
**External Program Review of the
State University System of Florida Board
of Governors
Office of Inspector General and
Director of Compliance
Compliance Program**

December 20, 2024

EXECUTIVE SUMMARY

As requested by the State University System of Florida Board of Governors inspector general and director of compliance (DoC), Nelson E. Perez, Executive Director of the Office of University Compliance at the University of Miami (See attached Biography) and James Allsman, Regional Compliance Officer at Thomas Jefferson University (See attached Biography), conducted an external quality assessment of its compliance program. The principle objectives of the program review (PR) were to assess conformance with applicable authoritative sources, such as the Federal Sentencing Guidelines, and to evaluate the compliance program's effectiveness in carrying out its mission as set forth in its Compliance Program and to identify opportunities to enhance its management and work processes as well as its value to the Board of Governors Office (Board Office) and the 12 institutions that comprise the State University System of Florida (System or SUS).

OPINION AS TO CONFORMANCE

It is our overall opinion that the compliance program "generally conforms" with the Office of Inspector General and Director of Compliance's (OIGC) Compliance Program. The PR team found that the overall Compliance Program in place is structurally effective and that the vast majority of the elements and subsections of elements reviewed meet or exceed the expectations for an effective Program. The personnel involved with executing and maintaining this high level of effectiveness should be greatly commended. As this was an extensive overall review, the PR team did identify some opportunities for further improvement, details of which are provided in this report.

Ratings Scale - "generally conforms," "partially conforms," and "does not conform."

- "Generally Conforms" means the assessor has concluded that the relevant structures, policies and procedure of the activity, as well as the processes by which they are applied, comply with the requirements of OIGC's Compliance Program in all material aspects.
- "Partially Conforms" means deficiencies in practice are noted that are judged to deviate from authoritative sources, but these deficiencies did not preclude the compliance activity from performing its responsibilities in an acceptable manner.
- "Does Not Conform" means deficiencies in practice are judged to be so significant as to seriously impair or preclude the compliance activity from performing adequately in all or in significant areas of its responsibilities.

SCOPE AND METHODOLOGY

The program review project began on March 5, 2024. The program reviewers, Nelson Perez and James (Jim) Allsman, met with the DoC and her compliance specialist, Lori Clark, to review the project details, such as methodology, milestones, materials needed, and time frame for completion.

To conduct the program review remotely, the compliance specialist created a Share File folder to make accessible the materials needed for the review. The reviewers accessed and reviewed all materials and requested additional information using the BOG External Assessment Tool Questionnaire and Additional Feedback Questions on August 22, 2024. OIGC staff provided the additional information on August 30, 2024.

Interviews with Chancellor Raymond Rodrigues and Board of Governors vice chair Alan Levine were held on November 12, 2024, and November 21, 2024, respectively.

OBSERVATIONS AND POSITIVE ATTRIBUTIONS

The compliance program materials reviewed indicate the OIGC's Compliance Program is well structured and progressive. The Compliance Program's elements are understood, and management is endeavoring to provide useful tools and implement appropriate practices. Some successful practices observed were:

- staff obtained professional training for various compliance activities;
- the audit and compliance specialist earned the Corporate Compliance and Ethics Professional (CCEP) designation;
- the DoC routinely reports to the BOG Audit and Compliance Committee on compliance-related topics;
- compliance staff provide meaningful compliance training to all Board Office staff; and
- compliance review reports are concise, and recommendations or observations undergo follow-up every six months until resolved.

Consequently, our comments and recommendations are intended to build on this foundation already in place in the compliance program.

RECOMMENDATIONS

Recommendations are divided into two groups:

PART I: MATTERS FOR CONSIDERATION FOR EXECUTIVE MANAGEMENT AND BOG AUDIT AND COMPLIANCE COMMITTEE

1. **Data analytics** should be utilized to gauge the effectiveness of the Compliance Program, which should be reported to the BOG at least "annually," versus "regularly."

PART II: MATTERS FOR CONSIDERATION FOR DIRECTOR OF COMPLIANCE

1. **Training Frequency** - Lack of training documentation as to when and how often Code of Conduct and/or Statement of Ethical Conduct Trainings are conducted due to decentralization. The trainings should be annually and documented.

2. **Follow-up with revisions** made to the OIGC governing documents (i.e., Charter, Compliance Program Plan, Committee and Office Charters, etc.) from the AACC and BOG meeting that was held on September 18-19 to ensure general conformity.

Thank you for the opportunity to be of service to the State University System of Florida Board of Governors Office of Inspector General and Director of Compliance. We will be pleased to respond to further questions concerning this report and furnish any desired information.

Respectfully submitted by:

Nelson E Perez

Nelson E. Perez, JD, CCEP
Executive Director
Office of University Compliance Services
University of Miami

Appendix A: Project Team

Nelson E. Perez, JD, CCEP

Nelson E. Perez is an accomplished attorney and compliance professional with extensive experience spanning legal practice, higher education, and corporate compliance. After earning his Juris Doctor from the John Marshall Law School, Nelson excelled as a senior associate attorney, achieving substantial settlements and leading class action litigation. His tenure as an administrative law judge for the Illinois Human Rights Commission was marked by operational efficiency and high settlement rates.

Transitioning to compliance, Nelson led innovative initiatives at Florida International University, developing training programs and policies that improved operational efficiency and compliance standards. He also contributed to corporate compliance as a senior analyst at Burger King Corporation, optimizing HR compliance processes.

Since 2018, Nelson has served as Executive Director of the Office of University Compliance Services at the University of Miami, where his expertise continues to drive excellence in compliance and ethics programs.

James M. Allsman, CIA, CRMA, MBA

James Allsman is an accomplished audit and compliance officer with over 20 years of experience spanning the healthcare and higher education sectors. He has built a distinguished career in internal audit, compliance, and ethics by successfully establishing governance functions, leveraging advanced practices and technology, and cultivating trusted partnerships with executives and stakeholders.

Currently serving as the Regional Compliance Officer for Thomas Jefferson University, James leads efforts to bridge the university's needs with Jefferson Enterprise compliance strategies. He collaborates closely with faculty and administrators to seamlessly integrate a culture of compliance into the university's educational and operational framework. His leadership ensures alignment with regulatory requirements, institutional policies, and strategic goals, helping to sustain Jefferson's strong ethical foundation and educational mission.

Before joining Jefferson, James was the Assistant University Compliance Officer at Villanova University, where he played a pivotal role in building the university's compliance and ethics program. He transformed compliance into an agile, well-respected function by optimizing policies, procedures, and processes while fostering a collaborative, risk-aware culture.

James began his career at Aetna (now Aetna CVS Health) as an internal auditor, where he contributed to enterprise risk management and compliance by conducting cross-functional assessments and ensuring adherence to regulatory standards. He later took on leadership roles at Tandigm Health and Jefferson Health System, where he honed his expertise in program management, internal controls, and stakeholder engagement.

Throughout his career, James has demonstrated a unique ability to bridge diverse professional domains, including healthcare operations, academic institutions, and corporate governance. His areas of expertise include:

- **Compliance & Ethics:** Developing and managing comprehensive compliance programs, conducting risk assessments, and ensuring adherence to ethical standards.
- **Internal Audit:** Leading financial, operational, and regulatory audits, providing actionable insights, and driving process improvements.
- **Cross-Functional Leadership:** Building high-performing teams, mentoring talent, and fostering productive collaboration across departments.