



University Compliance and Ethics

UNIVERSITY OF CENTRAL FLORIDA

2023-24 Compliance and Ethics Work Plan – Status of All Activities July 1, 2023 – June 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 2023-2024 Compliance and Ethics Annual Work Plan and includes the final status of the activities.

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 meetings in September, February, April, and June.
- Updates included the newly implemented I-9 tracking process in Workday; activities for the National Cybersecurity Awareness campaign; the foreign influence process including hiring of post doc positions; the newly created faculty hiring website page; Senate Bill 846 Agreements of Educational Entities with Foreign Entities; challenges with the Federal Student Aid simplification process; NCAA antitrust lawsuits which may affect how athletics departments function in the future; and changes to Title IX, Title II of the ADA, and the Pregnancy Workers Fairness Act regulations.
- Additional updates included 100% employee participation in the 2023 Code of Conduct Refresher Training; Goodcourse micro-learning eight-minute modules are available and can be tailored to the university; the Military and Veterans Compliance Survey; a Digital Accessibility Coordinator position has been filled, efforts are in process to create a digital accessibility website to aid the university in meeting federal requirements; and foreign travel restrictions and the challenges for faculty receiving funding.

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

- Co-chaired the Information Security and Privacy Advisory Committee.

SERVE AS MEMBERS OF 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 the Annual Security Report prior to publication to the campus community.
- With the Clery Compliance Analyst, completed the Campus Security Authority (CSA) identification project, to include a review of university-wide job descriptions within 16 divisions, met with each division's HR Business Center Leader to provide an overview of the project and inform them of the CSAs identified within their division, and HR Business Center reporting requirements moving forward. Also met with the HR Compensation and Classification team and attended the HR Leadership meeting to discuss the process of identifying CSAs.
- Assisted the Clery Compliance Analyst with finalizing, launching, and tracking of mandatory CSA training. There were 2,633 employees automatically assigned the training and by the end of the fiscal year, 98.97% completed it.

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 three editions of the *IntegrityStar* newsletter:
 - July 2023 edition featured articles on the 2022 UCF IntegrityLine Report with an accompanying video related to respect in the workplace, UCF's policy development process, and the Time and Effort Reporting Policy. The edition also included images referencing the policy lifecycle and workflow, and FAQs related to the policy development process.
 - "Case Corner" article featured a substantiated case from the 2022 UCF IntegrityLine Report and the "Privacy Points" section provided information on the university's new Controlled Unclassified Information (CUI) policy.
 - November 2023 edition featured articles on the importance of employee compliance training, 2023 Compliance and Ethics Week with a video preview of the week's activities, and the Clery Act requirements at UCF with accompanying FAQs.

- “Case Corner” article featured a report submitted by a student involving a third party posing as an employee, which helped facilitate awareness of an issue and the “Privacy Points” section provided tips on how to safeguard data.
- March 2024 edition featured articles, Your Feedback Matters: UCF Compliance and Ethics 10 Minute Culture Survey, April is Child Abuse Prevention Month, and Athletics Compliance at UCF including FAQs related to athletics compliance and athletics boosters. Also included a video by the University of Texas at Austin, McCombs School of Business called “Educate Yourself with Ethics Unwrapped.”
 - “Case Corner” article featured cases handled by leadership in support of the university’s aspiration to be a best place to learn and work and the Privacy Points provided a recap on the 2024 Data Privacy Day activities.

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.
- Revised the *Manager’s Checklist: Evaluation of Employee’s Concern* to include updates from Human Resources and the Office of Institutional Equity.
- Identified and executed a contract with a new IntegrityLine provider that will create efficiencies and improved reporting.
- Promoted the UCF IntegrityLine in the three editions 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

- 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 2023: *Florida Foreign Influence Act Disclosure – Denied Applicants 2023* and *Florida Foreign Influence Act Disclosure – Travel 2023*.
- Prepared and submitted the annual collection of student complaints to comply with federal regulations and regional accreditation requirements.
- 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 the following:
 - Twelve foreign gifts and contracts that in aggregate exceeded \$250,000 to the Federal Department of Education and 44 foreign gifts and contracts in aggregate exceeding \$50,000 to the Board of Governors (BOG) by the July 31, 2023, deadline.
 - Thirteen foreign gifts and contracts that in aggregate exceeded \$250,000 to the Federal Department of Education and 29 foreign gifts and contracts in aggregate that exceeded \$50,000 to the BOG by the January 31, 2024, deadline.
- In response to the BOG Inspector General’s August 9, 2023, Data Request, prepared and submitted the response confirming UCF does not have agreements with universities meeting the specified criteria located in a foreign country of concern by the August 22, 2023, deadline.

