



UCF Board of Trustees

Audit and Compliance Committee

September 27, 2024

Agenda Item

INFO-1: 2023-2024 Compliance and Ethics Work Plan Status of All Activities

Proposed Action

This information is being presented for information purposes only.

Authority for Board of Trustees Action

N/A

Supporting Documentation Included

Attachment A: 2023-2024 Compliance and Ethics Work Plan Status of All Activities

Facilitators/Presenters

Rhonda L. Bishop, Vice President for Compliance, Ethics, and Risk

Summary of Key Observations/Recommendations

Key highlights include:

- Conflict of Interest and Commitment Program
 - Achieved 100% completion with 2023-2024 outside activity and financial interest reporting.
 - Received a total of 5,443 disclosures (an increase from 4,993 last year) and 311 amendments (decrease from 394 last year).
 - Disclosures with at least one new outside activity are reviewed by the office. This year the office reviewed 930 (a decrease from 1,619 last year), with potential conflicts identified in 115 requiring a monitoring plan or annual update (an increase from 95 last year). Six disclosures were unapproved due to conflicts that could not be mitigated. At the time of this report, four disclosures were still under review.
 - Foreign influence red flag reviews were completed for responses containing foreign entities. Completed a total of 58 red flag reviews. Three contained at least one red flag or potential risk that resulted in additional awareness to the employees with one resulting in disengagement of the activity.
- Youth Protection Program
 - The office oversaw a total of 140 youth programs during this fiscal year, an increase from the 133 last year.
 - Total UCF hosted programs: 41 (29%)
 - Total third-party hosted programs: 99 (71%)
 - Of the 140 youth programs, 37 were overnight programs (26%)
 - Total number of minors served during this fiscal year: 17,355
- Foreign Influence Regulatory Reporting
 - As required by Section 117 of the Higher Education Act and Florida statute 1010.25, compiled a list of all UCF gifts and contracts with foreign entities and reported the following:
 - Twelve foreign gifts and contracts that in aggregate exceeded \$250,000 to the Federal Department of Education and 44 foreign gifts and contracts in aggregate exceeding \$50,000 to the Board of Governors (BOG) by the July 31, 2023, deadline.
 - Thirteen foreign gifts and contracts that in aggregate exceeded \$250,000 to the Federal Department of Education and 29 foreign gifts and contracts in aggregate that exceeded \$50,000 to the BOG by the January 31, 2024, deadline.
 - In response to the BOG Inspector General's August 9, 2023, Data Request, prepared and submitted the response confirming UCF does not have agreements with universities meeting the specified criteria located in a foreign country of concern by the August 22, 2023, deadline.
 - Collaborated with partner offices to respond to the BOG Inspector General's September 2023 foreign gift disclosure inspection request, providing additional supporting documentation for the purchase orders audited.

- In response to the Board of Governors' September 6, 2023, Data Request, prepared and submitted on behalf of UCF, a description of the UCF policies, procedures, and processes that were revised in response to Board of Governors Regulation 9.012, Foreign Influence, by the March 8, 2024, deadline.
- In response to the Board of Governors' March 14, 2024, Data Request, oversaw the data collection and compilation of the number of students domiciled in a foreign country of concern prior to receiving a graduate assistantship in the 2021-2022, 2022-2023, and 2023-2024 academic years, and submitted the response on behalf of UCF by the deadline on April 5, 2024.

Additional Background

N/A

Implementation Plan

Highlights of University Compliance and Ethics activities are provided to assist the committee in fulfilling their responsibility to provide oversight and be knowledgeable of the program. The Committee will continue to receive updates on the status of planned activities during each Committee meeting.

Resource Considerations

There are no resource considerations.