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

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SCCE Higher Education Compliance Conference

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Introduction

Introduction - Bios



Jessica Wasserman is an experienced professional with a diverse business and operational background. Over the past 10 years, she has developed expertise in the areas of governance, risk, and compliance. As Assistant Compliance Officer for New York University (NYU), Jessica leads a variety of projects and initiatives focused on ensuring compliance with different laws, regulations, policies, standards and best practices governing higher education institutions. Prior to joining NYU's Office of Compliance and Risk Management, Jessica led efforts to implement and operationalize NYU's Enterprise Risk Management Program.

Earlier in her career, Jessica enjoyed working for top business organizations like PricewaterhouseCoopers (PwC Advisory), Siemens (Siemens Energy, Inc.), and The Walt Disney Company. Jessica is a certified Six Sigma Green Belt and MBA Candidate at NYU's Leonard N. Stern School of Business.



John is a manager based in PwC's Chicago, IL office and works in the Internal Audit / Risk Assurance Practice. John has been working in public accounting since 2006, and has been with PwC since 2014.

John has worked in the higher education sector since 2011, serving in external audit, internal audit, and consultative roles. John has led comprehensive enterprise-wide risk assessments for large scale Universities and Academic Medical Centers, with a focus on strategic, financial, compliance, and operational risk. Currently John serves as the lead internal audit manager for two internal audit outsource engagements of prominent research universities.

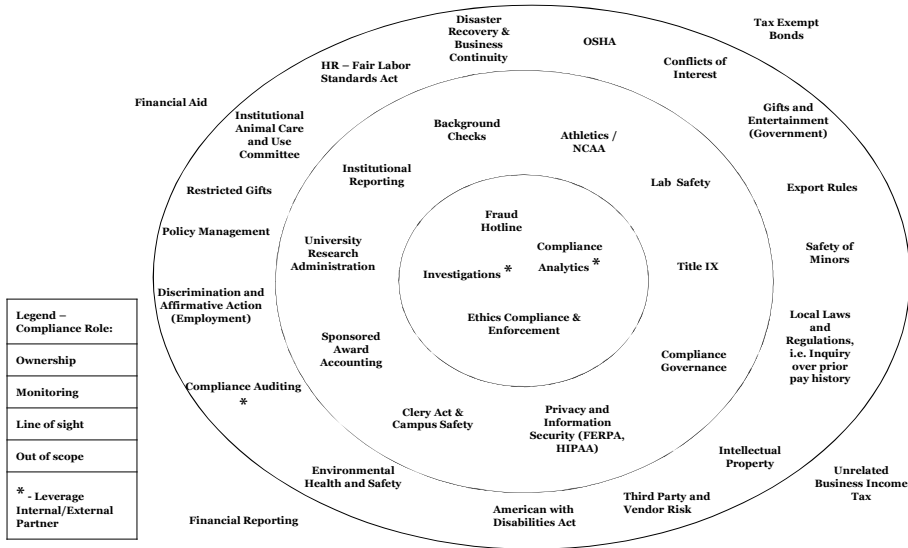
John has a B.B.S. from the University of Wisconsin-Madison in Risk Management and Insurance, and Accounting Information Systems. He is a Certified Public Accountant in the states of Illinois and Wisconsin.

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)

Compliance Function Design Option



Leveraging sponsors and supporters

Leveraging sponsors and supporters

Corporate Examples

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

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

Vision

Striving to be a team of world-class professionals helping to shape the future of the University.

- University of Tennessee

Objectives

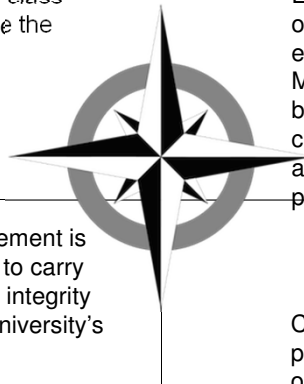
Establishment and maintenance of an organizational culture that encourages all Community Members to conduct University business ethically and with a commitment to compliance with applicable laws, regulations and policies...

- University of Miami

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.

- New York University



Scope

Constraints or boundaries for program like risk or compliance ownership and accountability. Scope tends to be found in an internal program manual.

Create Flexible Standardization

Compliance and Ethics activities requires balance between standardization and customization for efficiency and effectiveness.



- Standardize processes
 - Re-evaluate own program and processes every few years.
 - Set up templates and minimize changes
- Updates based on regulatory changes
 - Unique problems sometimes require unique solutions.

Flexible Standardization at Work



Processes/Workflows/Templates/Tools

- Policy management
- Risk assessment and management
- Training
- Formal Communications
- Monitoring
- Topical Subject Areas

-UCONN Compliance COI form

The State Code of Ethics for Public Officials states a conflict of interest exists when a state employee, in the discharge of their official duties, is required to take an action that would affect a financial interest of the employee, the employee's family member (spouse, parent, sibling, child or grandchild), or a business with which the employee is associated with. If prevented with a conflict of interest, the Code requires employees to prepare a written statement describing the matter and the nature of the conflict and deliver a copy to their immediate supervisor. The supervisor shall assign the matter to another employee who does not directly or indirectly report to that individual.