- Collaborated with partner offices to respond to the BOG Inspector General's September 2023 foreign gift disclosure inspection request, providing additional supporting documentation for the purchase orders audited.
- In response to a September 2023, letter from the United States Department of Education (DOE) requesting resolution to a FERPA complaint, performed an investigation and submitted to the DOE the findings and management's corrective actions. The DOE responded in December 2023 indicating satisfaction with the university's response with no further action required.
- In response to the Board of Governors' September 6, 2023, Data Request, prepared and submitted on behalf of UCF, a description of the UCF policies, procedures, and processes that were revised in response to Board of Governors Regulation 9.012, Foreign Influence, by the March 8, 2024, deadline.
- In response to the Board of Governors' March 14, 2024, Data Request, oversaw the data collection and compilation of the number of students domiciled in a foreign country of concern prior to receiving a graduate assistantship in the 2021-2022, 2022-2023, and 2023-2024 academic years, and submitted the response on behalf of UCF by the deadline on April 5, 2024.
- In support of the university's Higher Learning Commission accreditation application, oversaw the collection and submission of an investigation summary containing investigations spanning 10 years. Also prepared the evaluative narrative with supporting materials demonstrating the university's compliance with applicable and regulatory requirements.

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 tabling events.
- Updated the website to include the three *IntegrityStar* editions; revisions to content on the Our Staff, Training, and Youth Protection Program webpages; published the 2024 Compliance and Ethics Annual Report and the revised UCF Employee Code of Conduct; revised Youth Protection Program Resources; updated pdf files to be ADA compliant; and removed outdated files.
- Continued work on finalizing the website theme.

DISSEMINATE COMPLIANCE AND ETHICS PROGRAM INFORMATION AND EDUCATIONAL MATERIALS DURING TABLING EVENTS AND AT NEW EMPLOYEE ORIENTATIONS

- Provided the UCF Employee Code of Conduct, office brochure, privacy compliance brochure, gifts and honoraria brochure, Speak Up wallet cards, and UCF IntegrityLine Speak Up earbuds during August 2023 new faculty orientation.
- Provided the UCF Employee Code of Conduct, office brochure, privacy brochure, Youth Protection Program handout, gifts and honoraria brochure, UCF IntegrityLine Speak Up earbuds and Speak Up wallet cards to employees during October 2023 Benefits Fair.
- Provided the Privacy Compliance brochure and office promotional items at a Student Union tabling event promoting the activities for the 2024 Data Privacy Day.
- Provided the revised UCF Employee Code of Conduct, Speak Up wallet cards, and office promotional items at a Student Union tabling event promoting employees complete the 2024 Compliance and Ethics Culture Survey.

- Provided the UCF Employee Code of Conduct, office brochure, privacy brochure, gifts and honoraria brochure, and Speak Up wallet cards to Human Resources for distribution at ongoing new employee orientations.
- During this fiscal year, updated and published all the office's educational brochures.

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 AND EMPLOYEES TRAINING

- During this fiscal year, obtained Spanish translation of the two mandatory new employee courses and began tracking completion separately for each course.
- Number of new employees who took the online course and passed the final quiz:
 - English Employee Code of Conduct / Speak Up! = 4,198
 - Spanish Employee Code of Conduct / Speak Up! = 1
 - English Potential Conflicts – Florida Code of Ethics for Public Officers and Employees = 3,648
 - Spanish Potential Conflicts – Florida Code of Ethics for Public Officers and Employees = 1

PROVIDE ETHICAL LEADERSHIP TRAINING

- Provided Ethical Leadership Training on November 2, 2023, through Human Resources.

