



Board of Trustees
UNIVERSITY of WEST FLORIDA

Audit and Compliance Committee Meeting
Thursday, August 17, 2023
Zoom Webinar

[Zoom Webinar](#) | Passcode: 427158

Agenda

- | | |
|---|-------------------|
| I. Call to Order | Dick Baker, Chair |
| II. Roll Call | Anna Lochas |
| III. Greeting | Dick Baker, Chair |
| IV. Public Comment | Anna Lochas |
| V. New Business | Dick Baker, Chair |
| a. Action Items | |
| i. AUD-1 : Acceptance of the Internal Auditing PCard Reports and Annual Report | |
| ii. AUD-2 : Approval of the Office of Compliance & Ethics Annual Report | |
| iii. AUD-3 : Approval of the Office of Compliance & Ethics Work Plan | |
| b. Information Items | |
| i. INFO-1 : Office of Compliance & Ethics – Update on Activities | |
| ii. INFO-2 : Internal Auditing and Management Consulting – Update on Activities | |
| V. Other Committee Business | Dick Baker, Chair |
| VI. Adjournment | Dick Baker, Chair |

**UWF Board of Trustees Meeting
Audit & Compliance Committee
August 17, 2023**

Issue: Internal Auditing PCard Audit Reports: Results for Quarter 4 (April-June 2023) and the Annual Update (July 2022-June 2023)
Proposed action: Acceptance

Purpose

To provide UWF senior leadership a summary of PCard audit results for the most recent quarter, and for the entire fiscal year of 2022-2023. Our main objective is to report the status of PCard audits and any issues or findings requiring action.

Background

Internal Auditing & Management Consulting has been charged with auditing PCard holder and approver activity as well as departmental activities and internal controls. The objectives of these audits were to determine if departments complied with UWF PCard policies and procedures, as well as to evaluate the level of understanding of PCard policies among PCard holders and approvers. UWF has 323 PCard holders distributed across 112 departments. For the fiscal year, approximately 22,000 PCard transactions totaling \$13 million in expenses were paid via UWF PCards.

Notable Strengths

The Concur system provided a digital audit trail of transactions including who accessed the records. Electronic receipts and a documented business purpose were required for each transaction processed in Concur and there were no findings involving missing documentation. Internal control processes such as strong separation of duties, passwords remaining confidential, and required supervisory approval of transactions were noted.

Results - Quarter 4 (April – June 2023)

Five departments encompassing 17 cardholders were examined on a sample basis. Individual reports were distributed to department heads and Procurement & Contracts upon completion of the audits. The table below shows the volume of activity occurring for these departments and the amount tested. The detailed PCard reports are available from Internal Auditing & Management Consulting.

Number of Departments Reviewed	Number of Cardholders	Number of Transactions Occurring	Number of Transactions Tested	Total PCard Expenditures of Depts.	Total PCard Transaction \$ Tested
5	17	467	106 (23%)	\$180,609	\$93,554 (52%)
Audit Opinion for the PCard Audits					
EXCELLENT	GOOD	FAIR	POOR	Total	
4	1	0	0	5	

Departments Audited 4th Quarter:	
EXCELLENT	GOOD
Parking and Transportation Theatre University Commons University Police	Dept. of Communication

Results - Fiscal Year 2022/2023 (July 2022 – June 2023)

This is a summary of the PCard audit results for Fiscal Year 2022/23. A total of 20 PCard audit reports were issued. Individual reports were distributed to department heads and Procurement upon completion of the audits. The totals below show the volume of activity occurring for these departments and the amount tested. All reports are available from Internal Auditing & Management Consulting.

Number of PCard audits performed	Number of Cardholders Reviewed	Number of Transactions Occurring	Number of Transactions Tested	Total PCard expenses for these Depts.	Total \$ PCard Transactions Tested
20	113	3,538	731 (21%)	\$2,069,155	\$ 1,044,223 (50%)
Audit Opinion for the PCard Audit ¹					
EXCELLENT	GOOD	FAIR	POOR	Total	
13	5	2	0	20	

Recommendation: Acceptance of the Internal Auditing PCard Reports for the 4th Quarter and Fiscal Year Summary of PCard Audits for FY 2022/23.

Fiscal Implications: Fiscal oversight by the UWF Board of Trustees

Prepared by: Cindy Talbert, Chief Audit Executive, ctalbert@uwf.edu, 850-474-2637

Presenter: Cindy Talbert

¹ **Excellent:** Army ROTC, College of Health Dean’s Office, Computer Science, Emerald Coast, Housing and Residence Life, Kugelman Honors Program, Mathematics and Statistics, Parking and Transportation Services, School of Nursing, Theatre, Undergraduate Admissions, University Commons, and University Police; **Good:** Administration and Law, Dean of Students, Department of Communication, Student Engagement, and Student Government Association; **Fair:** Continuing Education and Intercollegiate Athletics.

PCard Audit: Department of Communication Report # P22-23_020 June 8, 2023	AUDIT OPINION: GOOD
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Audit Objective and Scope

To determine whether the Department is conducting its PCard financial and business processes under an adequate system of internal control, as required by University policy and guidelines and good business practice.

We reviewed the key internal controls over PCard financial and operational activities in accordance with UWF policies and procedures including:

- Safeguarding of PCard account information;
- Properly documented transactions, including purchase receipt and business purpose;
- Independent approval of PCard transactions; and
- Timeliness of PCard expense reports.

Procedures and Statistics

We reviewed a judgmental sample of transactions for the period October 1, 2022 through March 31, 2023, and we interviewed a Cardholder regarding PCard procedures in the Department.

AUDIT POPULATION	AUDIT SAMPLE
2 cardholders, 62 transactions, totaling \$29,469.77	26% of Audit Population (16 transactions and \$10,785.67 ~37% of total dollars spent), including 3 transactions over \$999.

Internal Control Strengths and Weaknesses

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> • Electronic receipts and business purpose required for each transaction processed in Concur. • Required supervisory approval of transactions. • Staff was knowledgeable of the PCard program. 	

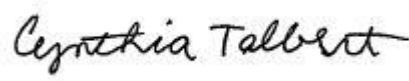
Finding

There were four instances in which Concur expense reports were submitted after the required deadline. All PCard charges for a given month should be assigned to an expense report and submitted and reviewed within 15 days of month-end.

Recommendation for Corrective Action

Establish a process to ensure that the monthly PCard expense reports are submitted and reviewed within 15 days of month-end as required by the PCard policy.

AUDITEE MANAGEMENT TEAM
 Dr. Kelly Carr, Chairperson
 Adriene Lewis, Office Administrator

INTERNAL AUDITING TEAM
 Elizabeth Mrachek, CIA, CPA

 Cynthia Talbert, CFE, CIA, CPA, CRMA
 Chief Audit Executive (ctalbert@uwf.edu)

This audit conforms to the *International Standards for the Professional Practice of Internal Auditing* of The Institute of Internal Auditors.

This report is intended solely for the internal use of the University and the UWF Board of Trustees. It is not intended to be used for any other purpose. This restriction is not intended to limit the distribution of this report, which is a matter of public record.

PCard Audit: Parking and Transportation Services
Report # P22-23_018
May 23, 2023

AUDIT OPINION:
EXCELLENT

Audit Objective and Scope

To determine whether the Department is conducting its PCard financial and business processes under an adequate system of internal control, as required by University policy and guidelines and good business practice.

We reviewed the key internal controls over PCard financial and operational activities in accordance with UWF policies and procedures including:

- Safeguarding of PCard account information;
- Properly documented transactions, including purchase receipt and business purpose;
- Independent approval of PCard transactions; and
- Timeliness of PCard expense reports.

Procedures and Statistics

We reviewed a judgmental sample of transactions for the period October 1, 2022, through March 31, 2023, and we interviewed select Cardholders regarding PCard procedures in the Department.

