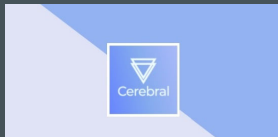


# COMPLIANCE OFFICER ROUNDTABLE

SCCE Higher Education Compliance Conference, June 2022



JACQUELINE KNISKA  
HEAD OF COMPLIANCE  
CEREBRAL



NEDRA ABBRUZZESE-WERLING  
Associate Vice President for Compliance Services  
BOSTON UNIVERSITY

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## Compliance Officer Roundtable 2022



This is recurring session at this conference.

We are soo very happy to be back in person!

### **RULES OF DECORUM AND PARTICIPATION**

We ask that you remain respectful and move the conversation forward with the goal of helpful education. We are all here to learn, share, and gain insight from one another.

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# Compliance Officer Roundtable

- The opportunity to understand the issues and challenges that face other compliance officers
- Strategies for strengthening compliance programs and providing adequate responses to emerging issues
- Adapting your program during unprecedented regulatory, political, and media scrutiny



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## INTRODUCTIONS

**Jacqueline Kniska**


Head of Compliance  
Cerebral



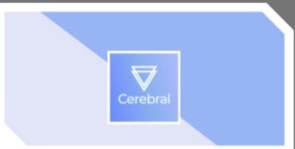
**Nedra Abbruzzese-Werling**  
Associate Vice President for Compliance Services  
Boston University

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# ABOUT OUR INSTITUTIONS





Cerebral



Cerebral


&






**BOSTON  
UNIVERSITY**






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## BOSTON UNIVERSITY AT A GLANCE

Private Urban Research University



Founded in 1839	Located in Boston, Massachusetts	Enrolling 33, 678 students				
						
<p>\$564.6 M Research Expenditures</p> <p>\$502.6 M Research Awards</p> <p>\$110.0 M BMC Clinical Research Grants</p>	<p>10,406 employees</p> <p>4,107 Faculty</p>	<p>17 schools and colleges (Law &amp; Med), 300+ programs of study, 10:1 Student/Faculty Ratio</p>	<p>300+ Global initiatives</p> <p>180 Alumni Countries</p> <p>11,000+ intl. students</p> <p>70+ Study Abroad Programs</p>	<p>407,000+ living alumni</p> <p>\$3.35 billion endowment</p>	<p>16,530 undergrads, 15,932 graduate &amp; professional students, 1,216 non-degree students</p>	<p>2 Boston campus locations (Charles River and Medical), 175 acres, 1,772 labs, 347 buildings, 850 classrooms</p>
Research	Employees	Academics	Global Impact	Alumni Endowment	Student Enrollment	Campus

**MORE BOSTON UNIVERSITY FACTS AVAILABLE AT [HTTPS://WWW.BU.EDU/PRESIDENT/BOSTON-UNIVERSITY-FACTS-STATS/](https://www.bu.edu/president/boston-university-facts-stats/)**

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# BOSTON UNIVERSITY

## Compliance Services Office



- Compliance Services was established in January 2015 and reports to the Vice President and General Counsel.
- Staffing: One AVP of Compliance Services and one Compliance Coordinator.
- Compliance Services provides regular reports to the Audit Committee of the Board of Trustees.
- University-wide Enterprise Risk Management effort identifies compliance (and other) risks across the University.

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# BOSTON UNIVERSITY

## Compliance Services Office

The Compliance Framework identifies the critical components of any effort to achieve compliance. The BU community will be able to meet its compliance obligations more efficiently and effectively if we share a common framework for communicating about and tackling compliance.



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## BOSTON UNIVERSITY Compliance Services Office

### Ongoing Responsibilities and Activities



#### Policy

- Maintain University's central policy website, [www.bu.edu/policies](http://www.bu.edu/policies)
- Identify policy gaps, update existing policies as needed, monitor policy changes



#### Compliance Matrix

- Maintain compliance matrix and inventory of compliance obligations, identifying responsible units and individuals and establishing accountability  
<http://www.bu.edu/compliance/compliance-matrix-public/>



#### Training

- Assist in development of training for individuals with compliance responsibilities and assessment of training gaps



#### Hotline Facilitation

- Assist in managing University's response to hotline and other compliance-related complaints

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## BOSTON UNIVERSITY Compliance Services Office

### Ongoing Responsibilities and Activities



#### Conflict of Interest Process and Oversight

- Facilitate the University's annual conflict of interest disclosure process
- Assure implementation of management plans as necessary



#### Monitoring

- Work closely with Internal Audit and Advisory Services to monitor ongoing compliance efforts
- Participate in the University's Enterprise Risk Management program to evaluate and mitigate compliance risks



#### Clery Compliance Coordination

- Facilitate Clery compliance tasks with OGC, BUPD, and others throughout campus



#### Support of Title IX Compliance Efforts

- Contribute to ongoing Title IX efforts as needed, including monitoring changes to the federal and state regulatory landscape

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# CEREBRAL

Private Corporation



Cerebral's mission is to improve access to long-term, high-quality mental health care for everyone who needs it. Unlike traditional mental health care, Cerebral is accessible, affordable, and free of stigma. With several

full-service monthly subscription plans to choose from, members receive online access to licensed clinicians, behavioral counselors, talk therapists, and nutritionists—all from the comfort of home, with medication delivered straight to their door.

