



BOARD *of* GOVERNORS

State University System of Florida

Compliance and Ethics Program Overview

Rhonda Bishop, Chief Compliance and Ethics Officer
University of Central Florida
January 22, 2015

www.flbog.edu



Agenda

- Benefits of an Institutional Program
- Requirements for Higher Education
- Elements of an Effective Program
- Program Development Overview
- SUS Compliance and Ethics Consortium



Higher Education

“Higher education is the most regulated industry”

*Adam Turteltaub, Vice President, Society for Corporate Compliance and Ethics Professionals, 2014
Higher Education Compliance Conference*



Cost of Non-compliance

Former University of Tennessee Professor John Reece Roth Sentenced to 48 Months in Prison for Illegally Exporting Military Research Technical Data

Education Department says Harvard violated Title IX

Emory University to Pay \$1.5 Million to Settle False Claims Act Investigation

Northwestern University to Pay Nearly \$3 Million to the United States to Settle Cancer Research Grant Fraud Claims

Felony charges filed against UC Regents and a UCLA chemistry professor after fatal laboratory fire

University Of Minnesota Pays \$32 Million to Settle Allegations of Selling an Unlicensed Drug and Mishandling NIH Grant Funds



Benefits of an Institutional Program

- Demonstrates stewardship over resources and communicates values
- Provides for communication to board and senior leadership
- Assures effective programs are in place
- Monitors performance
- Strengthens business practices
- Mitigates fines or penalties



Requirements for Higher Education

- Chapter 8 of the U.S. Federal Sentencing Guidelines:
 - Contains seven elements for an effective program
 - Defines the responsibility of the board, president, senior leadership, and the compliance and ethics officer



Elements of an Effective Program

1. Oversight
2. Standards and Procedures
3. Education and Training
4. Monitoring and Auditing
5. Reporting
6. Incentives and Disciplinary Measures
7. Response and Prevention
 - Risk Assessment
 - Effectiveness Assessment
8. “Promote an organizational culture that encourages ethical conduct and a commitment to compliance with laws.”



Chief Compliance and Ethics Officer

- Communicates to senior leadership and board
- Ensures consistent program development
- Serves as a liaison and catalyst
- Takes a proactive approach
- Identifies and mitigates compliance risks
- Builds relationships



Program Development

Education and Communication	Program Development	Office Development	Ethics, Compliance, and Risk
<ul style="list-style-type: none">• Program Overview• Communication Plan	<ul style="list-style-type: none">• Accountability Matrix• Advisory Committee• Risk Assessment• Code of Conduct• Helpline• Applicable Policies and Procedures	<ul style="list-style-type: none">• Hire Staff• Training and Access• Mission, Purpose, Goals, and Objectives• Website Development• Internal Procedures	<ul style="list-style-type: none">• Issue Response• Policy• Guidance



Compliance and Ethics Advisory Committee

- Chaired by the Chief Compliance and Ethics Officer
- Membership consists of compliance and ethics partners
- Additional representatives (e.g., Faculty Senate, General Counsel, and University Audit)
- Provides guidance and input on the development of a comprehensive program
- Reports compliance activities and risk mitigation within committee member's area
- Assists in the development of policies and procedures to support compliance, ethics, and risk management



SUS Compliance and Ethics Consortium

- Purpose:
 - provide an avenue for member institutions to discuss the development and improvement of compliance and ethics programs, new federal and state regulations, best practices, and issues
 - ensure effective communication and collaboration in the development of compliance and ethics programs across the State University System of Florida
 - promote a culture of ethics, accountability, and compliance
- Conference call quarterly:
 - June 27, 2013 – First conference call
 - September 29-30, 2014 – First in-person meeting
- Outreach for members through SUS Chief Auditors and General Counsels
- Current members – UCF*, USF*, FIU*, UNF*, FAMU, NCF, UWF, FSU, BOG Inspector General*

*Designated Compliance Officer



BOARD *of* GOVERNORS

State University System of Florida

www.flbog.edu