

Developing and Utilizing a HECA Model Compliance Matrix to Track Compliance Obligations on Your Campus

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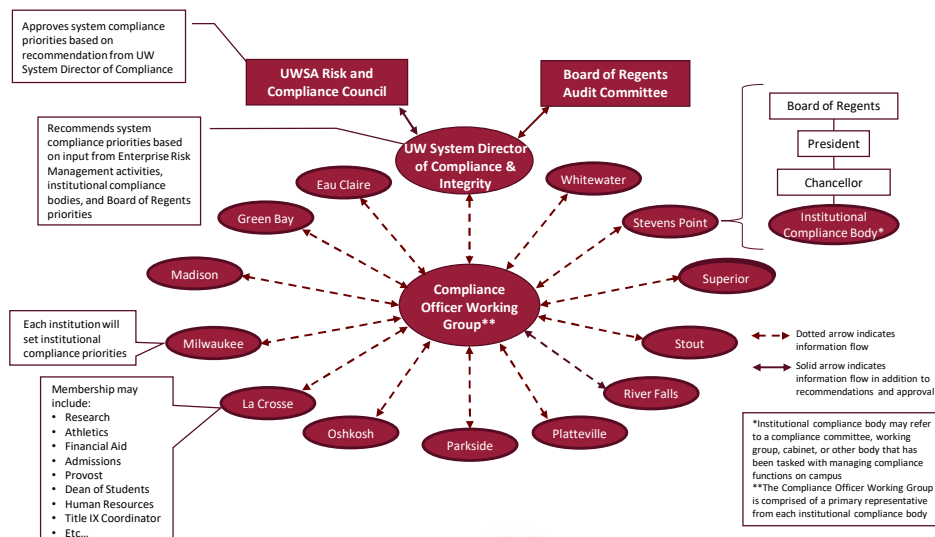
Grace Crickette, Vice Chancellor for Administrative Affairs and Ethics Officer, UW Whitewater

Kim Langolf, Interim Director of Sponsored Programs and Risk and Safety, UW Oshkosh



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Univ of Wisconsin Compliance Framework



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The First Deliverable: Compliance Matrix

- Started with the Higher Education Compliance Alliance Matrix
- Added in State Law
 - The biggest challenge
 - Started with the areas within statute and admin code that we knew contained obligations that applied to the university
 - Met with SMEs, attorneys across system to identify additional reports, disclosures that they were familiar with
 - Continue to add obligations in as we become aware of them
- Board of Regent policy, System policies
 - How to define "compliance obligation" for inclusion in the matrix
- Non-regulatory obligations (NCAA, accreditation)

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[demo]

Topic Area	Compliance Obligation	Institution	Source of obligation	Institutional Lead	Responsible Office	Primary Manager	Next Due Date
Academic Programs	Academic Quality Program Assessment	Oshkosh	Board	Provost and Vice Chancell		Hill, Charles	1/16/2021
Academic Programs	Add/Drop Policy For Courses	Oshkosh	Board	Provost and Vice Chancell			
Academic Programs	Age Discrimination Act of 1975	Oshkosh	Federal	Provost and Vice Chancell		Hill, Charles	
Academic Programs	Americans with Disabilities Act of 1990- Academic Programs Accommodations	Oshkosh	Federal	Vice Chancellor for Studer		Karlson, Kiersten	
Academic Programs	Annual reports: Accountability Report	Oshkosh	State	Provost and Vice Chancell			1/28/2021
Academic Programs	Annual reports: Remedial Course Report	Oshkosh	State	Provost and Vice Chancell		Watson, Mike	8/31/2020

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[demo]

Compliance... > Matrix > Item properties

Compliance Obligation

Academic Quality Program Assessment

Source

Board of Regents Policy

Summary

The University of Wisconsin System Administration shall provide increased system wide accountability for statewide assessment through the President's annual report. Each University of Wisconsin System Institution shall continue the assessment of students' verbal and quantitative skills, refine the techniques, and report annually on the use of assessment results in the improvement of teaching and learning.

