University Compliance Services

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www.utexas.edu/compliance

What I Hope to Accomplish Today

Introduce you to University Compliance Services (UCS)

— Who we are
— Why we’re here
— What we are trying to do
— How we work together
Who We Are

- Paul Liebman, Chief Compliance Officer and Director
- Clay Simmons, Deputy Director
- Dr. Jennifer Hammat, Asst Vice President-Title IX, Clery Act and Minors on Campus Coordinator
- Cristy Oliver, Administrative Manager
- Candice Fischbach, Policy Program Manager
- Jaime Davis, Training Coordinator
- Linda Millstone, Investigations Program Manager
- Keshia Williams, Senior Administrative Associate
- Janet West, Administrative Associate
Who We Are

Chief Compliance Officer and Director

Deputy Director

Asst VP – Title IX, Clery Act and Minors on Campus Coordinator

Sr. Admin. Associate

Policy Program Manager

Training Program Coordinator

Investigations Program Manager

Administrative Manager

Administrative Associate

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Policy Program Manager

Training Program Coordinator

Investigations Program Manager

Administrative Manager

Administrative Associate

Why We’re Here: The Big Picture

Mandated Boundaries: external forces (federal, state, local laws and regulations, Regents or UT System rules)

Voluntary Boundaries: internal choices (UT’s voluntary policies, contractual obligations, public commitments, Core Values, Honor Codes)

UT-Austin Business Model

Opportunities

Obstacles

UT-Austin Objective

Core Purpose

To transform lives for the benefit of society.
Why We’re Here

Significant consequences for violating boundaries:

• Death or serious injury
• Criminal liability for the University or individuals
• Civil, administrative or financial liability
• Interruption or loss of business and research opportunities
• Reputation damage
• Change of law

Nobody budgets for non-compliance
What We Are Trying To Do


What We Are Trying To Do

Be a “Compliance Center of Excellence” for the campus community.
What We Are Trying To Do

Tools, Parts, and Services!

UCS Activities

- Risks
- Corrective Action
- Investigations
- Reporting
- Policies
- Training
**ISSUE: Affordable Care Act**

**OBJECTIVE:** Implement the requirements of the Affordable Care Act.

**MILESTONES:**
- Assess legislation for business practice impacts (hiring, workforce management, tax/payroll reporting, eligibility, financial cost trending, etc.)
- Establish initial and recurring ACA measurement and stability periods (initial measurement is Nov. 1st, 2013 through Oct. 31st, 2014)
- Establish affordability measure, i.e. Safe Harbor W2 or rate of pay
- Develop system to provide the required ACA Marketplace Notice for all existing employees by Oct. 1st 2013 and all new hires thereafter
- Develop training materials and communication strategy to familiarize campus stakeholders on ACA employer requirements
- Modify existing Payroll Services voucher system to accommodate the collection of actual work hours for voucher paid employee types
- Modify HRMS assignment business rules to enable the identification of all employees in a centralized location, including casual employees
- Implement electronic timesheets for hourly employees to enable the collection of actual work hours into a single ACA tracking tool
METRICS:

• Number of ACA Stakeholder presentations and meetings conducted
• Number of current state benefits eligible employees
• Number of state non-benefits eligible employees
• Number of state non-benefits eligible employees trending toward ACA eligibility
• Number of existing state benefits eligible employees who may fall into the “affordability” risk pool
• Number of ACA eligible employees and percentage of those offered coverage
• Number of ACA eligible employees accepting and enrolling in UT Select
• Percentage of employees receiving required Marketplace Notice
• Percentage of employees receiving Qualified Offer reporting information pursuant to Sec. 6055 and 6056
• Number and nature of ACA related penalties

COMMENTS:

• UT System OEB is managing the ACA changes required for our benefits plan; however, they are not currently responsible for meeting employer responsibilities. But for the measurement period, all milestones listed on this document are being managed at the institution(employer) level. We regularly communicate with UT System OEB on our progress toward that end.
• An in-house ACA tracking tool (Excel spreadsheet) has been developed. However, it is insufficient to meet the financial forecasting needs of a campus our size and complexity. Nor is it sufficient in determining ACA eligibility and affordability without significant manual involvement and manipulation. A superior external tool, compatible with Workday, is available and the ACA Workgroup recommends it’s implementation for compliance reporting, cost trending, eligibility determinations and affordability calculations.

