

Wright State University

Implementation Plan:  
University-Wide  
Compliance Program

President David R. Hopkins

March 10, 2016

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## **Purpose of the Plan**

Wright State University is strongly committed to creating a culture of ethical conduct, integrity, and compliance with all applicable federal, state and local regulations, laws, and policies. The Board of Trustees recognizes that while regulatory compliance is the responsibility of the entire university community, effective university-wide compliance begins with the University's senior leadership and requires centralized leadership with authority and responsibility to coordinate compliance efforts across the campus. Currently, responsibility for compliance with state, federal, and university regulations and policies is decentralized to individuals or units with domain-specific expertise. This Plan adds the necessary central coordination, oversight and monitoring to the existing university compliance functions, and provides a mechanism for direct reporting of compliance matters to the President and to the Compliance and Audit Committee of the Board of Trustees.

To achieve the goals, Wright State will create a leadership position, the Director of University Compliance, who will report directly to the Chief Operating Officer and the Compliance and Audit Committee of the Board of Trustees following the organizational structure presented as the Director of Compliance Model in the University-wide Compliance Assessment – Phase II Results by Protiviti. The Director of University Compliance will have the independence and authority to oversee and execute consistent and comprehensive monitoring of all compliance functions. To coordinate assessment activities, the University will create a Compliance Committee chaired by the new Director of University Compliance. The Director of University Compliance will operate in a highly collaborative manner to build relationships across the organization to promote a robust compliance ecosystem, further weaving compliance throughout WSU's culture to support our rapid growth, and increasing complexity.

The creation of the Director's position and the Compliance Committee will help the university reach and sustain a mature infrastructure to support all the elements necessary for a strong compliance program. It will also clearly define the accountability and responsibility for all compliance functions including risk assessment, policies and procedures, compliance training programs, and monitoring and investigation. Our vision is to have an organization in which compliance is culturally ingrained in every stakeholder and where best practices, collaboration, and transparency permeate decision making at every level of the university.

## **Strategy**

A Director of University Compliance, with the stature that reflects the high importance that university leadership places on this role, will be hired. The position will have high visibility, full authority for compliance across the university, and independence to lead change as necessary. In addition to reporting to the Chief Operating Officer, the individual will engage closely with the Board of Trustees and General Counsel, as well as work in a highly collaborative way with existing effective compliance units and leaders. Initially, an internal search for the Director will be conducted to identify individuals currently involved in Wright State compliance efforts with the requisite background to lead the compliance infrastructure.

