Slide 1

Leveraging partnerships and technology to enhance your institution's compliance program

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Slide 2

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Introductions

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LEVERAGING PARTNERSHIPS AND TECHNOLOGY TO ENHANCE YOUR INSTITUTIONS COMPLIANCE PROGRAM

Format for today's SCCE presentation

Open dialogue	Collaborative session	Share examples	Ask questions

Agenda

- Background & Insights
- Case Study
- Key Takeaways
- Questions

Presentation goals and objectives

Enhanced risk-monitoring	Learn how institutions leverage technology to enhance compliance and create efficiencies in their compliance and risk-monitoring activities.
Effectiveness of activities	Offer ideas for increasing the effectiveness of your current compliance monitoring systems and limited resources.
Opportunities for collaboration and innovation	Discuss opportunities with institutional partners for improved compliance in their areas. Balance the effectiveness of university resources by leveraging technology.

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Federal sentencing guidelines intersection with partnerships and technology

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1 Development and distribution of written standards of conduct, as well as written policies and procedures

5 Responding promptly to detected offenses and developing corrective action

2 Designating a compliance officer and compliance committee

6 **Conduct monitoring and auditing**

3 Development and implementation of effective training and education

7 Enforcing standards through well-publicized disciplinary guidelines

4 **Developing effective lines of communication**

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Focus of today's presentation

4   **Developing effective lines of communication**

Strategic lines of communications help to establish effective compliance programs through:
- Partnerships (internal and external)
- Leveraging existing committees
- Increased awareness of compliance requirements and resources

6   **Conduct monitoring and auditing**

Technology aids in the monitoring and auditing of an institution by implementing enhanced:
- Processes
- Opportunities for automation
- Tools and resources

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Develop collaborative partnerships

- Internal audit
- External audit
- Compliance vs. compliance
- Legal/general counsel's office
- Information technology (IT)
- Privacy office
- Senior leadership
- Board of directors
- Partner institutions
- Other university partners (e.g., campus safety, human resources)

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Understand your challenges

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- Distributed/decentralized environment
- Lack of resources (e.g., budget, time, people)
- Complex regulations (e.g., IT, uniform guidance, etc.)
- Dynamic regulatory environment
- Decision makers/reporting processes
- Manual controls
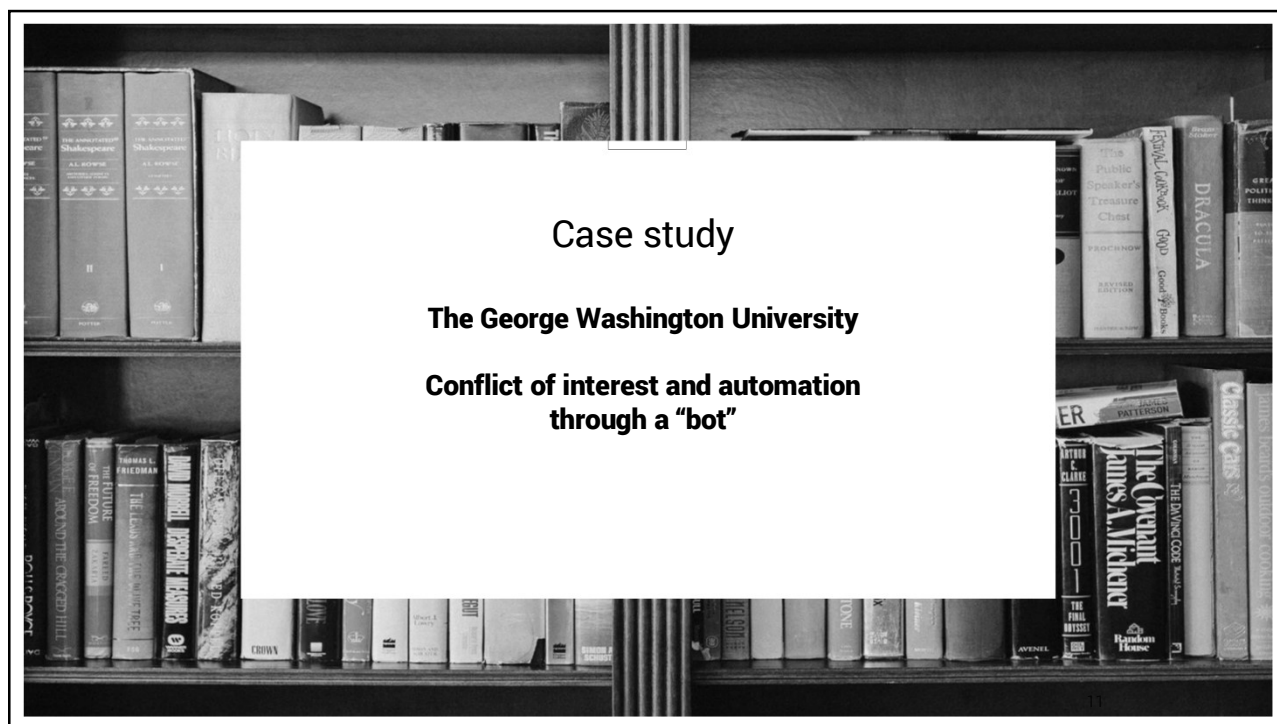- System limitations

