

Department/Unit: University Compliance

Year: 2018

Contact Name: Kelli Tittle

Contact Title: Director of Compliance

**Unit Overview/Mission/Purpose**

Wright State University operates in an increasingly complex regulatory and accreditory environment that is constantly changing and brings financial and reputational risks associated with non-compliance, both of which could have a negative impact on the university’s mission. Implementing an effective compliance program helps Wright State employees (as the program’s primary customers) mitigate these risks by incorporating the university’s mission and values into our systems and procedures to create a culture where ethical and legal behavior is ingrained in every day operations.

Traditionally, institutions of higher education have approached compliance in a very decentralized and siloed manner. Recognizing that this is not always the most effective approach, Wright State implemented a centralized compliance function in the fall of 2016 to coordinate compliance efforts across campus and to build and sustain a mature infrastructure to support all the elements necessary for a strong compliance program.

**Staffing**

	FY16	FY17	FY18	FY19
# Full Time Staff	1*	1	1	1
# Student Employee FTE	0	0	0	0

\*Office/position established November 2016

**Success Outcome 1:**

The Wright State compliance program is appropriately progressing through the maturity levels identified in the Compliance Management Capability Maturity Model (CMM). The CMM describes a continuum of levels from an ad-hoc, immature process to a mature, disciplined process focused on continuous improvement.

**KPI 1.1**

**Data:** Compliance Culture Survey will be conducted on a biennial basis (rotating with the “knowledge survey” described below) to measure stakeholder perceptions and attitudes towards Wright State’s compliance and ethics environment. Question examples: “I believe that Wright State University is committed to complying with the laws, rules, and regulations that govern its operations.” “I would feel comfortable reporting an ethics or compliance concern if I became aware of one.”

**Result:** TBD- this survey will be conducted in 2019

**Response/Action Plan:** Survey data will provide evidence of the maturation of the compliance program by identifying strengths, potential weaknesses, and trends in the program. Results will inform focus areas within annual compliance plan, including targeted training, communication, policy and procedure development, etc.

**KPI 1.2**

**Data:** Compliance Knowledge Survey will be conducted on a biennial basis (rotating with the “culture survey” described above) to measure stakeholder knowledge of Wright State’s compliance program. Question examples: “I know where to locate policies and procedures.” “I am aware of the EthicsPoint reporting hotline and how to access it.”

**Result:** See Attachment

**Response/Action Plan:** Survey data will provide evidence of the maturation of the compliance program by identifying strengths, potential weaknesses, and trends in the program. Results will inform focus areas within annual compliance plan, including targeted training, communication, policy and procedure development, etc.

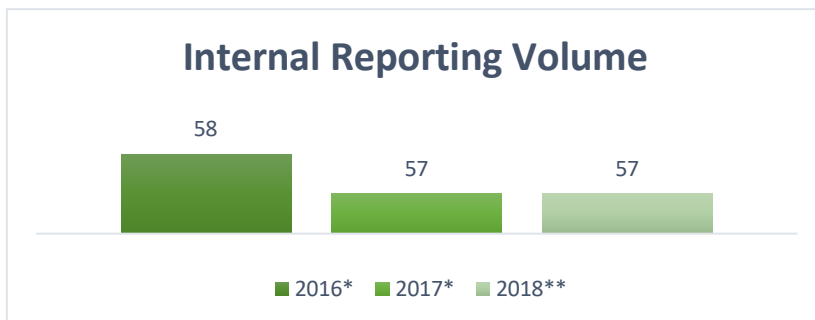
**Success Outcome 2:**

Stakeholders feel comfortable utilizing Wright State’s reporting line, EthicsPoint, to communicate questions and concerns.

**KPI 2.1 - Number of EthicsPoint reports per year**

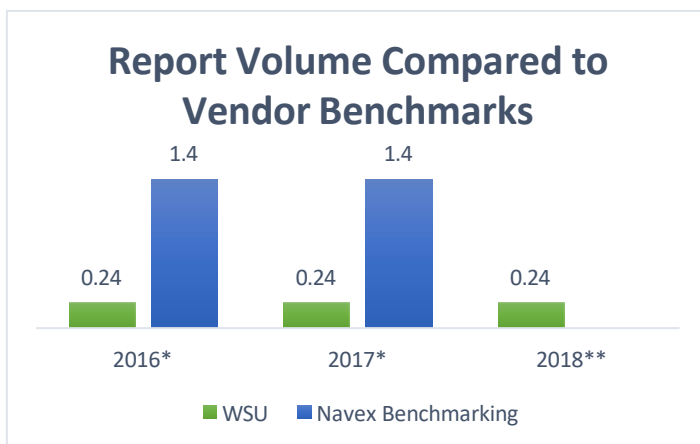
**Data:** Utilize EthicsPoint data to compare reporting volume both internally year over year, as well as compared to NAVEX Global <sup>1</sup> annual customer benchmarking data (represents customers in all industries, not just higher education). Falling outside the normal range identified in the benchmarking data is an indication that there is an issue that may need more attention.

**Result:** Internal reporting volume has remained consistent with 58 cases submitted in 2016 and 57 submitted in both 2017 and 2018. NAVEX uses “report volume per 100 employees” as its metric for report volume. This data represents information reported through a variety of channels, including in-person reports, not solely via EthicsPoint. The benchmark median was 1.4 for both 2016 and 2017. 2018 data was not provided. The Wright State data was calculated by modifying “per 100 employees” to “per 100 users” as a reflection that EthicsPoint is available to both employees and students. For years 2016-2018, the Wright State report volume per 100 users was consistently .24.



\*2016 and 2017 data reflects the consolidation of two sets of duplicate cases

\*\*2018 data through 11/30/18



\*2016 and 2017 WSU data reflects the consolidation of two sets of duplicate cases

\*\*2018 WSU data through 11/30/18; benchmarking data not available

<sup>1</sup> NAVEX Global is the EthicsPoint corporate name.

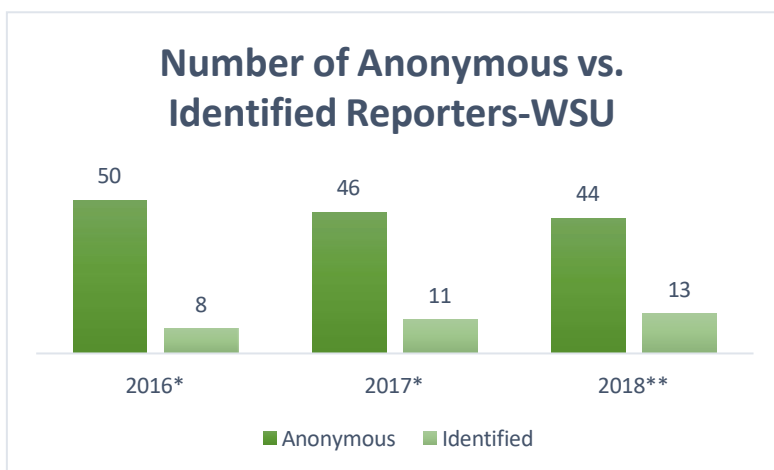
**Response/Action Plan:** Trends in data will help to identify areas for policy/procedure development or improvement, training and communication to the campus community regarding available resources, and potential areas to monitor.

**KPI 2.2 - Anonymous vs. identified reporters**

**Data:** Utilize EthicsPoint data to compare the number of anonymous vs. identified reporters both internally year over year, as well as compared to NAVEX Global annual customer benchmarking data (represents all industries, not just higher education). Falling outside the normal range identified in the benchmarking data is an indication that there is an issue that may need more attention. A lower rate of anonymous reporting is an indicator of trust in the system.

