You'll Thank Me for This One Day (Just Maybe Not Today)…
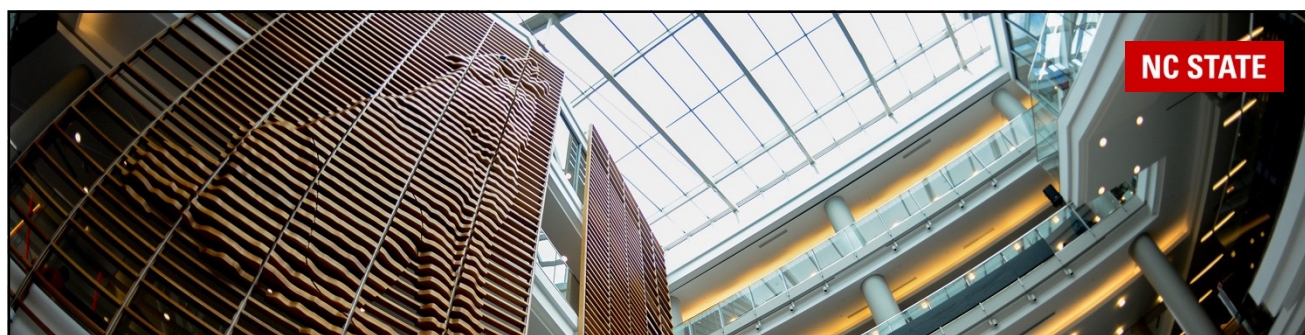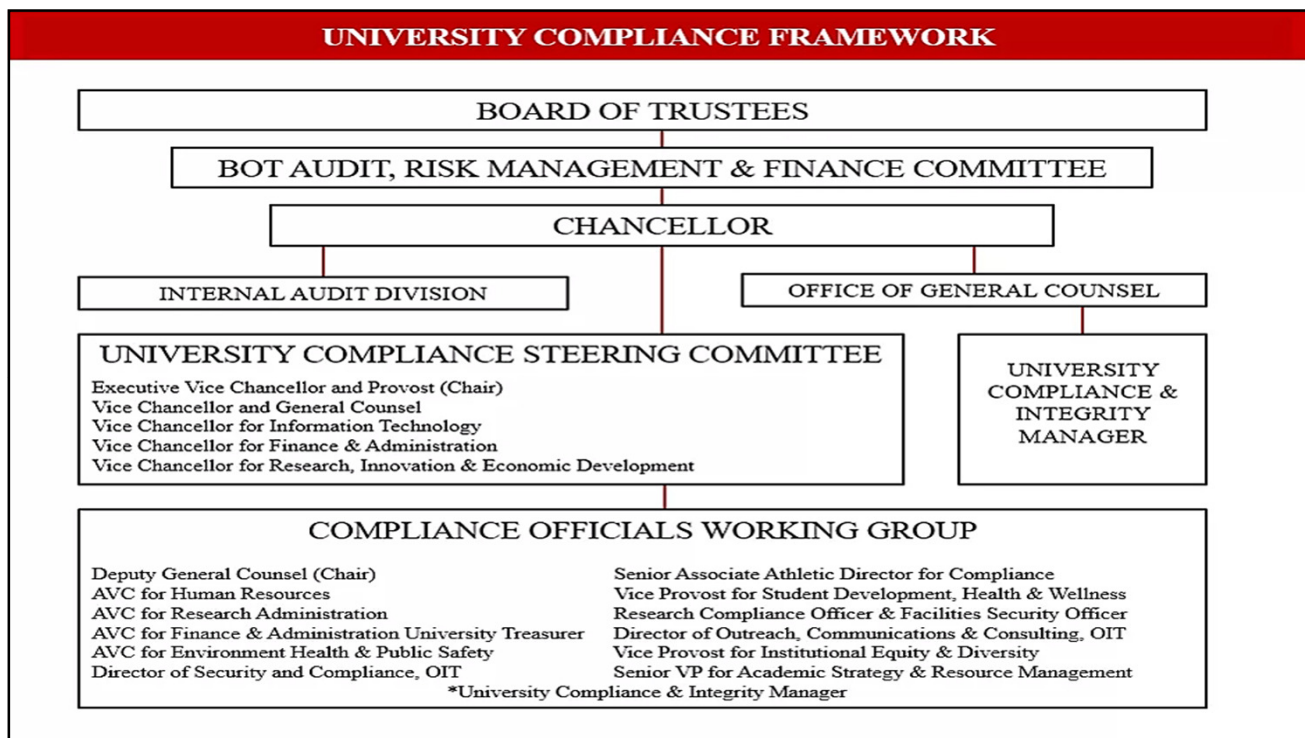
Measuring Compliance Program
Effectiveness and Improvement Strategies in
a Decentralized Environment

