



Board of Trustees Audit & Compliance Committee

Tuesday, May 25, 2021

9:40 – 10:40am

Microsoft Teams Virtual Meeting

Trustees Sandra Callahan, Chair; Oscar Horton, Shilen Patel

A G E N D A

I. Call to Order and Comments

Chair



















# 2020 Annual Report

Office of Compliance & Ethics























RI LWV FRPSOLDQFH DQG HWKLFV UHFRPPHQGDWLRQV  
UHVSQRVLELOLWLHV RI &RPSOLDQFH (WKLFV DUH VHW IF  
SURJUDP SODQ SXUVXDQW WR &KDSWHU 3DUW % 6HFV  
\*XLGHOLQHV DQG %2\* 5HJXODWLRQ

86) 3ROLF\ 2IILFH RI &RPSOLDQFH R\WKERPSOLI  
HWKLFV SURJUDP ZLWK WKH DXWKRULW\ WR FRRUGLQ  
DQG HWKLFV DFWLYLWLHV

86) 2IILFH RI &RPSOLDQFH LGHQWLIFY WKH  
UHVSQRVLELOLWLHV RI RXU FRPSOLDQFH DQG HWKLFV

86) &RPSOLDQFH (WKLFV SURJUDP SODQ VXPPDULJHV  
VWDWXV RI RXU FRPSOLDQFH DQG HWKLFV SURJUDP

& &RPSOLDQFH 2IILFHUV :RUNJURXS

7KH &RPSOLDQFH 2IILFHUV :RUNJURXS DVVLVWV WKH &&2  
EURDG EDVHG SURJUDP GHVLJQHG WR SUHYHQW PRQLWRU  
DQG ZKHQ QHFHVVDU\ WR IXOO\ PHHW FRPSOLDQFH UHTX  
DFWLRQV 7KLV ZRUNJURXS LV FRPSULVHG RI VHQLRU FRP  
ULVN' FRPSOLDQFH XQLWV ZLWKLQ 86)

\$WKOHWLFV &RPSOLDQFH  
(QYLURQPHQWDO +HDOWK 6DIHW\  
5HVHDFK ,QWHJULW\ &RPSOLDQFH  
'LYHUVLW\ ,QFOXVLRQ (TXDO 2SSRUWXQLW\  
3URIHVVLQRQDO ,QWHJULW\ 3URJUDP 86) +HDOWK  
,QIRUPDWLRQ 7HFKQRORJ\ 6HFXULW\

&RPSOLDQFH (WKLFV \$QQXC





3HUIRUPHG LQVSHFWLRQV RI ODERUDWRULHV XVL  
3URYLGHG ELRVDIHW\ WUDLQLQJ WR LQGLYLGX  
5HVSRQGHG WR VHYHQ ELRVDIHW\ LQFLGHQW UHSR  
&RRUGLQDWHG D VXFFHVIXO &'& UHJLVWUDWLRQ (I  
86) 6HOHFW \$JHQW SURJUDP  
7KH ,QVWLWXWLRQDO %LRVDIHW\ &RPPLWWHH ,%&  
UHVHDFK SURMHFWV DQG FRQLQXLQJ UHYLHZ\

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KRVWHG VHYHQ YLUWXDO GURS LQ 4 \$ VHVVLQRQV SI  
WR WKUHH 'HSDUWPHQWV 'LYLVLRQV UHVSRRQGHG W  
3DUWLFLSDWHG DV NH\ VWDNHNKROGHU LQ WKH 86  
ZRUNIORZV (+5 EHVW SUDFWLFHV DQG RQJRLQJ VXS  
UHJXODWRU\ FRYHUDJH SROLFLHV GRFXPHQWDWLRC  
3LORWHG D ULVN EDVHG SURYLGHU VHUYLEFH PRQLV  
FODLPV DQG UHODWHG SURYLGHU HGXFDWLRC  
&ROODERUDWHG ZLWK UHYHQXH F\FOH WR YDOLGDW  
ZRUNIORZV DQG VWDII F69(H)400V 7969(R)-0.1-0.832031(I)-0.832031