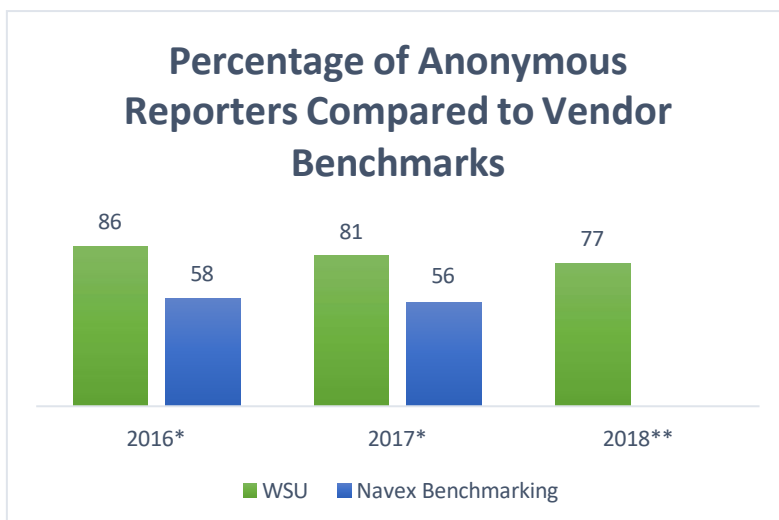
**Result:** Internally, the percentage of reporters who have submitted an EthicsPoint case anonymously has steadily decreased each year. In 2016, 86% of cases were submitted by anonymous reporters. In 2017, the percentage of anonymous reporters decreased to 81%, and, in 2018, the percentage was 77%.

In 2016, the median anonymous reporting rate from NAVEX customer benchmarking data was 58%, and, in 2017, the percentage was 56%. 2018 data was not published. This data contains information reported through a variety of channels, including in-person reports. Therefore, the name of the reporter is more likely to be known and could influence the rate of anonymous reports reflected in the customer benchmarking data.



\*2016 and 2017 data reflects the consolidation of two sets of duplicate cases

\*\*2018 data through 11/30/18



\*2016 and 2017 WSU data reflects the consolidation of two sets of duplicate cases

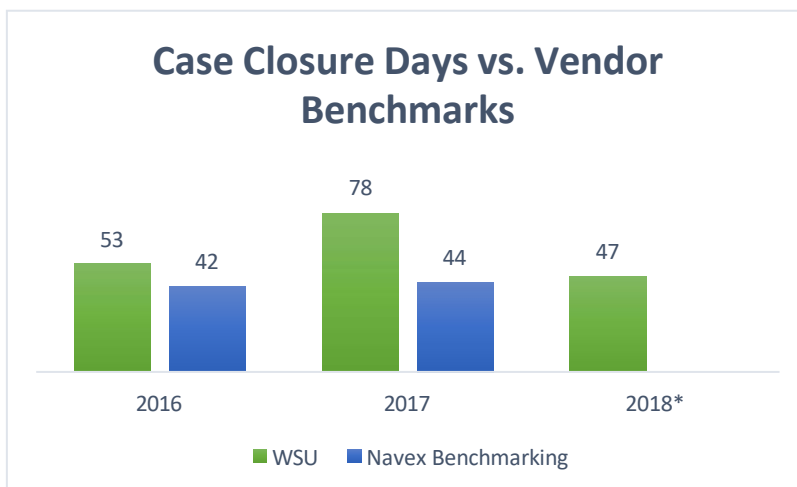
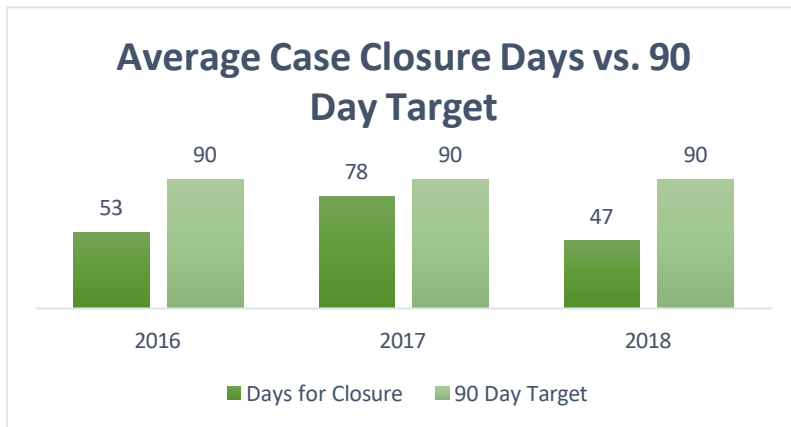
\*\*2018 WSU data through 11/30/18; benchmarking data not available

**Response/Action Plan:** Trends in data will help to identify areas for policy/procedure development or improvement and increased training and communication.

**KPI 2.3 - Case closure times**

**Data:** Utilize EthicsPoint data to compare case closure times to the internal target of 90 days, as well as compared to NAVEX Global customer benchmarking data (represents all industries, not just higher education). Falling outside the normal range identified in the benchmarking data is an indication that there is an issue that may need more attention. Cases that take too long to address and resolve could send a message to reporters that their issue is not being taken seriously. This could also be an indicator of insufficient resources necessary to investigate concerns.

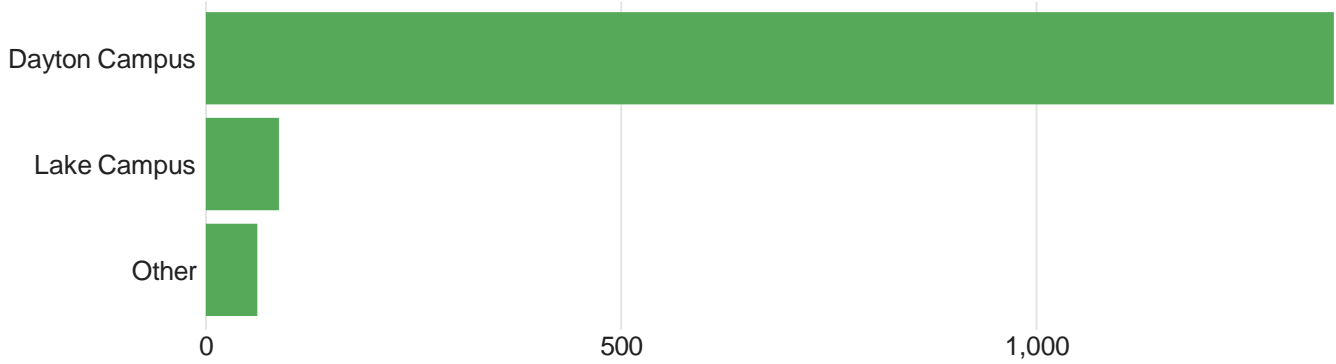
**Result:** Internally, average case closure time in 2016 was 53 days. In 2017, the average increased to 78 days, and, in 2018, the average closure time was 47. In every year, the average case closure time was under the internal target of 90 days. In 2016, the median case closure time identified in the NAVEX benchmarking data was 42 days, and 44 in 2017. 2018 data was not available.



\*2018 benchmarking data not available

**Response/Action Plan:** Trends in data will help to identify whether increased training and communication is needed for EthicsPoint responders and whether areas with higher closure times could benefit from additional resources.

