TABLE OF CONTENTS

USF System Compliance & Ethics Program

ORGANIZATIONAL CHART ................................................................................................ 3

ELEMENT 1: GOVERNANCE & HIGH-LEVEL OVERSIGHT .............................................. 4
  A. Board of Trustees Audit and Compliance Committee ........................................... 4
  B. USF System Compliance & Ethics Program .......................................................... 5
  C. (High Risk) Compliance Officers Workgroup ..................................................... 7

ELEMENT 2: ESTABLISH STANDARDS OF CONDUCT, POLICIES, & PROCEDURES 10
  A. Internal Control Policy ..................................................................................... 10
  B. Protection of Minors Policy ............................................................................. 10
  C. Florida Code of Ethics Policy .......................................................................... 10
  D. Higher Education Opportunity Act .................................................................. 11

ELEMENTS 3 & 4: CREATE A FAIR AND ETHICAL CULTURE & OPEN LINES OF
COMMUNICATION ........................................................................................................... 12
  EthicsPoint ........................................................................................................... 12

ELEMENT 5: EDUCATION AND TRAINING ..................................................................... 14
  A. Compliance & Ethics Training for New Employees ........................................... 14
  B. Compliance & Ethics Training for Current Employees .................................... 14

ELEMENT 6: DETECTION, REMEDIATION, AND ENFORCEMENT ............................... 15
  A. Protection of Minors on Campus/Summer Programs ........................................ 15
  B. Export Controls/Office of Foreign Assets Control (OFAC) Compliance .......... 15

ELEMENT 7: RISK ASSESSMENT, AUDIT, AND MONITORING .................................... 15
  A. USF System Enterprise-Wide Risk Assessments ............................................. 15
  B. Audit & Monitoring Risks ............................................................................... 16

ELEMENT 8: ASSESSMENT OF EFFECTIVENESS ........................................................ 18
USF System Compliance and Ethics Program
Organizational Chart

- Board of Trustees
  - Audit & Compliance Committee

- USF System President

- Senior Vice President & Chief Operating Officer

- Chief Compliance Officer
  - Jeffrey Muir
    - JD, Stetson Univ. College of Law
    - MPA Public Administration, USF
    - BA Political Science, USF

- Administrative Specialist
  - Jolanda Thompson
    - BSBA Management
    - Northwood University

- Associate Compliance Officer
  - Caroline Fultz-Carver
    - Certified Compliance & Ethics Professional
    - PhD Medical Sciences, USF
    - MHA Health Policy & Management, USF
    - MS Medical Sciences, USF
    - BS Biology, USF

- Senior Associate Director & SWA Intercollegiate Athletics
- Director Research Integrity & Compliance
- Associate Director of Compliance Division of Human Resources
- Director, Professional Integrity Program, USF Health
- Assistant Vice President Information Security
- Director Equal Opportunity & Compliance
- Director Environmental Health & Safety
The USF Compliance & Ethics Program was created in 2007 as a component of University Audit & Compliance (UAC), with the appointment of a Chief Compliance Officer (CCO) charged by President Genshaft and the USF Board of Trustees (BOT) to create and maintain an effective compliance and ethics program based on best-practices; to prevent, monitor, detect, and respond to non-compliance; and recommend corrective actions to fully meet regulatory requirements. In 2017, UAC separated into two entities: USF System Audit and the USF System Compliance & Ethics Program (the “Program”). This separation was in accordance with Board of Governors (BOG) Regulation 4.003, a regulation based on Chapter 8, Part B, Section 2(b) of the Federal Sentencing Guidelines, the Florida Code of Ethics for Public Officers and Employees, and industry best practices.

While our reporting relationship and responsibilities have changed under this new regulation, our mission of creating, supporting, and promoting a system-wide culture of compliance, ethics, and accountability remains the same. The Program continues to provide assurance to the BOT that the compliance and ethics activities of the USF System are reasonably designed, implemented, enforced, and effective in preventing and detecting violations of law, regulations, and policies, as well as violations of ethical principles of conduct.

This annual report summarizes the activities of our Program from July 1, 2016, to December 31, 2017, unless otherwise indicated. This extended reporting period is due to our transition from fiscal to calendar year for annual reporting to the BOT. This report is organized by the “essential elements” for an effective compliance and ethics program as prescribed by the Federal Sentencing Guidelines and fulfills our annual reporting requirements in accordance with BOG Regulation 4.003 and the USF System Compliance & Ethics Program Plan.

