the Board of Trustees in July 2024: *Florida Foreign Influence Act Disclosure – Denied Applicants 2024* and *Florida Foreign Influence Act Disclosure – Travel 2024*.
- As an added measure to our compliance efforts with Florida statutes and BOG regulation, the university contracted with Dun & Bradstreet to review the entities within the research portfolio for potential foreign parents which identified an adjustment to a prior foreign source reporting and notification to the BOG.
- Collaborated with partner offices to respond to the BOG Inspector General’s August 2024 foreign gift disclosure inspection request, providing additional supporting documentation.
- In response to the Department of Children and Families (DCF) licensing determination letter, coordinated with the Office of Military and Veteran Student Success to provide clarifications to DCF on the structure of the Soldiers to Scholars program and received a final determination that the program no longer required licensure.

- In response to the BOG August 29, 2024, Data Request, coordinated with the Office of International Collaboration and Export Control to prepare and submit the Foreign Influence Annual Report by the September 30, 2024, deadline.

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 Faculty Orientation.
- Updated the website to include the July 2024 *IntegrityStar* edition; revisions to content on the Our Team, published the 2024 Compliance and Ethics Week page, University Compliance and Ethics Program Plan, 2024-2025 Annual Work Plan, updated links, updated document accessibility, and removed outdated files.
- Finalized and published new Compliance and Ethics website.

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 Faculty Orientation.

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) = 1,439
 - Employee Code of Conduct / Speak Up! (Spanish) = 3
 - Potential Conflicts – Florida Code of Ethics for Public Officers and Employees (English) = 1,134
 - Potential Conflicts – Florida Code of Ethics for Public Officers and Employees (Spanish) = 2

LAUNCH TENTH ANNUAL COMPLIANCE AND ETHICS WEEK AWARENESS CAMPAIGN

- Preparations underway for the annual event scheduled November 4-8, 2024.

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) = 273
- Potential Conflicts – Florida Code of Ethics for Public Officers and Employees (Spanish) = 3

ISSUE ANNUAL MEMO ON VULNERABLE PERSONS ACT AND PROMOTE VULNERABLE PERSONS ACT ONLINE TRAINING

- The optional Protection of Vulnerable Persons training was completed by one employee during this reporting period.
- The next annual memo is scheduled for distribution in March 2025.

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.
 - Number of employees auto enrolled = 7,938
 - Number of employees completing the training by September 30 = 5,059

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 89 program staff working with minors during this reporting period.
- Overnight Youth Program Staff training was completed by 16 program staff supervising minors overnight, as required.

LAUNCH SECOND ANNUAL DATA PRIVACY DAY AWARENESS CAMPAIGN

- Began preparations for Data Privacy Day event scheduled January 28, 2025.

IDENTIFY ADDITIONAL OPPORTUNITIES TO DEVELOP AND DELIVER COMPLIANCE AND ETHICS TRAINING

- By invitation, led a UCF Knights Pre-Law Association Speaker Meeting providing students an overview of the office and UCF’s compliance and ethics program.
- Led a Compliance Training Workgroup meeting where the group discussed:
 - Migrating employee compliance training to Workday
 - Workday’s accessibility features
 - Integrating other training platforms with Workday
 - Consistency of deadlines, messaging, and sanctions for non-compliance
- Responded to 170 training related inquiries.

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 four policies.

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 the UCF Health Sciences HIPAA Collaborative.

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

- Closed outside activity reporting in the Huron COI system on August 7, 2024, for the 2023-2024 report year achieving 100% compliance with required submissions.
- Developed and implemented the 2024-2025 COI Communication and Implementation plan to prepare for the launch of the second-year reporting in the Huron COI system.
- On August 12, 2024, successfully launched the second outside activity and financial interest reporting year using the Huron COI system with a September 11, 2024, deadline:
 - Of the 4,329 users required to disclose, 4,207 submitted by September 11 achieving an 97.18% compliance rate with the 30-day deadline, an increase from the 88.4% achieved the first year.
 - Implemented the delinquent follow up process to ensure completion.
- Received and completed 22 reviews of potential conflicts associated with attendance at conferences or events sponsored by vendors or receiving discounts or gifts.
- Completed 287 conflict of interest reviews requested by employees and departments.
- Received and completed three supplier review requests for compliance with university regulation and state ethics laws.
- Worked with the Office of Research Administration Systems and Business Services to provide the Procurement Office with Huron COI access to evaluate potential conflicts in the procurement bid process.
- With the Office of International Collaboration and Export Control and Research Compliance Office, developed a new Inside Activity Decision Tree and revised the Outside Activity, Financial Interest and Potential Conflict Disclosure Matrix.