AUDIT POPULATION	AUDIT SAMPLE
3 cardholders, 26 transactions, totaling \$24,753.67	46% of Audit Population (12 transactions and \$14,355.99 ~58% of total dollars spent), including 3 transactions over \$999.

Internal Control Strengths and Weaknesses

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> • Electronic receipts and business purpose required for each transaction processed in Concur. • Required supervisory approval of transactions. • Staff were knowledgeable of the PCard program. 	

Finding

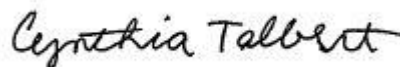
1. There were two instances in which Concur expense reports were submitted after the required deadline. All PCard charges for a given month should be assigned to an expense report and reviewed and submitted within 15 days of month-end.

Recommendation for Corrective Action

1. Establish a process to ensure that the monthly PCard expense reports are reviewed and submitted within 15 days of month-end, as required by PCard policy.

AUDITEE MANAGEMENT TEAM
 Chip Chism, Director
 Kerrie Brock, Office Administrator

INTERNAL AUDITING TEAM
 Lauren Alidor, Internal Auditor II



Cynthia Talbert, CFE, CIA, CPA, CRMA
 Chief Audit Executive (ctalbert@uwf.edu)

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PCard Audit: Theatre Department Report # P22-23_016 June 6, 2023	AUDIT OPINION: EXCELLENT
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Audit Objective and Scope

To determine whether the Department is conducting its PCard financial and business processes under an adequate system of internal control, as required by University policy and guidelines and good business practice.

We reviewed the key internal controls over PCard financial and operational activities in accordance with UWF policies and procedures including:

- Safeguarding of PCard account information;
- Properly documented transactions, including purchase receipt and business purpose;
- Independent approval of PCard transactions; and
- Timeliness of PCard expense reports.

Procedures and Statistics

We reviewed a judgmental sample of transactions for the period October 1, 2022, through March 31, 2023, and we interviewed select Cardholders regarding PCard procedures in the Department.

AUDIT POPULATION	AUDIT SAMPLE
4 cardholders, 180 transactions, totaling \$63,190.18	21% of Audit Population (37 transactions and \$42,262.50 ~67% of total dollars spent), including 8 transactions over \$999.

Internal Control Strengths and Weaknesses

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> • Electronic receipts and business purpose required for each transaction processed in Concur. • Staff was knowledgeable of the PCard program. 	

Finding

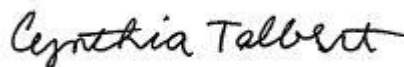
Each transaction selected for testing had the required receipt attached in the Concur application as supporting documentation; however, we were not able to confirm through Concur that each individual receipt for each of the cardholders was reviewed during the approval process by the designated PCard approver.

Recommendation for Corrective Action

To ensure strong controls over PCard transactions and the approval process, each PCard transaction receipt should be opened in Concur and reviewed prior to approving the transaction.

AUDITEE MANAGEMENT TEAM
 Glenn Breed, Chairperson
 Holly Komula, Office Administrator

INTERNAL AUDITING TEAM
 Lauren Alidor, Internal Auditor II



Cynthia Talbert, CFE, CIA, CPA, CRMA
 Chief Audit Executive (ctalbert@uwf.edu)

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PCard Audit: University Commons and Event Services Report # P22-23_017 June 6, 2023	AUDIT OPINION: EXCELLENT
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Audit Objective and Scope

To determine whether the Department is conducting its PCard financial and business processes under an adequate system of internal control, as required by University policy and guidelines and good business practice.

We reviewed the key internal controls over PCard financial and operational activities in accordance with UWF policies and procedures including:

- Safeguarding of PCard account information;
- Properly documented transactions, including purchase receipt and business purpose;
- Independent approval of PCard transactions; and
- Timeliness of PCard expense reports.

Procedures and Statistics

We reviewed a judgmental sample of transactions for the period October 1, 2022 through March 31, 2023, and we interviewed Cardholders regarding PCard procedures in the Department.

AUDIT POPULATION	AUDIT SAMPLE
3 cardholders, 88 transactions, totaling \$29,821.97	19% of Audit Population (17 transactions and \$14,274.30 ~48% of total dollars spent), including 7 transactions over \$999.

Internal Control Strengths and Weaknesses

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> • Electronic receipts and business purpose required for each transaction processed in Concur. • Required supervisory approval of transactions. • Staff was knowledgeable of the PCard program. 	

Finding

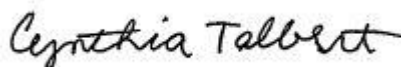
The UWF Expenditure Guidelines outlines the types of expenditures that are allowed to be spent from the State budgets. Of the items selected for review, there was 1 transaction totaling \$56.85 that would be classified as a disallowable charge to the Auxiliary Fund.

Recommendation for Corrective Action

We recommend that the department reimburse their budget for the disallowable expenditure, for example, from a Foundation account.

AUDITEE MANAGEMENT TEAM
 Kennyatta Cox, Director
 Vanessa Gribbin, Office Administrator

INTERNAL AUDITING TEAM
 Elizabeth Mrachek, CPA, CIA



Cynthia Talbert, CFE, CIA, CPA, CRMA
 Chief Audit Executive (ctalbert@uwf.edu)

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PCard Audit: University Police Report # P22-23_019 June 14, 2023	AUDIT OPINION: EXCELLENT
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Audit Objective and Scope

To determine whether the Department is conducting its PCard financial and business processes under an adequate system of internal control, as required by University policy and guidelines and good business practice.

We reviewed the key internal controls over PCard financial and operational activities in accordance with UWF policies and procedures including:

- Safeguarding of PCard account information;
- Properly documented transactions, including purchase receipt and business purpose;
- Independent approval of PCard transactions; and
- Timeliness of PCard expense reports.

Procedures and Statistics

We reviewed a judgmental sample of transactions for the period October 1, 2022, through March 31, 2023, and we interviewed select Cardholders regarding PCard procedures in the Department.

AUDIT POPULATION	AUDIT SAMPLE
5 cardholder, 111 transactions, totaling \$33,372.63	22% of Audit Population (24 transactions and \$11,875.62 ~36% of total dollars spent), including 6 transactions over \$999.

Internal Control Strengths and Weaknesses

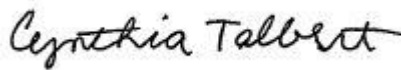
STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> • Electronic receipts and business purpose required for each transaction processed in Concur. • Required supervisory approval of transactions. • Staff was knowledgeable of the PCard program. 	

Findings

None

AUDITEE MANAGEMENT TEAM
 Marc Cossich, Chief of Police
 Sabra Cupples, Accreditation Manager

INTERNAL AUDITING TEAM
 Lauren Alidor, Internal Auditor II



Cynthia Talbert, CFE, CIA, CPA, CRMA
 Chief Audit Executive (ctalbert@uwf.edu)

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UWF Board of Trustees Meeting
Audit & Compliance Committee
August 17, 2023

Issue: Office of Compliance & Ethics Annual Report
Proposed action: Approval

Background Information:

Compliance and Ethics Annual Reporting: Each year, the Office of Compliance and Ethics develops an annual report to provide stakeholders with a general update on the program’s activities with an strategic emphasis on program activities that help satisfy the regulatory requirements established in *Board of Governors Regulation 4.003, State University System Compliance and Ethics Programs*.

