FLORIDA ATLANTIC UNIVERSITY
COMPLIANCE AND ETHICS ANNUAL REPORT
FY 2018-19

A. Executive Oversight	
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.	**Board of Trustees (BOT) Compliance and Audit Committee** Approved FAU's initial Compliance and Ethics Program (October 2018) Approved Compliance and Ethics Work Plan for FY2019-20 Regular communications between the Chief Compliance and Ethics Officer and the Audit and Compliance Committee Chair (Trustee Davis)
	University Compliance and Ethics Committee Created (Oct 2018) and convened three times Comprised of Departmental/Divisional Compliance and Operational Leaders Conducted heat mapping activity re risk and impact Completed University-wide compliance inventory
	University Policies and Procedures Committee Completed five new policies (see Section C. below) Amended four existing policies (see Section C. below)
	HIPAA Task Force Reconvened in February 2019 Updated HIPAA Notice of Privacy Practices Created new HIPAA-compliant Fundraising Policy re PHI
	Pre-Collegiate Programs Advisory Group Restructured to focus on compliance

Prepared new External Email header to alert users to messages sent from outside the University

Deployed newer full disk encryption technologies to

C. Regulations and Policies	

University regulations and policies are necessary to: (i) to meet compliance and/or regulatory requirements, (ii) promote or enhance risk reduction, ethical conduct, and mitigation efforts, and (iii) set standards, processes, and expectations.	**New University Policies**
	    Waiver of Tuition and Fees Policy
	    Religious Accommodations Policy for Employees
	    Information Security Policies (delegates data policies to data committee)
	    Cloud Service Providers
	    General Privacy Policy

	Amended University Policies
	    Social Media Policy
	    Systems and Data Classifications Policy
	    Responsible Use of Data Access Policy
	    Acceptable Use of Technology Resources Policy

	Amended University Regulations
	    Student Code of Conduct (amendments)
	    Admission Requirements and Enrollment Limitations (amendments)
	    Institutes and Centers (amendments)
	    Health Insurance for International Students (amendments)
	    Exceptional Circumstances Withdrawal
	    Anti-Discrimination/Anti-Harassment
	    Tuition, Fee Schedule and Percentage of Cost
	    University Direct-Support Organizations

	HIPAA
	    Created new HIPAA-compliant PHI Fundraising Policy
	    Updated Notice of Privacy Practices

	Other
	    Division of Research (DoR) created new policies for intellectual property terms in industry-sponsored research agreements and reporting to appropriate government agencies
	    CoM developed many new and updated policies for their 2020 first reaccreditation site visit, including policies addressing conflicts of interest in academic evaluations and diversity and inclusion
	    Student Health Services (SHS) updated its policy regarding the treatment of minors and enacted new policies covering chaperones, patient dismissal, medical care for individuals with intellectual disabilities, general

D. Effective Lines of Communication	

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.	**Websites**
	  Updated Compliance and Ethics Website
	  Updated EIC Website
	  Updated Athletics Compliance Website

	EIC
	  Instituted Maxient Case Management for all EIC matters
	  Developed standardized letters and reports within EIC
	  Developed case procedure manual
	  Developed protocol to inform DoR on grant recipient/PI matters in EIC for new NSF reporting requirements
	  Received 86 new Title IX/Harassment/Discrimination matters (80 internal; 6 external with 4 external agencies (OCR, FCHR, EEOC, PBEOE) and closed 86 cases

E. Education and Training	
Compliance and ethics training is a foundational element of an effective compliance program.	**Ethics** Launched on-line ethics training for new employees as part of onboarding and for BOT

	Title IX
	  Provided ATIXA Title IX Investigator Level I & Hearing Board Training Certification for 36 FAU Employees
	  Provided Title IX, Harassment and Discrimination training to all new employees and students

	Research
	  "The Importance of Compliance in Research" presented by AVP for Research, Office of Research Integrity
	  Four training sessions explaining tech development policy
	  Lunch hour series (allowable costs on federal projects)
	  Collaborative Inter-Institutional Trainings (CITI)
	  Three grants management training sessions

	Athletics
	  Created Athletics Bylaw Briefs (reminders to coaches)
	  Provided NCAA rules education to all sports

	ADA Website accessibility standards and best practices

	OIT
	  92 new users completed PCI training
	  760 new users completed Security Awareness training

	Police Multiple trainings, including active threat assessment and rape aggression defense
	Health Affairs 429 new users completed HIPAA training

F. Audit and Monitoring

Regular, rigorous review of University programs and operations allows issues to be identified early and remedied quickly. Continuous assessment is critical to ensuring an efficient, effective, and compliant w-2(pl

H. Response and Prevention

Research

Ensure reasonable steps are taken to respond to complaints, especially complaints of compliance violations and/or unethical conduct. Corrective action helps prevent similar issues from occurring in the future.

College of Education has developed two for-credit courses on "Responsible Conduct of Research", one for undergraduates and one for graduate students. First courses will be offered summer 2019. Talking with Graduate College, OURI and Deans to encourage participation and awareness.

Combating Trafficking in Persons notification (required for federal grants)4ea4 TwW4p1(um)-2(mduc)2tion andsgT4c.84 (e)4(F(