This form is intended to assist employees with meeting the above statutory requirements, as well as compliance with the University "Policy on Employment and Contracting for Service of Relatives".

To Complete the Form:

1. Employee - complete section 1 and provide a copy to your immediate supervisor.
2. Supervisor - complete section 2 and forward to the Senior Manager for final review and approval.
3. Senior Manager - complete section 3 and send original to the Office of Audit, Compliance & Ethics. A copy should be retained and another provided to the Employee for his/her records.

Section 1. DISCLOSURE

Required Action (examples: making a hiring or merit decision; contract award decision)


Name and Relationship of Family Member Affected or Associated Business:

Description of Potential Financial Impact:


Employee Signature: _____ Date: _____

Flexible Standardization at Work


MARCH 11, 2018
Visas Issued to Foreign Students Fall, Partly Due to Trump Immigration Policy
 The State Department issued 393,573 student visas in the year ended Sept. 30, 2017, down 17% from the previous year as a result of a stricter approval process, increased competition from schools overseas and less support for foreign study by some governments.



MARCH 9, 2018
Trump Administration Tells States to Stop Regulating Federal Student Loans
 President Donald Trump's administration moved Friday to stop states from regulating companies that collect U.S. student-loan payments, arguing that states were encroaching on the federal government's role.



MARCH 9, 2018
How Students in New York Are Graduating College With No Debt
 This video takes a look at a program adopted by Bronx Community College in New York that puts higher education within reach of students and eases the burden of student loans and the struggle to repay them.




Customized Actions

- Leadership/General Counsel/Legal guidance
- Higher Education trends
- Situational context

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

Key Compliance Contacts				
Compliance Area	Description	Responsible Org.	Phone (NYC)	E-Mail
ADA/Section 504	As part of the University's commitment to providing equal access and full participation for individuals with disabilities, the Office of Institutional Equity (OIE) monitors the University's compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. These entities provide information on the basis of disability in any service, program or activity. OIE provides training and guidance on federal disability laws and University Policies related to accessibility. The Associate Vice President of OIE serves as UConn's ADA, Coordinator and Section 504 Coordinator.	Institutional Equity Office of	486-2043 679-3993	oie@uconn.edu
Affirmative Action/Equal Employment Opportunity	The Affirmative Action/Equal Employment Opportunity and Section 504 Unit of the Office of Institutional Equity (OIE) provides search committee education and training. OIE can answer your questions throughout the search process to support compliance with AA/EEEO regulations and best practices.	Institutional Equity Office of	486-2043 679-3993	oie@uconn.edu
Animal Care, In Research and Biomedical	The Institutional Animal Care and Use Committee (IACUC) will provide guidance related to the University's program for the humane care and use of animals in research and teaching. Animal welfare is a non-negotiable concern that we reported to IACUC, the Affirming Veterinarian or Research Compliance Services (RCS).	Institutional Animal Care and Use Committee (Research Compliance Services)	486-2048 679-4726	
Asthetics	Asthetics Compliance can provide guidance regarding permissible and prohibited conduct of student athletes, coaches and administrators, in accordance with NCAA rules and regulations.	Asthetics Compliance	860-488-2038	

-UConn Compliance Contact List

Collaboration is a silo bulldozer

Collaboration is key to breaking down silos.

- Compliance/ERM/Internal Audit
 - Create shared drive with audit results and ERM and Compliance insights
- Working sessions with Compliance Officers or Administrators to layout compliance requirements and obligations
- Leverage survey systems (e.g. Qualtrics, Survey Monkey, Google Forms) to obtain feedback and insight

Compliance Collaboration Equations:

Compliance + Enrollment Management = Title IX

Compliance + EHS + Provost = Lab Safety

Compliance + ERM + IA + Functional Areas = Lines of Defense

Compliance + IT + (OGC) = GLBA

Compliance + IT + Dentistry + Student Health Center = HIPAA

CASE STUDIES

Tools and Resources

Tools and Resources

- Rebrand / relaunch “Hotline” to “Helpline”
 - Supplement with web portal
- Consider novel outreach / marketing
 - Off the shelf may not be effective for your Organization – how do you reach the decentralized environment & age/demographics of your audience?
 - Annual report to build awareness of the function and its success/challenges
- Qualtrics – *leverage prepaid software licenses*
- Create local hubs for informal discussion of your supporters/volunteers
- Leverage free /discounted webinars and resources from law firms and advisory firms
- Invest in personnel / Inventory personnel skill sets

Closing Remarks

Thank you



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