UW System Board of Regents
Audit, Risk, and Compliance Committee

Virtual via Zoom Videoconference
September 17, 2026

MEETING OF THE AUDIT, RISK, and COMPLIANCE COMMITTEE

The meeting of the Audit, Risk, and Compliance Committee was called to order at 9:15 a.m. by Chair Regent Karen Walsh.

A. Calling of the Roll

Roll call was taken. Regents Adams, Bogost, Goitom, Nixon, Palzewicz, and Walsh were present. Regent Traynor was absent.

B. Declaration of Conflicts

Regent Walsh asked if anyone had a conflict of interest regarding the items on the agenda: none were stated.

C. Proposed Consent Agenda

Next, Regent Walsh read the items on the proposed consent agenda, which consisted of the minutes of the August 20, 2026, Audit, Risk, and Compliance Committee Meeting. The materials were approved unanimously as distributed.

D. Office of Human Resources

1. Regent Policy Document Review: RPD 20-19, "UW System Criminal Background Check Policy" (First Reading)

Associate Vice President and Chief Human Resource Officer Jason Beier presented proposed revisions to Regent Policy Document 20-19, "UW System Criminal Background Check Policy" resulting from a 2025 Youth Protection Audit. The proposed changes would update policy language to align with current statewide criminal background check practices used by the university's vendor, expand the definition of vulnerable populations to include incarcerated students and align screening requirements for personnel working in prison education programs with Department of Corrections requirements, and replace country-specific international criminal background checks with a global sanctions screening as part of the standard background check package.

Committee members discussed the reliability and interpretation of international criminal background information and emphasized the need for sensitivity when reviewing records from countries whose criminal laws may differ from those in the United States. During the discussion, staff clarified that prison education programs involve contact with incarcerated individuals regardless of whether instruction is delivered in person or through distance education. The second reading is scheduled for the next Board meeting in October.

2. Regent Policy Document Review: RPD 20-22, "Code of Ethics" (First Reading)

Next, Mr. Beier presented proposed revisions to Regent Policy Document 20-22, "Code of Ethics" resulting from a 2025 audit of Employee-Owned Businesses Contracting with Universities of Wisconsin Institutions. Mr. Beier explained that the proposed changes would align ethics standards across employee groups, establish a consistent definition of immediate family member, strengthen conflict-of-

interest disclosure requirements, provide university staff access to institutional ethics committees, and support enhanced training for employees and supervisors. He noted that training materials and guidance are being developed in partnership with UW-Shared Services and will be available in advance of the spring outside activity reporting process.

Committee members discussed the interpretation of conflicts of interest and activities that may be considered contrary to the interests of the university. Questions were raised regarding employees' involvement with companies doing business with the university and the extent of procurement-related disclosure requirements. During the discussion, General Counsel Quinn Williams explained that existing ethics rules prohibit employees from using their university positions or information obtained through their employment for private advantage and that conflict-of-interest situations are evaluated based on the specific facts and circumstances of each case. The second reading is scheduled for the next Board meeting in October.

The Committee requested additional information from Mr. Beier regarding procurement disclosure requirements and safeguards related to employee relationships with university vendors and contractors before the policy's second reading.

With no further business, the meeting was adjourned.

Respectfully submitted,

Erika L. Laabs
Recording Secretary