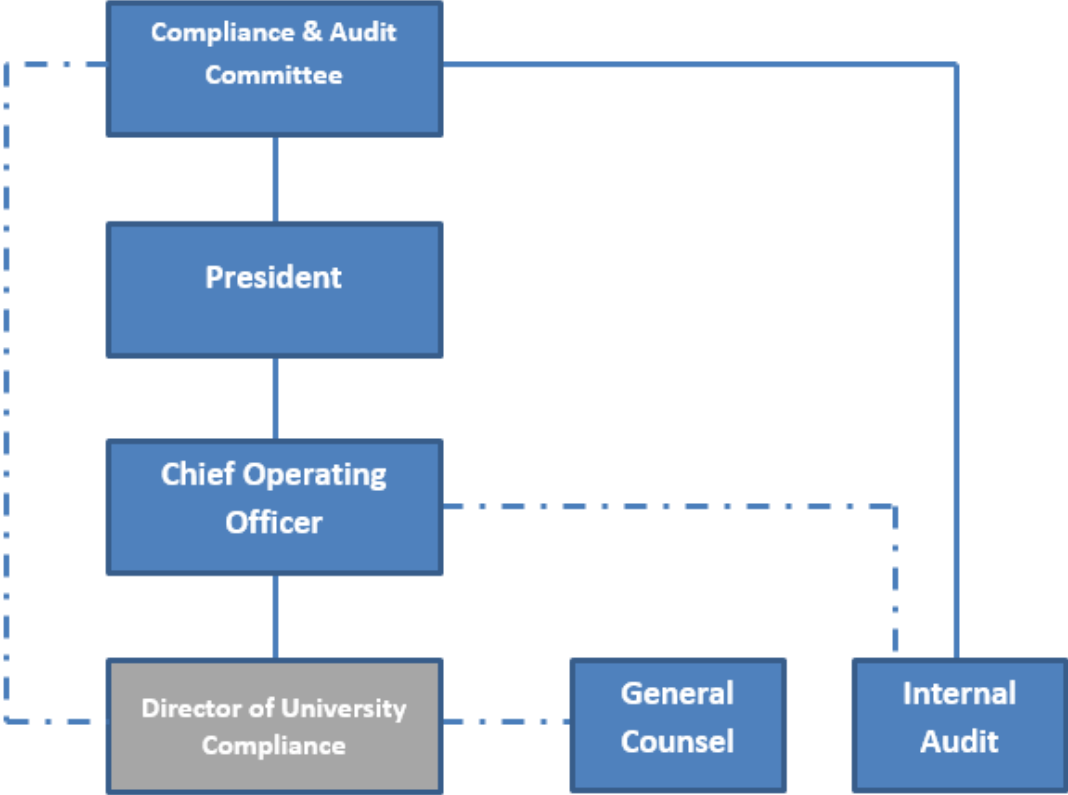
### **Phase I (immediate; Spring Semester 2016)**

- Hire a Director of University Compliance. See position description below.
- Create a WSU Compliance Council. See composition and responsibilities below.
- Review and realign (if necessary) compliance responsibilities to support the Compliance Council and Director position.
- Create an inventory of all university compliance policies and procedures, requirements, and responsible/accountable individuals

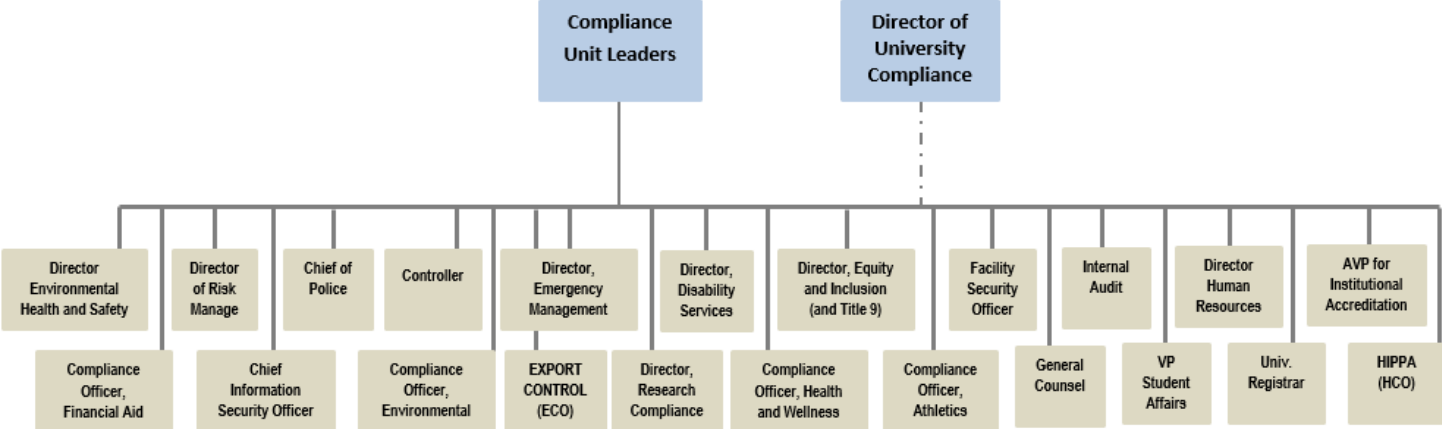
### **Key Responsibilities of Director of University Compliance**