## Q2 - Select your primary location.

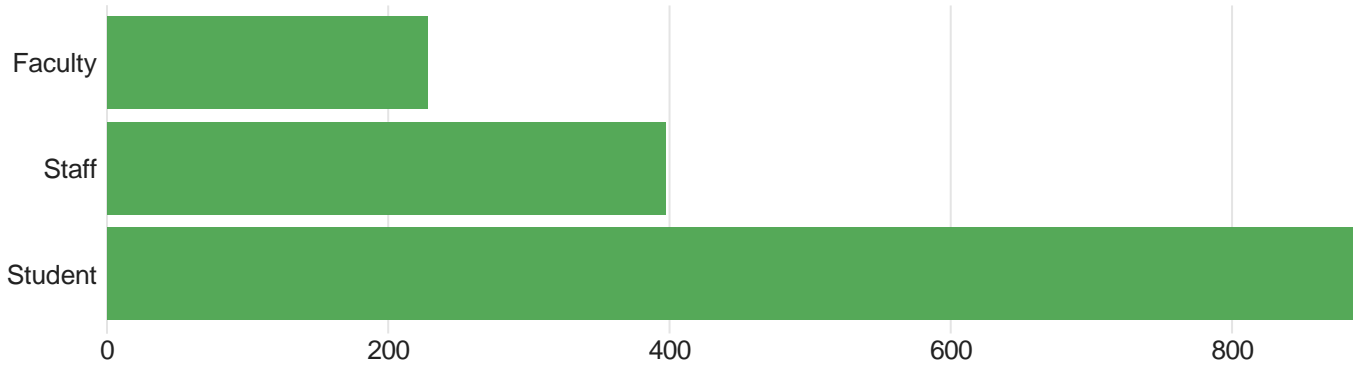


Field Select your primary location. - Selected Choice

Select your primary location. - Selected Choice

Field	Choice Count
Dayton Campus	1,358
Lake Campus	88
Other	62
Total	1508

### Q3 - Select your primary affiliation with Wright State.



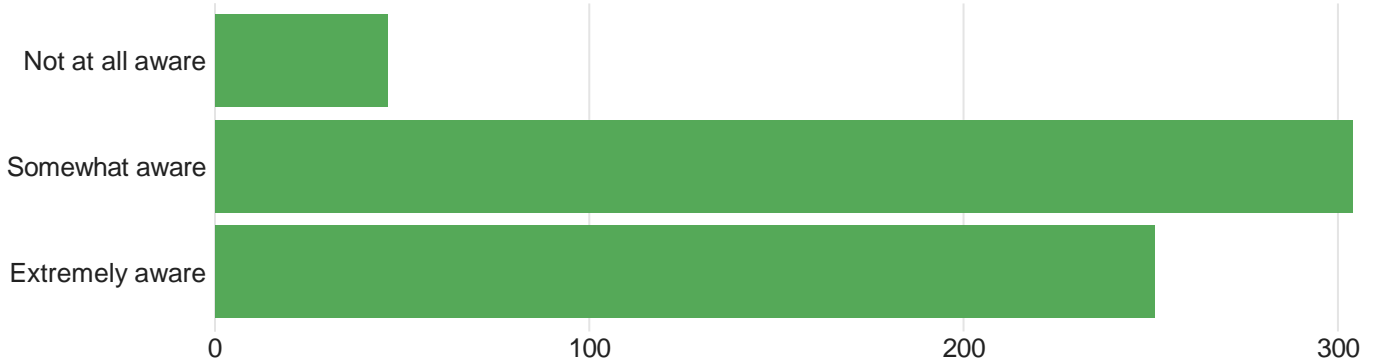
Field Select your primary affiliation with Wright State.

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Select your primary affiliation with Wright State.

Field	Choice Count
Faculty	228
Staff	397
Student	886
Total	1511

### Q4 - I am aware that Wright State University has a compliance program.

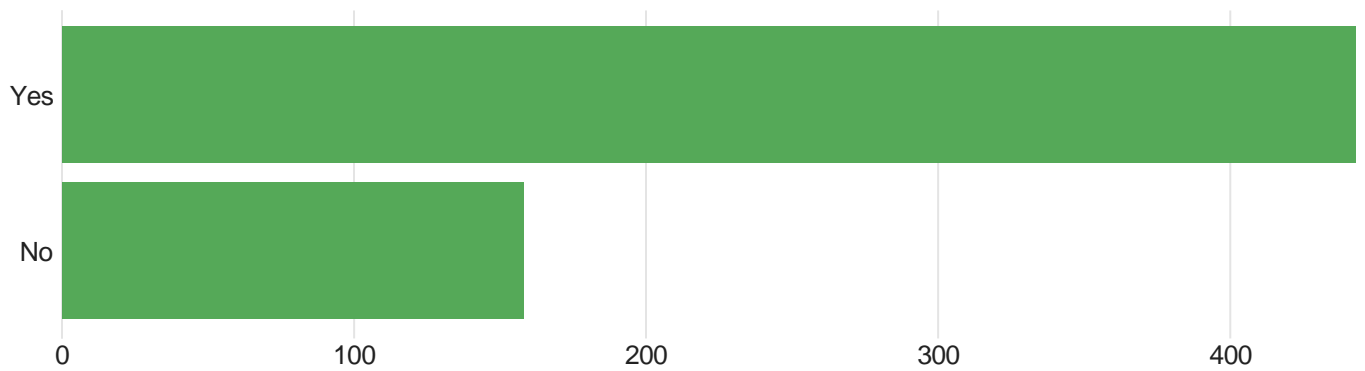


Field I am aware that Wright State University has a compliance program.

I am aware that Wright State University has a compliance program.

Field	Choice Count
Not at all aware	46
Somewhat aware	304
Extremely aware	251
Total	601

### Q5 - I know that Wright State University has a Compliance Director.



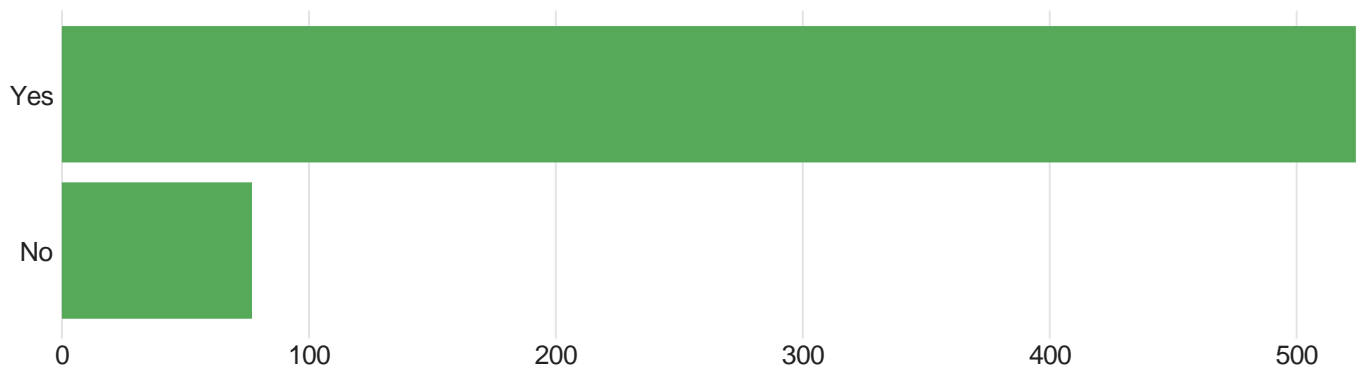
Field I know that Wright State University has a Compliance Director.

I know that Wright State University has a Compliance Director.

Field	Choice Count
Yes	443
No	158
Total	601



### Q6 - I know where to locate university policies.



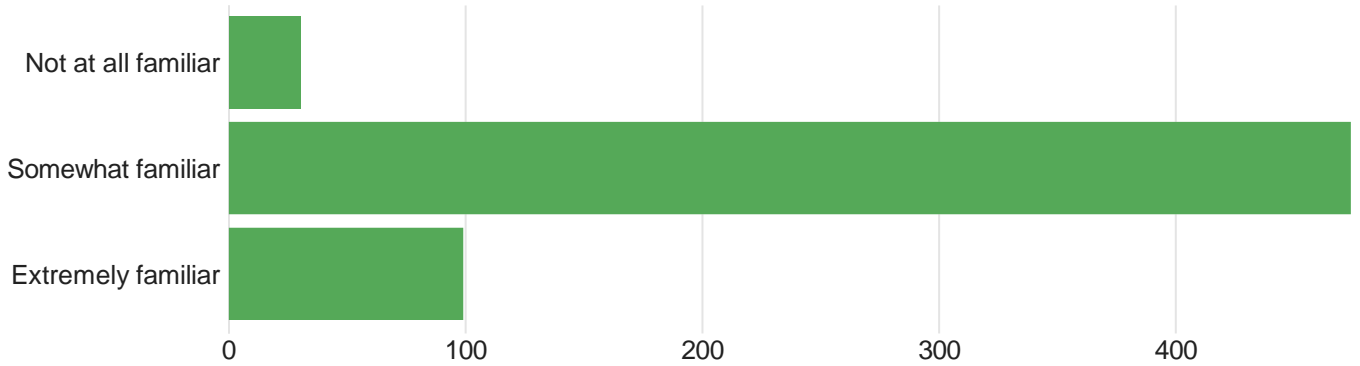
Field I know where to locate university policies.

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I know where to locate university policies.