**Element 1: Governance & High-Level Oversight**

The USF System addresses this element through the BOT Audit and Compliance Committee, the USF System Compliance & Ethics Program, and the (High-Risk) Compliance Officers Workgroup.

**A. Board of Trustees Audit and Compliance Committee**

BOG Regulation 4.003 required creation of a BOT committee solely focused on audit and compliance oversight. The BOT Finance and Audit Workgroup was separated into two committees: the BOT Finance Committee and the BOT Audit and Compliance Committee. The financial oversight responsibilities of the BOT Finance and Audit Workgroup were retained by the BOT Finance Committee; whereas its audit and compliance oversight responsibilities were transferred to the newly-created BOT Audit and Compliance Committee (the “Committee”).
To facilitate this modification in BOT committee structure, USF System Audit and the USF System Compliance & Ethics Program jointly drafted a [BOT Audit & Compliance Committee Charter](#) (“Committee Charter”). The Committee Charter was approved by the Committee at their May 2017 meeting and moved to the BOT (the “Board”) with a recommendation for approval. The Board approved the Committee Charter at their June 2017 meeting and a copy was submitted to the BOG pursuant to BOG Regulation 4.003 requirements.

**B. USF System Compliance & Ethics Program**

Implementation of [BOG Regulation 4.003](#) and [4.002](#), required separation of UAC into two units: USF System Audit and the USF System Compliance & Ethics Program, each reporting directly to the BOT Audit & Compliance Committee and administratively to the USF System President. Prior to this reporting period, our Program reported to the BOT and President through the Executive Director of UAC.

To implement this reorganization, USF System Audit and our Program jointly updated existing policies or drafted new USF System policies; and our Program drafted a program charter and plan as described below:

- **Updated** [USF System Policy 0-025: USF System Audit](#), to include new BOG Regulation 4.002 requirements. This policy addresses the authority of USF System Audit for the direction of a broad, comprehensive program of internal audit for the University of South Florida System. These policy updates were implemented in July 2017.

- **Drafted new** [USF System Policy 0-026: USF System Compliance & Ethics Program](#) to address the authority of the Program for the coordination and management of all USF System compliance and ethics activities under BOG Regulation 4.003. This newly drafted policy was successfully promulgated and implemented in August 2017.

- **Drafted new** [USF System Compliance & Ethics Program Charter](#) (“Program Charter”) to identify the purpose, authority, and responsibilities of the USF System Compliance & Ethics Program in accordance with BOG Regulation 4.003. The Program Charter was reviewed by the Committee at their February 2017 meeting and moved to the Board with a recommendation for approval. The Board approved the Program Charter at their March 2017 meeting and a copy was submitted to the BOG pursuant to BOG Regulation 4.003.
• Drafted new USF System Compliance & Ethics Program Plan ("Program Plan") to summarize the current status of the USF System Compliance & Ethics Program in accordance with BOG Regulation 4.003. The Program Plan was reviewed by the Committee at their May 2017 meeting and moved to the Board with a recommendation for approval. The Board approved the Program Plan at their June 2017 meeting and a copy was submitted to the BOG pursuant to BOG Regulation 4.003.

During this reporting period, the BOG, through their Inspector General and Director of Compliance, periodically checked with all State University System (SUS) institutions regarding their progress towards implementing BOG Regulation 4.003. Each SUS institution completed a BOG-provided SUS Compliance Program Status Checklist indicating the status of their implementation the BOG regulation. The completed checklist was submitted to the BOG Inspector General and Director of Compliance and was summarized for presentation to the BOG. Our Program completed and submitted a baseline checklist in January 2017 and an updated checklist to the BOG in September 2017, as requested. Below is a summary of our institution’s implementation of BOG Regulation 4.003 relative to all other SUS institutions, as summarized by the BOG Office of the Inspector General.

