



COMPLIANCE OFFICER ROUNDTABLE

SCCE Higher Education Compliance Conference
June 2023



BOSTON
UNIVERSITY

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

Compliance Officer Roundtable 2023



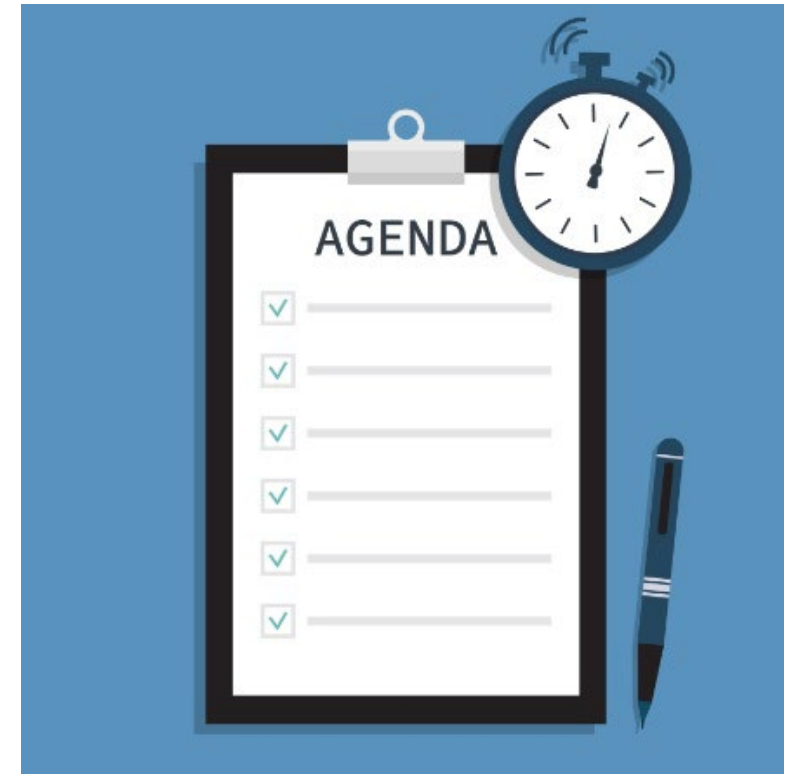
This is recurring session at this conference.

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.

Compliance Officer Roundtable

- 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



INTRODUCTIONS

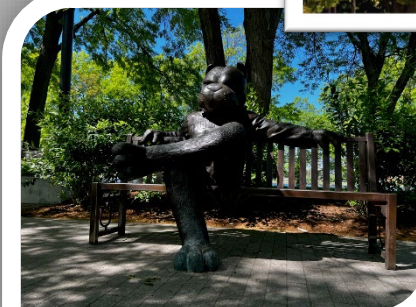


Nedra Abbruzzese-Werling

Associate Vice President for Compliance Services
Boston University

ABOUT BOSTON UNIVERSITY

**BOSTON
UNIVERSITY**



**BOSTON
UNIVERSITY**

BOSTON UNIVERSITY AT A GLANCE

Private Urban Research University



Founded in 1839



Located in Boston, Massachusetts



Enrolling 36,729 students



\$630.7 M Research Expenditures
\$531.2 M Research Awards
\$110.0 M BMC Clinical Research Grants

Research

10,468 employees
4,187 Faculty

Employees

17 schools and colleges (Law & Med), 300+ programs of study, 11:1 Student/Faculty Ratio

Academics

300+ Global initiatives
180 Alumni Countries
11,000+ intl. students
70+ Study Abroad Programs

Global Impact

414,500+ living alumni
\$3.35 billion endowment

Alumni Endowment

17,590 undergrads,
17,937 graduate & professional students,
1,202 non-degree students

Student Enrollment

2 Boston campus locations (Charles River and Medical),
175 acres, 1,495 labs,
343 buildings, 846 classrooms

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/)

BOSTON UNIVERSITY

Compliance Services Office – “CSO”



- CSO established January 2015
 - 8 years young
- Reports to the Senior Vice President and General Counsel
- Staffing: 2 FTE
 - AVP for Compliance Services
 - Compliance Coordinator
- Provides regular reports to the Audit Committee of the Board of Trustees

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.