Field	Choice Count
Yes	524
No	77
Total	601

### Q7 - I am familiar with the content of Wright State policies.

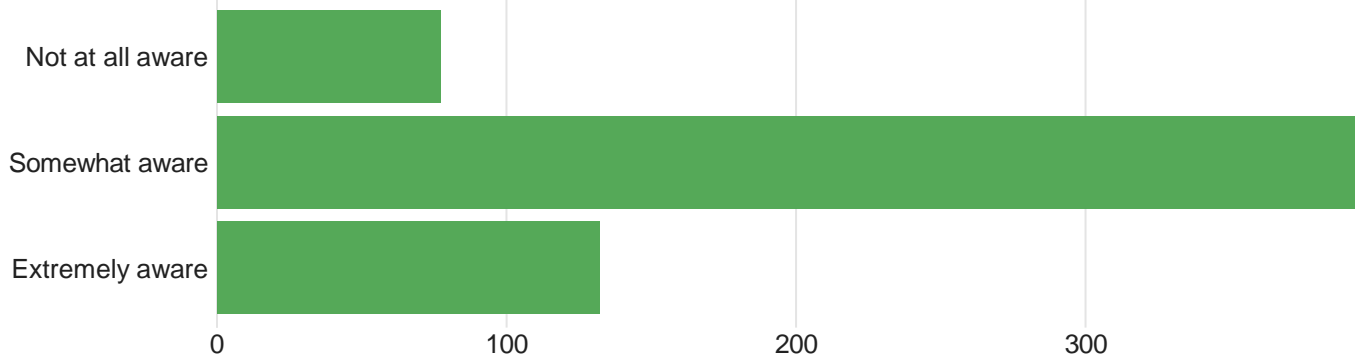


Field I am familiar with the content of Wright State policies.

I am familiar with the content of Wright State policies.

Field	Choice Count
Not at all familiar	30
Somewhat familiar	474
Extremely familiar	99
Total	603

Q8 - I am aware that Wright State University offers compliance-related training on a variety of topics.

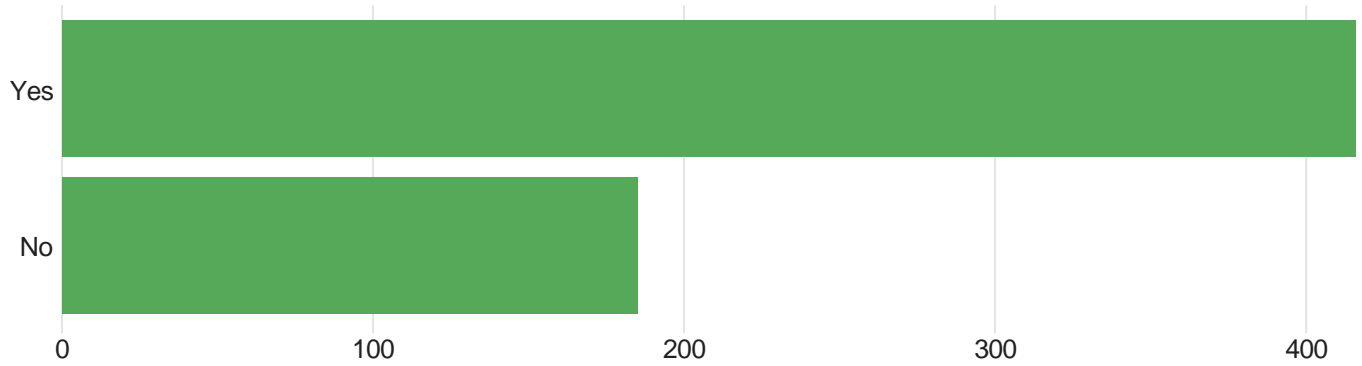


Field I am aware that Wright State University offers compliance-related training on a variety of topics.

I am aware that Wright State University offers compliance-related training on a variety of topics.

Field	Choice Count
Not at all aware	77
Somewhat aware	393
Extremely aware	132
Total	602

Q9 - I have completed compliance-related training training (examples: Campus Security Authority training, research compliance training, sexual harassment training).

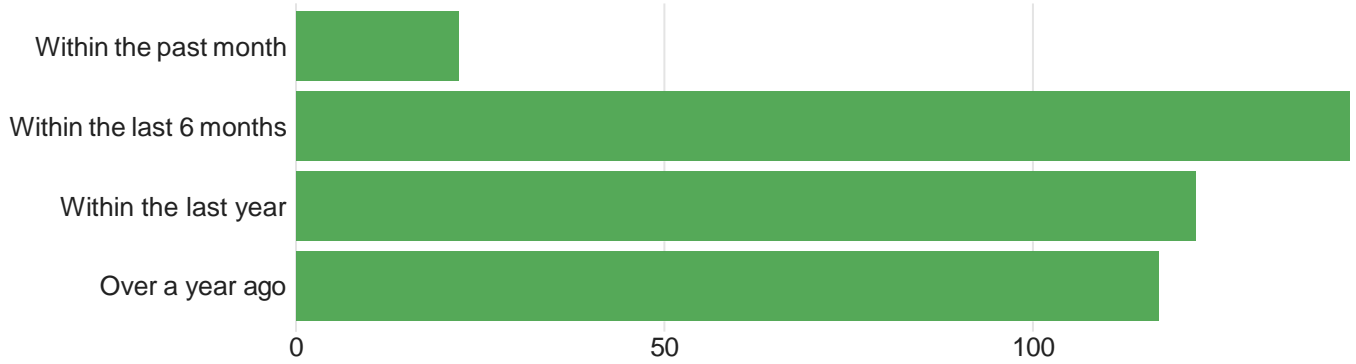


Field I have completed compliance-related training training (examples: Campus Security Authority training, research compliance training, sexual harassment training).

I have completed compliance-related training training (examples: Campus Security Authority training, research compliance training, sexual harassment training).

Field	Choice Count
Yes	416
No	185
Total	601

### Q10 - How recently did you complete the training?

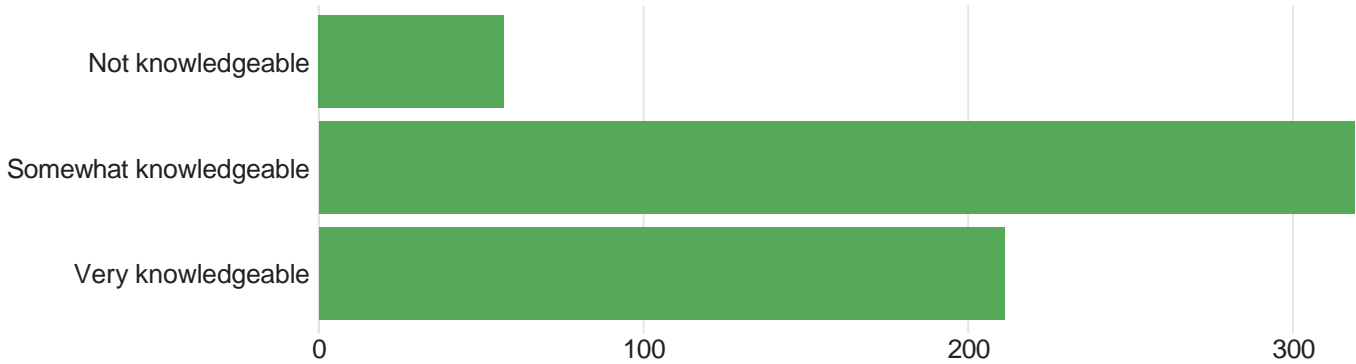


Field How recently did you complete the training?

How recently did you complete the training?

Field	Choice Count
Within the past month	22
Within the last 6 months	143
Within the last year	122
Over a year ago	117
Total	404

Q11 - I know how to contact a compliance-related department (examples: Office of Equity and Inclusion, Office of Research Compliance, University Compliance).

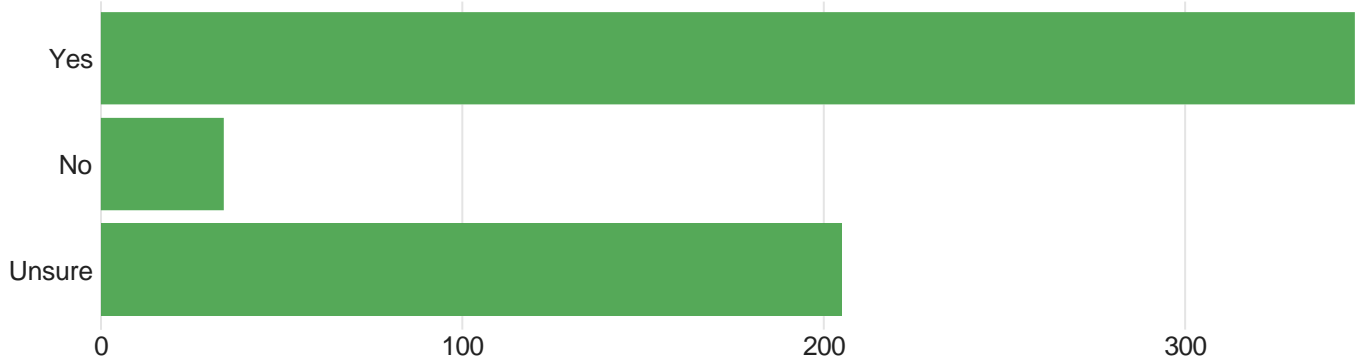


Field I know how to contact a compliance-related department (examples: Office of Equity and Inclusion, Office of Research Compliance, University Compliance).