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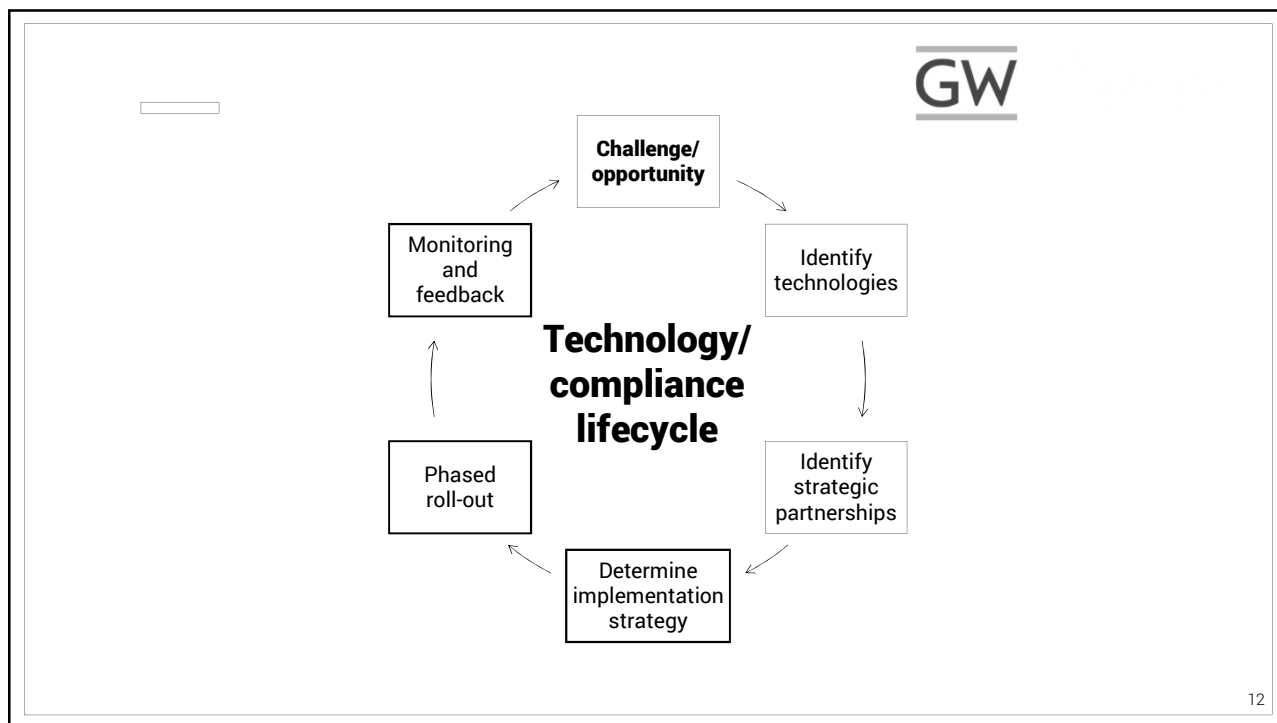
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Leverage what exists

- What is the maturity of your process?
- Are you already leveraging technology?
- Do your processes and technology need to or have the capacity to intersect different processes/stakeholder groups?
- Do you need to work with where you are?

