

# **Coordinated Compliance, Policy, and Ethics Program**

Annual update May 2018 – April 2019

**University of North Carolina Wilmington**

**Office of General Counsel**

**Jim Koebel – Assistant General Counsel for Compliance**

# Executive Summary

This report summarizes compliance-related activities conducted since the last annual update in April 2018.

## Compliance Activities and Initiatives

### Completed Projects

Randall Library digitization copyright

### In-Progress Projects

“Compliance 101” training  
Threat Assessment protocol  
Drug Free Schools and Communities Act

### Ongoing Activities

Compliance calendar  
Compliance reporting  
Compliance Committee  
Committee service

## Policy Review and Creation

### Completed Reviews and Revisions

Conflict of Interest or Commitment  
Ethics  
Weapons on Campus  
Workplace Violence Policy and Protocol  
Interaction with Media  
Marquee  
Improper Relationships Between Students and Employees

### In-Progress Reviews and Revisions

Disability Accommodations for Students  
Various Office of University Relations (OUR) policies

### Planned Policies

Section 504/ADA Coordination and Student Grievances  
Disability Accommodations for Staff  
Unmanned Aerial Vehicles (Drones)  
Data Management  
Social Media & Media Access Guidelines

## Ethics

Ethics policy revision  
Departmental presentations of Conflict of Interest and Commitment requirements  
COI policy revision  
COI online training module

## Other

HIPAA assessment  
Campus trainings

Compliance Program Pillars		
Compliance	Policy	Ethics

**Compliance**

*“Compliance” includes myriad legal and operational obligations. The compliance function of the Program primarily encompasses legal obligations with a reporting or filing deadline, but also addresses day-to-day legal standards.*

Completed Projects

- ❖ Randall Library digitization copyright

Randall Library will collect information, in the form of a worksheet completed by faculty, prior to processing certain requests for copyrighted media in the classroom. The information will ensure compliance with copyright requirements when faculty request to have media converted from one format to another.

Ongoing Projects & Initiatives

- ❖ Compliance calendar

Housed on the compliance website, a campus-wide compliance calendar lists filing and reporting deadlines as well as programmatic compliance owners (for example, the Director of Title IX and Clery Compliance is responsible for posting the Annual Security Report by October 1). The calendar is intended to ensure transparency and clarity with respect to various compliance obligations. The centralized maintenance of an up-to-date compliance inventory will facilitate the University’s encouragement of legal compliance. A calendar has been posted to the compliance website, with additional data to be added as an ongoing project.

- ❖ Compliance reporting

A system to report compliance projects, needs, and trainings is being piloted. The reporting system is reflective of best practices and is intended to facilitate communication with the Assistant General Counsel for Compliance and prioritization of projects.

- ❖ Compliance Committee

A committee of stakeholders exists and occasionally meets to discuss specific compliance goals/projects and policies.

- ❖ University committee/workgroup service

- ADA/Section 504 Committee

- Athletics Title IX Review Board
- Clery Committee
- Data Governance Committee
- Drone Committee
- ERM Committee
- ERM Workgroup: Minors on Campus
- Health Insurance Portability and Accountability Act (HIPAA) Committee
- Information Technology Advisory Committee (ITAC)
- Institutional Research Board (IRB)
- Institutional Animal Care and Use Committee (IACUC)
- Military Affairs Advisory Board
- SACS Re-Accreditation Workgroup
- Title IX Advisory Committee

### In-Progress Projects

- ❖ “Compliance 101” training

Brief subject matter trainings that highlight university policy and procedures are being developed to provide to new and existing employees. The trainings will complement existing New Employee Orientation programming.

- ❖ Threat Assessment protocol for staff, faculty, and students

The Threat Assessment Team is improving the process for evaluating potential situations to ensure consistency and incorporate best practices.

- ❖ Drug Free Schools and Communities Act

In conjunction with the Office of Title IX and Clery Compliance and other units in the Division of Student Affairs, review compliance with DFSCA.