BOSTON UNIVERSITY Compliance Services Office

Core Responsibilities



Policy Website

- Maintain University’s central policy website, www.bu.edu/policies
- Identify policy gaps, update existing policies as needed, monitor policy changes



Compliance Matrix

- Maintain a compliance matrix and inventory of compliance obligations, identifying responsible units and individuals to establish accountability and ownership in a transparent way <http://www.bu.edu/compliance/compliance-matrix-public/>



Hotline Oversight and Facilitation

- Oversees the University’s Hotline and assists with other non-Hotline complaints and reports made to the Compliance Office through email, phone, and referrals.
- Consults on all investigations, prepares investigation reports, conducts some investigations, prepares response provided to reporter at case closure.



Conflict of Interest Process and Oversight

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



BOSTON UNIVERSITY Compliance Services Office

Ongoing Responsibilities and Activities



Training

- Oversees and manages U-wide training on Sexual Misconduct Prevention and Harassment and Discrimination prevention taken by all employees.
- Assist in development of training for individuals with compliance responsibilities and assessment of training gaps, and recommendations for future trainings
- Manages relationship with our training content vendor



ERM

- Contributes to the University-wide Enterprise Risk Management effort identifies compliance (and other) risks across the University



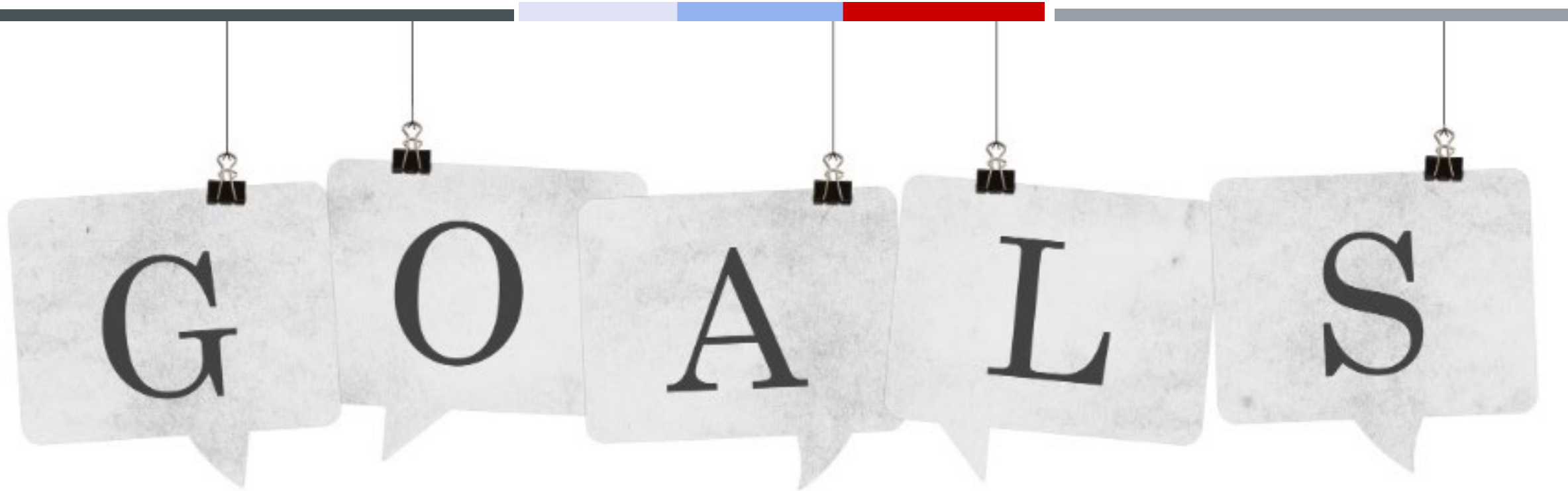
Monitoring

- Work closely with Internal Audit and Advisory Services, the Office of the General Counsel, Research Compliance, and other offices to monitor ongoing compliance efforts
- Participate in the University's Enterprise Risk Management program to evaluate and mitigate compliance risks



Contributes to specific Compliance Obligations and Projects

- Clery Act Compliance: Facilitate Clery compliance tasks with OGC, BUPD, and others throughout campus, including CSA designation
- Protection of Minors: Contributes to working group that manages the Protection of Minors Program and delivers trainings
- Title IX: Supports and contributes to ongoing Title IX efforts as needed, including monitoring changes to the federal and state regulatory landscape, and assisting with Climate Survey efforts
- Privacy: Coordinate Privacy efforts by co-leading a Privacy Coordinating Committee



for today's Roundtable

Compliance Officer Roundtable



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 AND MAKE FRIENDS

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.



Compliance Officer Roundtable



LEARN FROM ONE ANOTHER

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.
- Develop strategies for your own programs.



POLL | GAUGING THE AUDIENCE

QUESTION

How long have you been in your role?