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Case study

The George Washington University

Conflict of interest and automation through a "bot"

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Challenge/ opportunity

Monitoring and feedback

Identify technologies

Technology/ compliance lifecycle

Phased roll-out

Identify strategic partnerships

Determine implementation strategy

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Case study – GW conflict of interest

Challenge
- COI is centrally managed in 'Big C' Compliance office
- Multiple university partners actively involved throughout the process
- The policies and processes are established and implemented but are not a 'well-oiled machine'
- The policies and processes also vary slightly for each reporting group (e.g., board of trustees, key personnel, faculty, staff)
- The COI questionnaire can be confusing with terms and definitions, not always understood by the responder which results in incomplete responses and disclosures
- The process relies on manual controls and stakeholder interventions at many key points, from requesting initial data, analysis and reporting
- Questionnaires are distributed on multiple platforms based on the responding group

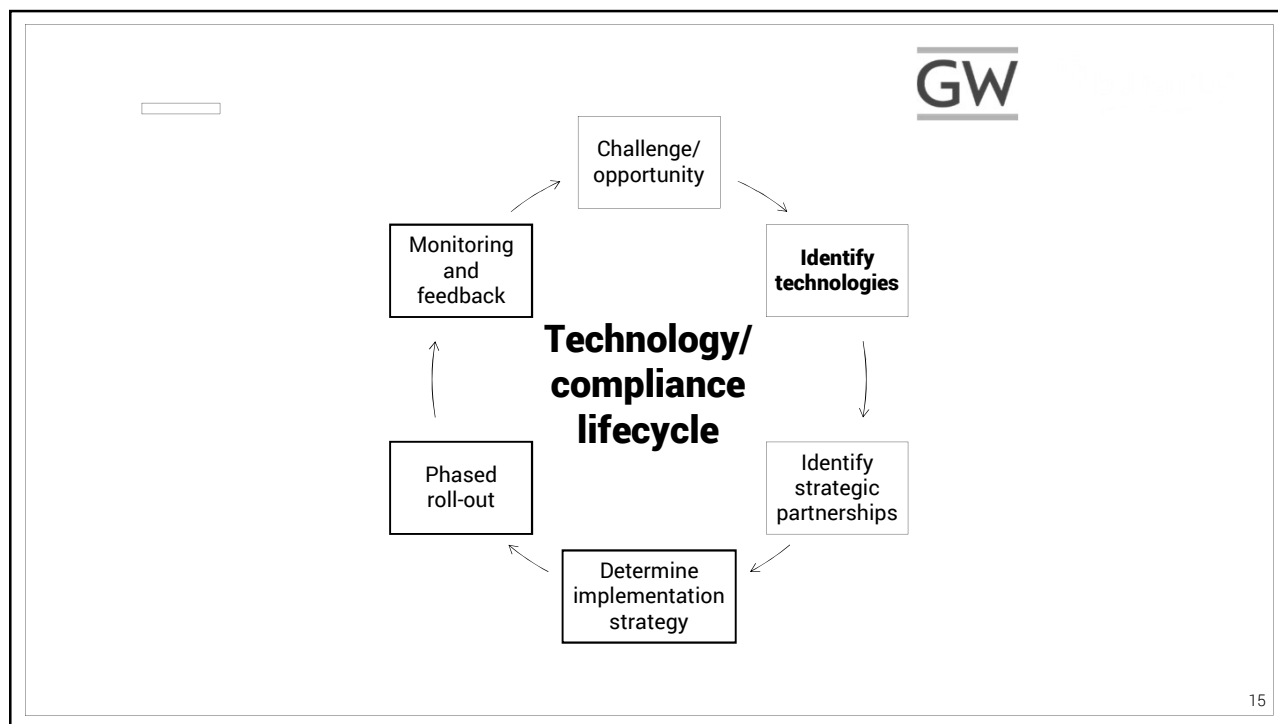13

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Case study – GW conflict of interest