An annual report is required to be submitted to the Board of Governors Office per BOG Regulation 4.003(7)(g)(8); specifically stating that the Chief Compliance Officer must: *“Report annually to the board of trustees on the activities and effectiveness of the Program and provide documentation of such report to the Board of Governors Office...”*

1. Approval of the 2022-23 Compliance and Ethics Annual Report

Recommendation: Approval of the Office of Compliance & Ethics Annual Report
Implementation: None
Fiscal Implications: Fiscal oversight by the UWF Board of Trustees

Prepared by: Matthew Packard, 857-6070, mpackard@uwf.edu
Presenter: Matthew Packard



Office of
Compliance and Ethics
UNIVERSITY *of* WEST FLORIDA



Annual Report

2022-2023

◆ Prepared by: Matthew W. Packard, CCEP
Chief Compliance Officer, Office of Compliance & Ethics ◆

Executive Summary:

The mission of the University of West Florida's ("UWF") Office of Compliance and Ethics' ("OCE") **to establish and maintain a centralized compliance and ethics function and promote a system-wide culture of compliance, integrity, and ethical behavior.**

The OCE strives to achieve this through adherence to the elements of an effective compliance and ethics program, originally set forth in *Chapter 8 § 8B2.1, Effective Compliance and Ethics Programs, of the U.S. Federal Sentencing Guidelines* and enshrined with regulatory authority via the *Florida Board of Governors ("BOG") Regulation 4.003, State University System Compliance and Ethics Programs.*

In recognition of these guiding principles, the OCE annual report is presented within the context of these elements, which UWF defines as the following:

1. Governance & Accountability
2. Policies & Procedures
3. Education & Awareness
4. Auditing, Monitoring, & Risk Assessment
5. Response, Prevention, & Enforcement
6. Incentives & Discipline
7. Measure Program Effectiveness

Special thanks go out to the many individuals who help make OCE's mission a reality. Compliance is a collective effort and none of the following achievements could have been possible without the dedication and effort of countless individuals who dedicate their time, energy, and effort toward helping UWF meet its compliance goals. Go Argos!

Respectfully yours,



Matthew W. Packard, CCEP
Chief Compliance Officer

Annual Report

2022-2023

The Office of Compliance and Ethics

Program Benefits:

- Proactively protects from financial and reputational harm
- Promotes commitment to the value of integrity
- Facilitates effective risk management and mitigation



Report Highlights:

- 2023 Closed Captioning Campaign
- Updated Risk Rankings
- Updated Policies Section

Report appendices:

- Integrity Helpline Statistics
- OCE's Risk Framework Model
- UWF Risk Heat Map
- Residual Risk Trends

Governance & Oversight

UWF's compliance and ethics function is designed to operate independently and with direct access to UWF leaders. This "top-down" approach ensures that the function has the authority and resources it needs to effectively carry out its mission.

The Chief Compliance Officer (CCO), Matt Packard, CCEP, is responsible for leading the compliance and ethics function. The CCO reports administratively to the UWF President and functionally to the Board of Trustees. This reporting structure gives the CCO the independence and authority to carry out his duties without interference.

The CCO's responsibilities include:

- Developing and implementing UWF's compliance and ethics program
- Providing training and education on compliance and ethics
- Investigating potential compliance violations
- Reporting compliance concerns to the UWF President and Board of Trustees

The CCO's direct access to UWF leaders enables him to quickly escalate concerns to the highest levels, if necessary. This ensures that compliance issues are addressed promptly and effectively.

UWF's commitment to compliance and ethics is evident in its organizational structure and the authority it gives to the CCO. This "top-down" approach ensures that the compliance and ethics function have the resources and authority it needs to effectively carry out its mission.

In addition, OCE relies on Compliance Partners and participation with various committees/ workgroups to increase its operational footprint and incorporate program goals into the wider UWF strategic plan. The following are a sample of the CCO's current committee memberships/ workgroup assignments:

- Risk and Compliance Council, Vice-Chair
- Campus Accessibility Advisory Group (CAAG)
- InfoSys Workgroup
- Extended Cabinet
- FL SUS Compliance and Ethics Consortium, UWF Representative
- UWF Copyright Compliance, UWF DMCA Officer
- Research Support Group
- Hiring Committee, Research Integrity Officer
- Electronic Information and Technology Accessibility (EITA) Advisory Group, Team Lead
- UWF Compliance Accountability Oversight
- SACSCOC Accreditation Workgroups
- PCI DSS Compliance Program, Team Lead
- GDPR Workgroup, UWF GDPR Privacy Officer
- Foreign Influence Workgroup
- Higher Education Opportunity Act (HEOA) Consumer Information Oversight

Closed Captioning

Closed captioning is required by federal regulation for a good reason... it benefits the whole community.

The following statistics help illustrate the impact properly implemented closed captioning can have on both learning outcomes and quality of instruction:

- Regardless of whether they have a disability of any kind, a majority of students use closed captions at least some of the time.
- Roughly 90 percent of all students who use closed captions find them at least moderately helpful for learning.
- Specific ways in which closed captions can aid learning include comprehension, accuracy, engagement, and retention.

Furthermore, a recent USF St Petersburg study suggests a strong link between the use of closed captions and improved faculty evaluations. Specifically, faculty who offered captioning on their material were rated more highly, particularly in four different areas:

- Respect and Concern for the Students
- Facilitation of Learning
- Communication of Ideas and Information
- Overall Rating of the Instructor

“Accessibility is not Optional”



Taking the Guesswork Out of Compliance

Since its inception, the Office of Compliance and Ethics (OCE) has strived to engage with the community by joining workgroups and providing compliance knowledge through active collaboration. This has helped to increase OCE's operational footprint and compliance awareness.

Over the past year, the Chief Compliance Officer (CCO) conducted a top-down review of the university's Compliance Database and Accountability Matrix to ensure its accuracy and distribution of compliance obligations. By developing widely-available resources that simplify compliance, the OCE strives to take the guesswork out of compliance for faculty and staff, so they can focus on preparing the next generation of learners to take on the world.

Policies & Procedures

UWF policies and procedures are designed with intention to address specific risks and regulations. In order to reduce redundant policies and keep existing policies up-to-date, UWF policies are governed by *UWF Policy P-01.03-12.17, University Policy Development and Issuance Process*, which establishes the policy review and renewal procedures.

Over the last year, a monumental effort was spearheaded by a devoted staff in the Office of the General Counsel, to review and update UWF's existing policy library. Although this is still an ongoing process, this year the university updated, revised, or revoked an impressive 19 policies, which included:

1. [Emergency Management](#)
2. [Faculty Qualifications](#)
3. [UWF Server Administration](#)
4. [Export Control](#)
5. [Immunization Requirements](#)
6. [Study Abroad Programs](#)
7. [Authority to Sign Contracts](#)
8. [Contract Review by the Office of the General Counsel](#)
9. [Board Self-Evaluation](#)
10. [Compensation](#)
11. [F-1 and J Visa Status Medical Insurance Requirements](#)
12. [Institutes and Centers](#)

13. [Disposal of University Information Technology Hardware, Software, and Data Storage Devices](#)
14. [Electronic Mail Communications](#)
15. [Administrative Rights to a University Computing Workstation](#)
16. [Code of Conduct Relating to Student Loan Practices](#)
17. [Endpoint Computing Workstations](#)
18. [Facilities and Administrative Costs \(F&A\) on Sponsored Programs](#)
19. [Responding to Allegations of Misconduct in Research](#)

In addition, to UWF's local-level policy activity, an effort is ongoing at the state-level to update the current regulatory library for the Board of Governors. This has resulted in a record number of regulations, *approximately sixty-six (66) at the time of this report*, which have been either updated, revised, or revoked over the last two years alone.

The Board of Governors has publicly stated that the trend is expected to continue. Accordingly, our office will continuously monitor all regulatory changes and strive to keep the university community informed and prepared to address the challenges of a rapidly evolving regulatory environment.

Education & Awareness

As a public institution of higher education, we are responsible for complying with a complex and ever-changing regulatory environment. This environment includes hundreds of rules, regulations, policies, procedures, and statutes from local, state, and federal levels.