Policy Highlight:
Conflict of Interest

• UTS 180 → HOP 5-2011
  • Conflict of Interest, Conflict of Commitment, and Outside Activities
  • Related to but different than HOP 7-1210 Promoting Objectivity in Research
• Compliance is important, but the process is not intuitive
• Provost Website
• Online training: CW 181
Training Program Process
Maturity Continuum

Historical Info

FY 2013-2014

FY 2014-2015

FY 2015-2016

Value

1999
- Compliance role was created.

2001
- CTS launched, which allowed training to be tracked.

2006
- Compliance is its own unit.

2010-2012
- Significant reporting and tracking improvements.

2013
- TWC Audit reveals large gaps in reporting abilities and data manipulation

(1) Maintain and improve current training processes

(2) Conduct a self-assessment of the effectiveness of compliance training students, staff and faculty

(3) Conduct Biennial "Ethical Climate" Survey

(2) Implement agreed-upon training program improvements; track progress; assess value of improvements

Training Program Activities

Sub-Project/Key Deliverables for 2013-2014

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<td>Ongoing</td>
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| (1) Work with IT and end users to ensure that online courses are delivered as problem-free as possible. |
| Ongoing |

| (1) Work with subject matter owners to ensure that content in online courses is current, accurate and relevant to end users. |
| Ongoing |

| (1) Continue to offer and improve classroom compliance and ethics modules. |
| Ongoing |

| (1) Continue to offer and improve training and professional development opportunities for UT Austin faculty and staff. |
| Ongoing |

| (1) Research ways to improve accessibility (ADA and foreign languages) for current online courses, handouts and website. |
| Q2 |

| (2) Assess the current state of compliance and ethics training at UT Austin – i.e., Who gets what training? Why, how and when? Costs, ROI and perceived value added? |
| Q1/Q2 |

| (2) Benchmark trends and best practices in compliance and ethics training – i.e., substance and delivery methods. |
| Q2/Q3 |

| (2) Using findings from assessment, benchmark UT Austin against other UT System schools as well as other similarly situated schools. |
| Q2/Q3 |

| (2) Share assessment and benchmark findings with key stakeholders. Assess feedback. Report to ECC. |
| Q2/Q3 |

| (2) Develop first draft of short and long-term recommendations for improving compliance and ethics training program. |
| Q3 |

| (2) Share recommendations with key stakeholders. Assess feedback. |
| Q3/Q4 |

| (2) Develop final draft of short and long-term recommendations. Report to ECC. |
| Q4 |

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<td>Will miss target date</td>
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<td>Complete</td>
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Last revised: 3/24/14
How We Work Together

Expectations of all students, faculty and staff:

• Act legally and ethically at all times
• Encourage others to act legally and ethically at all times
• Manage conscientiously
• Prevent and report retaliation
• Complete required training
• Ask questions before engaging in risky behavior
• Report illegal or unethical behavior in a timely manner

Report suspicious behavior:

• Any supervisor/manager
• Human Resources
• Legal Department

• University Compliance Services
  • In person: 1616 Guadalupe St, UTA 2.206
  • Regular mail: PO Box 8118, Austin, TX 78713
  • Campus mail: Mail code D9200
  • Phone: 512-232-7055
  • Fax: 512-232-3722
  • Email: hotline@compliance.utexas.edu
How We Work Together

Report suspicious behavior anonymously to the Compliance & Ethics Hotline:
• www.reportlineweb.com/utaustin
• 877-507-7321

Confidentiality will be maintained to the greatest extent allowed by law and under the circumstances of the report.

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