



**COMPLIANCE OFFICE – ANNUAL REPORT  
FY 2022 - 2023**



**Submitted By:**  
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## **UNIVERSITY OF NORTH FLORIDA 2022-2023 COMPLIANCE OFFICE ANNUAL REPORT**

### **BACKGROUND**

The Florida Board of Governors (BOG) Regulation 4.003, SUS Compliance and Ethics Programs, requires each University Board of Trustees (BOT) to implement a university-wide compliance and ethics program to promote ethical conduct and maximize compliance with applicable laws, rules, regulations, and policies. The UNF BOT adopted the first UNF Compliance and Ethics Program Plan at its October 2017 meeting, and it remains the guiding document for operations of the Office of University Compliance (Office). In January 2022, the Office completed the required five-year independent program review and received a “Generally Conforms” (highest) rating in all sixteen categories, with recommendations to grow UNF’s compliance operation over the next five years.

The Program is modeled on the seven elements of an effective compliance and ethics program described in the Federal Sentencing Guidelines and supports UNF's Mission, Vision and Values. The plan also conforms to requirements of BOG Regulation 4.003. This report summarizes the activities and initiatives of the Compliance Office in support of the Program and its goals during the 2022-23 fiscal year.

### **NEW ACTIVITIES**

- Onboarded new Chief Compliance and Ethics Officer in February 2023
- Established direct reporting lines from Office of Equal Opportunity and Inclusion and Athletics Compliance
- Began compliance project to ensure accurate reporting and management of amorous relationships and employment of relatives
- Participated as a member of UNF and SUS workgroups addressing new legislation (SB 266, HB 1521, HB 931)
- Participated as a member of UNF workgroup to draft policies and procedures to implement new statewide post-tenure review requirements
- Participated as a member of UNF workgroups to draft new and revised policies for Student Government, exceptional withdrawal, and faculty overloads and incidental compensation
- Served on the search committee for UNF’s new Assistant Vice President for Human Resources
- Assisted Athletics with new onboarding process and establishment of requirements for volunteer coaches

## COMPLETED ACTIVITIES

- In partnership with the Center for Professional Development and Training and Artisan Learning, developed a stand-alone, asynchronous training module on compliance with UNF's Conflict of Interest Regulation and Amorous Relationships Policy and navigation of our Conflict of Interest disclosure requirements (deployment scheduled for Fall 2023)
- Oversaw completion and delivery of UNF's Florida Equity Report
- Led a comprehensive review and revision process for the Department of Recreation and Wellness' activity participation waivers
- Conducted a survey of academic and administrative departments regarding employment applications; provided guidance on state law compliance
- Investigated reports from UNF community members regarding conflicts of interest, facilities maintenance, unethical behavior, and impermissible signage

## CONTINUING ACTIVITIES

### 1. Executive Oversight

- Board of Trustees Audit and Compliance Committee
  - Quarterly updates to the Committee on emerging and on-going compliance issues
- Compliance Officer
  - Leads UNF's efforts to ensure compliance with all elements of BOG Regulation 4.003, State University System Compliance and Ethics Programs
  - Updates with President Limayem and members of the Executive Staff on emerging and ongoing compliance and ethics issues
  - Updates with the Senior Woman Administrator regarding Athletics compliance issues
  - Updates with staff of the Office of Equal Opportunity and Inclusion to ensure compliance with state and federal laws
  - Updates with members of the Dean of Students' Office, including participation on CARE and CATA teams
  - Ex-officio member of University-wide Compliance Committees, including the Title IX Committee, the Clery Act Committee, the Campus Safety Advisory Committee, the Financial Aid Policy Committee, the Data Governance Committee, and the GDPR Task Force
- Compliance, Ethics and Risk Oversight Committee (CEROC)
  - Co-chair with Chief Audit Executive for CEROC monthly meetings
  - In collaboration with the Chief Audit Executive, continued work to establish and grow an Enterprise Risk Management Program, in alignment with UNF's new strategic plan

## 2. Standards of Conduct/Policies and Procedures

- Assisted with updates to, or creation of, 38 university policies and regulations
- Assessed policies and procedures governing policy and regulation development and sought feedback on areas for improvement

## 3. Effective Lines of Communication

- Engaged in regular updates with BOT Audit and Compliance Committee members, the President, and members of the Executive staff as noted above
- Continued enhancements and updates to the Compliance and Ethics webpage
- Provided communications to campus regarding expansion of the Office
- Monitored [compliance@unf.edu](mailto:compliance@unf.edu), [privacy@unf.edu](mailto:privacy@unf.edu), and [eoip@unf.edu](mailto:eoip@unf.edu) email addresses as additional touch points for enhanced communications
- Continued to be an open door to employees, students, and others to address questions and concerns regarding compliance and ethics issues
- Re-established partnership with FBI Jacksonville and identified University Compliance as a key point of engagement for federal compliance issues

## 4. Education and Training

- Issued memo to Academic Affairs regarding the PERM immigration process
- Participated in a two-day, university-wide Title IX training offered by the Association of Title IX Administrators (ATIXA)
- Participated in an educational session with RecWell staff on new state law requirements
- Facilitated trainings and awareness sessions on Title IX and sexual violence prevention for new and returning student-athletes
- Examined availability of pre-built trainings from vendors on various topics

## 5. Audit and Monitoring

- Provided quarterly compliance updates to BOT Audit and Compliance Committee
- Continued to enhance the compliance directory to identify federal and state higher education compliance requirements and the University's responsible party
- Monitored the university calendar for civil discourse-related items and assisted with drafting of UNF's Summer 2023 Civil Discourse Recommendations Update, ensuring continued compliance with BOG requirements
- Tracked compliance issues arising from internal and external audits, and other program reviews and monitored corrective action

## 6. Enforcement and Discipline

- Promoted awareness of UNF policies and procedures and regulatory requirements
- Assisted with providing of recommendations to supervisors regarding appropriate discipline for policy violations

## 7. Response and Prevention

- Issued update notices and other alerts to compliance partners regarding regulatory changes
- Participated in discussions regarding UNF's protections and responses to cyberthreats and cyberattacks

### Goals for 2023-2024

1. Expand the Office by hiring a general compliance officer, privacy officer, and Clery coordinator
2. Continue progress in meeting the requirements of the UNF Compliance and Ethics Program and implement recommendations from the five-year review
3. Continue the policy and regulation review and revision process, including crosswalk project to ensure adoption of all BOG-required items
4. Continue efforts to mature UNF's Enterprise Risk Management Program via CEROC
5. Review new Title IX rules (expected October 2023) and lead any policy or regulation revision efforts
6. Review new federal third-party servicer regulations (expected Spring 2024) and lead any policy, regulation, or procedure revision efforts
7. Enhance compliance and ethics training, education, and awareness programs across campus
8. Complete the project to automate the policy review process
9. Reengage the monthly discussion forum bringing together compliance partners from across campus to discuss on-going and emerging compliance issues (carry-forward from previous Annual Report)

Respectfully Submitted,



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