Employee education and awareness is essential to maintaining compliance. To this end, the university has established a dedicated system of online education programs and awareness resources.

These resources provide faculty and staff with on-demand training and education throughout the year.

More specifically, OCE has created a number of accountability and awareness tools that make compliance more accessible to our community, including the UWF Compliance Calendar, Accountability Matrix, and Compliance Database. All of which provide up-to-date information on all UWF's reporting requirements and underscore the accountable job roles.

A sample of UWF's essential training offerings include:

- Certified Knowledge Worker Certification
- Anti-Harassment Associate
- FERPA
- New Employee Orientation
- Reporting Abuse
- PCI DSS Credit Card Processor (CCP) Certification
- Ethical Employee Training
- Kognito: At-Risk Training

Auditing, Monitoring & Risk Assessment

As Vice-Chair of the UWF's Risk and Compliance Council, it is the responsibility of the CCO to spearhead the annual system-wide risk assessment and to ensure the consistency and integrity of the collected data. This process involves the coordination of subject matter experts from across the university spectrum to gather and map out UWF's contemporary risk environment, identify and define mitigating controls, and determine their effectiveness.

Below are the "Top Ten" risks as measured by their residual risk rating for FY 2022-23 [Also see Appendix D].

The top ten risks of 2022-2023:

1. Unfunded Mandates from State
2. Professional Liability Claims
3. Employment Recruitment
4. Employment Retention
5. Compression of Wages (Faculty and Staff)
6. Deferred Maintenance

7. Increase in Energy Costs
8. Continued Freeze on Tuition/Fees
9. Challenging Policy-Making Environment toward Higher Education
10. Debt Ceiling and Ability to Draw Title IV Funds

In addition to the Risk Assessment and Risk & Compliance Council activities, the OCE takes Helpline reporting into account when evaluating/monitoring UWF's workplace environment.

Response, Prevention & Enforcement

The UWF Integrity Helpline is a cornerstone of the OCE. First rolled out in summer of 2017, this system helps to facilitate a "speak up" culture by providing employees a safe space to voice concerns or report wrongdoing without any fear of retaliation or retribution.

Since its inception, the Helpline reporting levels have remained below average. During the 2022-23 FY, the Helpline receive approximately 1.25 reports per month, up from 0.6 the previous year. This trend is very likely be attributed to the return to campus and the associated increased person-to-

person interactions that followed. [See Appendix B for more information].

In terms of where the reported cases originated, the majority of cases continue to stem from Human Resources (40%), followed by Regulatory (27%), Academics (13%), Equal Employment Opportunity (13%), and Other (7%).

These trends are largely in line with Higher Education industry, where Human Resources constitute the vast majority of all reported cases. According to the [Navex Global 2022 Hotline Incident Management Benchmarking Report](#), 50% of all global

reporting is associated with HR, Diversity, and Workplace Respect.

Lastly, an important tool in the university's prevention efforts is imparted through proactive hiring practices. UWF's implements stringent screening processes, which maintain that no job finalist will receive an offer of employment without clearing a background screening. Furthermore, those applying for elevated positions of "Special Trust" are required to undergo "Level 2" fingerprint background check.

Incentives & Discipline

To proliferate our cultural values and shared expectations, OCE, collaborates with the Office of General Counsel, Human Resources, and Internal Auditing and Management Consulting to triage employee reporting and properly coordinate any subsequent investigations stemming from the Integrity Helpline.

Depending on the result of the investigation, disciplinary measure may be necessary. UWF's employs specific disciplinary procedures which are explicitly delineated within UWF Policy HR-22.00-4/22, Standards of Conduct. Specifically, the UWF Standards for Disciplinary Action

Table outlines progressive disciplinary actions for a variety of work standards. This method helps ensure disciplinary actions are carried out with consistency and expedience, thus, providing for the fair and equitable treatment of all employees.

Over the next 12 months, OCE plans to work with Human Resources and university leadership in order to develop new methods of incentivizing compliance and ethical behavior, such as incorporating these elements into the performance review process.



Measure Program Effectiveness

To ensure the success of any program, it is essential to strive for continuous improvement. In the case of compliance and ethics programs, this is particularly imperative as the regulatory environment is constantly changing.

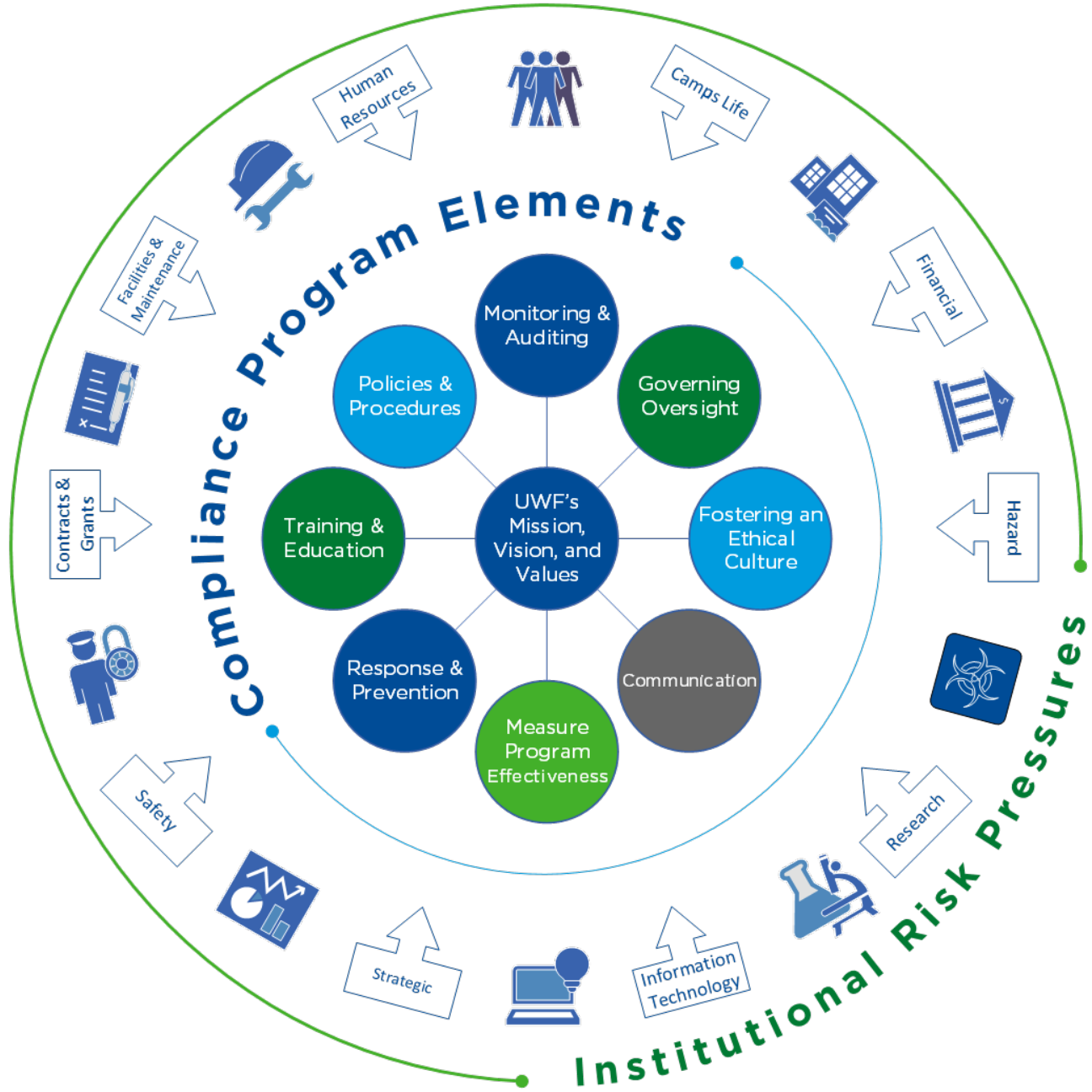
The Office of Compliance and Ethics implements a number of tools and practices to address program effectiveness. These include quarterly reporting to the Board of Trustees Audit and Compliance Committee, biannual meetings with the University President, and the production of an Annual Report and Annual Work Plan, to help ensure the program stays on track and is held accountable to its established goals.