**COMPLIANCE AND ETHICS PROGRAM STATUS**

18 Regulatory Elements

- ** Implemented:** FIU, UCF, UNF, USF
- **At least half:** FAMU, FAU, FGCU, FL POLY, NCF, UF
- **Less than half:** FSU, UWF

[Diagram showing compliance status]
C. (High Risk) Compliance Officers Workgroup

The Compliance Officers Workgroup assists the CCO in maintaining an effective and broad-based program designed to prevent, monitor, and detect areas of non-compliance and, when necessary, to fully meet compliance requirements and recommend corrective actions. This workgroup is comprised of senior compliance officers in the following “high-risk” compliance units within the USF System, all of whom have an “accountable reporting” relationship to the CCO:

- Athletics Compliance
- Environmental Health & Safety
- Research Integrity & Compliance
- Diversity and Equal Opportunity (including Title IX and ADA compliance)
- Human Resources Compliance
- Professional Integrity Program, USF Health
- Information Security

Brief descriptions of several of the above-listed “high-risk” compliance units and highlights from this reporting period are provided below.

**Athletics Compliance**

The USF Athletics Compliance Office (Athletics Compliance) ensures compliance with National Collegiate Athletic Association (NCAA) and American Athletic Conference rules and associated USF System regulations and policies through its education, monitoring, and enforcement efforts. During the 2016-2017 academic year, Athletics Compliance provided 209 in-person educational sessions. These sessions provided athletics compliance education to 745 athletic employees, student-athletes, on-campus constituents, and external constituents (e.g., local establishments, friends of the program, etc.).

**Environmental Health & Safety**

USF Environmental Health & Safety (EH&S), a department within the Division of Facilities Management, ensures potential environmental hazards are properly remediated in accordance with applicable federal, state, and local requirements; USF System policies, procedures, guidelines; and industry best practices. EH&S serves as the liaison between the USF System and external agencies and provides environmental health and safety awareness and compliance training. EH&S administers multiple programs to achieve this end. Some highlights from FY 2016-2017 include:
• Provided safety and compliance training to 9,080 faculty, staff, students, and affiliates via its 27 different classroom-based and online training courses.
• Conducted 198 emergency evacuation drills as well as 4 Fire Safety Education and Training sessions for approximately 350 individuals.
• Performed 1,522 laboratory safety inspections in research and teaching laboratories, studios, and shops.
• Performed 33 laboratory chemical cleanouts involving the removal of approximately 5,503 individual items of unwanted, expired, and/or unused chemicals.
• Performed 60 inspections of construction/development contractors’ Stormwater Pollution Prevention Plans and completed 5 stormwater compliance audits of grounds and vehicle maintenance areas.
• Facilitated the following external inspections:
  ‐ 22 inspections by the Florida Department of Health.
  ‐ 9 inspections by the Environmental Protection Commission.
  ‐ 270 fire and safety code inspections by the Office of the State Fire Marshall.
• Performed 100 Indoor Environmental Quality (IEQ) assessments at USF Tampa and USF St Petersburg and 20 asbestos sampling assessments.
• Provided permitting and code/safety related inspection support for approximately $175 million of USF System construction-related costs.

Research Integrity and Compliance

Research Integrity and Compliance, a division within USF Research & Innovation, ensures research performed within the USF System is safe, ethical, and complies with all applicable regulations, laws, and institutional policies. Some highlights from FY 2016-2017 include:

• Provided export control training to 461 faculty, administration, and staff employees.
• Co-hosted the Association of University Export Control Officer’s 5th Annual Meeting in May 2017 with 5 other SUS institutions.
• Implemented new processes with USF World to streamline and ensure export control and immigration compliance for international students from comprehensively sanctioned countries, from initial application to travel (while enrolled as USF students) to separation from our institution.
• Reviewed or provided services to ensure compliance with export control laws for over 754 items (e.g., research contracts, biosafety protocols, H1-B visas, J-1 visas, NASA attestation reviews, special projects, research proposals, and foreign travel).
• Provided live and online human subject research-related training to more than 8,000 people through its education program.
• Audited 29 human subject research sites of which 2 (7%) were audited for cause.
• Developed and implemented a human subject research self-audit process.
• Began ClinicalTrials.gov monitoring activities.
• Participated in community and on-campus outreach events for human subject research, reaching more than 2,000 people.
• Reviewed 190 project-specific disclosures for financial conflicts of interest in research with 136 (72%) requiring a management plan.
• Performed 150 IACUC (Institutional Animal Care and Use Committee) laboratory inspections and responded to 8 reports of alleged noncompliance.
• Provided 13 boating safety classes resulting in 31 trained individuals.
• Offered first aid, CPR/AED, oxygen provider, and nitrox classes for a total of 28 classes taken by 182 scientific diving researchers.
• Performed 56 inspections laboratories using biohazardous agents.
• Provided biosafety trainings to 1,348 individuals.
• Responded to 7 biosafety incident reports.
• Coordinated a site visit from the National Institutes of Health.
• Developed and implemented an online submission system for Institutional Biosafety Committee protocols (BiosafetyNet).