I know how to contact a compliance-related department (examples: Office of Equity and Inclusion, Office of Research Compliance, University Compliance).

Field	Choice Count
Not knowledgeable	57
Somewhat knowledgeable	319
Very knowledgeable	211
Total	587

Q27 - I received notification of Wright State's 2018 Annual Security and Fire Safety Report.

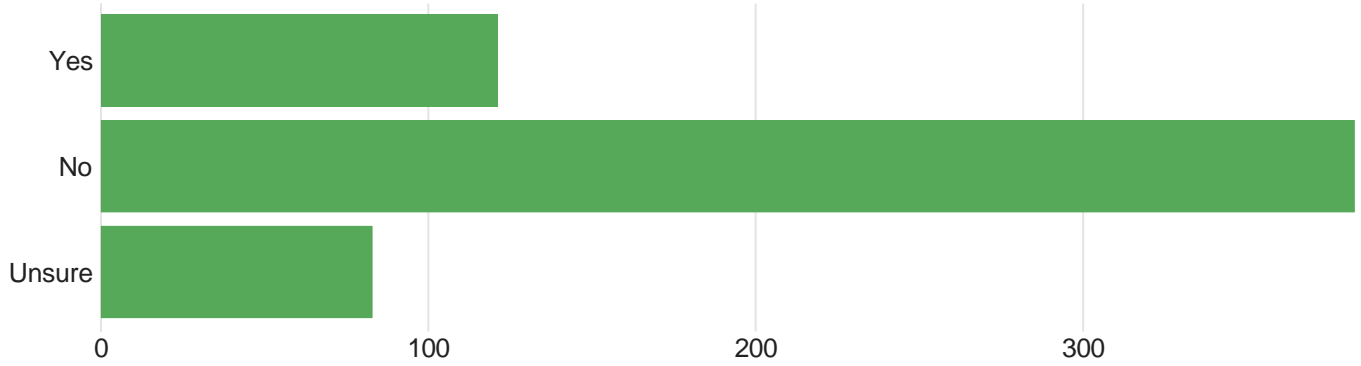


Field I received notification of Wright State's 2018 Annual Security and Fire Safety Report.

I received notification of Wright State's 2018 Annual Security and Fire Safety Report.

Field	Choice Count
Yes	347
No	34
Unsure	205
Total	586

Q28 - I accessed Wright State's 2018 Annual Security and Fire Safety Report.



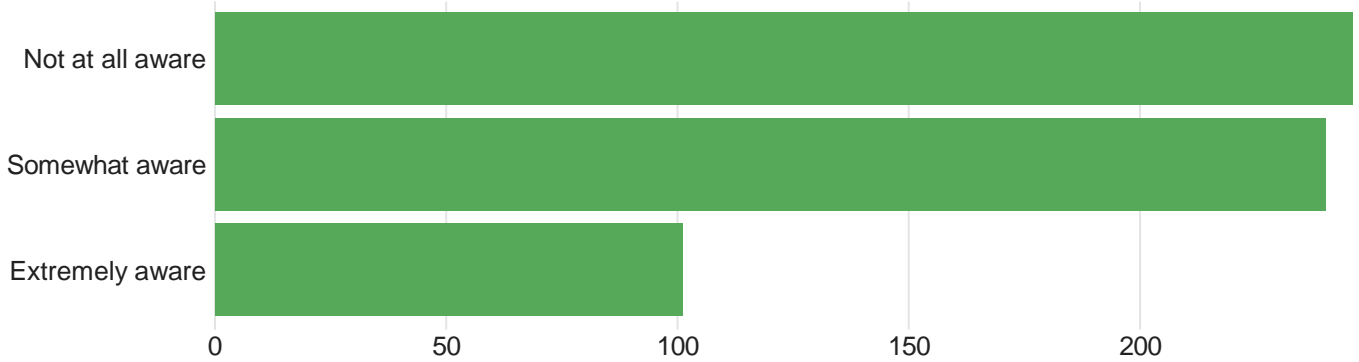
Field I accessed Wright State's 2018 Annual Security and Fire Safety Report.

I accessed Wright State's 2018 Annual Security and Fire Safety Report.

Field	Choice Count
Yes	121
No	383
Unsure	83
Total	587



Q12 - I am aware of the EthicsPoint reporting hotline and how to access it.

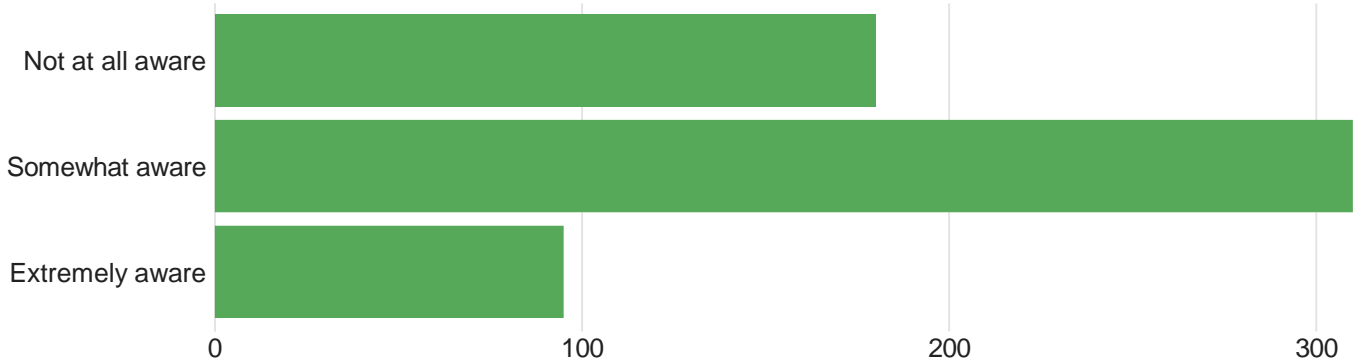


Field I am aware of the EthicsPoint reporting hotline and how to access it.

I am aware of the EthicsPoint reporting hotline and how to access it.

Field	Choice Count
Not at all aware	246
Somewhat aware	240
Extremely aware	101
Total	587

Q13 - I am aware of the compliance department website.

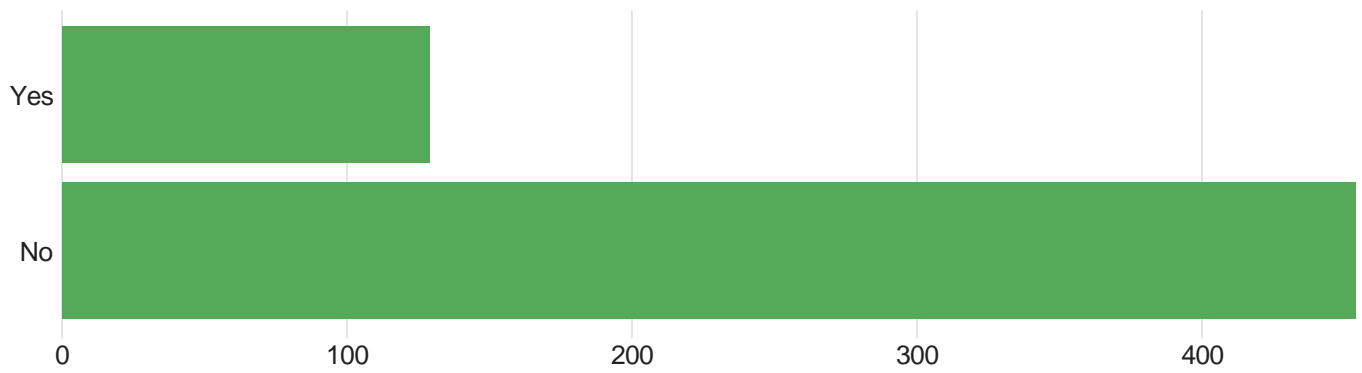


Field I am aware of the compliance department website.