Lastly, to ensure program effectiveness over the long-term, UWF compliance function undergoes a compulsory, external review process every five years that is initiated through the State University System Compliance and Ethics Consortium. Last year, UWF completed its first ever external review, the results of which were largely positive. Most importantly, the review confirmed that OCE is meeting all of the Board of Governors performance goals and regulatory requirements established by *BOG Regulation 4.003, SUS Compliance and Ethics Programs*.

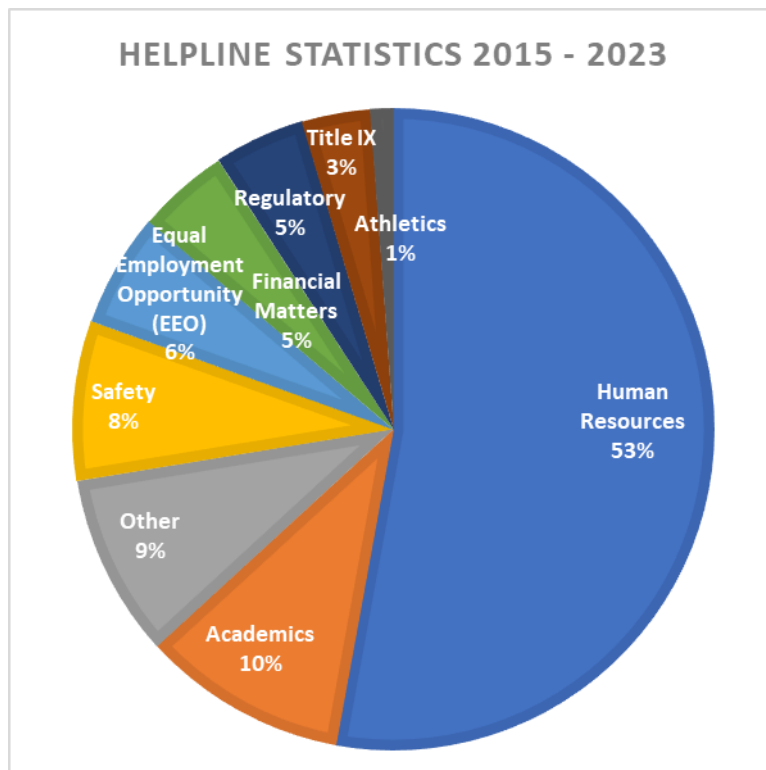
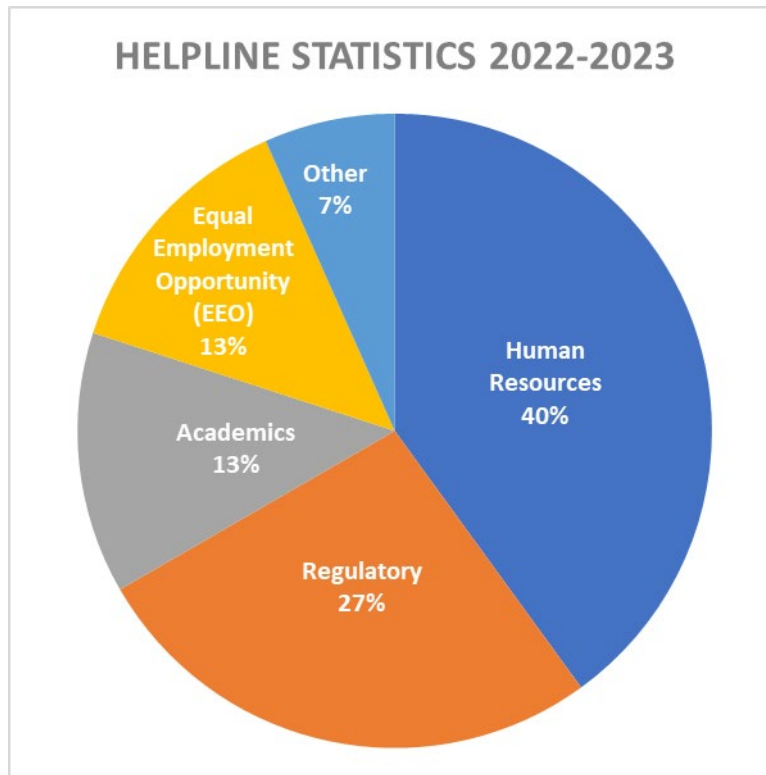


“UWF operates with fairness, respect, and integrity in all matters: Doing the right thing for the right reason.”

