



## Project Management Office Case Study Compliance Matrix

September 2021

**Initiative:** The UW System's Office of Compliance and Integrity launched a compliance matrix database to help institutions meet their compliance requirements and obligations across the UW System. The matrix is a SharePoint database that includes nearly 500 university compliance obligations from federal and state law, as well as Board of Regents and UW System policies.

The Compliance Matrix is used to inventory, track, and organize obligations by identifying responsible parties across all 11 comprehensive institutions, UW-Milwaukee, and UW System Administration. (UW-Madison has its own matrix.)

The Compliance Matrix alerts responsible staff of upcoming due dates and reporting information to ensure timely compliance; links directly to relevant laws, regulations, and policies; alerts institutions when a responsible party is no longer active in the system; and provides information on who to contact for guidance.

**Challenge:** The UW System Office of Compliance and Integrity did not have an automated business process for managing compliance information. The fully built-out compliance matrix application will serve as a central source of truth about compliance information across the UW System and increase operational efficiency through a standardized and automated business process.

**PMO Services Provided:** The Project Management Office provided comprehensive project initiation, planning, and execution support services, including management and oversight of the application's software development team.

### Project Goals:

- Create a compliance matrix application incorporating data from all campuses
- Create an instruction manual for appropriate use, maintenance, and ongoing development of the application. The instructions will also cover development of the matrix
- Implement a communication plan for UW System responsible offices and campuses
- Promote the new matrix, its purpose, and benefits to UW System-responsible offices and campuses and to national higher education compliance and regulatory organizations

### Initiative Results

The project successfully deployed a fully functional compliance application with substantially complete data from the eleven comprehensive institutions, UW-Milwaukee, and UWSA. There will be a total of 537 obligations when they go live in fall 2021.

A matrix administrator was identified at each institution who worked with project staff to establish a plan for access and permissions, ongoing maintenance, and the inclusion of additional obligations. Each employee profile in the matrix is synched with the employee's profile in HRS, and an automated process alerts campuses of employee transitions. The final phase added specific features and functionality requested by institutions to make the tool as valuable and user-friendly as possible.

Through communication outreach by the OCI several national organizations requested additional information about the matrix including the University Risk Management & Insurance Association and Society of Corporate Compliance and Ethics. The OCI has also been requested to present to multiple national audiences in the higher education and private/non-profit sector.

### Initiative Deliverables

- Compliance Matrix launched on October 1, 2020
- Detailed phased project plans, with clear exit criteria for each phase
- [Overview video](#)
- [Office of Compliance and Integrity Compliance Matrix web page](#)

### Value of Compliance Matrix to UWSA Internal Audit

- The Compliance Matrix is a natural starting point for audit objectives, as the matrix contains the compliance obligation, source of the obligation, summary, and reporting requirement.
- The Compliance Matrix is also a tool for risk assessment. For our fiscal year 2022 Audit Plan, we created a risk assessment document that included identifying the Compliance Matrix topic for each potential audit topic, to aid in ensuring our audits focus on high-risk areas.
- The Compliance Matrix helps us identify institutional contacts for a specific compliance obligation, such as disclosure of foreign gifts and contracts per Section 117 of the Higher Education Act.
- For the Foreign Influence audit, we identified the Compliance Matrix as a best practice as it had a new functionality of automatic reminders 90, 60, and 30 days in advance of upcoming compliance deadlines, including Section 117 due dates.