Diversity Inclusion & Equal Opportunity

The Office of Diversity, Inclusion & Equal Opportunity (DIEO) ensures the USF System workplace and academic environments are free from discrimination, harassment, and retaliation based on protected categories of race, color, sex (including sexual harassment), national origin, sexual orientation, religion, age, disability, marital status, gender identity and expression, and veteran’s status, as provided by law. Some highlights from this reporting period include:

• Equal Opportunity (EO) Section received 169 reports of which 53 were investigated. Of those investigated, 5 (9%) were substantiated based on the preponderance of evidence standard.
• EO provided 34 harassment prevention and sexual harassment prevention trainings to USF System students and employees resulting in 1,473 people trained.
• The Office of Title IX (Title IX) received 313 reports of which 268 were determined to fall under the provisions of Title IX. Of these, 12 (4%) were substantiated based on the preponderance of evidence standard.
• Title IX provided 71 live training sessions resulting in 4,269 USF System employees trained.
Element 2: Establish Standards of Conduct, Policies, & Procedures

Throughout this reporting period, the USF System Compliance & Ethics Program reviewed new USF System policies and revisions to existing USF System policies issued by the Office of the General Counsel for comment. The Program provided the Office of the General Counsel, whenever possible, with draft language aimed at harmonizing language with existing policies; reducing or eliminating redundant policy statements with existing policies; and clarifying language to facilitate understanding. Below are highlights from this reporting period:

A. Internal Control Policy

The USF System Compliance & Ethics Program assisted USF System Audit with drafting, promulgating, and implementing a new USF System Internal Control Policy 0-023. This policy communicates internal control objectives as set forth by the BOT and establishes standards in the design and implementation of the system of internal controls for the USF System. This policy was successfully promulgated and implemented in August 2017.

B. Protection of Minors Policy

In response to recommendations from USF System Audit, the CCO created a USF System-wide working group to devise a plan for ensuring compliance with background screenings for employees of summer camps/programs either utilizing USF property or conducted by USF units. This effort resulted in the creation and implementation of USF System Policy 0-029: Background Screenings for Summer Programs Involving Children in May 2017. The working group also drafted and implemented procedures for USF Summer Programs and Third-Party Summer Programs to follow to ensure their personnel obtained the appropriate background screenings in conjunction with the requirement set forth in USF System Policy 0-029.

C. Florida Code of Ethics Policy

During this reporting period, the USF System Compliance & Ethics Program updated USF System Policy 0-027: Florida Code of Ethics for Public Officers and Employees: Compliance and Disclosure. This policy states the foundational standards of conduct for all USF System employees as the Florida Code of Ethics for Public Officers and Employees (FCOE), Section 112.313 of the Florida statutes. Policy updates were designed to clarify discloser and reviewer responsibilities. These updates also included the addition of customer service standards for reviewers of FCOE, nepotism, or outside activity disclosures. These policy updates were based on frequently asked questions and comments from USF System employees and their management teams, which were received either directly or via the eDisclose Help Desk.
D. Higher Education Opportunity Act

The Higher Education Act of 1965 (HEA) governs the administration of federal funding for higher education programs. The USF System must comply with HEA in order to remain eligible for Title IV funding from the U.S. Department of Education and for funding from other federal agencies sponsoring USF System Research Projects. The Higher Education Opportunity Act of 2008 (HEOA) amended HEA and includes compliance with the following federal laws:

- Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act);
- Violence Against Women Act (VAWA) amendments to the Clery Act;
- Equity in Athletics Disclosure Act (EADA);
- Student Right to Know Act; and
- The Drug Free Schools and Communities Act (DFSCA).

For the purposes of this report, the term “HEOA” refers collectively to the above-listed federal laws and their associated regulations. HEOA requirements are complicated and often involve cross-jurisdictional compliance risks, e.g., regulatory risks affecting more than one university leadership area or more than one USF System institution.