LAUNCH NINTH ANNUAL COMPLIANCE AND ETHICS WEEK AWARENESS CAMPAIGN

- Promoted Compliance and Ethics Week activities in the November edition of the *IntegrityStar*, on the office's website, and a customized email banner signature block.
- Compliance and Ethics Week held November 6-13, 2023, included short training modules on the topics of accountability, behaving ethically, and civil discourse, and an engaging activity to build an IntegrityLine Speak Up logo puzzle.
- Received prize donations from university departments and Direct Support Organizations for distribution to employees who participated in the campaign.
- A total of 180 employees participated as follows:
 - The ABCs of Compliance and Ethics: Accountability (video): 166 employees viewed
 - The ABCs of Compliance and Ethics: Behaving Ethically (video): 164 employees viewed
 - The ABCs of Compliance and Ethics: Civil Discourse (video): 159 employees viewed
 - Speak Up puzzle activity: 162 employees submitted entries
- Awarded one grand prize - a mini helmet signed by UCF head football coach Gus Malzahn, and 65 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. During this fiscal year, the following are the total number of existing employees who took the online courses and passed the final quiz:

- Gifts and Honoraria = 19
- Potential Conflicts – Florida Code of Ethics for Public Officers and Employees = 413

ISSUE ANNUAL MEMO ON VULNERABLE PERSONS ACT

- The optional Protection of Vulnerable Persons training was completed by 23 employees during this fiscal year.
- The annual memo was distributed in March 2024.

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

- The 2023 Code of Conduct refresher training containing customized modules (English and Spanish) addressing Conflicts of Interest, Accurate Books and Records, and Political Activities launched on October 22, 2023, with a completion deadline of November 1, 2023.
 - Number of employees auto enrolled: 7,731
 - Number of employees completing the training by the November 1, 2023, deadline: 6,716 (90.67%)
 - Implemented follow up process for delinquent training. By December 31, 2023, 7,310 (99.12%) had completed the training.
 - Reached 100% completion on April 3, 2024
- Began preparations for the 2024 Code of Conduct refresher training that will be distributed in September 2024.

MONITOR COMPLIANCE WITH COMPLETION OF THE YOUTH PROTECTION ONLINE TRAINING MODULE AS REQUIRED BY POLICY

- Required Youth Protection training was completed by 494 program staff working with minors during this fiscal year.
- An additional Overnight Youth Program Staff training was completed by 96 program staff supervising minors overnight, as required.

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

- Developed a privacy awareness article explaining the differences between privacy and security for the Information Security Office Security Awareness Newsletter published in August 2023.
- Annual mandatory security and privacy course launched on March 11, 2024, and will automatically assign each employee annually thereafter from the date the employee last took the course.
- Launched the office’s inaugural Data Privacy Day awareness campaign, celebrated annually on January 28, to promote awareness about data privacy and educate individuals on how to secure their personal information.
 - On January 26, hosted a tabling event at the Student Union where students and employees had the opportunity to learn more about the office, ask questions about data privacy, enter a prize drawing, and receive UCF swag.
 - On January 29, delivered a live webinar, titled “Privacy[at]UCF” that explored how privacy compliance assists the campus community, explained what privacy is versus security, and provided tips to protect data at home and at work.

IDENTIFY ADDITIONAL OPPORTUNITIES TO DEVELOP AND DELIVER COMPLIANCE AND ETHICS TRAINING

- Reviewed and revised the online new hire Employee Code of Conduct and Speak Up! training course and the Potential Conflicts – Florida Code of Ethics for Public Officers and Employees course for 2024. Translated and published both courses in Spanish.
- As a result of issued recommendations from two investigations, employees were required to take the Ethical Leadership and Potential Conflicts training.
- Attended the Office of Research’s Exchanging Ideas and Tips (EXCIT) meeting with colleges and departments in September to discuss privacy compliance versus the use of artificial intelligence and large language models.
- Participated in and contributed compliance related information at the UCF Learning & Development Community of Practice workgroup meetings.
- Prepared and delivered custom conflict of interest training for UCFAA staff.
- Delivered training on state ethics laws to the Staff Advisory Council.
- Delivered gifts training to the English Language Institute.
- Participated in the UCFAA Camp Summit, providing athletic coaches and operations managers with Youth Protection Program updates and policy requirements.
- Participated in the SUS Compliance and Ethics Consortium in-person meetings held at the University of Florida March 25-26, 2024.
- At the request of the Compliance and Ethics Advisory Committee, created a Compliance Training Workgroup consisting of individuals from all compliance offices and partner offices. Developed a shared calendar for use by the workgroup to schedule training and discussed transitioning compliance related training from other Learning Management System platforms to Workday.
- During this fiscal year, responded to 714 training related inquiries.