&RPSOLDQFH (WKLFV \$QQXD



,QIRUPDWLRQ 6HFXULW\ HQVXUHV WKH VHFXULW\ RI 86) I  
WKLW UHSRUWLQJ SHULRG LQFOXGH

:RUNHG ZLWK ([WHUQDO FRQVXOWDQWV ZKR ZHU  
DVVHVVPHQW RI WKH +,3\$\$ HQYLURQPHQW DW 86) 3  
6WRUDJH 2QH'ULYH DQG %R[ GHSOR\PHQW RQ FDPS  
&RQWULEXWHG WR WKH SODQQLQJ DQG GHSOR\PHQV  
RI \$\$\$OLHG 7HFKQRORJ\ '62  
3DUWLFLSDWHG LQ H[WHUQDOO\ GULYHQ JDS DQDC  
&\EHUVHFXULW\ 0DWXULW\ 0RGHO &HUWLILFDWLRQ  
UHTXLUHG IRU ZRUN ZLWK &RQWUROOHG 8QFODV  
&RQWUROOHG UHVHDFK 7KH JDSV LGHQWLILHG ZHI  
3DUWLFLSDWHG LQ PXOWLSOH LQFLGHQW LQYHVWLJ  
2IILFH RI ,QWHUQDO \$XGLW ,QWHUQDO \$XGLW \*HQ  
,QWHJULW\ 2IILFH GHWHUPLQLQJ WKH VHYHULW\ RI  
IRU EUHDFK QRWLILFDWLRQ WR DSSURSULDWH VWDW  
\$VVHPEOHG GRFXPHQW ZLWK OHVVRQV OHDUQHG I  
SDQGHPLF UHODWHG FKDQJHV LQ WKH ZRUN HQYLUR  
RWKHU 86) VWXGHQWV IDFXOW\ DQG VWDII 7KLV  
'LVDVWHU 5HFRYHU\ WDEOHWRS H[HUFLVH  
5HYLHZHG DQG XSGDSO#(W18)-0.167969(8)-0.167969(8)-0.16

&RPSOLDQFH (WKLWV \$QQXD

' 6WDWH 8QLYHUVLW\ 6\ VWHP RI )ORULGD &RPSOI

,Q DGGLWLRQ WR EHLQJ WKH ILUVW FRPSOLDQFH DQG HWK  
686 LQVWLWXWLRQ DQG WKH ILUVW 686 LQVWLWXWLRQ V  
ZH FRQWLQXHG RXU SDUWLFLSDWLRQ LQ WKH 686 &RPSOLD  
7KH &RQVRUWLXP ZDV HVWDEOLVKHG RQ -XQH WR  
XQLYHUVLWLHV WR GLVFXVV WKH GHYHORSPHQW DQG LPSI  
SURJUDPV QHZ IHGHUDO DQG VWDWH UHJXODWLRQV EH  
IDFLQJ ,Q DGGLWLRQ WKH SXUSRVH RI WKH FRQVRUWLX  
DQG FRODERUDWLRQ LQ WKH GHYHORSPHQW RI FRPSOLD  
7KH FRQVRUWLXP LV FRPSULVHG RI &KLHI &RPSOLDQFH 2II  
UHVSHFWLYH FRPSOLDQFH DQG HWKLFV SURJUDPV ZLWKLQ  
PHPEHUV WKH ,QVSHFWRU \*HQHUDO DQG 'LUHFWRU RI &R  
IURP WKH 686 )ORULGD %RDUG RI \*RYHUQRUV

'XULQJ WKLW UHSRUWLQJ SHULRG RXU LQDXJXUDO &KLHI &  
VHUYLQJ IRU WZR \HDUV DV FKDLU RI WKH FRQVRUWLXP  
7KH &RQVRUWLXP FRQWLQXHG LWV ZRUN WR ILQDOLJH WKH  
UHYLHZ RI RXU FRPSOLDQFH DQG HWKLF SURJUDP %2\* 5  
LQVWLWXWLRQV WR EHJLQ WKLW UHYLHZ RQ RU EHIRUH 1R

(OHPHQW (VWDEOLVK 6WDQGDUGV RI

&RPSOLDQFH (WKLFV \$QQXD



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(OHPHQWV &UHDWH D )DLU DQG (W  
&RPPXQLFDWLRQ

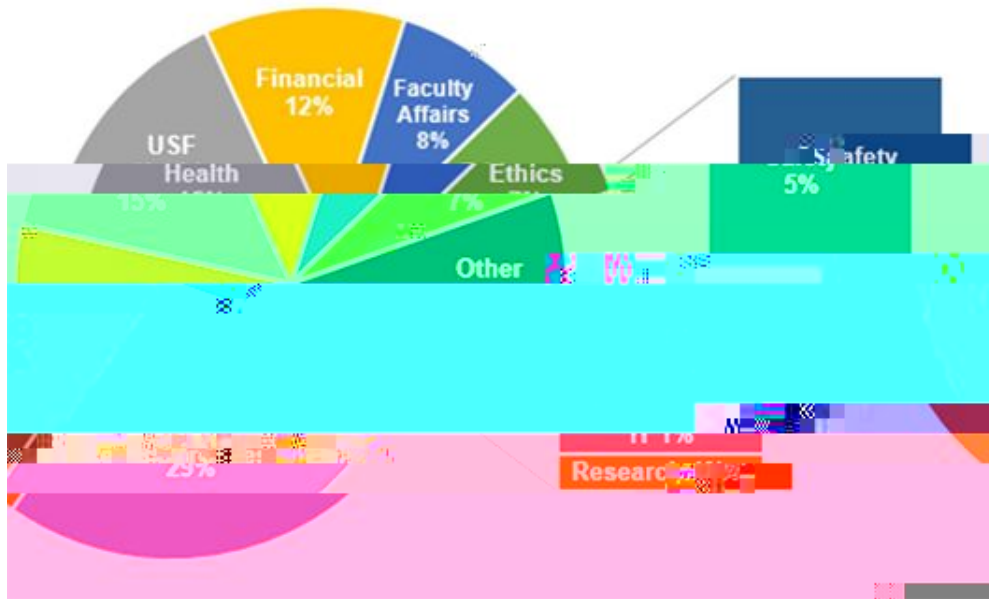
8QGHU WKH SURYLQVLRQDWLRQ :DVWH )UDXG RU )LQD  
3UHYHQWLRQ DQDOOH86)FDQDJHUV DQG WKHLU HPSOR\HH'  
SUHYHQWLQJ GHWHFWLQJ DQG UHSRUWLQJ ZDVWH IUDX  
YLRODWLRQV RI 86) SROLF\ RU UHJXODWLRQ