Citation

RPD 5-1

Institutional Lead

Responsible Office

Primary Manager

Regulation 1

Provost and Vice Chancellor fo...

Hill, Charles

Reporting Requirements

Triggering Event/Disclosure

Regulation 2

UW System Administration, Annually via the President's report, with information gathered from each Institution

Notes

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[demo]



Compliance Matrix

Past Due and Upcoming Obligations

Admins Only

Definitions

Edit

+ New Send by email Promote Page details

Past Due and Upcoming Obligations



Katherine Ignatowski
DIRECTOR OF COMPLIANCE

Matrix

Topic Area	Compliance Obliga...	Institution	Next Due Date
Academic Programs	Teacher Preparation Programs	Oshkosh	4/30/2020

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[demo]

Filter by 'Institutional Lead' x

- ☐ (Empty)
- ☐ Accounting Services
- ☐ Assistant Chancellor & Director of Athle...
- ☐ Assistant Chancellor for Business and Fi...
- ☐ Assistant Chancellor for Diversity and L...
- ☐ Assistant Chancellor for Enrollment and ...
- ☐ Assistant Chancellor for International E...
- ☐ Assistant Chancellor for University Adva...
- ☐ Assistant Chancellor of Diversity and In...
- ☐ Assistant Vice Chancellor of Human Resou...

Apply Clear all

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Compliance Matrix Home

 Katherine Ignatowski
DIRECTOR OF COMPLIANCE

Matrix > Assistant Chancellor & Director of Athletics

[See all](#)

Topic Area	Compliance Obliga...	Institution	Source of obligatio...	Institutional Le...	Responsible Office	Primary Manager	Next Due Date
Athletics	Endorsement of Statement of Principles from the Knight Foundation Commission on Intercollegiate Athletics	Oshkosh	Board	Assistant Chancellor & Dir		N/A	1/28/2021
Athletics	Equity in Athletics Disclosure Act (EADA)	Oshkosh	Federal	Assistant Chancellor & Dir		Sims, Darryl	10/14/2020
Athletics	Section 504 of The Rehabilitation Act of 1973- Non-Discrimination in Athletics and Extracurricular activities	Oshkosh	Federal	Assistant Chancellor & Dir		Sims, Darryl	
Athletics	Title IX- Athletics	Oshkosh	Federal	Assistant Chancellor & Dir		Sims, Darryl	

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[demo]

Filter by 'Topic Area' ×

- ☐ (Empty)
- ☐ Academic Programs
- ☐ Accounting
- ☐ Accreditation
- ☐ Admissions
- ☐ Athletics
- ☐ Auxiliary Services
- ☐ Campus Safety
- ☐ Contracts & Procurement
- ☐ Copyright & Trademark
- ☐ Disabilities
- ☐ Discrimination
- ☐ Diversity Affirmative Action
- ☐ Employee Benefits

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Compliance Matrix

Past Due and Upcoming Obligations Admins Only Definitions Edit

+ New Export to Excel PowerApps Automate ...

Matrix > Campus Safety

Topic Area	Compliance Obligat...	Institution	Source of obligatio...	Institutional Lead	Responsible Office	Primary Manager	Next Due Date
Campus Safety	Campus Sex Crimes Prevention Act (3 1601 of the Victims of Trafficking and Violence Protection Act of 2000)	Oshkosh	Federal	Vice Chancellor for Admin		Bartlein, Michael	9/30/2020
Campus Safety	Drug Free Schools and Communities Act	Oshkosh	Federal	Vice Chancellor for Studen		Munin, Art	9/30/2020
Campus Safety	Emergency Planning and Community Right to Know Act (EPCRA)	Oshkosh	Federal	Vice Chancellor for Admin		Potratz, Greg	
Campus Safety	Executive Order # 54 Relating to Supplemental Mandatory Reporting Requirements of Child Abuse and Neglect	Oshkosh	State	Vice Chancellor for Admin		Bartlein, Michael Kuert	
Campus Safety	Higher Education Act: Institutional and Financial Assistance Information for Students: Disclosure of Fire Safety Standards and Measures	Oshkosh	Federal	Vice Chancellor for Admin		Leibold, Kurt	
Campus Safety	Higher Education Act: Institutional and Financial Assistance Information for	Oshkosh	Federal	Vice Chancellor for Admin		Leibold, Kurt	