I am aware of the compliance department website.

Field	Choice Count
Not at all aware	180
Somewhat aware	310
Extremely aware	95
Total	585

### Q14 - I have accessed the compliance department website.

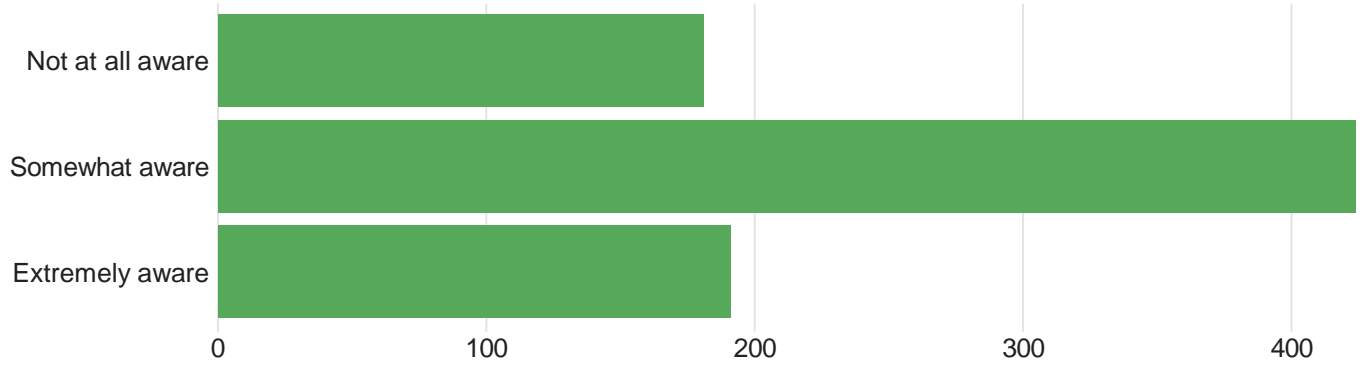


Field I have accessed the compliance department website.

I have accessed the compliance department website.

Field	Choice Count
Yes	129
No	454
Total	583

### Q15 - I am aware that Wright State University has an Office of Community Standards and Student Conduct.

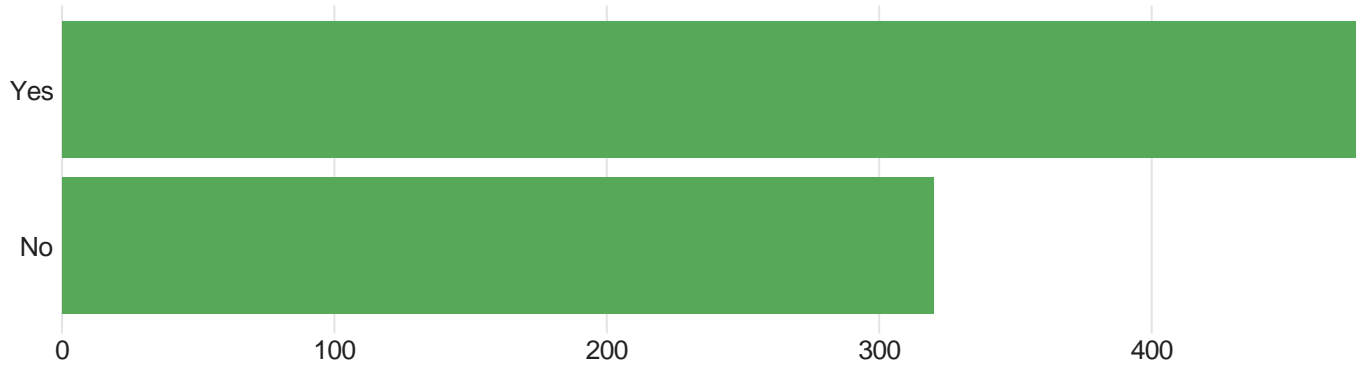


Field I am aware that Wright State University has an Office of Community Standards and Student Conduct.

I am aware that Wright State University has an Office of Community Standards and Student Conduct.

Field	Choice Count
Not at all aware	181
Somewhat aware	424
Extremely aware	191
Total	796

Q16 - I know where to access the Wright State University Student Handbook.

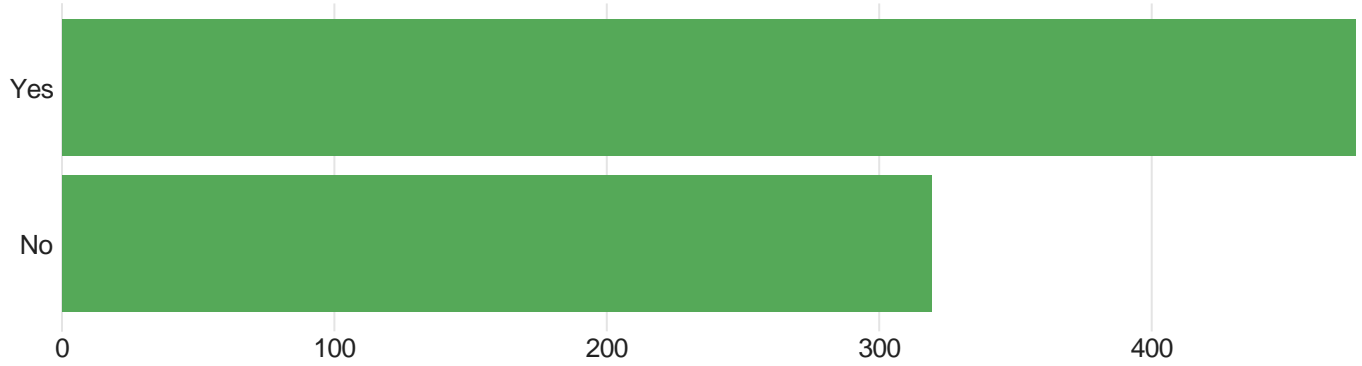


Field I know where to access the Wright State University Student Handbook.

I know where to access the Wright State University Student Handbook.

Field	Choice Count
Yes	475
No	320
Total	795

Q17 - I know where to locate Wright State University policies and the Code of Student Conduct.

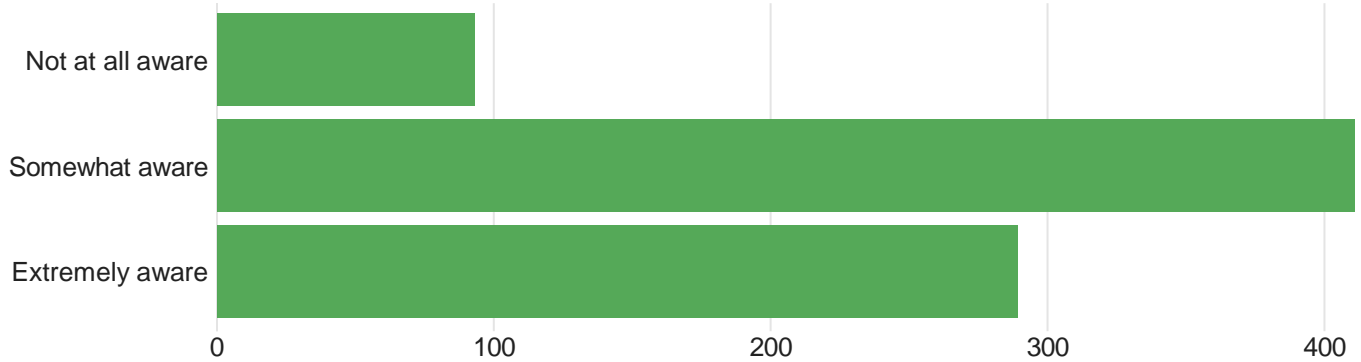


Field I know where to locate Wright State University policies and the Code of Student Conduct.

I know where to locate Wright State University policies and the Code of Student Conduct.