(WKLQV3RLQWŠRXU WKLUG SDUW\ KRVWHG KRWOLQHŠHQDEO  
WKH 86) FRPPXQLW\ WR VDIHO\ VHFUHO\ DQG DQRQ\PRXVC  
PLVFRQGXFU IUDXG DEXVH DQG RWKHU YLRODWLRQV RI 8  
RI WKH SULPDU\ WRROV DVVLVWLQJ 86) LQ RXU HIIRUWV  
FRPSOLDQFH'

'XULQJ FDOHQGDU \HDU ZH DGGUHVHVG UHSRUWV 2  
UHPDLQH G LQ SURFHVV E\ \HDU HQG 2I WKH FOR  
VXEVDQWLDWHG ZHUH XQVXEVDQWLDWHG DQG  
3UHIUUHG' ZKHQ WKH UHSRUWHG LQFLGHQW IDOOV RXWVLG  
PDWWHUV LQYROYLQJ IDFXOW\ RU VWXGHQWV 3OHDVH VHH  
LQIRUPDWLRQ E\ SULPDU\ LVVXH

&RPSOLDQFH (WKLQV \$QQXD'

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2XU SURJUDP SURYLGHV FRPSOLDQFH DQG HWKLFV WUDL  
HPSOR\HHV DV IROORZV

2QOLQH FRPSOLDQFH DQG HWKLFV WUDLQLQJ UHTXLU  
HPSOR\HHV RQ WKH 7DPSD FDPSXV DV SDUW RI QHZ HP  
DGPLQLVWHUHG E\ WKH +XPDQ 5HVRXUFHV 'XULQJ  
FRPSOHWHG WKLV WUDLQLQJ  
:H UHFHLYHG QR WUDLQLQJ UHTXHVVV IRU LQ SHUVRQ  
WR &29,' LQ SHUVRQ WUDLQLQJ UHVWULFWLRQV  
2QH RQ RQH RULHQWDWLRQ VHVVLRQV ZLWK QHZ  
DGPLQLVWUDWLRQ DQG HPSOR\HHV ZKLFK LV SURYL  
UHSUHVHQWDWLYHV FRQWLQXHV WR XVH PDWHULDOV

% &RPSOLDQFH (WKLFV 7UDLQLQJ IRU &XUUHQW

&HUWDLQ 86) HPSOR\HHV DUH UHTXLUHG WR FRPSOHWH  
)&2( GLVFORVXUH LQ H'LVFORVH RXU RQOLQH GLVFORVX  
LQFOXGHV HGXFDWLRQ RQ FXUUHQW )&2( QHSRWLVP DC  
UHVWULFWLRQV XQG 86) WKLFV &2(7DPSD IROORZLQJ HPSOR\H

&RPSOLDQFH (WKLFV \$QQXD

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:KHQ VXFK JDSV DUH LGHQWLILHG RXU SURJUDP FRQYHQH\  
DQG LPSOHPHQW FURVV MXULVGLFWLRQDO SROLFLHV DQG S  
JDSV LQFOXGLQJ HQIRUFHPHQW

\$ )RUP 2QH )LQDQFLDO ,QWHUHVW 'LVFORVXUH

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FRQVXOWLQJ SURMHFWV IRU NQRZQ RU VXVSHFWHG FRPSOL  
DULVH ZKHQ 86) KDV QR NQRZQ LQWHUQDO FRQWUROV RU H[  
ODZ RU LQGXVWU\ EHVW SUDFWLFHV 6XFK UHYLHZV DVVH'  
RIILFH DLP WR EULQJ WKH SURFHVV RU XQLW LQWR FRPSO  
LQVWLWXWLRQ %HORZ LV D GLVFXVVLQJ RI FRPSOLDQFH  
FRQVXOWLQJ SURMHFWV SHUIRUPHG E\ RXU SURJUDP WKLV I