MANAGE UNIVERSITY-WIDE YOUTH PROTECTION PROGRAM

- Youth program registrations approved by the department resulted in 23 UCF organized and hosted youth programs and 43 third-party programs, serving a total of 5,226 minors during this reporting period. Two registrations were cancelled after approval at the request of the program sponsor.
- Processed and approved 28 youth program registrations (28 in-person, of which two contained a virtual component) that have or will occur.
- With the removal of the campus liaison requirement, program sponsors now submit registration access requests directly through Squire to register new programs. During this

period, the office processed five registration access requests, approving two that were appropriately submitted by program sponsors. The remaining three were denied as they were submitted by program staff. The office provided additional guidance and education to program staff regarding the registration process.

- Reviewed and edited the Athletics Handbook to include mandatory reporting of child abuse.
- Collaborated with the Florida Department of Children and Families and delivered in-person training to the Soldiers to Scholars youth program staff.
- Finalized youth program site visit procedures to begin in February 2025.
- Met with UCF and Valencia Downtown campus leadership to provide an overview of the Youth Protection Program and guidance on program requirements.
- Two-day onsite visit to the Soldiers to Scholars facility to meet with staff to cover program requirements.
- Met with the Florida Department of Children and Families to discuss state requirements for youth programs and background checks.
- Met monthly with the Squire Youth Program Registration system vendor to improve efficiencies in the registration and review process.
- Responded to 185 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.
- Worked with the UCF Foundation to strengthen their process for identifying foreign sources through an engagement with Dun & Bradstreet.

DEVELOP AND MANAGE UNIVERSITY-WIDE PRIVACY PROGRAM

- Processed two Data Subject Access Requests and performed nine research-related ancillary reviews.
- Reviewed, provided guidance, and approved privacy related language in seven contracts.
- Addressed a student concern regarding personally identifiable information with the university registrar.
- Met with a faculty member regarding a proposal involving privacy related software and submitted a letter of support to the NSF.
- With Information Security, proposed edits to university policy to address AI recording technology and recordings in general.
- Finalized the HIPAA Privacy Compliance Policy and 1st edition of the HIPAA Policy Manual and submitted it to the Faculty Senate and College Policy Liaisons for review.
- Worked with Information Technology and Information Security to resolve concerns with a Business Associate Agreement.
- Met with UCF Global and the Office of the General Counsel to discuss an alternate approach to data transfers with European universities.
- Reposted the Director, Privacy Compliance position, conducted interviews, and made an offer to an internal candidate who accepted the position to begin in October.
- Collaborated with Human Resources and responded to an applicant's request to delete their employment application account.

- Finalized policy revisions to the University Email Policy stemming from the work group formed to address privacy and compliance risks resulting from the email migration project.

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 six new reports which came directly through our 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, 53 IntegrityLine cases and two cases which came directly to our office were investigated and closed.
- Performed intake of eight potential cases that did not rise to the level of an investigation following the initial inquiry phase.
- Responded to seven 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 winner Brian Boyd, University Registrar, for his dedication to promoting compliance with FERPA and contributions to the Drug Free Schools and Workplace policy requirements, in the July 2024 edition of the *IntegrityStar*.

PROMOTE AWARENESS OF UCF REGULATIONS, POLICIES AND PROCEDURES, AND REGULATORY

REQUIREMENTS

- Highlighted in the July 2024 edition of the *IntegrityStar* a total of four new and revised UCF policies and 21 new and revised regulations that had been implemented since the last edition.
- Distributed one campus-wide email to employees alerting them of the approval of three new, revised, and emergency policies. One of the four approved policies was pulled for additional edits.

PROMOTE ACCOUNTABILITY AND CONSISTENT DISCIPLINE

- Continued to provide recommendations for appropriate discipline for substantiated cases to ensure accountability and consistency in corrective actions.
- Participated in a Predetermination Conference following an investigation outcome that resulted in a proposed action to discharge for misconduct.
- 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 will be finalized and 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.

9. *New Regulations and Special Projects*

IMPLEMENT NEW UCF INTEGRITYLINE SYSTEM

- Continued working closely with the third-party vendor to ensure seamless transition to the new system in 2025.

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

- Formed a steering committee and an advisory group made up of faculty and staff of all levels from across various colleges and units to customize the survey and communications strategy.
- Led meetings with leadership to introduce the survey and ModernThink, and provided completion status updates once the survey was active.