- Promote a culture of integrity and ethical behavior throughout the university in all areas dealing with compliance with federal, state, and university regulations and policies.
- Develop and lead university compliance strategy.
- Coordinate and provide oversight of university-wide compliance functions via leadership of the WSU Compliance Council.
- Develop a formal process and controls for compliance risk assessment, and report annual assessment results to the Compliance & Audit Committees of the Board of Trustees.
- Conduct consistent and comprehensive compliance assessments and report university compliance activities to the Compliance & Audit Committee of the Board of Trustees.
- Work collaboratively with the Office of General Counsel and others to develop and conduct compliance and risk assessments and mitigation strategies.
- Create and maintain an inventory of compliance requirements, policies and procedures for each area of the university, and identify all key responsible individuals.
- Review, revise, update or create new compliance and ethics policies and procedures as needed.
- Integrate compliance into all business, education and research processes.
- Provide support and awareness for compliance through education, resources, oversight and monitoring.
- Ensure adequate training resources and document employee adherence to compliance and ethics training requirements.
- Investigate and follow up on all compliance complaints or concerns.

# Organizational Chart



# Dual Reporting



## Compliance Council

The Compliance Council will meet monthly throughout the year, and will be chaired by the Director of University Compliance. Through the Council, the compliance leaders of specific compliance domains throughout the university will have a reporting line to the Director of University Compliance, and a dual (direct) reporting line to their respective unit leaders or vice presidents following Option 2: University Compliance Dual Reporting structure presented in the Protiviti report.

### The Compliance Council will:

- Coordinate oversight and monitoring of compliance areas including research, athletics, student financial aid (and Title IV), information security and privacy, human resources, equity and inclusion (and Title IX), campus safety, financial integrity, records integrity, accreditation, compliance of affiliate entities
- Ensure consistent university-wide adherence to all compliance standards and policies
- Work with the Director of University Compliance and General Counsel to identify compliance priorities and risks
- Identify compliance resources that are needed, and resources that can be shared across compliance areas.
- Provide data as required for presentations and reports to the Board of Trustees, and assist the director in writing compliance reports, including annual reports to the campus community.

### The Compliance Council will include:

- Director of Compliance (Chair) Director of Emergency Management
- Director of Research Compliance HIPPA (HCO)
- Facility Security Officer Export Control (ECO)
- University Controller
- General Counsel (or representative)
- Chief of Police
- Director of Equity and Inclusion
- Director of Disability Services
- Director of Risk Management
- Compliance Officer, Financial Aid
- Director of Environmental Health and Safety
- Director of Athletics Compliance
- Chief Information Security Officer
- University Audit
- VP Student Affairs
- Director of Human Resources
- University Registrar
- AVP for Institutional Accreditation
- Director of Emergency Management

**HR Assigned Classification:**  
**Position No.:**

**Affirmative Action No.:**

## Position Description Form

<b>DEPARTMENT:</b>	University Compliance
<b>REPORTS TO (Name and Title):</b>	President
<b>PREPARED BY (Name, Title and Date):</b>	
<b>APPROVED BY (Name, Title and Date):</b>	

### I. Job Purpose

Please provide one or two sentences that describe the overall purpose of this job. The job purpose describes why the job exists. Statements should generally begin with "To" and "By".

**Job Purpose:**

Reporting to the Chief Operating Officer and the Compliance and Audit Committee of the Board of Trustees the position of Director of University Compliance will provide coordination, oversight and monitoring of all university compliance functions. By assessing compliance risks, the position will provide assurance that the operations of the university are supported by adequate compliance resources.