Automation provides OPPORTUNITY to find efficiencies in several ways

Benefits of automation
- Allows for proactive managing and monitoring for completion
- Reduces manual effort to gain clarification or more information on disclosure
- Efficient identification of key risk areas
- Timely escalation and remediation
- Enhanced search capabilities: builds a standardized and detailed history of COI reporting which can be more easily accessed and understood by partners as well as used for future analysis (e.g., questionnaire results, reporting summaries)
- Automated communication and alert notifications
- Tracking and monitoring results/completion statistics
- Protects against the loss of institutional knowledge through resource attrition

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Technology/compliance lifecycle

- Challenge/opportunity
- Identify technologies
- Identify strategic partnerships
- Determine implementation strategy
- Phased roll-out
- Monitoring and feedback

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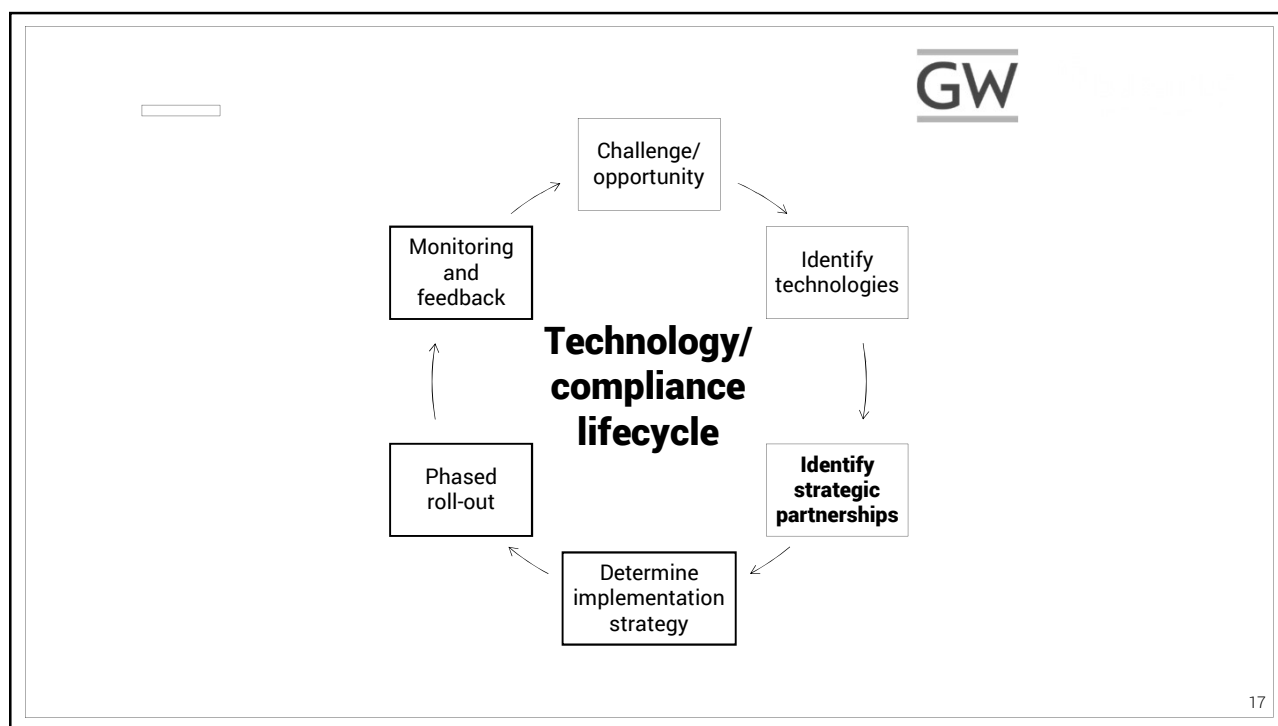---

Case study – GW conflict of interest

Disparate systems and technologies
- Banner ERP system – questionnaire
- Box – cloud-based content management platform
- Microsoft Excel – analysis/documentation
- Google Email – notifications/follow-up
- Microsoft Word – counseling letters and management plans
- Other COI systems (research, physicians, board portal)