ISSUE ADDITIONAL REGULATORY ALERTS AND UPDATES AS APPROPRIATE

- In response to the BOG issued *Activity with Foreign Countries of Concern Guidance Document for State University System Institutions* dated September 2023, the vice president for compliance, ethics, and risk formed a task force and oversaw the process to identify the scope and impact of the requirements related to hiring specified positions.

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 17 policies.
- Updated resources in the online University Policy Library.
- Updated the Policies Requiring a Five-Year Review chart.
- Began transitioning current policies to updated letterhead and updating ADA digital compliance for publishing in the online Policies and Procedures Manual.

UPDATE AND PUBLISH REVISED UCF EMPLOYEE CODE OF CONDUCT

- Performed a comprehensive review of the UCF Employee Code of Conduct in coordination with university compliance offices and partners, and relevant university departments. The ADA compliant version of the revised Code of Conduct was published on the office's website in April and printed copies were provided to Human Resources to distribute to all new employees during orientation.
- Distributed print copies to employees in Environmental Health and Safety and in each prize pack awarded to employees for their participation in the 2024 Compliance and Ethics Culture Survey.

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. Reviewed and updated the UCF Health Sciences HIPAA Collaborative roster to ensure appropriate membership and contact details for those individuals with HIPAA responsibilities.

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 PROCESS

- Closed outside activity reporting in the Huron COI system on August 7, 2023, for the 2022-2023 report year achieving 100% compliance with required submissions.
- Developed and implemented the 2023-2024 COI Communication and Implementation plan and on August 14, 2023, launched the outside activity and financial interest reporting with a September 13, 2023, deadline.
 - Of the 4,674 users required to disclose, 4,131 submitted by September 13 achieving an 88.4% compliance rate within the 30-day deadline.
 - Implemented the delinquent follow up process and by December 2023, reached 100% completion rate.
 - Received a total of 5,443 disclosures (an increase from 4,993 last year) and 311 amendments (down from 394 last year).
 - Disclosures with at least one new outside activity are reviewed by the office and this year the office reviewed 930 (a decrease from 1,619 last year), with potential conflicts identified in 115 requiring a monitoring plan or annual update (an increase from 95 last year). Six disclosures were unapproved due to conflicts that could not be mitigated. At the time of this report, four disclosures were still under review.
 - Foreign influence red flag reviews were completed for each positive response to financial interests and outside activities with foreign entities. Completed a total of 58 red flag reviews. Three contained at least one red flag or potential risk that resulted in additional awareness to the employees with one resulting in disengagement of the activity.
 - Ensured compliance with foreign influence inquiry COI procedures. Two employees failed to complete the annual disclosure process within 90 days prompting a foreign influence red flag review resulting in no red flags identified.

- Reviewed 90 new disclosed relatives for potential conflicts (a decrease from 127 last year and 401 the year prior). This reduction is due to the Huron functionality that does not require repeated review of previously disclosed activities.
- Responded to 400 separate requests for assistance with reporting outside activities and conflicts of interest (a decrease from 590 last year). This number is slowly decreasing as disclosers are becoming more familiar with the Huron COI system.
- Received and completed a total of 74 reviews of potential conflicts associated with attendance at conferences or events sponsored by vendors and receiving discounts or gifts.
- Reviewed and provided feedback on 37 research exemption requests (increase from 14 the year prior) and coordinated with the provost, president, and Chair of the Board of Trustees for their approval as required by state statute.
- Revised and posted the updated Potential Conflict of Interest or Commitment, Outside Activity or Employment HR-11 form.
- Revised the Board of Trustees Policy Conflict of Interest Statement and Disclosure Form approved by the UCF Board of Trustees.