Field	Choice Count
Yes	475
No	319
Total	794

Q18 - I am aware that Wright State University policies and the Code of Student Conduct serve to educate students as to their civic and social responsibilities as members of the Wright State community.

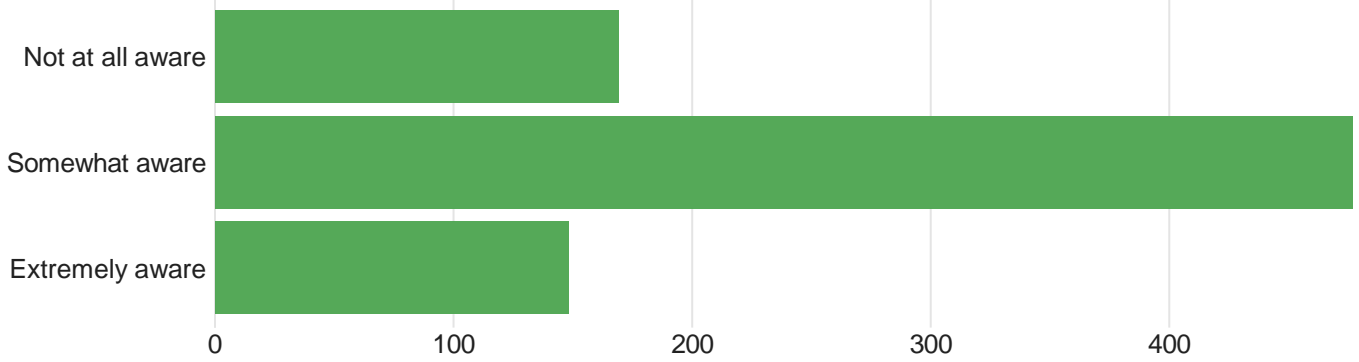


Field I am aware that Wright State University policies and the Code of Student Conduct serve to educate students as to their civic and social responsibilities as members of the Wright State community.

I am aware that Wright State University policies and the Code of Student Conduct serve to educate students as to their civic and social responsibilities as members of the Wright State community.

Field	Choice Count
Not at all aware	93
Somewhat aware	411
Extremely aware	289
Total	793

### Q19 - I am familiar with the content of Wright State University policies and the Code of Student Conduct.



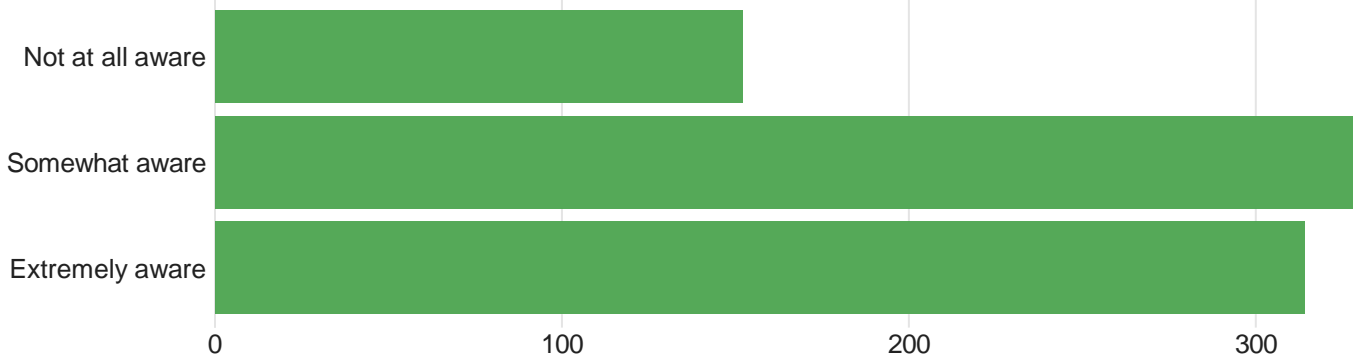
Field I am familiar with the content of Wright State University policies and the Code of Student Conduct.

I am familiar with the content of Wright State University policies and the Code of Student Conduct.

Field	Choice Count
Not at all aware	169
Somewhat aware	477
Extremely aware	148
Total	794



### Q29 - I am aware that Wright State has a Gender-Based Harassment and Violence policy.

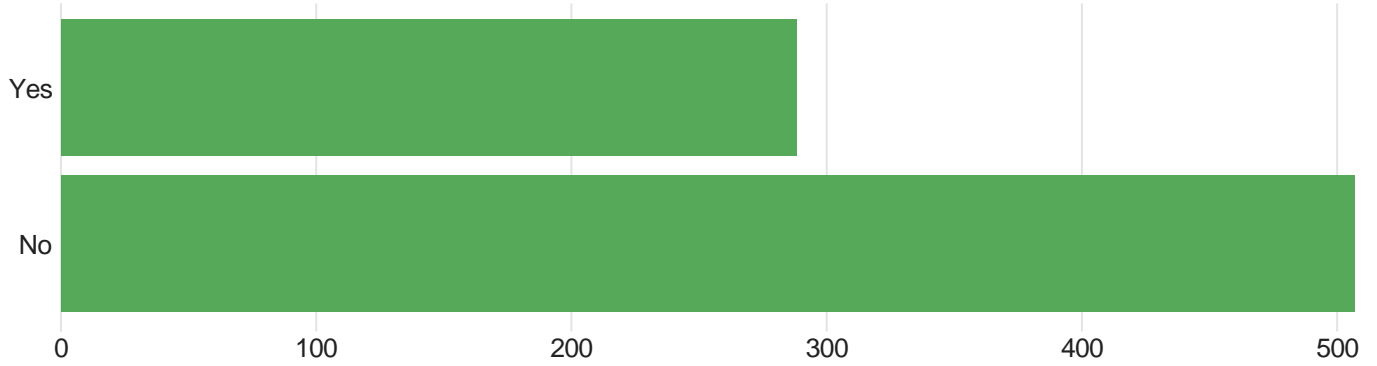


Field I am aware that Wright State has a Gender-Based Harassment and Violence policy.

I am aware that Wright State has a Gender-Based Harassment and Violence policy.

Field	Choice Count
Not at all aware	152
Somewhat aware	328
Extremely aware	314
Total	794

### Q20 - I know how to report an incident to the Office of Community Standards and Student Conduct.



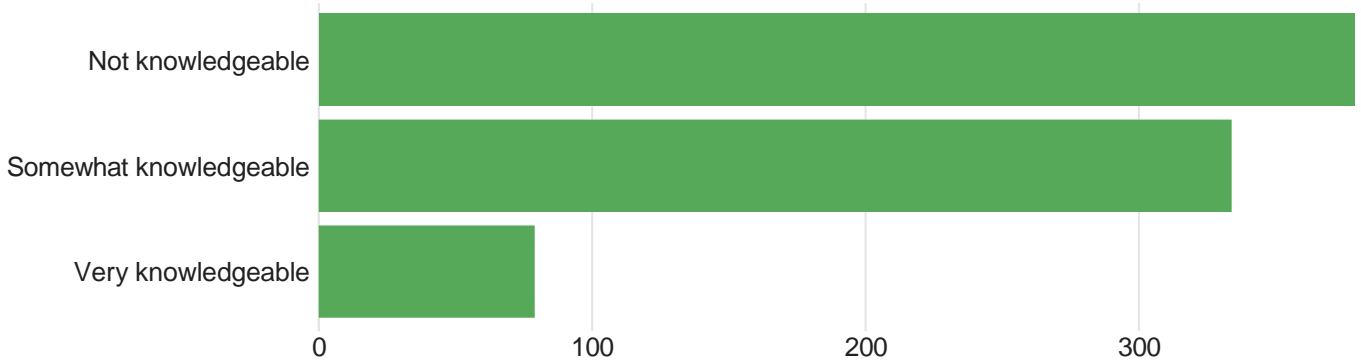
Field I know how to report an incident to the Office of Community Standards and Student Conduct.

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I know how to report an incident to the Office of Community Standards and Student Conduct.

Field	Choice Count
Yes	288
No	507
Total	795

Q21 - I know how to contact a compliance-related department to ask a question or report a concern (examples: Office of Equity and Inclusion, Office of Research Compliance, University Compliance).