RESPONSES

1. Less than 1 year
2. 1-3 years
3. 3-5 years
4. 5-10 years
5. Over 10 years

POLL | GAUGING THE AUDIENCE

QUESTION

What is your
Compliance role?



RESPONSES

1. Key Administration Leader that oversees head Compliance Officer/Office
2. Head Compliance Officer (even if your title is different)
3. Works in the Compliance Office under the direction of the Head Compliance Officer
4. Works in a related office/position that supports or overlaps with the Compliance Officer/office (i.e. Audit, investigations, ERM, etc.)
5. Other

POLL | GAUGING THE AUDIENCE

QUESTION

What is your Background?



RESPONSES

1. Law
2. Audit
3. MBA
4. Risk Focus
5. Other

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

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**

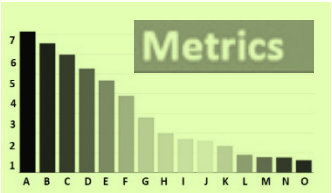
Compliance Officer Roundtable

Priorities and Topics for Discussion

What's on your mind?



ROUNDTABLE TOPICS | 3 AREAS FOR DISCUSSION



Research Compliance

Undue Foreign Influence

Clery Act

Minors

Title IX

COVID

Privacy

State Authorization

accessibility

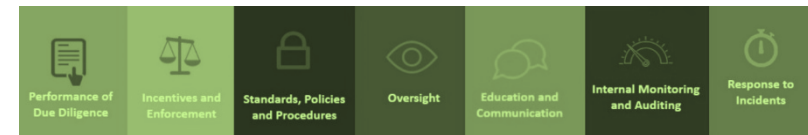
Conflicts of interest



ROUNDTABLE TOPICS

PROGRAM LEVEL - FOUNDATIONAL ELEMENTS

- Scope of Program - What is in your program **beyond** the basic elements
 - How operational is too operational?
 - How to protect core role and avoid “Scope Creep”
 - Successful pivots;? sharing workload and re-centering E&C Initiatives?
- Program Maturity
- Program Assessments/Evaluations
 - External: Government Regulator experiences?
 - Internal: Maturity Ratings or Effectiveness Reviews?
- Positioning of the Program w/in the Org. - how do you achieve goals with current structure, or changed structure?
- Establishing Priorities: The "Risk-Based" Approach (when you know you can't do it all, but you need to do something)
 - Who assists in establishing the priorities for the University?
- Foundational Compliance Program Elements



ROUNDTABLE TOPICS

SUBJECT MATTER ISSUES

Specific Compliance Obligations or Areas of Anticipated Change or Regulatory Focus OR older compliance issues you haven't yet figured out

- Undue Foreign Influence - (i.e. Sec. 117 Reporting; Academic Espionage; Conflict of Commitment; NIH; OSTP; etc...)
- Third Party Service Providers and Online Program Managers (TSP & OPM)
- Privacy – New State laws, HIPPA, PIPL, GDPR, FERPA
- Minors – managing risks
- Accessibility – web and physical
- Research Compliance Issues
- Enterprise Risk Management
- Title IX – New regulations expected May 2023
- State Authorization (and SARA compliance) and Distance Education Requirements and Disclosures
- Conflicts of Interest



ROUNDTABLE TOPICS

CHALLENGES OF A COMPLIANCE OFFICER

- How do you reduce risk?
- How do you get buy-in?
- What are your best practices for investigations?
- How do you establish buy-in?



ROUNDTABLE TOPICS | AUDIENCE-DRIVEN DISCUSSION



COMPLIANCE OFFICER ROUNDTABLE

TIPS FROM A COMPLIANCE OFFICER WHO HAS BEEN AT IT A WHILE!!!

Lead by example

Strive to set an ethical tone and model ethical behavior.

Develop campus allies

We can't be effective without establishing campus partners who trust us.

BE



FLEXIBLE

Be transparent, accountable, and communicate your work to others.

Document your efforts: Leave a solid record trail for others.

Don't get discouraged easily. Real progress takes time.

Be Kind.

Prioritize your integrity

Build a program that will outlast any position, office, person, or function.

Embed your program into the business processes and culture of the university.

Is the juice worth the squeeze?



Will the outcome be helpful and worth your time? Ask this question before embarking on a project

Compliance leadership is a long game. It can take years to get the buy-in necessary to be effective.



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!

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.

COMPLIANCE OFFICER ROUNDTABLE

TANK-
YOUS!



Thank you
friends.



thank

YOU

Thanks!