During this reporting period, our Program continued to assist each institution within the USF System to meet their HEOA compliance responsibilities in accordance with [USF System Policy 0-233: Higher Education Opportunity Act Initiative: USF System, Portal, and Security & Fire Safety Reporting Compliance](#) (the “HEOA Initiative”) as follows:

- Coordinated with over 26 units to design and implement a procedure coordinating the creation of an HEOA-compliant Annual Security and Fire Safety Report for each institution in the USF System, which complies with the Clery Act and VAVA, including distribution of these reports to the U.S. Department of Education and all current USF System students and employees.
- Reviewed written disclosures of rights, options, and services for victims of VAVA crimes for compliance with VAVA regulations and provided harmonizing language with VAVA regulations to the Office of Title IX.
- Confirmed HEOA Portal complied with HEOA disclosure requirements for this reporting period.
- Reviewed HEOA-required annual notices to students and employees summarized in the below table by notice type, federal law, and required recipient for compliance with federal law. Created templated language for each notice listed below to be used by each institution within the USF System to ensure compliance:
Our intent is to transition from the oversight and consulting activities of the HEOA Initiative to a USF System HEOA policy, which assigns responsibility to the appropriate USF System position, unit, and university leadership for ensuring HEOA compliance and mitigating cross-jurisdictional HEOA compliance risks. The draft policy assigns these responsibilities in accordance with best practices as set forth by the U.S. Department of Education and has been harmonized with USF System Policy 0-023: Internal Control.

Elements 3 & 4: Create a Fair and Ethical Culture & Open Lines of Communication

Under the provisions of USF System Regulation 5.001: Waste, Fraud, or Financial Mismanagement Prevention and Detection, all USF System managers and their employees are responsible for preventing, detecting, and reporting waste, fraud, financial mismanagement, or other violations of USF System policy or regulation.

EthicsPoint

EthicsPoint, our anonymous reporting hotline, serves as one of the primary tools assisting the USF System in this effort. In 2017 we upgraded EthicsPoint. The upgrade included several improvements and included consolidation of our hotline with the USF Foundation EthicsPoint Hotline into one, central USF System EthicsPoint Hotline.

For the period 7/1/16 to 12/31/17, we received 132 unduplicated reports, which is consistent with the number of reports from the FY 2015/16 reporting period. The proportion of human resources-related reports is also consistent at 63% of the total (note that these are now reported both in the “HR” and USFH” categories). Thirty-three percent of all reports were found to be “substantiated”, consistent with past reporting periods. Ten reports were referred, typically to the student code of conduct process or transferred to the Title IX process.

<table>
<thead>
<tr>
<th>Notice Type</th>
<th>Federal Law</th>
<th>Required Recipient under Federal Law</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Student Financial Aid Penalties for Drug Law Violations</td>
<td>HEOA</td>
<td>All Current Students</td>
</tr>
<tr>
<td>Voter Registration Information</td>
<td>HEOA</td>
<td></td>
</tr>
<tr>
<td>Institutional and Financial Aid Information</td>
<td>HEOA</td>
<td></td>
</tr>
<tr>
<td>Drugs and Alcohol Abuse Prevention Programs</td>
<td>DFSCA</td>
<td>All Current Students and Employees</td>
</tr>
<tr>
<td>Availability of the Annual Security and Fire Safety Report (ASR)</td>
<td>Clery VAWA</td>
<td>All Current Student and Employees</td>
</tr>
</tbody>
</table>
During this reporting period, our Program publicized EthicsPoint via the following mechanisms:

- Included EthicsPoint, USF Regulation USF5.001, and USF System Policy 0-027 education in our Compliance & Ethics sessions during new employee orientation;
- Provided EthicsPoint posters to departments and encouraged their prominent display throughout our campuses; and
- Included EthicsPoint information in the training component of the Florida Code of Ethics (FCOE) form in the eDisclose System.
Element 5: Education and Training

A. Compliance & Ethics Training for New Employees

Our Program provided compliance and ethics training to 958 new USF System employees as follows:

- Live trainings provided every two weeks to new USF Tampa administration and staff employees attending “Welcome to USF”, a program administered by the Division of Human Resources (DHR).
- Live trainings provided periodically throughout the year, based on hiring volume, to new USF St. Petersburg (USFSP) faculty, administration, and staff employees attending orientation, a program administered by USFSP Human Resources.
- One-on-one orientation sessions with new USF Sarasota-Manatee (USFSM) faculty, administration, and employees provided by USFSM Human Resources using materials provided by our Program.