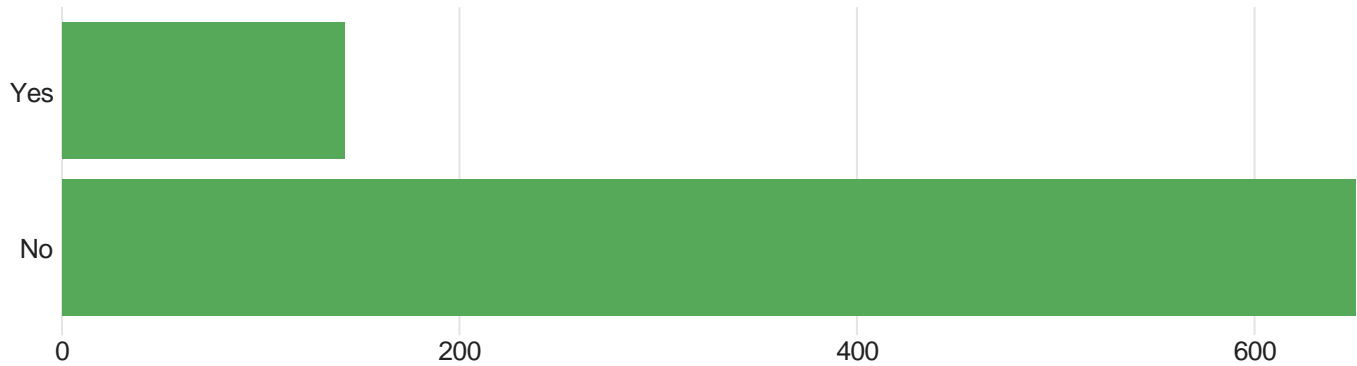


Field I know how to contact a compliance-related department to ask a question or report a concern (examples: Office of Equity and Inclusion, Office of Research Compliance, University Compliance).

I know how to contact a compliance-related department to ask a question or report a concern (examples: Office of Equity and Inclusion, Office of Research Compliance, University Compliance).

Field	Choice Count
Not knowledgeable	379
Somewhat knowledgeable	334
Very knowledgeable	79
Total	792

Q22 - I have completed compliance-related training training (examples: Campus Security Authority training, research compliance training, Title IX training).

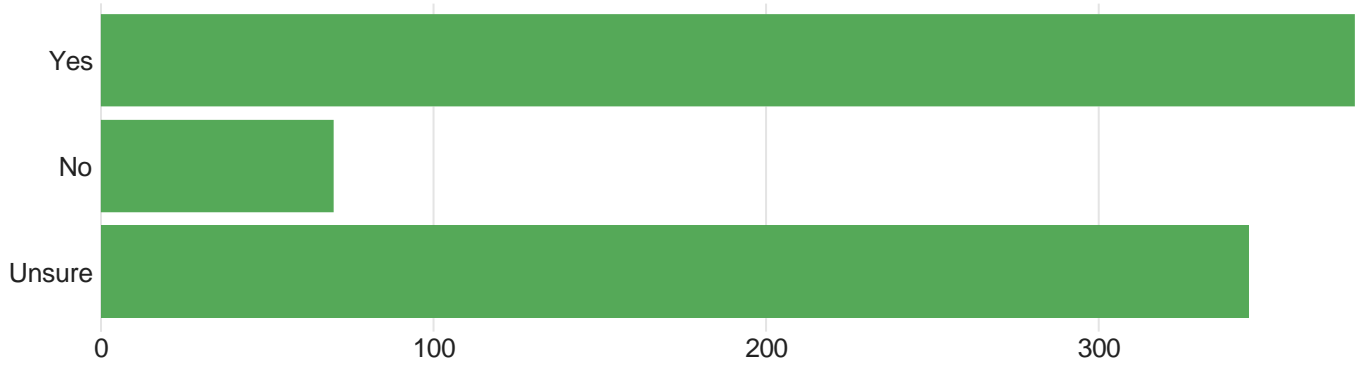


Field I have completed compliance-related training training (examples: Campus Security Authority training, research compliance training, Title IX training).

I have completed compliance-related training training (examples: Campus Security Authority training, research compliance training, Title IX training).

Field	Choice Count
Yes	142
No	651
Total	793

### Q25 - I received notification of Wright State's 2018 Annual Security and Fire Safety Report.



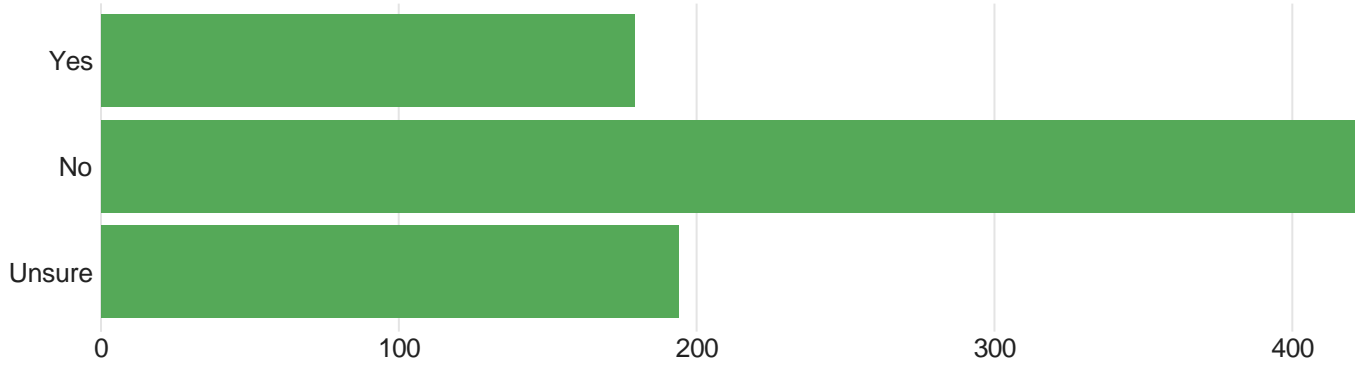
Field I received notification of Wright State's 2018 Annual Security and Fire Safety Report.

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I received notification of Wright State's 2018 Annual Security and Fire Safety Report.

Field	Choice Count
Yes	377
No	70
Unsure	345
Total	792

### Q24 - I accessed Wright State's 2018 Annual Security and Fire Safety Report.

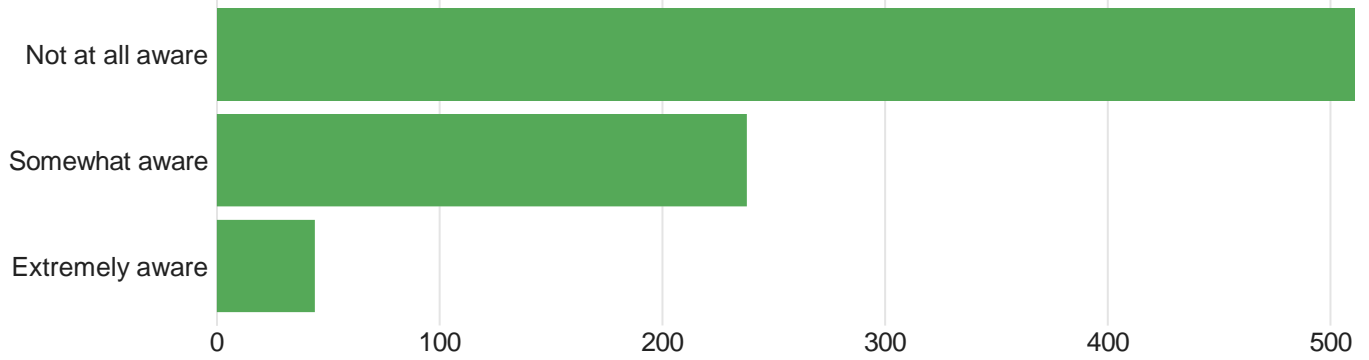


Field I accessed Wright State's 2018 Annual Security and Fire Safety Report.

I accessed Wright State's 2018 Annual Security and Fire Safety Report.

Field	Choice Count
Yes	179
No	421
Unsure	194
Total	794

Q23 - I am aware of the university's EthicsPoint reporting hotline and how to access it.



Field I am aware of the university's EthicsPoint reporting hotline and how to access it.

I am aware of the university's EthicsPoint reporting hotline and how to access it.

Field	Choice Count
Not at all aware	511
Somewhat aware	238
Extremely aware	44
Total	793