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SURWHFWLRQ DQG SULYDF\ ULJKWV IRU SHUVRQDO GDWD S  
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UHJDUGOHVV RI WKHLU ORFDWLRQ ZKHQ WKHLU SHUVRQDO

,QVWLWXWLRQV IDLQLQJ WR FRPSO\ ZLWK WKH \*'35 PD\ EH  
¼ 0 0 RU DQQXDO JOREDO WXUQRYHU ZKLFKHYYHU  
UHFHQWO\ ILQHG \*RRJOH 0 IRU YLRODWLQJ WZR SU  
WUDQVSDUHGF\ DQG QRW K69(H)-0.152340003

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 &RGH RI (WKLFV )&2( GLVFORVXUH UHTXLUHPHQW DV V  
 HPSOR\HHV PXVW FRPSOHWH DQ )&2( GLVFORVXUH ZLW  
 HPSOR\PHQW VWDUW GDWH (PSOR\HHV UHFHLYH WKUHH  
 PRVW UHFHQW )&2( GLVFORVXUH ,Q DGGLWLRQ RXU \$UF  
 'LVFORVXUH &RPSOLDQFH 5HSRUWV )&2( 5HSRUWV LGHQ  
 SXUYLHZ ZKR DUH UHTXLUHG WR FRPSOHWH DQ DQQXDO )  
 WKH\ KDYH GRQH VR ZLWKLQ WKH SDVW PRQWKV 6HQLR  
 IROORZ XS ZLWK QRQRPSOLDQW HPSOR\HHV WR HQVXUH  
 GLVFORVXUH LQ H'LVFORVH

'XULQJ RXU PRQLWRULQJ DQG VXEVTXHQQ IROORZ XS  
 RYHUDOO )&2( GLVFORVXUH FRPSOLDQFH UDWK RI IRU &  
 PHHWLQJ WKHLU DQQXDO )&2( GLVFORVXUH UHTXLUHPHQW



& \$QQXDO 6SRQVRUHG 5HVHDFK ([HPSWLRQ 5HS  
 7KH )ORULGD &RGH RI (WKLFV IRU 3XEOLF 2IILFHUV DQG  
 HPSOR\HHV IURP KDYLQJ HPSOR\PHQW RU FRQUDFWXDO  
 DOVR GRLQJ EXVLQHV ZLWK WKH 86) XQOHVV DQ H[HPSV  
 7KHUH DUH PXOWLSOH H[HPSWLRQV DIIRUGHG XQGHU WKH  
 5HVHDFK ([HPSWLRQ 65( ZKHQ DSSURYHG E\ WKH 3UH  
 &KDLU PXVW EH UHSRUWHG WR WKH )ORULGD \*RYHUQRU  
 86) HPSOR\HHV GLVFORVH VXFK UHODWLRQV KLSV DV SDU  
 H'LVFORVH &RPSOLDQFH (WKLFV LV UHVSRQVLEOH U  
 GHWHUPLQLQJ ZKHWKHU RU QRW DQ 65( DSSOLHV WR WKH  
 LQ FROODERUDWLRQ ZLWK 3DWHQWV DQG /LFHQVLQJ DQG  
 D PXOWL MXULVGLFWLRQDO SURFHGXUH WR HQVXUH WUDC

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UHYLHZHG DSSURYHG DQG UHSRUWHG SXUVXDQW WR VWD  
ZHUH FRPSDQLHV ZLWK ZKRP 86) HPSOR\HHV KDG DQ  
UHODWLRQVKLS HOLJLEOH IRU D 65(

&RPSOLDQFH (WKLFV \$QQXD

Agenda Item: IVc

USF



Dr. Caroline Fultz-Carver | May 25, 2021





# Cataloging Compliance Training Requirements



- Leveraged Accountable Reports in high-risk compliance areas to map employee training requirements
  - Athletics
  - Compliance and Ethics
  - Equal Employment Opportunity
  - Environmental Health & Safety
  - Human Resources
  - Information Technology Security
  - Research
  - Title IX and VAWA

# Compliance Training

## Mapping Process for Federal and State Training Requirements

### Compliance Training Requirement

- Driver: Federal or state law, university policy or regulation, etc.
- Driver Specifics

### Fines and Penalties for Noncompliance

- Summary
- Levied Against Employees
- Levied Against USF

### Responsible Unit

- Subject matter expert
- Frequency
- Modality
- SCORM compliance
- Compliance Monitoring Process

### Target Employee By:

- **Position Type**  
Faculty, Administration, Staff, or Temporary/OPS
- **Role at USF**  
Researchers, Supervisors, Mandatory Reporters under Federal Law, etc.



