Coordinated Compliance, Policy, and Ethics Program

Annual update May 2020 – April 2021

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 2020.

Compliance Activities and Initiatives

Completed Projects
- Professional licensure disclosures
- Student emotional support animal (ESA) accommodations processes
- Faculty clinical assignment requirements

In-Progress Projects
- Privacy in data requests
- NCAA Title IX disclosure process

Ongoing Activities
- Compliance calendar
- Committee service

Policy Review and Creation

New Policies
- Reasonable Accommodations (Employees)

Completed Policy Reviews and Revisions
- Freedom of Expression by Non-University Individuals/Groups
- Social Media Guidelines

In-Progress Policy Reviews and Revisions
- Unmanned Aerial Aircraft (Drones)
- Sponsored Research
- EHRA Faculty and Non-Faculty Recruitment and Selection

Ethics
- Nothing to report

Other
- Campus trainings
Coordinated Compliance, Policy, and Ethics Program

Annual Update for the Period May 2020 – April 2021

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

- Professional license disclosures
  
  With academic administrators, developed processes to implement federal regulations requiring disclosures to students regarding programs that lead to professional licensure and out-of-state licensure criteria.

- Student emotional support animal (ESA) accommodations processes
  
  With Director of Disability Resource Center, reviewed and revised request process & forms for student ESA accommodations in light of recent federal guidance.

- Faculty clinical assignment requirements
  
  With the School of Nursing, developed and implemented policy and procedures for ensuring compliance with various contractual requirements.

In-Progress Projects

- Privacy in data requests
  
  With the Office of Institutional Research and Planning, review and enhance safeguards for data privacy in requested data analyses and reports.

- NCAA Title IX disclosure process
  
  With Athletics and Title IX Director, develop and implement process for compliance with NCAA Board of Governors requirement regarding disclosures of Title IX misconduct information from student-athletes.

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 ensures transparency and clarity with respect to various compliance obligations. The centralized maintenance of an up-to-date compliance inventory facilitates 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
  - Embracing R2 workgroups
  - ERM Committee
  - Faculty Search Committee Process Improvement workgroup
  - 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
  - Telework Work Group
  - Title IX Advisory Committee

**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**

- 0._.___ Disability Accommodations for Staff
  
  With Human Resources, created new policy to address existing accommodation request procedures, standards, and grievance processes.

**Completed Reviews**

- 02.340 Freedom of Expression by Non-University Sponsored Individuals or Groups
  
  With Student Affairs, updated to reflect current processes for protection of free speech rights of non-university groups/individuals and university time, place, and manner guidelines.

- Social Media Guidelines
Coordinated Compliance, Policy, and Ethics Program
Annual Update for the Period May 2020 – April 2021

With OUR, updated guidance and standards for university-affiliated social media accounts.

In-Progress Reviews/Revisions

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

Update policy and approval processes to address new federal standards permitting certain flights occurring at night and/or over people.

- 08.111 Recruitment and Selection of EHRA Non-Faculty Positions
- 08.___ Recruitment and Selection of EHRA Faculty Positions

Advise HR and AARM on pending revisions to recruitment and selection processes.

- Sponsored Research policies

Led by Research Office, review and update sponsored research policies to align with current regulations and R2 status.

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 2020 – to April 2021.

Other

- Trainings delivered:
  - Annual Office of General Counsel LEAD UNCW module
  - New supervisor training
  - ADA reasonable accommodations