### II. Essential Job Functions

The essential job functions are the duties and responsibilities of the job that involve the fundamental nature of the job, occupy a large proportion of the employee’s time or require specialized expertise. **Other duties not listed as essential functions may be assigned.**

A sample essential function for an Office Assistant I would be “Communicates with callers and visitors providing information about the department.” Note that to perform this job successfully, an individual must be able to perform each essential function satisfactorily. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Please state each essential job function and the approximate percentage of time spent in each function in the spaces provided below. When possible, describe job functions based on natural groupings of work activities and label these groups as essential job functions. Please limit the number of job functions to a total of 6. The percentages of time spent performing the essential functions should add up to 100%.

**Wright State University provides equal opportunity without regard to race, sex, color, religion, ancestry, national origin, age, disability, veteran status, or sexual orientation. Upon selection and prior to employment, each selected applicant who has advised us of an existing disability will be assisted so that we can implement reasonable accommodations to enable performance of the essential functions of the job.**

<p><b>1</b></p> <p>Percent of time spent in this function: <u>20</u> %</p>	<p><b>Essential function:</b></p> <p>Develop and implement mechanisms and formal processes for assessment of compliance risks. Report risk assessment findings and other compliance issues to the Compliance and Audit Committee of the Board of Trustees.</p> <p>Develop and lead the university’s compliance strategy.</p>
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<p><b>2</b></p> <p>Percent of time spent in this function: <u>10</u> %</p>	<p><b>Essential function:</b></p> <p>Monitor compliance functions in all campus units, and promote a culture of collaboration, integrity, ethical behavior, and compliance in all campus units and at all levels.</p>
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<b>3</b>	Percent of time spent in this function: <u>20</u> %	<b>Essential function:</b>  Convene and manage the University Compliance Council. Work collaboratively with other offices including the Office of General Counsel, compliance units, Audit, and risk management.
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<b>4</b>	Percent of time spent in this function: <u>20</u> %	<b>Essential function:</b>  Create and maintain an inventory of compliance requirements and review and develop compliance and ethics Policies and Procedures (Wright Way Policy).
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<b>5</b>	Percent of time spent in this function: <u>20</u> %	<b>Essential function:</b>  Document compliance and ethics training requirements and ensure appropriate training programs are provided for all university stakeholders along with documentation of personnel completion of training.
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<b>6</b>	Percent of time spent in this function: <u>10</u> %	<b>Other related duties:</b>  As assigned by the Chief Operating Officer.
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### III. Supervision and Fiscal Responsibilities

**Supervision:** Does this position have any supervisory responsibilities or direct the work of others? If so, please list below the type of supervision/work direction provided by this position and to whom it is given.

None. Infrastructure building may require support staff.

**Fiscal Responsibilities:** Does this position have responsibility for managing specific budgeted accounts, analyzing budget transactions, monitoring accounts or does it have full responsibility for planning, forecasting and final approval of budget transactions? If so, please list below what fiscal responsibility the position has and approximately the dollar amount associated with that responsibility.

TBD. Compliance Office budget not yet established.

## IV. Minimum Job Qualifications

Please list any specific previous training, certifications or skills (e.g. computer software training) that can increase competency (knowledge, skills and abilities) in performing this job, and any working conditions that the employee may be exposed i.e. temperature, noise, hazardous materials, climbing, hours of work, etc.

Strong leadership, collaborative, verbal and written communication skills. Experience in assessing compliance risks in a research university. Ability to interpret complex legal statutes or guidelines.

**Working Conditions:**

Office, travel (conferences and local affiliated entities), deadlines and compliance issues may require after hours work.

### EDUCATION AND EXPERIENCE REQUIREMENTS

**Required:**

JD or earned doctorate.

**Required Professional license or certificates:**

**Preferred:**

Working knowledge of 2 CFR-200 (Uniform Guidance) and other Federal and State regulations, laws and statutes, including at least several of the following areas: HIPPA, FERPA, Clery Act, Title IV, Title IX, ADA, OSHA, Export Controls, Animal Welfare Act, Human Subjects research, facility security, fiscal regulations.

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<b>HR Reviewed By and Date:</b>
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Distribution: white-Human Resources; canary-Department; pink-Budget; goldenrod-Affirmative Action