

## You'll Thank Me for This One Day (Just Maybe Not Today)...

Measuring Compliance Program  
Effectiveness and Improvement Strategies in  
a Decentralized Environment

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## 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

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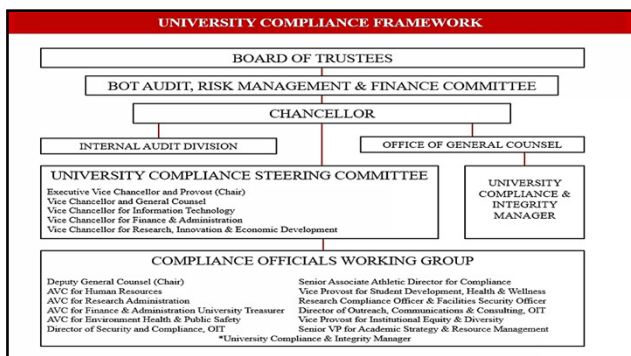
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NC STATE

### 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

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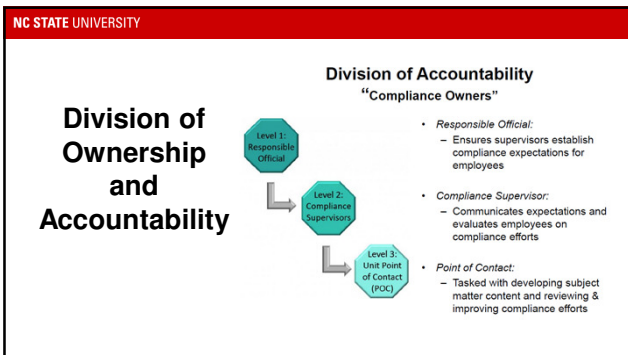
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NC STATE UNIVERSITY

Example – Clery Act

Level 1:  
Responsible Official

Level 2:  
Compliance Supervisors

Level 3:  
Unit Point of Contact (POC)

Responsible Official

Associate Vice Chancellor for Environmental Health and Public Safety

Compliance Supervisor

University Police Chief

Point of Contact

Clery Compliance Coordinator

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NC STATE UNIVERSITY

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:

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NC STATE UNIVERSITY

Law

Common Name

Subject Matter

Responsible Unit

Search:

Clear Search

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z Additional Laws

42 U.S. Code - Section 1981 Civil Rights Act of 1966

Alternative Action Regulations (9 CFR Part 91 - 1 Part 91-2 Part 91-1)

Age Discrimination in Employment Act of 1967 (ADEA)

America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act

American Invents Act of 2011

American Job Creation Act of 2004

American Recovery and Reinvestment Act (ARRA) of 2009

Americans with Disabilities Act (ADA) Amendments Act of 2008 (ADAAA)

Americans with Disabilities Act of 1990 (ADA) - Disability Services

Americans with Disabilities Act of 1990 (ADA) - Equal Opportunity & Equity

Americans with Disabilities Act of 1990 (ADA) - IT Accessibility

Animal Welfare Act

Anti-Kidnapping Act of 1990

Sponsored Programs and Regulatory Compliance Services (SPARCIS)

America Creating Opportunities to Meaningfully Promote Excellence in Technology, Education, and Science Act

Common Name: America COMPETES Act

Subject Matter Area: Research

Description: To invest in innovation through research and development, and to improve the competitiveness of the United States.

External Links and Resources: <http://www.usa.gov/50states/2009/02/26>

Enforcement Authority: National Science Foundation

Internal Links and Resources: <http://www.ncsu.edu/ncsu/sparcis/compliance/integrity/>

Point of Contact - All Code

Responsible Unit: Sponsored Programs and Regulatory Compliance Services (SPARCIS)

Responsible Unit URL: <http://www.ncsu.edu/ncsu/sparcis/>

American Recovery and Reinvestment Act (ARRA) of 2009

Animal Welfare Act

Arms Export Control Act (AECA)

Export Administration Act of 1979

Export Control Act (ECA) International Traffic in Arms Regulations (ITAR)

Federal Funding Accountability and Transparency Act (FFATA)

Food and Drug Administration Code of Federal Regulations (CFR)

Institutional Review Boards (Federal Policy for the Protection of Human Subjects)

National Science Foundation Act of 1950

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## 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

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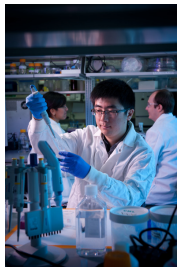
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## Measuring Effectiveness

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




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

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NC STATE UNIVERSITY			
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			
15			

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Improvement Strategies	
<ul style="list-style-type: none"> <li>• Review and revise existing policies, regulations, and rules</li> <li>• Develop internal SOPs, guidelines, and protocols</li> <li>• Update training content</li> <li>• Increase effective communication with compliance partners</li> <li>• Formalize after-action reviews and protocols</li> <li>• Formalize documentation procedures</li> <li>• Develop metrics and measures for monitoring compliance activity</li> <li>• Develop rapid response protocols, exercises, and tabletops</li> <li>• Other ...</li> </ul>	

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### 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

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### Open Discussion

Reporting and Documenting Results

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



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### Questions?

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