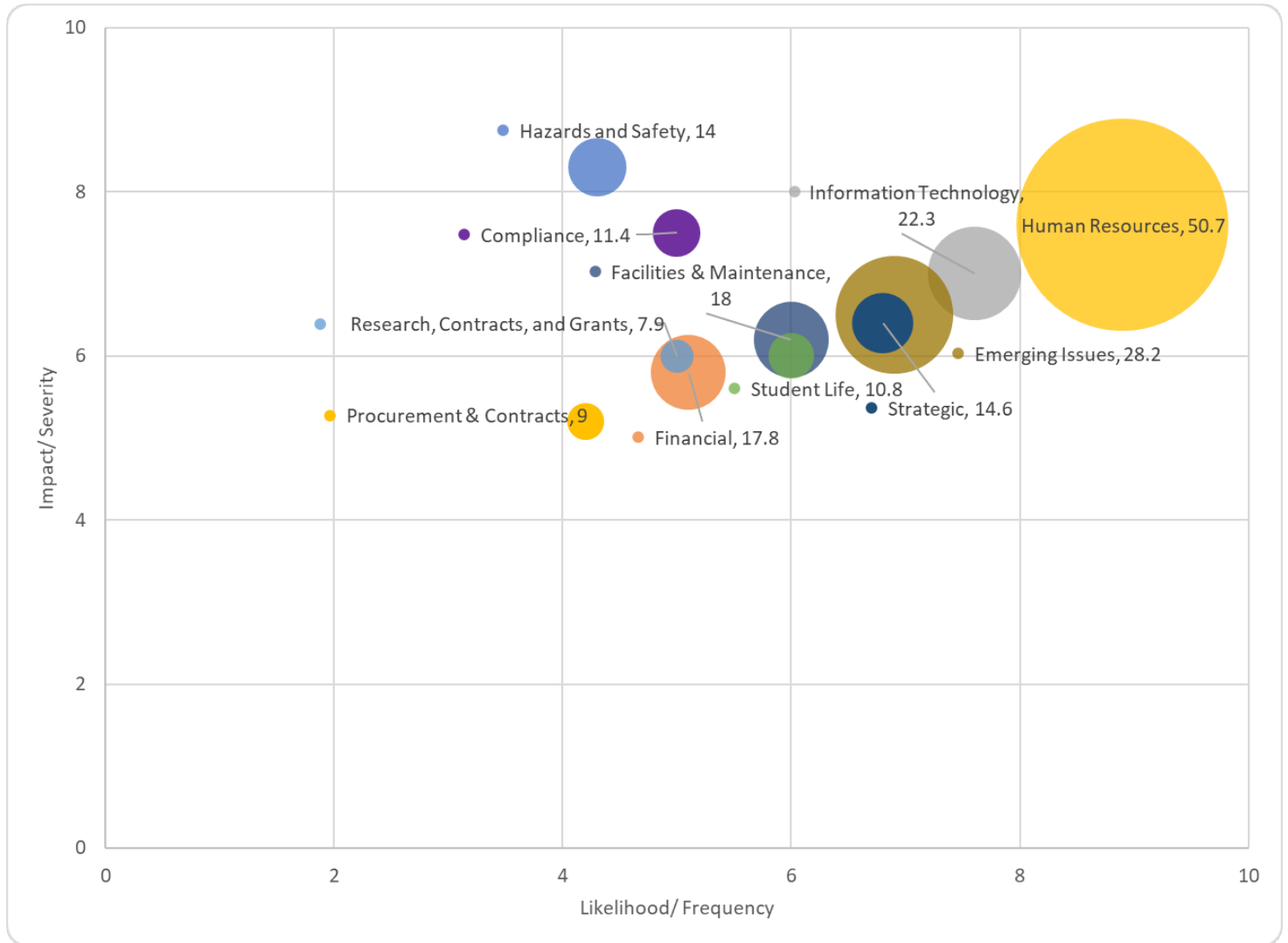
UWF Compliance Risk Framework



UWF Integrity Helpline Statistics

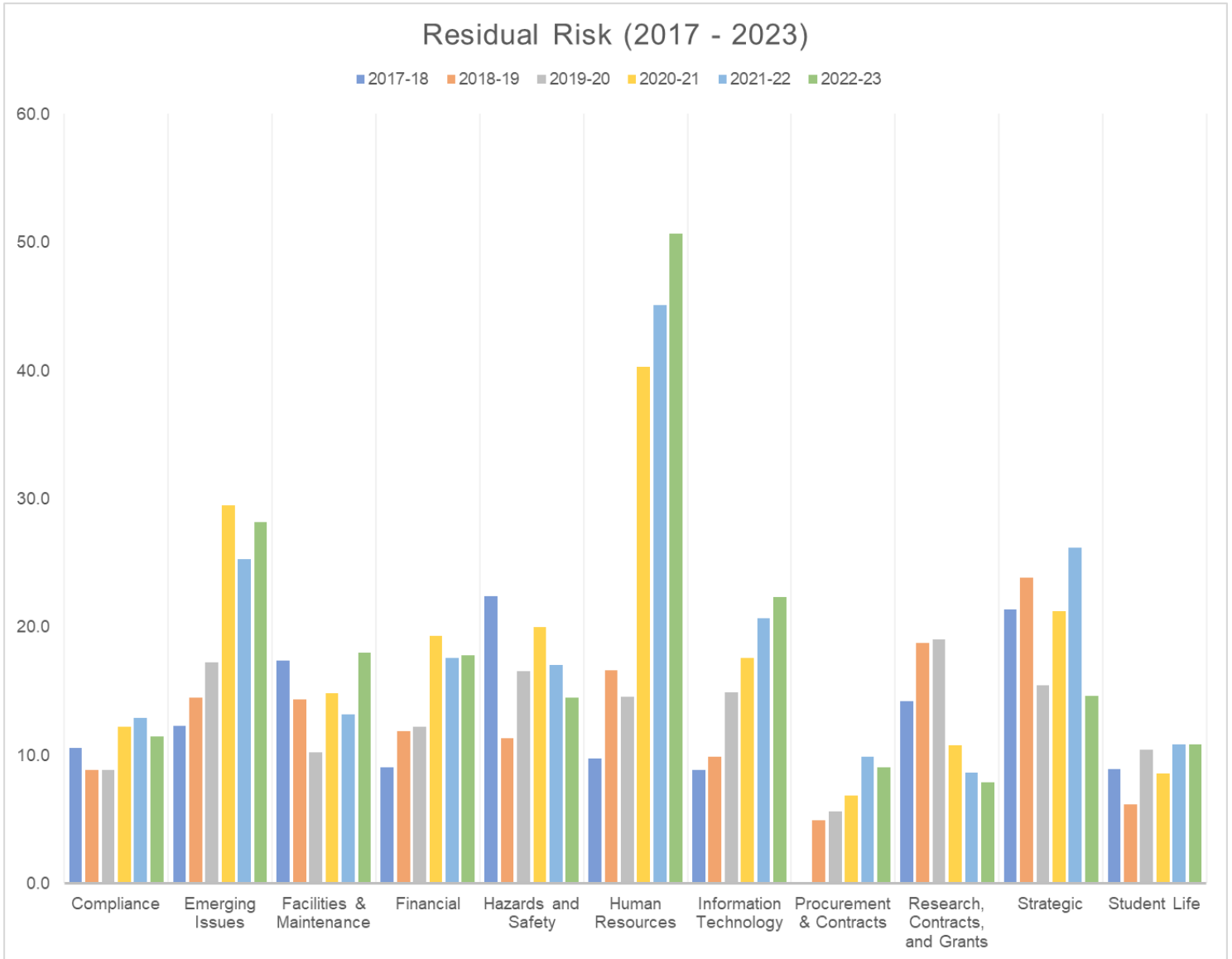


2022-2023 Risk Heat Map¹



¹ Each risk area is plotted on the axis of Likelihood/Frequency and Impact/Severity via a 1 to 10 scale. The relative size of each “bubble” is associated with its overall Residual Risk (i.e., relative risk to the university after the effectiveness of our compensating controls are considered).

Residual Risk Trends²



² The following graph depicts the median residual risk ratings for each UWF risk area over the past six years. The greater the overall residual risk the greater the risk exposure.

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OCE is on the Web!

Visit at:

uwf.edu/compliance-and-ethics

uwf.edu/eita



UWF Board of Trustees Meeting
Audit & Compliance Committee
August 17, 2023

Issue: Office of Compliance & Ethics Work Plan
Proposed action: Approval

Background Information:

Compliance and Ethics Work Plan: The Compliance and Ethics Work Plan supplements the annual report and provides stakeholders with the current compliance framework for meeting the requirements of *Board of Governors Regulation 4.003, State University System Compliance and Ethics Programs*.

The document has been amended from its 2022 version to reflect changes in the general activities of the Chief Compliance Officer, including digital accessibility oversight.

1. Approval of the updated Compliance and Ethics Work Plan

Recommendation: Approval of the Office of Compliance & Ethics Work Plan
Implementation: None
Fiscal Implications: Fiscal oversight by the UWF Board of Trustees

Prepared by: Matthew Packard, 857-6070, mpackard@uwf.edu
Presenter: Matthew Packard

2023-24 Compliance & Ethics Work Plan

The mission of the Office of Compliance and Ethics (“OCE”) is to establish and maintain a centralized compliance and ethics function that promotes a university-wide culture of compliance, integrity, and ethical conduct. OCE is a forward-thinking function that focuses its efforts on projects that provide preemptive protections, establish internal controls, and address other protective measures designed to mitigate risk and defend the university’s reputational standing.

The purpose of the Compliance & Ethics Work Plan is to outline the elements of an effective compliance and ethics program as defined by Florida Board of Governor’s Regulation 4.003, State University System Compliance and Ethics Programs and provide specific examples of how each fundamental obligation is satisfied through a selection of OCE operational responsibilities.