Agenda

- Overview of NC State's Compliance and Integrity Program
- Measuring Effectiveness
- Improvement Strategies
- Moving forward… and moving the needle
- Open Discussion: Reporting and Documenting Results

UNIVERSITY COMPLIANCE FRAMEWORK

BOARD OF TRUSTEES

BOT AUDIT, RISK MANAGEMENT & FINANCE COMMITTEE

CHANCELLOR

INTERNAL AUDIT DIVISION

OFFICE OF GENERAL COUNSEL

UNIVERSITY COMPLIANCE STEERING COMMITTEE

Executive Vice Chancellor and Provost (Chair)
Vice Chancellor and General Counsel
Vice Chancellor for Information Technology
Vice Chancellor for Finance & Administration
Vice Chancellor for Research, Innovation & Economic Development

UNIVERSITY COMPLIANCE & INTEGRITY MANAGER

COMPLIANCE OFFICIALS WORKING GROUP

Deputy General Counsel (Chair)
AVC for Human Resources
AVC for Research Administration
AVC for Finance & Administration University Treasurer
AVC for Environment Health & Public Safety
Director of Security and Compliance, OIT

Senior Associate Athletic Director for Compliance
Vice Provost for Student Development, Health & Wellness
Research Compliance Officer & Facilities Security Officer
Director of Outreach, Communications & Consulting, OIT
Vice Provost for Institutional Equity & Diversity
Senior VP for Academic Strategy & Resource Management

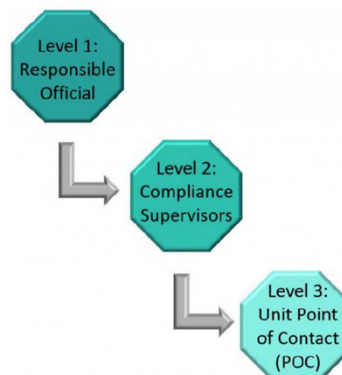*University Compliance & Integrity Manager

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Compliance Officials Working Group

- Accreditation
- Athletics
- Academic and Student Affairs
- Environmental Health and Public Safety
- Finance Division
- Global Engagement
- Human Resources

- Institutional Equity and Diversity
- Information Technology
- Registration and Records
- Research Administration
- Scholarships and Financial Aid

- **Division of Ownership and Accountability**
- **Policies, Regulations, and Rules**
- **Matrix**
- **Training**
- **Branding and Marketing**
- **Ethics and Values**
- **Monitoring and Metrics**
- **Response and Prevention**

Division of Ownership and Accountability

Division of Accountability
"Compliance Owners"

- *Responsible Official:*
  – Ensures supervisors establish compliance expectations for employees

- *Compliance Supervisor:*
  – Communicates expectations and evaluates employees on compliance efforts

- *Point of Contact:*
  – Tasked with developing subject matter content and reviewing & improving compliance efforts

Example – Clery Act
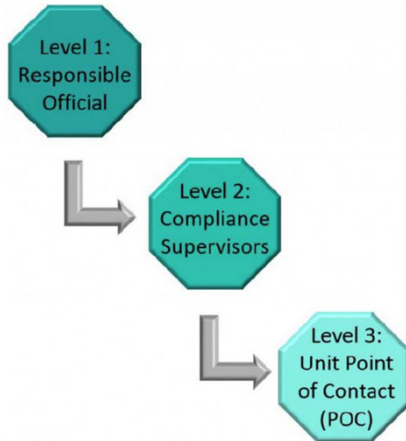
Responsible Official
➢ Associate Vice Chancellor for Environmental Health and Public Safety

Compliance Supervisor
➢ University Police Chief

Point of Contact
➢ Clery Compliance Coordinator

Division of Ownership & Accountability
Evaluations and Assessments

COMPLIANCE & INTEGRITY

a. **Policy:** Complies with personnel and equal opportunity policies, including prohibitions on harassment, discrimination, and workplace violence, and all other policies, including appropriate use of university resources.
b. **Safety:** Complies with all safety requirements for the position, including successful completion of training and proper use of personal protective equipment.
c. **Ethics:** Chooses ethical actions, even under pressure, avoids situations considered inappropriate or that present a conflict of interest, holds self and others accountable for ethical decisions.
d. **Respect:** Appreciates individual and cultural differences and treats all people with dignity and respect.

GOALS AND OBJECTIVES

At the beginning of the performance cycle, the supervisor sets at least three (3) goals and objectives for the year based on key business needs and strategic initiatives. If the employee has responsibilities as a Point of Contact (POC) owner of a compliance subject, please include written compliance-related objectives for the upcoming fiscal year.

