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
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 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.

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<thead>
<tr>
<th>GOAL:</th>
<th>Description:</th>
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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?
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

<table>
<thead>
<tr>
<th>Compliance Area</th>
<th>Attitude</th>
<th>Rating</th>
<th>Industry Best Practice</th>
<th>Current Ongoing Activity</th>
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<tbody>
<tr>
<td>[Insert Compliance Area]</td>
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<tr>
<td>Ownership and Accountability</td>
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<td>Policies, Regulations, and Rules</td>
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<td>Training and Education</td>
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<td>Branding and Marketing (Communication with Partners)</td>
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<td>Ethics &amp; Values</td>
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<td>Monitoring and Metrics (Incident Tracking)</td>
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<td>Response and Prevention</td>
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<tr>
<td>Other</td>
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## Improvement Strategies

<table>
<thead>
<tr>
<th>Compliance Area</th>
<th>Notes/Attachments</th>
<th>Status</th>
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<tbody>
<tr>
<td>[Insert Compliance Area]</td>
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<tr>
<td>[Insert Compliance Program Attribute]</td>
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<tr>
<td>[Insert Compliance Point of Contact]</td>
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<tr>
<td>[Insert Description of Improvement Strategy]</td>
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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 …

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?