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Purpose & Benefits

- Provides clear picture of compliance burden across the institutions (approx. 500 obligations so far)
- Visibility for VPs, AVPs on compliance obligations that fall within their purview of supervision
- Allows for identification of responsibility for each obligations
- Ability to track reporting deadlines, run queries of upcoming reports
- Facilitate collaboration between responsible parties across system
- Ensure obligations are reassigned after staff transitions [integration with HR database]
- Serves as a reference database to house internal guidance, manuals etc. that relate to obligations

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Campus Perspectives

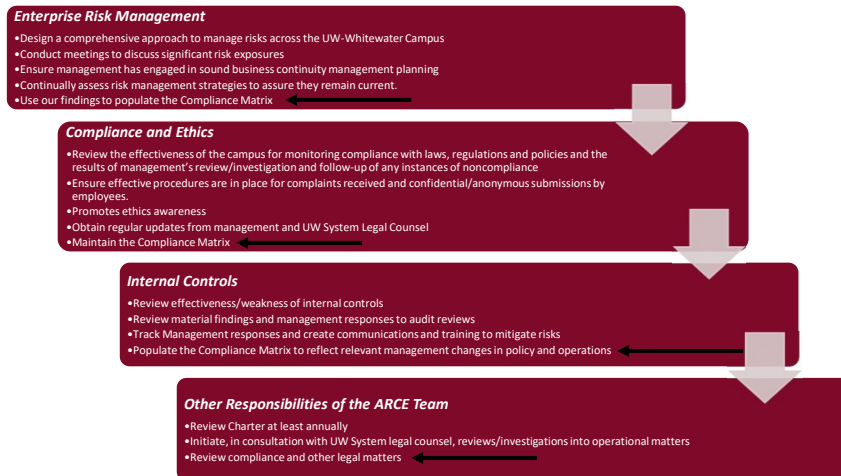
- Matrix Rollout to University of Wisconsin – Whitewater
 - Identify responsible parties
 - Upload institution specific policies, manuals, etc.
- Institutional perspectives – *How we got the work done*
 - Initial information gathering – leveraged the Audit Risk Compliance and Ethics (ARCE) work and Team
 - Leverage data from Enterprise Risk Management (ERM) Tool, Control Self-Assessment program, and from Audit findings to populate Matrix
 - Ongoing the Compliance Matrix is part of the ARCE program

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Administrative Roles and Expectations (*Roadmap*)



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UW Oshkosh Compliance Framework

- Historical culture of compliance at UW Oshkosh
 - Decentralized approach
- UW System Centralization of Compliance
 - UW Oshkosh selected as pilot program to implement system-wide compliance framework

Charge for Working Group

Compile, assess, and understand the current compliance efforts at UW Oshkosh in order to support a newly developed UW System compliance program.

Objective 1

- To provide UW System with a high-level assessment of current compliance efforts at UW Oshkosh by August 31st, 2019. (Completed)

Objective 2

- To complete a compliance matrix developed by UW System which includes required areas of compliance at UW Oshkosh by December 31, 2019. (Completed)

Objective 3

- Understanding the gaps in programming at a system and campus level in order to allocate resources. (In Progress)

Objective 4

- Improve and/or redesign current compliance efforts to align with UW System and remain relevant for our own campus culture. (Not Started)

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Moving Forward at UWO

- Barriers
 - Changing the culture
 - Centralizing compliance obligations
 - Financial instability
 - Decreased workforce
- Next Steps
 - Implementing Enterprise Risk Management
 - Compliance under this umbrella

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Future Functionality?

- Serve as a repository for reports, allow campuses to view each others' submissions and system to compile relevant information for leadership, Board of Regents
- Ability to email a larger group of interested parties regarding developments, updates, changes regarding a particular obligation through the tool
- Incorporate obligations into position descriptions for responsible parties

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Questions?

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