

UW System  
Office of  
Compliance & Integrity

FY 2023  
Annual Plan



# Introduction

The UW System Office of Compliance and Integrity provides a centralized approach to developing and implementing an effective and impactful compliance structure at the system and institutional level, as well as promoting and maintaining a culture of ethics and integrity in our work.

When the Office of Compliance and Integrity was created, it incorporated a centralized compliance framework and structure based on Six Key Elements of an Effective Compliance Structure as identified in the Federal Sentencing Guidelines (shown below).



The Office of Compliance and Integrity also used a phased-in approach to develop the necessary governance structure and inventory to identify and understand the compliance requirements. This was and continues to be an important step in creating a long-term, sustainable compliance structure, both at the institutional level and at the UW System level. Phases 1 and 2 have been successfully completed over the past three years. We are now in Phase 3.

**Phase 1:**

Assess current state; establish governance structure for systemwide compliance.

**Phase 2:**

Develop systemwide inventory of major compliance obligations and identify responsible parties on all campuses.

**Phase 3:**

Identify high-risk compliance areas; create plans & develop resources to mitigate compliance risk in those areas.

The Office of Compliance and Integrity has worked in collaboration with each UW System institution to identify campus liaisons who will assist and support the institution in its responsibility to identify high-risk compliance areas, craft policies to codify standards for compliance, and develop tools and resources necessary to aid compliance efforts. The Office of Compliance and Integrity has and will continue to seek innovative and cost-effective ways to support institutions in their compliance efforts to mitigate new and emerging risks.

This Annual Plan provides a high-level overview of the Office of Compliance and Integrity and how it has and continues to serve the UW System and its institutions regarding compliance and ethics.

## Our Mission

To assist UW System institutions in identifying and fulfilling compliance obligations from federal law, state law, and Board of Regents policies and to promote a culture of ethics and integrity in the work done across UW-System.

## Our Guiding Principles

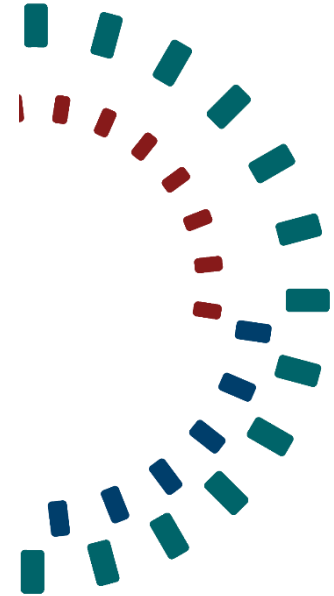
- **Integrity:** We work honestly, fairly, and in line with policies, procedures, and professional best practices.
- **Collaborative:** We strive to build trust, operate with unity of purpose, build meaningful connections, networks, and consensus, and facilitate communication and learning.
- **Objective:** We approach issues with an open mind and empathy.
- **Analytical:** We apply comprehensive, evidence-based standards, and data in assigning priorities, and we maximize efficiencies when utilizing resources.
- **Innovative:** We lead by example and use creative, cutting-edge approaches to problem-solving.
- **Growth Mindset:** We engage with others and proactively plan to enable the UW System institutions to be future ready.
- **Transparent:** We commit to openly share information about our services, to provide access and appropriate disclosure of information, and bring clarity to compliance-related policies, procedures, and guidance.
- **Service:** We are dedicated to help UW System institutions be successful with compliance and integrity-related information, policies, procedures, and guidance.
- **Outreach:** We seek to continuously assess the needs and interests of UW System institutions and respond appropriately and in a timely manner to their interests and needs.

## Our Responsibilities

- Create and maintain a centralized compliance framework and structure using the Office of Compliance and Integrity's Six Key Elements of an Effective Compliance Structure (adapted from the Federal Sentencing Guidelines) to provide compliance services to UW System and its institutions.
- Monitor internal and external compliance environments; produce reports; identify and communicate potential risks and vulnerabilities to university decision makers; and establish processes to coordinate and communicate internally regarding the UW System's compliance with federal, state, and local laws, rules, and regulations as well as institutional policies.
- Coordinate educational and training programs to ensure that members of the university community understand the compliance responsibilities relevant to their work.
- Build collaborative relationships and establish regular communication processes with compliance partners with UW System and between and among the comprehensive institutions.
- Collaborate with UW System Risk Management to evaluate and prioritize compliance risks to the UW System and develop mitigation plans to lower risks and probability of noncompliance.
- Assist management and staff in high-risk compliance areas across the UW System with development and maintenance of compliance programs.
- Provide support, guidance, and resources to institutions in areas of Title IX, Investigations of Misconduct, Clery Act, Ethics, Wisconsin Public Records Law, Youth Protection Activities, Mediation and Facilitation Services, and State Authorization of Distance Education.
- Brief the Audit Committee of the Board of Regents, the UW System President, and the UW System Risk and Compliance Council on key compliance risks and gaps within the UW System.
- Develop tools and resources to leverage expertise and share best practices among UW System institutions to address common barriers to compliance.
- Develop an annual training program, in conjunction with the Office of General Counsel, to educate and inform institutions and stakeholders on compliance-related topics of interest.
- Oversee and facilitate regular meetings and collaboration with institutional communities of practice to remain up to date on institutional issues as well as provide general updates and information on compliance related issues.

