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

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**Institutional compliance body may refer to a compliance committee, working group, cabinet, or other body that has been tasked with managing compliance functions on campus**

**The Compliance Officer Working Group is comprised of a primary representative from each institutional compliance body**
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)

[.demo]
Compliance... > Matrix > Item properties

Compliance Obligation
Academic Quality Program Assessment

Summary
The University of Wisconsin System Administration tools provide increased system-wide accountability for statewide assessment through the President's annual report. Each University of Wisconsin System institution must conduct the assessment of student-written and quantitative skills, refine the techniques, and report annually on the use of assessment results in the improvement of teaching and learning.

Institutional Goal
Responsible Office
Primary Manager

Reporting Requirements
UW System Administration, Annually via the President's report, with information gathered from each institution.

Notes

[Univ of Wisconsin System]

Compliance Matrix
Past Due and Upcoming Obligations

Past Due and Upcoming Obligations
Katherine Ignotowski DIRECTOR OF COMPLIANCE

Matrix

<table>
<thead>
<tr>
<th>Topic Area</th>
<th>Compliance Obligations</th>
<th>Institution</th>
<th>Next Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Academic Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Teacher Preparation Programs</td>
<td></td>
<td></td>
<td>4/30/2020</td>
</tr>
</tbody>
</table>

[Univ of Wisconsin System]
[demo]
### Compliance Matrix

#### Past Due and Upcoming Obligations

<table>
<thead>
<tr>
<th>Topic Area</th>
<th>Compliance Obligation</th>
<th>Institution</th>
<th>Source of obligation</th>
<th>Institutional Lead</th>
<th>Responsible Office</th>
<th>Primary Manager</th>
<th>Next Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Campus Safety</td>
<td>Emergency Planning and Community Right-to-Know Act of 1986, Colorado Uniform Business and Community Right-to-Know Act</td>
<td>Oshkosh</td>
<td>Federal</td>
<td>Vice Chancellor for Student</td>
<td>Monroe, Ant</td>
<td>6/30/2020</td>
<td></td>
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<tr>
<td>Campus Safety</td>
<td>Executive Order # 54 Relating to Supplemental Mandates Reporting, as Required by the Uniform Mitigation Reporting Act (for Mitigation and Financial Assistance Information for Students)</td>
<td>Oshkosh</td>
<td>State</td>
<td>Vice Chancellor for Admin</td>
<td>Ponzio, Greg</td>
<td>6/30/2020</td>
<td></td>
</tr>
<tr>
<td>Campus Safety</td>
<td>Higher Education Act</td>
<td>Oshkosh</td>
<td>Federal</td>
<td>Vice Chancellor for Admin</td>
<td>Bartman, Michael</td>
<td>6/30/2020</td>
<td></td>
</tr>
</tbody>
</table>
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 obligation
- 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

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
Administrative Roles and Expectations (Roadmap)

Enterprise Risk Management
- Design a comprehensive approach to manage risks across the UW-Whitewater Campus
- Conduct meetings to discuss significant risk exposures
- Ensure management has engaged in sound business continuity planning
- Continually assess risk management strategies to assure they remain current.
- Use our findings to populate the Compliance Matrix

Compliance and Ethics
- Review the effectiveness of the campus for monitoring compliance with laws, regulations and policies and the results of management's review/investigation and follow up of any instance of noncompliance
- Discourage effective procedures are in place for complaints received by employees.
- Promote ethics awareness
- Obtain regular updates from management and UW System Legal Counsel
- Maintain the Compliance Matrix

Internal Controls
- Review effectiveness/weakness of internal controls
- Review material findings and management responses to audit reviews
- Track management responses and create communications and training to mitigate risks
- Populate the Compliance Matrix to reflect relevant management changes in policy and operations

Other Responsibilities of the ARCE Team
- Review Charter at least annually
- Initiate, in consultation with UW System legal counsel, reviews/investigations into operational matters
- Review compliance and other legal matters

UW Oshkosh Compliance Framework

- Historical culture of compliance at UWO
  - Decentralized approach
- UW System Centralization of Compliance
  - UWO 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)
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

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
Questions?