Our Program provided compliance and ethics content and review for the new online compliance and ethics training developed by the DHR. This new online training was implemented in December 2017 and replaces our live compliance and ethics training sessions for new USF Tampa administration and staff employees going forward.

B. Compliance & Ethics Training for Current Employees

Certain USF System employees are required to complete an annual Florida Code of Ethics (FCOE) disclosure in eDisclose, our online disclosure and review system. This disclosure includes education on current FCOE, nepotism, and outside activity prohibitions and restrictions under the FCOE and USF System Policy 0-027. The following employee position types must annually complete this disclosure:

- All current faculty.
- All current administration employees.
- All current staff employees issued a procurement card (PCard) or FAST (Financial Accounting System) role.
- All current temporary employees issued a PCard or FAST role.

During this reporting period, 9,757 FCOE disclosures were submitted by current USF System faculty, administration, staff, and temporary employees in eDisclose. This translates to 6,455 USF System employees receiving FCOE, nepotism, and outside training during our reporting period.

Our program also provided additional live, department-level FCOE, nepotism, and outside activity training to several operating units, including Intercollegiate Athletics.
Element 6: Detection, Remediation, and Enforcement

The USF Compliance and Ethics Program continues to work with compliance units to detect compliance gaps. When such gaps are identified, our program convenes multidisciplinary teams to develop and implement cross-jurisdictional policies and procedures aimed at addressing compliance gaps, including enforcement.

A. Protection of Minors on Campus/Summer Programs (see also Element 2)

The new process for ensuring background screenings for summer camps/programs that was contained in the new USF System Policy 0-029 and its attendant procedures implemented a coordinated approach that proved to be highly effective during the summer of 2017. Units involved included the DHR, who bear the heaviest load in the program, as well as the Office of the General Counsel, the Phyllis P. Marshall Student Center, Housing & Residential Education, Campus Recreation, USF Athletics, USF Health, and Innovative Education. Over 35 USF programs and a like amount of non-USF camps utilizing our facilities were successfully processed through the DHR during summer 2017. USF System Compliance & Ethics will continue to monitor the background clearance process and we are beginning work on a more comprehensive protection of minors program to address non-summer programs as well.

B. Export Controls/Office of Foreign Assets Control (OFAC) Compliance

At the request of President Genshaft, the CCO led a working group of the Export Controls Advisory Committee to conduct a comprehensive review of the compliance control structure regarding potential violations of sanctioned programs administered by the federal OFAC. The review identified several compliance gaps and new procedures were put in place in Information Security, Export Controls, and USF World. Immediate departmental and “focused” training programs were implemented as well. (See also, Element 7B.)

Element 7: Risk Assessment, Audit, and Monitoring

A. USF System Enterprise-Wide Risk Assessments

Every three years since 2011, the USF System Compliance & Ethics Program has coordinated and facilitated an enterprise-wide risk assessment for the USF System as part of the Enterprise Risk Management (ERM) program. ERM is an institution-wide or holistic approach to risk management. “Risk Management” is a process that defines how our organization does the following:
• Identifies risks to the achievement of goals and objectives;
• Measures the significance of each identified risk;
• Determines the most appropriate business response to each risk; and
• Evaluates and reports on how well the chosen responses are carried out.

For the 2017 risk assessment, the CCO conducted workshops with each Vice President/Regional Chancellor direct-reports to identify function and process risks in each unit and rank each risk with respect to its impact on the achievement of USF System goals and objectives and the probability that the function or process will fail to contribute to that achievement. The results of the workshops were then shared with executive management and priority risks were identified. General risk categories that emerged included:

• Performance Metrics/Student Success
• Cybersecurity
• Infrastructure
• Student/Employee Safety
• Student/Employee Health and Wellness
• Talent Management

Years two and three of the ERM process will include monitoring of mitigation efforts to address specific risks and identification of any “emerging risks” in year three.