## Our Areas of Focus

- Oversight and Updates on Changes to Laws and Regulations (Compliance Matrix Management)
- Title IX and Sexual Violence Prevention
- Clery Act
- Title IX and Civil Rights Investigations
- Mediation and Facilitation Services
- Youth Protection, Data Collection and Compliance
- Public Records
- Record Management
- Ethics and Conflicts of Interest
- State Authorization of Distance Education (SARA)



## Our Team

The UW System Office of Compliance and Integrity team is a highly qualified, focused, and energetic group that approaches their work with passion, commitment, and focus so that the UW System and its institutions can focus on its goals, priorities, and mission. Please see the UWSA Office of Compliance and Integrity's webpage for staff details:

<https://www.wisconsin.edu/offices/office-of-the-president/office-of-compliance-and-integrity/>

## FY2023 Goals

This coming year provides the Office of Compliance and Integrity with an opportunity to continue to provide the high quality support, guidance and training that has been offered in the past, as well as move into the next phase of compliance services. This phase will utilize a risk-informed approach where risk assessments will be used to identify and define the level, type, and timeliness of the Office of Compliance and Integrity's services to assist institutions in the creation of compliance plans and development of resources to mitigate and respond to risks and set up processes and programs for institutional success.

The following goals are intended enhance the level and quality of services in the Office of Compliance and Integrity in an impactful, proactive, and efficient manner for the benefit of the UW System.

### **GOAL 1:**

#### **Communication, Training and Data Tracking**

- Develop and implement a communications plan to provide regular and relevant information and updates on compliance-related issues in a variety of formats to the Board of Regents, System Administration and institutional leadership and stakeholders.
- Develop and implement changes to the UW System Compliance Matrix database that will create a more interactive process for user-engagement, automated updates and notifications, accountability of responsible parties and/or timely updates and data-tracking.
- In conjunction with institutional needs, and in collaboration with Office of General Counsel, develop and implement an annual Compliance and Integrity training program that will provide regular and consistent topic-specific training programs and resources that can be utilized by UW System and institution on issues and topics related to compliance.
- Implement a data tracking program to assess the level and quality of the services provided, such as number and type of cases, investigations, mediations, record requests and other recordable activities within the Office of Compliance and Integrity and provide an annual report of this information to UW System leadership and institutions.

### **GOAL 2:**

#### **Policy Development and Implementation**

- Assist the Board of Regents and UW System Administration in the development and implementation of board and system policies on matters related foreign gifts and influence, records management, investigative services, mandatory employee training updates, and other policies or processes that may be necessary to address system-wide standards of compliance.
- Continue to assist institutions in the development and implementation of youth protection processes and procedures to comply with the newly adopted RPD 23-3

(Youth Protection, Compliance, and Data Collection) and approved SYS 625 (Youth Protection and Compliance).

- Provide training, education, and resources to institutions and stakeholders, as needed, to ensure compliance with board and system policies.
- Facilitate and oversee the state rulemaking process to revise applicable UWS Administrative Codes, as necessary, to comply with the amended federal regulations under Title IX of the Education Amendments of 1972.

### **GOAL 3:**

#### **Implement a UW System Risk, Compliance and Audit (RCA) Model**

- Work in collaboration with UW System Office of Internal Audit and Office of Risk Management to implement a new three-pronged planning process that will incorporate the annual goals, plans and functions from all three areas into one main communication plan to assist institutions in creating a strategic approach for assessing risks, implementing processes, and verifying the quality and success of internal controls.
- Review and revise the role and responsibility of the UW System Risk and Compliance Council to add audit and ethics areas of oversight, as well as an increased engagement with institutional leadership.
- In collaboration with UW System Risk Management, develop and implement a new user-friendly risk assessment tool that can be used by both UW System and institutions to identify, address, and respond to past, present, and future risks.

### **Goal 4:**

#### **Develop New Specialized Area of Expertise for State Authorization of Distance Education/Reciprocity Agreement (SARA).**

- Develop and implement a centralized the Office of Compliance and Integrity compliance plan and structure for assisting institutions in meeting the compliance requirements of the State Authorization Reciprocity Agreement (SARA) which regulates the terms and conditions under which participating institutions may offer distance education across state borders.



- Provide staff support to the UW System President's Office in its membership on the State of Wisconsin Distance Learning Authorization Board (DLAB)(this board is responsible for the regulatory oversight and authorization of all Wisconsin institutions that participate in SARA).

**Goal 5:  
Spearhead the UW System Civil Dialogue Project**

- Work in collaboration with UW System Administration and institutional stakeholders to develop and offer educational programming, training and resources on topics related to freedom of speech and expression and civil discourse, in accordance with RPD 4-21 (Commitment to Academic Freedom and Freedom of Expression).

*Updated Sept, 2022*