Cerebral was founded and launched in January 2020 and is now a leading online mental health care service platform. More information can be found at <https://cerebral.com/>.

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## for today's Roundtable

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# Compliance Officer Roundtable

## G O A L S



### SHARE

To facilitate an open, honest, trustworthy discussion of real-time and emerging challenges faced by compliance and ethics officers on campuses of varied sizes and within compliance programs at every stage of maturity.

- Provide a safe place to share and listen

### NETWORK

Create opportunities to connect to and with one another, understand the issues and challenges we are facing collectively, share strategies for strengthening compliance programs and providing adequate responses to emerging issues and trends, gain perspective, gauge progress toward your program's continuous improvement.

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# Compliance Officer Roundtable

## G O A L S



### LEARN

Learn you are not alone, and get insight from others on:

- How to address issues
- Strategies for how and what to prioritize
- What strategies may have failed at other institutions, so you can learn from others failure.

### GAIN INSIGHTS TO TAKE HOME

Get ideas for demonstrating where the program is and where it may need to be that you can take back to your institution.

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## POLL | GAUGING THE AUDIENCE

### QUESTION

How long have you been in your role?



### RESPONSES

1. Less than 1 year - and still in shock!
2. 1-3 years
3. 3-5 years
4. 5-10 years – expert level, no doubt
5. Over 10 years, - and can no longer be shocked

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## WEBINAR COMPOSITION POLL | GAUGING THE AUDIENCE

### QUESTION

How mature is your program?



### RESPONSES

1. **Infancy** -  
Brand new
2. **The Tween Years** -  
On our way to mature
3. **Fully Mature**  
We got this Compliance thing down

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## WEBINAR COMPOSITION POLL | GAUGING THE AUDIENCE

### QUESTION

What do you struggle with most?



### RESPONSE

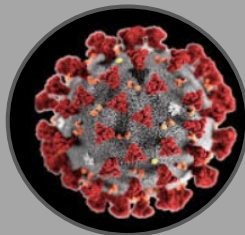
1. Communicating program/your scope/role to other offices
2. Getting buy-in / understanding and inclusion from your institution about your office's purpose
3. Being contacted or relied on too much - for every compliance issue/function at your institution
4. Achieving formal Compliance Program inclusion in institutional governance
5. Other

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## POLL | COMPLIANCE OFFICE PRIORITIES/INVOLVEMENT

### QUESTION

How involved have you been in your school's COVID-19 response?



### RESPONSES

1. Not involved at all
2. Peripherally involved
3. Directly Involved
4. Heading response

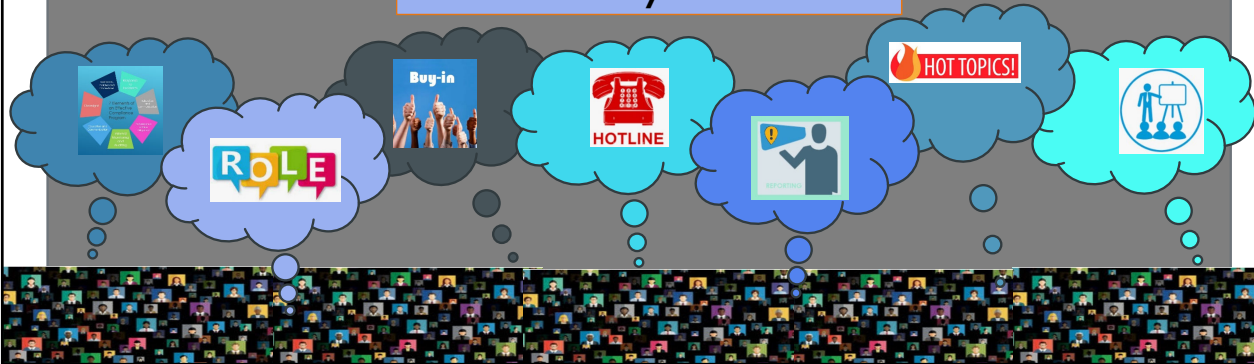
Note: We asked this question in the last two years (in the virtual format). The responses both years indicated no common approach - which is not surprising.

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# Compliance Officer Roundtable

## Priorities and Topics for Discussion

What's on your mind?