MANAGE UNIVERSITY-WIDE YOUTH PROTECTION PROGRAM

- During this fiscal year processed a total of 152 submitted registrations (all in-person with 11 also operating virtually), approving all 152. Five were later cancelled at the request of the program sponsor.
- Oversaw a total of 140 youth programs during this fiscal year.
 - UCF hosted programs: 41 (29%)
 - Third-party hosted programs: 99 (71%)
 - Of the 140 youth programs, 37 were overnight programs (26%)
 - Total number of minors served during this fiscal year: 17,355
- Revised the university's Youth Protection policy (2-005) to clarify the definition of "minor" and removed the campus liaison requirement for third-party organizations. Added language to the background check section regarding the certification form process for third-party programs and required completion of overnight staff training for program staff supervising minors overnight. The revised policy also included updated camp insurance instructions for UCF hosted programs.
- Revised and published resources on the Youth Protection Program webpage.
- Worked with four youth programs to resolve issues of non-compliance.
- Updated language on the Youth Protection Program webpage clarifying exceptions to the policy based on policy revisions.
- Worked with the Squire vendor to add features in the system that enhances the registration and review process to be more thorough and accurate.
- Participated in Big 12 Youth Protection Network meetings and Higher Education Protection Network Resources Committee meetings.
- Responded to a total of 703 Youth Protection Program related inquiries during this fiscal year.

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 the Research

Compliance Office to discuss foreign influence red flags, inquiries, and subsequent investigations.

- In collaboration with the Office of International Collaboration and Export Control, Procurement Services, and the Office of Emergency Management, reviewed processes that were established to comply with drone security standards under Florida Statute 934.50. Proceeded with action items to include a new Unmanned Aircraft System Policy.
- Collaborated with the Office of International Collaboration and Export Control to draft a new International Collaboration Policy.

DEVELOP AND MANAGE UNIVERSITY-WIDE PRIVACY PROGRAM

- During this fiscal year, processed a total of 64 Data Subject Access Requests, 35 Vendor Risk Management requests, and performed 13 Research-related ancillary reviews.
- Reviewed, provided guidance, and approved privacy related language in 65 contracts.
- Worked with the university registrar on 12 Family Educational Rights and Privacy Act related reports/issues.
- Met with Communications Disorders Clinic and Physical Therapy Clinic representatives to support their HIPAA Security Program Review with a third-party assessor.
- Initiated a work group to address privacy and compliance risks resulting from the email migration project. Met with department leaders who employ student employees to gather information to inform the mitigation strategy that will be incorporated in university policy and procedures.
- Discussed AI recording technology with Information Security and the Office of the General Counsel and agreed to include language in university policy. Draft language is under review.
- Drafted Emerging Technology article published in the Privacy Points section of the *IntegrityStar*.

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.

REVIEW THE UCF INTEGRITYLINE AND DEPARTMENT DATABASE FOR TRENDS AND RISK AREAS AND ADDRESS APPROPRIATELY

- Analyzed and prepared the UCF IntegrityLine Report for calendar year 2023. Identified a significant drop in the reported issue type Offensive or Inappropriate Communication, from 66 reports in 2022, down to 33 in 2023. These types of reports 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. These results reflect a very positive trend and reinforce the efforts made by the office throughout 2020, 2021, 2022, and 2023 to increase civility in the workplace.

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 277 new reports through the UCF IntegrityLine alleging misconduct in this fiscal year, an increase from the 250 submitted last year.
 - Triaged incoming 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.
 - Two hundred and seventy-two (272) IntegrityLine cases were investigated and closed during the fiscal year, an increase from 260 closed last year.
- University Compliance and Ethics received 17 new reports of potential misconduct made directly to the office and 17 cases that were under review were completed and closed.
- Performed intake of 16 potential cases that did not rise to the level of an investigation following the initial inquiry phase.
- Responded to 16 public records requests for IntegrityLine and investigation records during this fiscal year.

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:
 - July 2023 edition – Dr. Manoj Chopra, Associate Dean for Academic Affairs and Professor of Civil Engineering, College of Engineering and Computer Science, for his commitment to the university's process for evaluating and investigating concerns raised through the UCF IntegrityLine and his support of the university's Comprehensive Compliance Program.
 - November 2023 *IntegrityStar* edition – Millicent Downer, Human Resources Director for the Administration and Finance Division, for her support and contributions to the university's Clery compliance program.
 - March 2024 *IntegrityStar* edition – Melissa Dagley, Ed.D., Executive Director – UCF STEM, for her continuous support of the university's Youth Protection Program and collaboration with our office.
- All award winners were issued a signed and framed *IntegrityStar* Award certificate and Dr. Chopra and Dr. Alison Cares (previous *IntegrityStar* Award winner) were acknowledged during a public meeting.
- During Compliance and Ethics Week November 6-13, 2023, awarded 66 employees prizes for their participation in the week's activities.

- Awarded 63 employees prizes for their participation in the 2024 Compliance and Ethics Culture Survey.

