#### Doing More with Less: Coordinating a Decentralized Compliance Function with Limited Central Resources

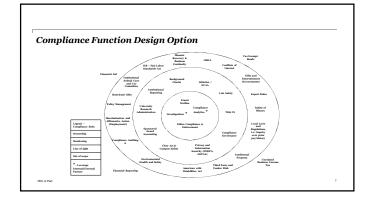
Monday, June 4, 2018 SCCE Higher Education Compliance Conference

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# Introduction

## Introduction - Bios Decentralization defined Higher Education Decentralization Defined Minimal compliance responsibilities owned by central resources E.g., written code of ethics/conduct, fraud hotline Requires culture of shared responsibility Potential lack of formal/defined accountability - Limited FTE; may be supported through standing/steering committees - Assists in monitoring changes in the regulatory environment, helps coordinate strategic initiatives $\,$ - Failures of compliance $\,/\,$ noncompliance may not have clear reporting or tracking • Limited use of technology (i.e., hotline, landing page website)



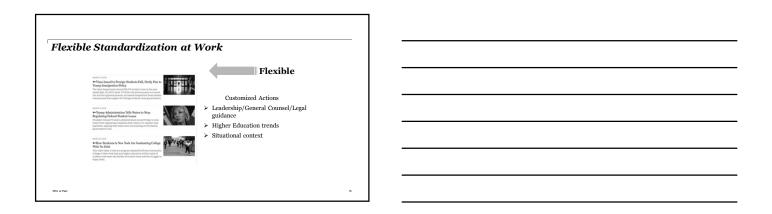
Leveraging spon	sors and su	pporters	

Leveraging sponsors and supporters
Corporate Examples
Profiles
<ul> <li>International service organizations, approximately 30K employees, and 2-5 FTE central compliance resources</li> </ul>
Themes/Examples
<ul> <li>Use training/certificates as a way to develop a network of supporters (e.g., Ethics Ambassador)</li> </ul>
<ul> <li>Limit use of service providers, and leverage in-house resources (e.g., training, in-house counsel)</li> </ul>
<ul> <li>Development and maintenance of personal relationships across the Enterprise, including knowing specialties/knowledge areas</li> </ul>
<ul> <li>Leverage external network for industry-wide developments (e.g., GDPR)</li> </ul>
Emphasis on neval outrooch/massaging

### Leveraging sponsors and supporters Higher Ed Examples Profiles - Large research universities, ranging from 2 to .5 FTE working in central compliance · Themes/Examples · Compliance Committee Compliance inventory and ownership matrix Coordination with internal audit Trustee and Senior Leadership Support · Culture of accountability · Support for major initiatives Regular reporting to the Trustees (e.g., Audit Committee) Personal relationships and trust Annual training video Streamlining compliance processes and activities Establish a Guiding Light Objectives Establishment and maintenance of an organizational culture that encourages all Community Members to conduct University business ethically and with a commitment to compliance with applicable laws, regulations and policies... University of Mami Striving to be a team of world-close professionals helping to shape the future of the University. Mission The mission of the Office of Compliance and Risk Management is to assist New York University to carry out its academic mission with integrity and in accordance with the University's legal, regulatory and ethical responsibilities. Scope Constraints or boundaries for program like risk or compliance ownership and accountability. Scope tends to be found in an internal program manual. - New York University

# Create Flexible Standardization Compliance and Ethics activities requires balance between standardization and customization for efficiency and effectiveness. Standard Flexible • Standardize processes • Re-evaluate own program and processes every few years. • Set up templates and minimize changes • Unique problems sometimes require unique solutions.





### Communication is a never-ending highway Communication is one of the most important, but time-consuming activities that compliance and ethics officers engage in. So how do we become more efficient and effective communicators? · Know who to contact List out contacts, areas and responsibilities • Thought Leadership Pieces No substitute for good relationships Collaboration is a silo bulldozer Collaboration is key to breaking down silos. Compliance Collaboration Equations: • Compliance/ERM/Internal Audit > Create shared drive with audit results and ERM and Compliance insights Compliance + EHS + Provost = Lab Safety Working sessions with Compliance Officers or Administrators to layout compliance requirements and obligations Compliance + ERM +IA + Functional Areas = Lines of Defense Compliance + IT + (OGC) = GLBA Leverage survey systems (e.g. Qualtrics, Survey Monkey, Google Forms) to obtain feedback and insight Compliance + IT + Dentistry + Student Health Center = HIPAA CASE STUDIES

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#### Thank you



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