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Challenge/
opportunity

Monitoring
and
feedback

Identify
technologies

**Technology/
compliance
lifecycle**

**Identify
strategic
partnerships**

Phased
roll-out

Determine
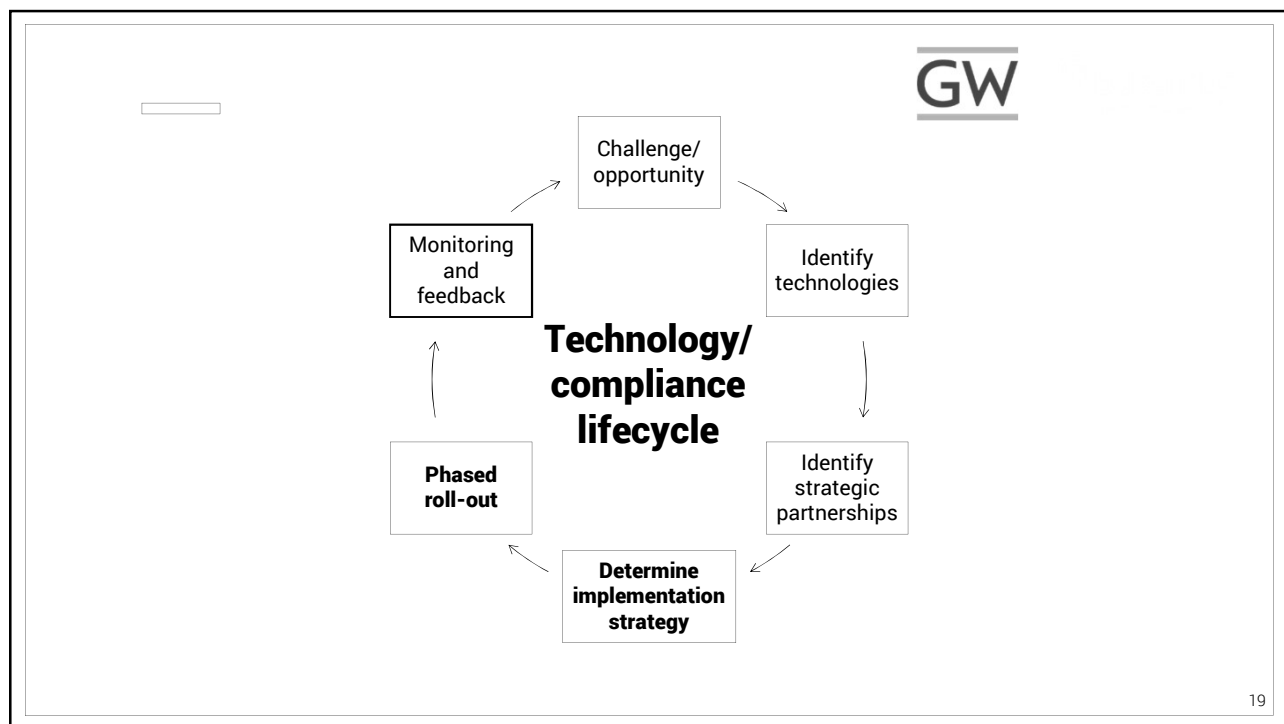implementation
strategy

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Case study – GW conflict of interest

Coordination needed with process partners
- The Office of Ethics, Compliance and Privacy
- Office of the General Counsel (OGC)
- Office of the Vice President for Research (OVPR)
- Faculty Affairs
- Medical Faculty Associates
- Individual Schools & Divisions (Medical)
- The Board of Trustees
- Policy Advisory Committee

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Slide 19

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Technology/ compliance lifecycle

- Challenge/ opportunity
- Identify technologies
- Identify strategic partnerships
- Determine implementation strategy
- Phased roll-out
- Monitoring and feedback

