Coordinated Compliance, Policy, and Ethics Program

Annual update May 2019 – April 2020

University of North Carolina Wilmington
Office of General Counsel
Jim Koebel – Associate General Counsel
Executive Summary
This report summarizes compliance-related activities conducted since the last annual update in April 2019.

Compliance Activities and Initiatives
Completed Projects
- Threat Assessment protocol
- PCI third-party compliance

Ongoing Activities
- Compliance calendar
- Committee service

In-Progress Projects
- “Compliance 101” training
- Faculty clinical assignment requirements

Policy Review and Creation
New Policies
- DoD MOU
- Unmanned Aircraft Systems (Drones)

Completed Policy Reviews and Revisions
- Temporary SHRA Employees
- Student Disability Grievance Procedure
- HRL Solicitation & Posting

In-Progress Policy Reviews and Revisions
- Protection of Minors
- Employment Policy for Library Faculty
- Mass emails

Planned Policy
- Disability Accommodations for Staff

Ethics
- Nothing to report

Other
- Campus trainings
Coordinated Compliance, Policy, and Ethics Program
Annual Update for the Period May 2019 – April 2020

Compliance Program Pillars

<table>
<thead>
<tr>
<th>Compliance</th>
<th>Policy</th>
<th>Ethics</th>
</tr>
</thead>
</table>

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

- Threat Assessment protocol for staff, faculty, and students

  The Threat Assessment Team has developed and implemented modifications to its process for evaluating potential situations to ensure consistency and incorporate best practices.

- Payment Card Industry third-party compliance

  PCI Committee developed contractual terms for vendors processing credit card transactions.

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 must post 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.

- University committee/workgroup service

  - ADA/Section 504 Committee
  - Clery Committee
  - Data Governance Committee
  - ERM Committee
  - 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
  - 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. Trainings about conflicts of interest and copyright have been completed.

- Nursing faculty clinical assignment requirements

  In conjunction with the School of Nursing, develop and implement policy and procedures for ensuring compliance with various contractual requirements.

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.

New Policies

- Department of Defense MOU recruitment policy

  Created policy to address regulatory requirements regarding recruitment of service members and compensation restrictions for admissions and financial aid staff.

- 05.450 Interim Policy on the Purchase and/or Operation of Unmanned Aircraft Systems (Drone Policy)

  In conjunction with multiple campus stakeholders, created new policy to address parameters and risk management standards for obtaining and flying drones by various constituencies (e.g., faculty, student organizations, third parties).

Completed Reviews

- 08.130 Employment of Temporary SHRA Employees and Additional Campus Employment of SHRA Employees

  In conjunction with Human Resources, revised to comply with System-level changes and current practices.

- Student Disability Grievance Procedure

  In conjunction with ADA/504 Coordinator, revised policy for investigation and redress of student grievances regarding campus access and accommodation.

- HRL Solicitation & Posting policies
In conjunction with Housing and Residence Life, reviewed and revised policies on solicitation and posting to address First Amendment and privacy concerns.

In-Progress Reviews/Revisions

- **02.250 Protection of Minors**
  
  Revise to comply with recent System policy and incorporate risk management practices.

- **Employment Policy for Library Faculty**
  
  In conjunction with University Librarian, revise processes for clarity and consistency with UNC System Code and UNCW Faculty Handbook.

- **Mass Emails**
  
  In conjunction with OUR, Research Integrity Office, Institutional Research and Planning, and Information Technology Services, revise to reflect current practices, incorporate privacy concerns, and ensure compliance with confidentiality and research protocol standards.

Planned Policy

- **0__.___ Disability Accommodations for Staff**
  
  In conjunction with ADA/504 Coordinator and Human Resources, create new policy to address accommodation request procedures, standards, and grievance processes.

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 2019 – to April 2020.

Other

- **Trainings**
  
  Delivered:
  
  - Annual Office of General Counsel LEAD UNCW module
  - Copyright training to academic departments
  - New supervisor training