Status of Establishing the Compliance Oversight Function for the UM System

An effective compliance program has multiple activities in place that together encourage and reinforce the culture and behaviors consistent with our principles and values as we perform our work in meeting our mission obligations. The overall objective is to establish an oversight compliance function that:

1. Reinforces a culture of integrity and accountability
2. Empowers staff, faculty and leadership to “own” and take responsibility for doing what’s right and reporting concerns
3. Is consistent with the Federal Sentencing Guidelines Effective Elements

Recruiting the executive directors, developing and establishing the Code of Conduct, building the system-wide team by meeting with compliance professionals and senior leaders at each university and completing a gap analysis/risk assessment of areas with regulatory and compliance obligations are the top four priorities.

The following is a status update for establishing the foundation for an ongoing effective compliance program.

Recruiting
- Candidates for the executive directors for internal audit and compliance have been sourced and interviews are underway to narrow the pool to the top 2-3 candidates for onsite visits.
- Recruiting and onboarding these leaders is a critical component for progressing with establishing a firm foundation for a system-wide compliance program.

Code of Conduct
- The agreement is being finalized between Navex Global and UM System to use their Code of Conduct Development Team for designing and writing the code. Input will be utilized from key stakeholders throughout the System.
- Establishment of the Code of Conduct Steering Committee is underway.
- Target implementation date is mid-September 2020.

Building the System-wide Team and Overall Support
- The Chief Audit and Compliance Officer has met with the chancellors, provosts, CFOs and vice chancellors of research at each UM System university.
- A presentation was made to the Executive Compliance Committee of the Health System and meetings with the Chief Compliance Officer have occurred.
• Meetings have occurred with Research Compliance, and the Office of Sponsored Programs at MU; meetings with other compliance professionals are being scheduled as the calendar allows.

**Gap Analysis/Risk Assessment**

• Engaging the compliance professionals to assist in assessing what is being done well and where there are opportunities for improvement is the approach for conducting the gap analysis/risk assessment. Work has progressed slowly, but will move more quickly once compliance staff are onboard. Priority will be given to those areas with the highest risk and largest gaps.

• Areas to assess include:

  Research
  Security/Privacy
  Campus Safety
  Environmental Health & Safety
  Title IX/Office of Civil Rights
  Diversity, Equity and Inclusion
  Human Resources (Employee regulations)
  Admissions
  Registrars/Enrollment (FERPA; Identity Theft)
  Donors and gifts
  Financial Aid
  Finance (GLBA, PCI Compliance, Identity Theft, IRS)
  International Students/programs/travel
  Contract Compliance

**Other Initiatives**

• A draft policy for the Protection of Minors on Campus has been developed and input is being gathered from key stakeholders with the expectation that staff, faculty and volunteers working with minors will follow training and registration requirements for summer activities. Full compliance with the policy is expected by December 2020 at the latest. Work is underway to establish a website that accommodates registering of minors on campus programs, training, and ordering of background checks.

• MU Research Compliance has a plan for expanding export control expertise across the UM System. The Chief Audit and Compliance Officer is working with Research Compliance to develop the proposal for consideration and approval.
University of Missouri System
Board of Curators
April 9, 2020
Audit Committee

Compliance Program Implementation Status
UM
Oversight Compliance Function

Objective:

• Reinforce a culture of Integrity and Accountability

• Empowers staff, faculty and leadership to “own” and take responsibility for doing what’s right and reporting concerns

• Is consistent with the Federal Sentencing Guidelines Effective Elements
Top Priorities

• Recruitment
• Code of Conduct
• Building the System-wide Team and Overall Support
• Gap Analysis/Risk Assessment
• Other Initiatives
Questions?