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Slide 20

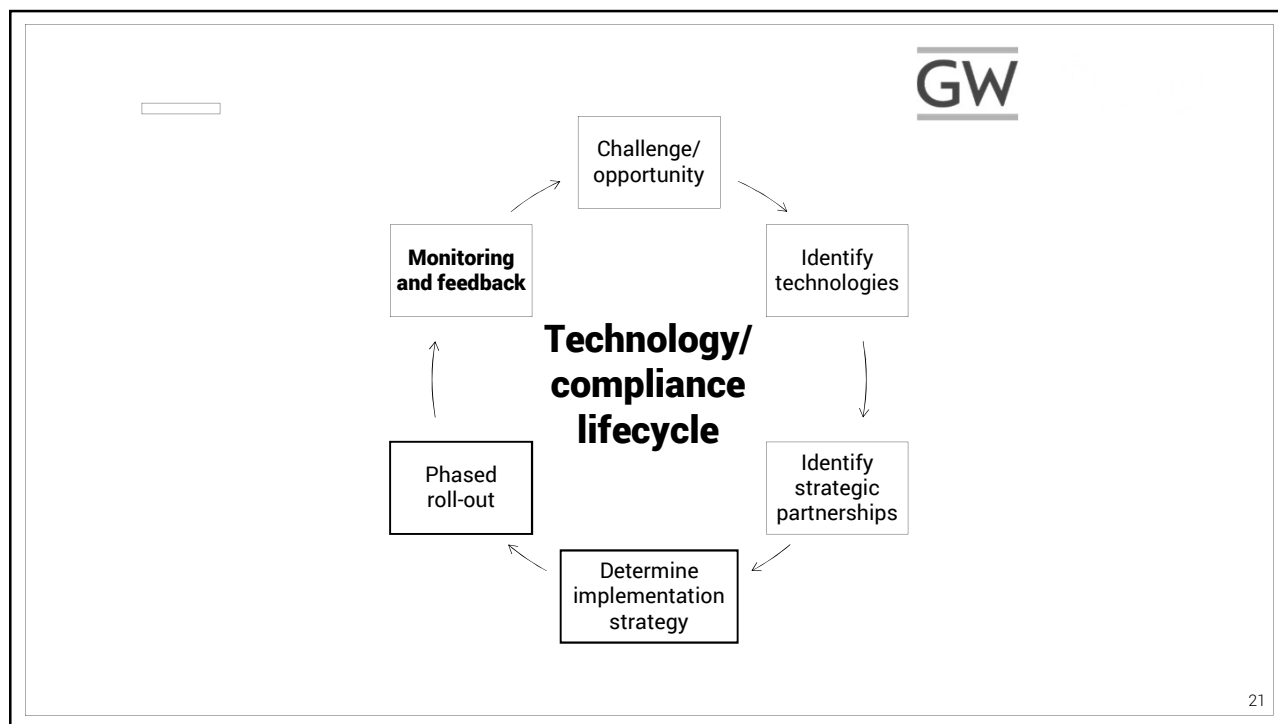**GW** **bakertilly** now, for tomorrow.

Case study – GW conflict of interest

Project roll-out – how was this accomplished?
- Preliminary project plan/timeline
- Pilot year
- Pilot population
- Future bot enhancements and build-out
- Future system enhancements/changes
- Other stakeholder populations

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Technology/compliance lifecycle

- Challenge/opportunity
- Identify technologies
- Identify strategic partnerships
- Determine implementation strategy
- Phased roll-out
- Monitoring and feedback

Case study – GW conflict of interest

Monitoring and feedback
- Ongoing process that requires recurring communications and a strong "tone-at-the-top"
- Requires a transparent process to encourage ad-hoc and timely disclosures
- Third party/vendor management payment processing using reported data to avoid further COI
- Additional information to serve a periodic risk management tool (e.g., hotline reported concern)
- Recurring/periodic policy reviews
- Website communications (forms, templates, contact info)

Key takeaways

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- The compliance environment is complex, often decentralized and constantly evolving
- Form PARTNERSHIPS across the organization; change is easier when you have advocates
- Use PARTNERSHIPS to challenge the status quo; have courage to recommend change
- Operate as a forward-looking function when trying to improve processes, even if it only enhances the short-term
- Recognize repetitive, non-value add tasks to consider how TECHNOLOGY can lighten the manual steps; critically important when other factors impede a 'system' solution.

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Questions?

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Thank you

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