Governance & Oversight	
<p>Promote accountability among UWF employees for compliance with federal, state and local laws and regulations, and appoint knowledgeable individuals responsible for aiding in the development and implementation of a comprehensive compliance and ethics program</p>	Serve as Vice-Chair to the Risk and Compliance Council
	Chair the UWF Payment Card Industry Data Security Standards workgroup; provide guidance and policy support; administer Credit Card Processor training
	Appropriately delegate the University’s compliance obligations to accountable persons by use of the UWF Higher Education Database, Compliance Calendar and Accountability Matrix
	Provide employees ample resources and guidance using the university’s business library and through continuous communication with compliance partners

Serve on various standing committees and workgroups to provide compliance guidance and help achieve UWF's strategic mission

Spearhead UWF's Electronic Information Technology & Accessibility initiative and ensure all UWF's digital offerings are accessible to all persons through the contract review process

Response, Prevention, & Enforcement

Create an effective communication network that allows for the efficient dissemination of information to compliance partners and provide an easily accessible mechanism for employee reporting

Administer the UWF Integrity Helpline to ensure cases are properly assigned, receive prompt attention, are thoroughly investigated, and are closed in a timely manner

Continually maintain and promote UWF compliance and ethics website and UWF business library resources

Maintain effective compliance communications through use the compliance partner network

Issue regulatory alerts, reporting deadlines, and updates at least monthly

Collaborate with Integrity Helpline Partners to review Helpline allegations of misconduct and support in the investigatory process

Monitor the EITA web portal and respond promptly to reports of barriers to accessibility within the uwf.edu web domain

Education & Awareness

<p>Educate the UWF community on compliance obligations, regulatory requirements, and how compliance and ethics are incorporated into, and support, UWF’s strategic goals</p>	<p>Coordinate annual Board of Trustees (BOT) compliance and ethics training as accorded by state and federal regulation</p>
	<p>Report significant instances of fraud to the President, Board of Trustees, and when applicable, to the Board of Governors in accordance with BOG Regulation, 4.001, University System Processes for Complaints of Waste, Fraud, or Financial Mismanagement</p>
	<p>Provide targeted compliance and ethics training and communications to UWF employees to supplement existing employee training programs</p>
	<p>Evaluate UWF’s training programs for effectiveness and identify any potential regulatory or strategic gaps</p>

Policies & Procedures

<p>Work with relevant areas to maintain and develop University policies, procedures, and regulations that suitably represent UWF’s commitment to ethical conduct and compliance with all applicable laws and regulations</p>	<p>Continuous review of UWF policies with special attention to any policy over five years old</p>
	<p>Review, develop, and promote UWF’s employee codes of conduct in order to adequately communicate the University’s ethical expectations</p>
	<p>Ensure policies and procedures adequately reflect UWF’s commitment to ethical conduct and facilitate a system-wide culture of compliance</p>
	<p>Monitor changes to the Board of Governors regulatory library and ensure UWF policies and procedures are updated as required</p>

Auditing, Monitoring & Risk Assessment

<p>Identify and remediate noncompliance through annual risk assessments and develop proactive programs designed to monitor areas of risk</p>	<p>Utilize the UWF Compliance Database, Accountability Matrix, and Compliance Calendar to monitor compliance obligations and designate accountability</p>
	<p>Spearhead completion of the UWF Risk and Compliance Council's annual system-wide risk assessment and develop the accompanying risk heat map—Communicate data and findings to senior leaders and the BOT Audit & Compliance Committee</p>
	<p>Conduct data analysis of past and present risk assessment data and develop an annual risk report and maintain risk dashboards</p>
	<p>Collaborate with Risk and Compliance Council to communicate university risk data to the appropriate persons</p>
	<p>Work with General Counsel, Office of Human Resources, and Research Administration and Engagement to assist with the university-wide conflict of interest and outside commitment processes</p>

Discipline and Incentives

<p>Promote the compliant and ethical behavior through incentives and appropriate disciplinary guidelines</p>	<p>Promote accountability and consistent discipline by adhering to the UWF Standards of Conduct policy</p>
	<p>Work with UWF Integrity Helpline Partners to promote consistent disciplinary measures when conducting investigations</p>
	<p>Promote awareness of UWF policies and procedures and applicable regulatory requirements through periodic reminders and employee resources</p>

Identify compliance incentive opportunities wherever possible to encourage ethical behavior and facilitate a system-wide culture of compliance

Work with senior leaders to emphasize compliance and ethical behavior in their messaging and incorporate these values when conducting performance reviews

Measure Program Effectiveness

Evaluate and report on the overall performance of the UWF compliance function and the compliance and ethics culture at UWF

Create and submit the Office of Compliance and Ethics Annual Report to the Board of Trustees Audit and Compliance Committee for approval

Monitor, maintain, and evaluate Integrity Helpline reporting data for any trends and/ or red flags

Continuous Monitoring of Compliance and Ethics Program's adherence to BOG/REG 4.003

Collaborate with SUS Compliance Consortium in a statewide compliance program benchmarking and facilitation

Coordinate with the SUS Compliance and Ethics Consortium to carry out 5-year program evaluations

UWF Board of Trustees Meeting
Audit & Compliance Committee
Aug, 17, 2023

Issue: Office of Compliance & Ethics - Update on Activities
Proposed action: Informational

Background Information:

Compliance and Ethics Activities and Board Oversight: This information provides the Audit and Compliance Committee with a broad overview of the activities of the UWF Compliance and Ethics function and highlights contemporary compliance and ethics trends and issues. In doing so, this provides the Audit and Compliance Committee and University President with the essential knowledge necessary to carry out its responsibility¹ to “*exercise oversight with respect to the implementation and effectiveness*” of UWF’s Compliance and Ethics function.

Risk Assessment/ Enterprise Risk Management: The University annually conducts a system-wide risk assessment to determine the potential impact, likelihood, and residual risk rating² for UWF’s risk profile. In addition, this year’s assessment will follow up on previous year’s risk data to help determine the efficacy of our existing control structures.

UWF Integrity Helpline: The University is required to provide this service per Board of Governors Regulation 4.003(7)(e). This informational item will provide the Audit and Compliance Committee with a high-level overview of the activity and reporting trends of the university’s anonymous employee reporting system.

Recommendation: Informational Item
Implementation: None
Fiscal Implications: Fiscal oversight by the UWF Board of Trustees

Prepared by: Matthew Packard, 857-6070, mpackard@uwf.edu
Presenter: Matthew Packard

¹ Per [Florida Board of Governors Regulation 4.003, SUS Compliance and Ethics Programs](#)

² Residual risk is the total risk presented to the university after we take into account the overall effectiveness of the mitigating control structures, if any.



Office of
Compliance and Ethics
UNIVERSITY of WEST FLORIDA

Audit and Compliance Committee

OCE Informational Update

Payment Card Industry Data Security Standards (PCI DSS)

- UWF's Credit Card Compliance
- New standards released, PCI DSS V.4.0
- Review shows that UWF Credit Card Compliance program is well situated for PCI DSS Ver. 4.0
- Policies and procedures under annual review

Annual Reporting

- 2022-23 Annual Report
- 2023-24 Annual Work Plan
- Risk Assessment Data Analysis
- UWF Integrity Helpline end of year reporting

Florida State University System

Florida BOG continues to revise and update Policy library

- OGC is working to ensure UWF policies are getting updated on pace with BOG
- OCE provides oversight and information updates

Compliance Partner Collaborations

- OSRR
- General Counsel
- Human Resources
- Title IX
- Controller's Office
- ITS
- Cont. Education
- Dean of Students
- Vice Provost
- Finance & Admin
- RAE
- International Affairs
- Procurement
- EH&S

Student Rights and Responsibility Conduct Review Board

- CCO actively serving on the SRRC Student Conduct Hearing Board
- Served as UWF staff representative on two hearings over the last quarter

2023 Annual Risk Assessment

- Completed!
- Data reporting is the final phase
- The data shows some notable increases and decreases in specific risk areas
- The overall impact on risk posture and our risk profile are negligible

SUS Compliance & Ethics Consortium

- Working group met virtually in July
- Discussion focused largely on identifying concerns associated with foreign gift reporting and travel
- UWF is in a strong position, with solid internal controls established

UWF Data Governance

- Over the last quarter OCE worked alongside ITS, Dean of Students, and Continuing Education
- Work focused on data retention requirements and cleaning up our data systems for efficiency

Contract Accessibility Reviews

- Electronic Information and Technology Accessibility reviews to ensure UWF adheres to ADA and Section 504 of the Rehabilitation Act
- 44 contracts reviewed
- 44 contracts cleared