### **Policy**

*Policies address issues with university-wide impact, can ensure compliance with external standards, and create internal mechanisms for achieving operational goals. The policy function of the Program focuses on the ongoing review and updating of existing policies, as well as the creation of policies to respond to new legal requirements and/or emerging higher education issues.*

### Completed Reviews

- ❖ 03.230 Conflict of Interest or Commitment

In conjunction with the Director of the Research Integrity Office, reviewed, clarified, and revised in accordance with System policies.

❖ 02.310 Ethics

Clarified ethical responsibilities related to gifts, annual filings for certain individuals, training, and the positions of Ethics Liaison and Legislative Liaison.

❖ 05.501 Weapons on Campus

In conjunction with University Police, revised in accordance with State law.

❖ 08.540 Workplace Violence Policy and Protocol

In conjunction with Threat Assessment Team, reviewed for compliance and updated per revised State policy.

❖ 02.510 Interaction with Media

❖ 02.560 University Marquee

In conjunction with Office of University Relations (OUR), revised to reflect current practices and affirm academic freedom and free speech principles.

❖ 02.220 Improper Relationships Between Students and Employees

In conjunction with HR, reviewed for compliance and clarified university stance.

In-Progress Reviews/Revisions

❖ 04.190 Disability Accommodations for Students

In conjunction with Director of Disability Resource Center and ADA/504 Coordinator & Committee, review existing processes and grievance procedures.

❖ 0\_.\_\_\_ Mass Emails

In conjunction with OUR, Research Integrity Office, Institutional Research and Planning, and Information Technology Services, revise to reflect current practices and ensure compliance with confidentiality and research protocol standards.

❖ 02.550 University Photography

❖ 02.530 University Advertisements

❖ 02.500 Communications for Public Distribution

In conjunction with OUR, revise to reflect current practices, ensure compliance with confidentiality standards, and affirm academic freedom and free speech principles.

Planned Policies

❖ 0\_.\_\_\_ Section 504/ADA Coordination and Student Grievances

In conjunction with ADA/504 Coordinator, establish policy to reflect new role and for federal compliance.

❖ 0\_.\_\_\_ Disability Accommodations for Staff

In conjunction with Human Resources, create new policy to address accommodation request procedures, standards, and grievance processes.

❖ 0\_.\_\_\_ Unmanned Aerial Vehicles (Drones)

In conjunction with SPARC, create new policy to address parameters for obtaining and flying drones; develop processes for risk management (e.g., insurance requirements, liability waivers); address use of drones by various constituencies (e.g., faculty, student organizations, third parties).

❖ 0\_.\_\_\_ Data Management

Led by Office of the Provost & Data Governance Committee, implement data classification standards and roles for ensuring data protection.

❖ Social Media Guidelines

❖ Media Access Guidelines

In conjunction with OUR, create guidelines to ensure consistent and appropriate application of media standards while safeguarding academic freedom and free speech principles.

## Ethics

*UNCW's existing commitment to an ethical workplace culture is embodied in Policy 02.310, Ethics. Ethical conduct includes legal compliance in addition to abiding by professional standards and codes of conduct, and applies to all members of the university community in all of its academic and administrative operations. The ethics function of the Program seeks to ensure: (i) reporting processes are available and made known, (ii) subject-specific policies contain appropriate ethical standards, and (iii) accountability exists.*

❖ No ethics-related issues have been reported within the Compliance program from May 2018 – to April 2019.

❖ UNCW Ethics policy (02.310) has been substantially revised and updated.

❖ In conjunction with the Director of the Research Integrity Office, UNCW's Conflict of Interest or Commitment policy (03.230) and procedures have been revised and approved.

❖ The Director of the Research Integrity Office and Asst. General Counsel for Compliance have delivered departmental trainings/presentations on COI reporting requirements and developed an online, on-demand training module.

## Other

- ❖ HIPAA Risk Analysis

HIPAA Committee is reviewing consultant analysis of campus HIPAA controls, activities, and opportunities.

- ❖ Trainings

Delivered annual LEAD UNCW module by Office of General Counsel. Delivered ADA/Section 504 training.