

**FLORIDA ATLANTIC UNIVERSITY  
COMPLIANCE AND ETHICS  
ANNUAL REPORT  
FY 2019-20**

A. Executive Oversight		
<u>C</u>	<u>P</u>	<u> </u>
<p>Oversight and direction for the CEP sets the overall tone for accountability, sound risk management, ethical behavior, and compliance with laws and regulations. The compliance office serves as a central point and resource for coordination, collaboration, and oversight of activities and initiatives to promote and encourage a culture of compliance and ethical behavior.</p>	<p>Compliance office reports regularly to the BOT Audit &amp; Compliance Committee and confers with the BOT Audit &amp; Compliance Committee Chair as needed.</p>	<p>Approved first <a href="#">compliance and ethics annual report</a> and second <a href="#">compliance and ethics work plan</a> and compliance office conferred as needed with BOT Audit &amp; Compliance Committee Chair.</p>
	<p>Compliance office chairs quarterly meetings of the University Compliance and Ethics Committee (comprised of Departmental /Divisional Compliance and Operational Leaders).</p>	<p>Met quarterly (four times), formed a conflict of interest task force, and discussed topics including foreign influence issues, diversity, and a third-party ethics hotline.</p>
	<p>Compliance office chairs University Policies and Procedures Committee.</p>	<p>Reviewed three new policies and two amended policies (see Section C below) and updated the responsible parties for all policies.</p>
	<p>Compliance office chairs the HIPAA Task Force.</p>	<p>Met four times either as a full group or a subcommittee; discussed telehealth and mobile device security and best practices.</p>
	<p>Compliance office participates on the Pre-Collegiate Programs Advisory Group.</p>	<p>Met four times; w</p>

	Provide oversight on new legislative and BOG compliance requirements, including new financial processes and reporting requirements.	Compliance participated in the BOG-Crowe financial audit and provided oversight for CARES compliance.
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	Provide oversight to potential rule changes on the FTC’s Safeguards Rule re expanded information security requirements for “customer information”.	FTC Safeguard Rule implementation is still pending.
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New University-wide policies: (i) [Clean Desk and Clear Screen](#); (ii) [Reporting Foreign Gifts & Contracts](#); and (iii) [Information Security Roles and Responsibilities](#).

Updated University-wide policies: (i) [System and Data Classifications](#) and (ii) [Environmental Health & Safety](#).

Regulation updates: (i) [Restrictive Covenants](#); (ii) [Exceptional Circumstances Withdrawal](#); (iii) [Student Financial Aid](#); and (iv) [Textbook and Instructional Materials Affordability](#).

Updated immigration policies,

**D. Effective Lines of Communication**

<u>C</u>	<u>P</u>	<u>O</u>
Open lines of communication are critical to early detection and identification of issues. Continued use of communications tools helps foster an environment of open, honest, and effective communications.	Maintain, update and promote the Compliance and Ethics Website.	Ethics updates completed. Ongoing,
	Streamline Title IX and other reporting areas.	Student Affairs and OEI worked together to launch the “ <a href="#">Report a concern</a> ” webpage with reporting directions for all areas of concern.
	Coordinate timely responses to regulatory and other external agencies.	Closed 131 OEI matters (five (5) external and 126 internal) with an average timeframe for internal matters of 61 days from open to close and an average response time to external agencies of 14 days.
	Coordinate communications with new Inspector General.	Deferred to FY21 (or the hiring of the new IG)

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COVID-19: Various communication plans, including without limitation, the



**F. Audit and Monitoring**

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**G. Enforcement and Discipline**

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Incentives for employees to engage in conduct in accordance with laws, rules, and policies, and, conversely, appropriate disciplinary measures when employees engage in conduct which is non-compliant.

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OIT: Updated information security incident response plan and associated playbooks.

EH&S: Updated charters for the University Safety Committee and the University Radiation Safety Committee.

FAU Health Units: Proactive measures for clinical units to quickly enable TeleHealth during COVID-19 pandemic addressing required consents and attestations.

DoR: Taking proactive steps to address foreign influence in research by: (i) meeting with University administration and FBI, (ii) hosting a town hall meeting with the FBI with FAU researchers and administration on November 1, 2019, (iii) launching an enhanced website with [Guidelines for International Research Collaborations](#), and (iv) hosting webinar(s) on "Global Engagement and "Foreign Influence" in Research – Practical Guidance for a Changing Landscape.

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