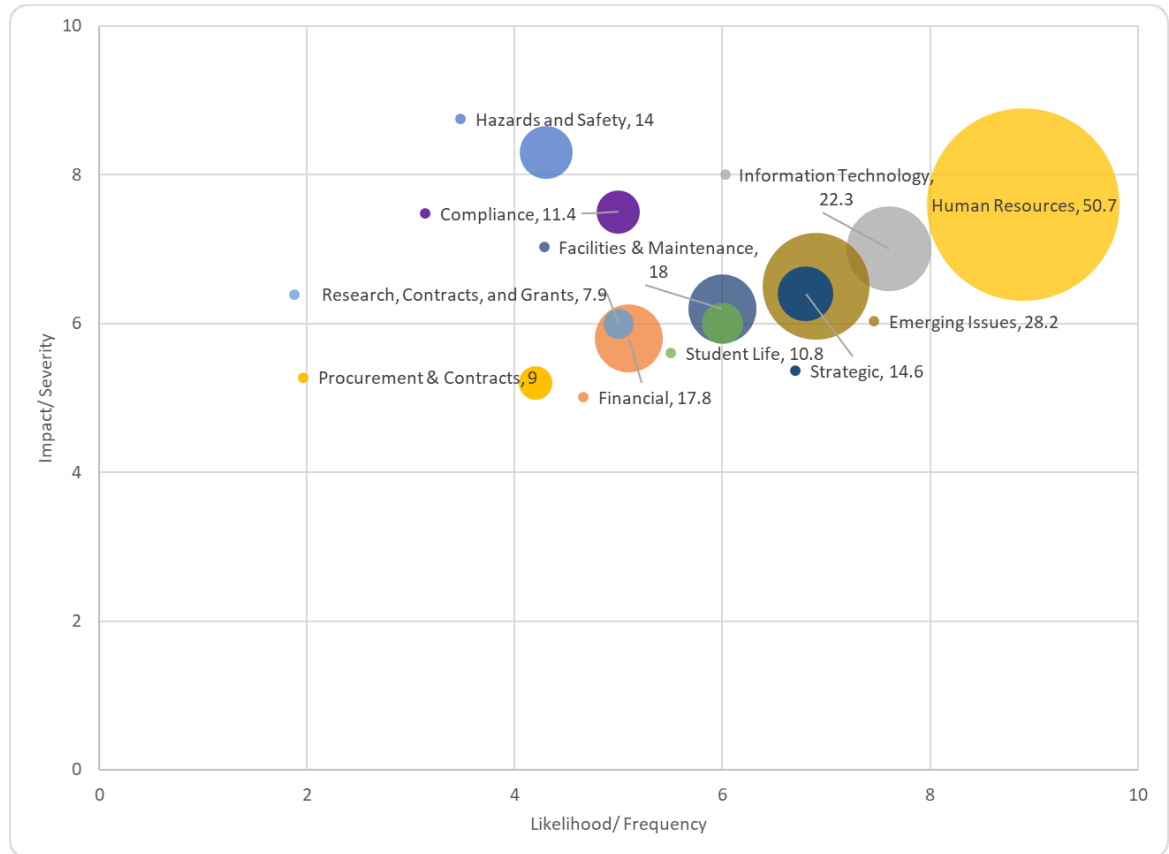
2022-23 Risk Heat Map

Increased risk exposure:
Human Resources, IT,
Facilities & Maintenance, and
Emerging risk areas

Decreased risk exposure:
Strategic and Hazards & Safety
risk areas

The current data implicates a
slight increase in overall
residual risk

Human Resources continues to
deal with high levels of risk
exposure from risk external
pressures



Top Ten Risks

1. Unfunded mandates from state
2. Professional liability claims
3. Employee Recruitment
4. Employee Retention
5. Compression of wages/faculty and staff
6. Deferred maintenance
7. Increase in energy costs
8. Continued freeze on tuition and fees
9. Challenging Policy-making environment toward higher education
10. Debt Ceiling and ability to draw title IV funds

Risk Insights



140

Risks Evaluated
*Total # of risks
evaluated this year*



5%

Critical Risks
*Increase in risks with a
residual rating of 20+*



3%

Residual Risk Levels
*3% increase in overall
residual risk*

Risks: “Very High, Very High”

**Risks
Designated
as Very
High
Likelihood
& Severity**

Unfunded Mandates from the State

Deferred maintenance

Increase in Energy Costs

Continued Freeze on Tuition and Fees

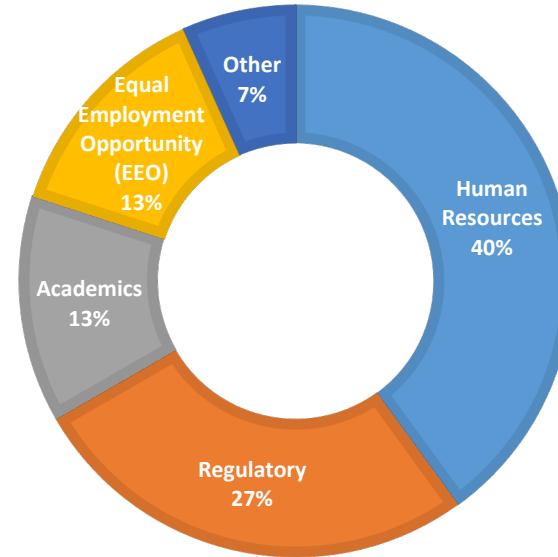
Integrity Helpline Statistics

Increase in reporting levels from 2021-22 (up from 0.2 to 0.5 per 100 employees)

Human Resources at 40% is lower than global average (Avg. 53.8%*)

Averaging approx. 0.5 reports per 100 employees (Avg. 1.4*)

HELPLINE STATISTICS 2022-2023



UWF Board of Trustees Meeting
Audit & Compliance Committee
August 17, 2023

Issue: Internal Auditing and Management Consulting - Update on Activities
Proposed action: Informational

Purpose: To provide the Committee with an overview of activities within Internal Auditing & Management Consulting, as required by the department Charter.

1. Status of internal audits in progress
2. Status of advisory/consulting activities
3. External audits in progress
4. Audit follow up
5. Miscellaneous items

Recommendation: Information only
Implementation: None
Fiscal Implications: Fiscal oversight by the UWF Board of Trustees

Supporting Documents:
Audit Recommendations Status 8/1/23

Prepared by: Cindy Talbert, Associate VP/Chief Audit Executive, 474-2638, ctalbert@uwf.edu
Presenter: Cindy Talbert

**Internal Auditing
Audit Recommendations
Status as of August 1, 2023**

Overdue Implementation Dates			Report Date	Initial Implement Date	Current Implement Date
	Rec #	Topic			
22-23_006 Nautilus Card	2	Review of Adjustments	5/19/2023	7/1/2023	7/1/2023

Future Implementation Dates					
	Rec #	Topic	Report Date	Initial Implement Date	Current Implement Date
22-23_007 Foundation Business Processes	3	Annual Inventory at Tanglewood	5/23/2023	10/31/2023	10/31/2023
22-23_008 Student Accessibilty Resources, Title IX, and Equal Opportunity Departments	1	Access Control	6/12/2023	10/1/2023	10/1/2023
22-23_008 Student Accessibilty Resources, Title IX, and Equal Opportunity Departments	2	KREQ Review for Student Conduct Software	6/12/2023	10/1/2023	10/1/2023
22-23_008 Student Accessibilty Resources, Title IX, and Equal Opportunity Departments	3	Overdue Anti-Harassment Training	6/12/2023	10/1/2023	10/1/2023
22-23_008 Student Accessibilty Resources, Title IX, and Equal Opportunity Departments	4	Length of Time to Complete EO Investigation	6/12/2023	10/1/2023	10/1/2023