GOAL:	
Description:	

NC STATE UNIVERSITY

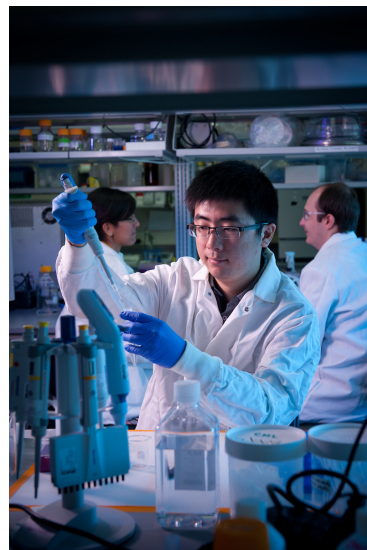# Framing the Issues in Decentralized Environment

- Issue 1: How do we achieve a culture of constant improvement?

- Issue 2: How do we generate relevant data on an annual basis for reporting?

- Issue 3: How do we achieve "ownership awareness" across all vertical levels (ROs, Supervisors, POCs) for the identifiable improvements advanced by the responsible compliance units?

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Solution: Compliance Program Self Assessments

1. Benchmarking current landscape

2. Develop and report back improvement strategies

Measuring Effectiveness

- Step 1: Charge Point-of-Contacts
- Step 2: Identify Compliance Areas
- Step 3: Benchmarking Status Quo

Benchmarking

	A	B	C	D	E
1	[Insert Unit Name]				
2					
3	Compliance Area	Attribute	Rating	Industry Best Practice	Current Ongoing Activity
4		Ownership and Accountability	▾	▾	
5		Policies, Regulations, and Rules	▾	▾	
6		Training and Education	▾	▾	
7	[Insert Compliance Area]	Branding and Marketing (Communication with Partners)	▾	▾	
8		Ethics & Values	▾	▾	
9		Monitoring and Metrics (Incident Tracking)	▾	▾	
10		Response and Prevention	▾	▾	
11		Other:	▾	▾	

Improvement Strategies

fx [Insert Unit Name]

	A	B	C
1	[Insert Unit Name]		
2			
3	[Insert Compliance Area]	Notes/Attachments	Status
4	[Insert Compliance Program Attribute]		
5	[Insert Compliance Point of Contact]		
6			
7			
8			
9			
10	[Insert Description of Improvement Strategy]		
11			
12			
13			
14			

Improvement Strategies

- Review and revise existing policies, regulations, and rules
- Develop internal SOPs, guidelines, and protocols
- Update training content
- Increase effective communication with compliance partners
- Formalize after-action reviews and protocols
- Formalize documentation procedures
- Develop metrics and measures for monitoring compliance activity
- Develop rapid response protocols, exercises, and tabletops
- Other …

NC STATE
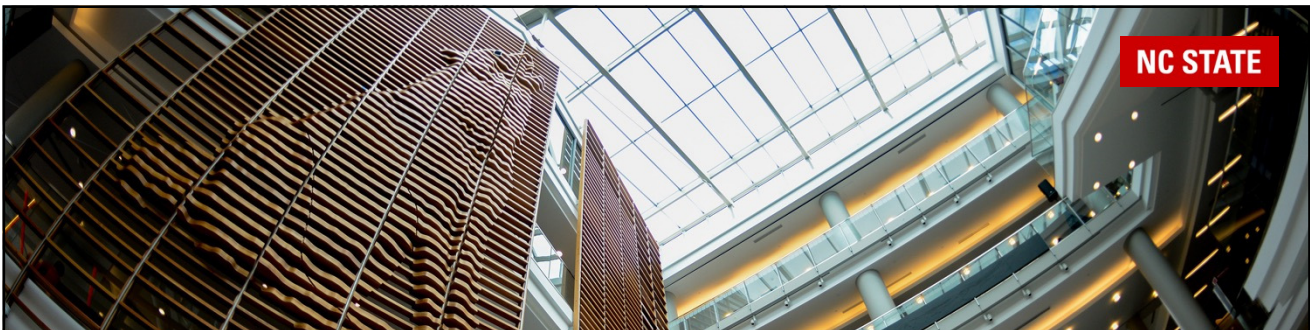
Current Ongoing Activities/Partnerships

- NIST 800-171 Compliance
- EU General Data Protection Regulation
- Protection of Minors on Campus
- Research Compliance Education Modules
- SACSCOC Administrative Unit Assessments
- HIPAA Compliance Review
- State Authorization Reciprocity Agreements Renewal

Open Discussion

Reporting and Documenting Results

- Governing Boards and Committees
- State Public Records Laws
- Employee Evaluations
- Accreditation
- Audits and Agency Reviews

Questions?