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## ROUNDTABLE TOPICS | TWO AREAS FOR DISCUSSION

### Program Level

Maturity; Effectiveness;  
Foundational Elements  
of a Compliance Program



### Subject Matter Level

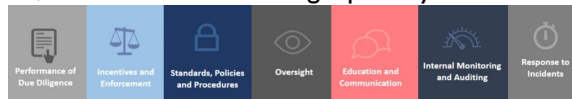
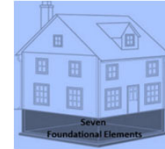
Specific Compliance  
Obligations;  
Areas of Anticipated  
Change or Unspecified

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## ROUNDTABLE TOPICS

### PROGRAM LEVEL - FOUNDATIONAL ELEMENTS

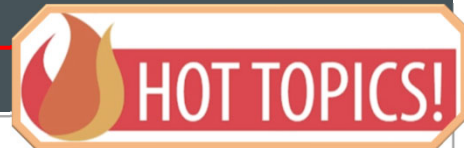
1. Program Assessments or Evaluations
  - Government Regulator experiences?
  - Maturity Ratings or Effectiveness Reviews?
2. Scope of Program - What is in your program **beyond** the basic elements
  - How operational is too operational?
  - How do you survive good work being rewarded with role expansion or scope creep?
  - Successful pivots; sharing workload and re-centering E&C Initiatives
3. [Re]Positioning of the Program w/in the Org. - how do you stay focused and focus others to advance E&C initiatives? Any accountability successes?
4. The "Risk-Based" Approach - the best answer when you know you can't do it all, but how do you create the basis, what/who drives setting a priority?
5. Other ideas?



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## ROUNDTABLE TOPICS

### SUBJECT MATTER LEVEL



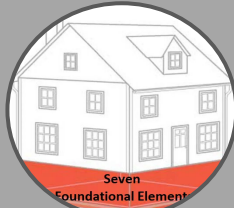
1. Undue Foreign Influence - All activities with a foreign component (i.e. Sec. 117 Reporting; Academic Espionage; Conflict of Commitment; NIH; OSTP; etc... )
2. Privacy - esp. Vaccine Mandate; Proof of vaccination
3. Minors
4. Accessibility
5. Title IX Implementation - 1 year later - where are we? tone on campus?
6. COVID - Return to Campus; Financial Impact
7. State Authorization (and SARA compliance) and Distance Education Requirements and Disclosures
8. What's missing?

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## WEBINAR POLL | AUDIENCE CHOICE

### QUESTION

Which Foundational elements would you like to discuss?



### RESPONSES

1. ASSESSMENTS OR EVALUATIONS (EFFECTIVENESS, MATURITY, ETC...)
2. SCOPE OF PROGRAM - WHAT IS WITHIN IT AND THOSE DRIVERS?
3. [RE]POSITIONING OF THE PROGRAM W/IN THE ORG. - HOW DO YOU STAY FOCUSED TO ADVANCE YOUR INITIATIVES? (FORMALITY, ACCOUNTABILITY)
4. THE "RISK-BASED" APPROACH - WHAT IS SETTING THE EVALUATION? KEY CONSIDERATIONS
5. OTHER IDEAS OR TOPICS TO RAISE?

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## WEBINAR POLL | AUDIENCE CHOICE

### QUESTION

Which specific Compliance Obligations (subject matter) would you like to discuss?



### RESPONSES

1. UNDUE FOREIGN INFLUENCE
2. TITLE IX - NEW REGULATIONS
3. PRIVACY
4. MINORS ON CAMPUS
5. ACCESSIBILITY
6. COVID
7. STATE AUTHORIZATION (AND SARA COMPLIANCE) AND DISTANCE EDUCATION REQUIREMENTS
8. OTHER

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## OTHER CONSIDERATIONS FOR THE CHIEF ETHICS AND COMPLIANCE OFFICER (CECO)

### QUESTIONS

1. How do you ground yourself in your work
2. How do you get in touch with your organization?
3. What do you do to remember why you do what you do?
4. How do you prioritize your work when there are soo many issues to tackle?
5. What strategies do you use to develop your workplan/projects?
6. How do you get buy-in for your program/initiative?
7. Feel near burnout? Its tough out there and we already have tough jobs!

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## ROUNDTABLE TOPICS | AUDIENCE-DRIVEN DISCUSSION

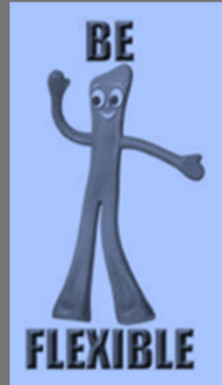


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## COMPLIANCE OFFICER ROUNDTABLE SO WHAT IS A LEADER TO DO?

**Prioritize  
your integrity**

**Say what you  
mean and  
mean what  
you say**



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## COMPLIANCE OFFICER ROUNDTABLE CONSIDER THE ROLE OF STRESS

As stress [fueled by incivility] increases, employees become **less** capable – because **stress disrupts memory and hampers the processing of information.**

Fortune 1000 firms spend as much as **13%** of their time, or **7 full weeks a year**, mending employee relationships and replacing workers who just can't - or won't - take it anymore.

Christine Pearson and Christine Porath [management professors, Georgetown University], *The cost of bad behavior; how incivility is damaging your business and what to do about it.* 2009 study cited in *Creating a civil workplace culture*, David Bogoslaw in *Corporate Secretary.com Special Report 2*, 2014

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## COMPLIANCE OFFICER ROUNDTABLE

One of the benefits of this SCCE Conference is making friends in the Compliance field. Now go NETWORK so you have friends to continue to use as a sounding board after you leave the conference.

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## COMPLIANCE OFFICER ROUNDTABLE



Thank you for your participation!

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