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

- In the July 2023 edition of the *IntegrityStar* edition, highlighted 12 new and revised UCF policies and 19 new and revised regulations that had been implemented since the last edition. In the November 2023 *IntegrityStar* edition, highlighted one new UCF policy and four new and revised regulations. In the March 2024 edition, highlighted a total of four new and revised UCF policies and four new and revised regulations.
- During this fiscal year, distributed five campus-wide emails to employees alerting them of the approval of new, revised, and emergency policies.

PROMOTE ACCOUNTABILITY AND CONSISTENT DISCIPLINE

- Continue 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 2022-2023 including the activities of our compliance partners and programs across the university was submitted in December to the BOG as required by BOG Regulation and provided to the Audit and Compliance Committee of the Board of Trustees at the February 2024 meeting.

LAUNCH FIFTH COMPLIANCE AND ETHICS CULTURE SURVEY AND BENCHMARK RESULTS AGAINST PRIOR YEAR'S RESULTS IN 2016, 2018, 2020, AND 2022

- Promoted the survey in the March 2024 edition of the *IntegrityStar*, in email communications, and a customized email banner signature block.
- Survey was launched on March 4 and remained open until April 5.
- Initiatives this year to increase participation:
 - UCF Marketing and Communications distributed all emails on behalf of the office in both English and Spanish.
 - Faculty Senate encouraged faculty participation.
 - University Compliance and Ethics directly contacted student employees to encourage participation, hosted a tabling event with a QR Code to take survey, and promoted a prize drawing – received 349 entries. Awarded 63 employees a series of UCF branded items, a newly printed UCF Employee Code of Conduct, and a personalized thank you card.
- Achieved a 25.3% response rate, an increase from the 17.7% rate in 2022.

- Office of Excellence and Assessment Support analyzed the results and issued final reports. The reports and an executive summary will be provided to the Audit and Compliance Committee of the Board of Trustees during its September meeting. The office will communicate the findings in the November 2024 edition of the *IntegrityStar*.

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

- The 2022-2023 results report, and 2023-2024 assessment plan were submitted for Divisional Review Committee review. The 2023-2024 plan focuses efforts to support the university aspiration to be a best place to learn and work, specifically measuring workplace culture and a respectful workplace.

9. *New Regulations and Special Projects*

CONTINUE TO PARTNER WITH HUMAN RESOURCES TO ENSURE COMPLIANCE WITH EMPLOYEE ACKNOWLEDGMENT OF THE EMPLOYEE ANNUAL NOTICES

- Assisted Human Resources in tracking and follow up for the 2023 Employee Notices:
 - Number of employees auto enrolled: 7,411
 - Number of employees completing acknowledgement by the deadline: 6,569 (90%)
 - Achieved 100% compliance by October 4, 2023.
- In the spirit of continuous improvement and an effort to create efficiencies, initiated a project to consolidate mandatory trainings. Collaborated with Human Resources, compliance offices and partners to identify which of the notices contained in the Employee Annual Notice were required under law. Implemented a process to include those legally required notices in the annual Code of Conduct refresher training that will launch in September 2024. Through this initiative and in collaborating with the Compliance and Ethics Advisory Committee, the mandatory requirement for employees that would have normally been launched in March 2024 was discontinued.

TO ENSURE COMPLIANCE AND TRANSPARENCY OVERSAW THE WORKGROUP CHARGED WITH EVALUATING THE REPORTING OF RESEARCH EXPENDITURES TO THE NSF HERD SURVEY

- The Vice President for Compliance, Ethics, and Risk coordinated meetings every other week to evaluate the reporting of research expenditures for the current reporting period and to develop procedures to automate collection moving forward.
- The subgroup met with individuals from Arizona State University to discuss their use of Workday and the associated procedures for identifying research and development expenditures and the associated collection reports.
- The workgroup met with research administrators to discuss and receive input on the use of work tags to automate identification of research expenditures in Workday.

SUPPORTING A BEST PLACE TO LEARN AND WORK

- In collaboration with the Office of the President, coordinated the Leading at the Speed of Trust leadership retreat facilitated by Stephen M. R. Covey. The retreat was held at the KPMG Lakehouse in June 2024.
- Engaged ModernThink to provide a multi-year employee experience survey in coordination with Human Services. Served on the Executive Committee for development of the survey and communications and provided an overview to leadership.