B. Audit & Monitoring Risks

The USF System Compliance & Ethics Program is available to perform compliance reviews, risk assessments, and other consulting projects when compliance gaps are known or suspected. Compliance gaps can arise when the USF System has no known internal controls or the existing controls are not consistent with the law or industry best practices. Such reviews, assessments, and projects performed by the Program aim to bring the process or unit into compliance and, thereby mitigate risk to the institution. Below is a discussion of compliance reviews, risk assessments, and other consulting projects performed by our Program this reporting period:

**Annual FCOE Disclosure Compliance Monitoring**

Our Program continues to monitor USF System employee compliance with the annual FCOE disclosure requirements set forth in USF System Policy 0-027. On the second Tuesday of every month, our Program sends senior managers an FCOE Disclosure Compliance Report (FCOE Report) identifying all USF System employees under their purview who are required to complete an annual FCOE disclosure and whether or not they have done so within the past 12 months. Senior managers and their designees then follow up with noncompliant employees to ensure they complete their annual FCOE disclosure in eDisclose. During 2017, this monitoring by our Program and subsequent follow up by senior managers resulted in an overall FCOE
disclosure compliance rate of 90% for the USF System. The percentage of USF System employees who met their annual FCOE disclosure requirement in the eDisclose system is provided below, by institution:

- Sarasota-Manatee: 95% percent
- Tampa (Health too): 89% percent
- St. Petersburg: 96% percent

**International Student Immigration & Export Controls Consulting Project**

Our Program assisted USF World and USF System Export Controls in developing a cross-jurisdictional process for ensuring international students comply with immigration and export control laws. Our program convened and chaired a workgroup comprised of the Director of USF World and the USF System Export Control Officer. This workgroup flowcharted how admissions, USF World, and export control processes work together across the life-cycle of international students attending USF, from pre-arrival to separation. The workgroup adjusted the process to eliminate process redundancies; streamlined communication between USF World and USF System Export Controls; and ensured compliance requirements for their respective areas were appropriately documented and met. The workgroup issued a final procedure in December 2017. The final procedure included a review and version control process and assigned the responsibility for records retention and version control to USF System Export Controls.

**NCAA Compliance Review**

Our Program was tasked with assessing the USF System’s readiness for an Institutional Compliance Review by the American Athletics Conference (“The American”). Our program and USF Athletics Compliance co-developed a NCAA Documentation Analysis tool. This tool identifies key documents the USF System would be expected to provide to a site reviewer from The American. Our Program convened a cross-jurisdictional NCAA workgroup to assess the USF System’s preparedness for an NCAA documentation review using the tool. The workgroup was charged with addressing any identified gaps by bringing documents identified on the
tool and their associated processes into compliance with NCAA rules and best practices. A baseline analysis was completed in June 2017. Our Program continues to assist workgroup members in the bringing their documentation and associated processes into compliance with NCAA rules and best practices. This NCAA compliance review project is ongoing.

**VAWA Training Compliance Review**

In accordance with the Violence Against Women Act (VAWA), the USF System provides new USF System students and employees with sexual assault, dating violence, domestic violence, and stalking prevention and awareness training (“VAWA Training”). The provisions of VAWA training must occur in order for the USF System to remain eligible for Title IV funding under HEOA. During this reporting period, our program reviewed VAWA training for compliance with VAWA regulations. Compliance gaps identified by our Program were provided to the appropriate organizational unit to address.

**DFSCA Compliance Review**

The Drug Free Schools and Communities Act (DFSCA) requires the USF System to perform a biennial review of its drug and alcohol prevention programs in order to remain eligible for Title IV funding. This review resulted in a Biennial Drug and Alcohol Prevention Program Report (Biennial AOD Report). During this reporting period, the Center for Student Well Being, a part of Student Affairs & Student Success, requested a compliance review of their 2014 Biennial AOD Report, which they intended to use as a template for their 2016 report. Our Program reviewed the 2014 report for compliance with DFSCA and Department of Education best practices. Identified compliance gaps were provided to the Center for Student Well Being. Our Program provided advice and guidance on how to develop a best practice standard operating procedure for the creation of future Biennial AOD Reports.

**Element 8: Assessment of Effectiveness**

Under BOG Regulation 4.003, the CCO is required to provide an Annual USF System Compliance & Ethics Program Report (“Annual Report”) on the effectiveness of the Program to the BOT. Any Program Plan revisions, based on the CCO’s Annual Report, must be approved by the BOT. Copies of this Annual Report and revised Program Plan are provided to the BOG. This Annual Report fulfills our annual reporting requirement on the effectiveness of the USF System Compliance & Ethics Program to the Board. No revisions to our Program Plan, based on this Annual Report, are recommended by the USF System Compliance & Ethics Program at this time.