



**COMPLIANCE OFFICE – ANNUAL REPORT  
FY 2023 - 2024**



**Submitted By:**  
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## **UNIVERSITY OF NORTH FLORIDA 2023-2024 COMPLIANCE OFFICE ANNUAL REPORT**

### **BACKGROUND**

The Florida Board of Governors (BOG) Regulation 4.003, SUS Compliance and Ethics Programs, requires each University Board of Trustees (BOT) to implement a university-wide compliance and ethics program to promote ethical conduct and maximize compliance with applicable laws, rules, regulations, and policies. The UNF BOT adopted the first UNF Compliance and Ethics Program Plan at its October 2017 meeting, and it remains the guiding document for operations of the Office of University Compliance and Ethics (Office). In January 2022, the Office completed the required five-year independent program review and received a “Generally Conforms” (highest) rating in all sixteen categories, with recommendations to grow UNF’s compliance operation over the next five years.

The Program is modeled on the seven elements of an effective compliance and ethics program described in the Federal Sentencing Guidelines and supports UNF's Mission, Vision and Values. The plan also conforms to requirements of BOG Regulation 4.003. This report summarizes the activities and initiatives of the Compliance Office in support of the Program and its goals during the 2023-24 fiscal year.

### **NEW ACTIVITIES**

- Participated as a member of UNF and SUS workgroups addressing new legislation (SB 266, HB 7063) and BOG Regulations (9.013, 10.003)
- Participated as a member of UNF workgroup to draft changes to regulation on free expression (offered for approval at the September 2024 BOT meeting)
- Founded Title IX Collegiate Partners group, bringing together Title IX administrators from all five Jacksonville-area colleges and universities
- Trained and served as a hearing officer for appeal of a Student Conduct Code matter
- Met with internal and external colleagues to understand and strengthen UNF’s employee immigration processes
- Participated as a member of UNF’s response team on free expression activities
- Appointed to the Jacksonville Ethics Commission

## **COMPLETED ACTIVITIES**

- Participated as a member of UNF workgroup to draft policies and procedures to implement new statewide post-tenure review requirements
- Completed crosswalk project to ensure UNF policies and regulations have components required by BOG regulations
- Served on the search committee for UNF's new Assistant Vice President for Human Resources
- Oversaw completion and delivery of UNF's Department of Defense Voluntary Education and Memorandum of Understanding updates
- Oversaw completion and delivery of UNF's Florida Equity Report submission to the BOG
- Led UNF's policy and regulation revision processes, resulting in approval of 37 new or revised policies and regulations, including new policies governing immunization requirements and exceptional withdrawals, and major revisions to policies governing UNF's enrollment management and tuition scholarships for employees and dependents
- Conducted investigations of reports from UNF community members regarding conflicts of interest, unethical behavior, process irregularities, and violations of signage policies
- Led the processes to update the UNF BOT Bylaws and Delegation of Presidential Authority

## **CONTINUING ACTIVITIES**

### **1. Executive Oversight**

- Board of Trustees Audit and Compliance Committee
  - Quarterly updates to the Committee on emerging and on-going compliance issues
- Compliance Officer
  - Leads UNF's efforts to ensure compliance with all elements of BOG Regulation 4.003, State University System Compliance and Ethics Programs
  - Updates with President Limayem and members of the Executive Staff on emerging and ongoing compliance and ethics issues
  - Updates with the Senior Woman Administrator regarding Athletics compliance issues
  - Updates with staff of the Office of Equal Opportunity and Inclusion (EOI) to ensure compliance with state and federal laws
  - Updates with members of the Dean of Students' Office, including participation on CARE and CATA teams
  - Ex-officio member of University-wide Compliance Committees, including the Title IX Committee, the Clery Act Committee, the Campus Safety Advisory

Committee, the Financial Aid Policy Committee, the Data Governance Committee, and the GDPR Task Force

- Compliance, Ethics and Risk Oversight Committee (CEROC)
  - Co-chair with Chief Audit Executive for CEROC monthly meetings
  - In collaboration with the Chief Audit Executive, continues work to establish and grow an Enterprise Risk Management Program, in alignment with UNF's strategic plan (please see CEROC Annual Report for more information)

## 2. Standards of Conduct/Policies and Procedures

- Assessed policies and procedures governing policy and regulation development and sought feedback on areas for improvement
- Participated in workgroups and drafting activities related to policies on standards of conduct for students and employees

## 3. Effective Lines of Communication

- Engaged in regular updates with BOT Audit and Compliance Committee members, the President, and members of the Executive staff
- Continued enhancements and updates to the Compliance and Ethics webpage
- Provided communications to campus regarding expansion of the Office and new hires in EOI
- Monitored [compliance@unf.edu](mailto:compliance@unf.edu), [privacy@unf.edu](mailto:privacy@unf.edu), and [eoip@unf.edu](mailto:eoip@unf.edu) email addresses as additional touch points for enhanced communications
- Continued to be an open door to employees, students, and others to address questions and concerns regarding compliance and ethics issues
- Elected Chair of the SUS Compliance Consortium, improved communication with colleagues at sister institutions and the BOG
- Continued and strengthened the partnership with FBI Jacksonville and identified University Compliance as a key point of engagement for federal compliance issues, including roundtable luncheon with the President (September 2023) and the "Be Smart With Your Smartphone" event (April 2024)

## 4. Education and Training

- Launched UNF's stand-alone conflict of interest training through Osprey Ascend
- Attended ERM training at North Carolina State University (November 2023)
- Attended the SCCE Annual Higher Education Conference (June 2024)
- Participated in webinars and online sessions on higher education topics, including campus activism, digital accessibility, Title IX compliance, and post-tenure review
- Facilitated trainings and awareness sessions on Title IX and sexual violence prevention for new and returning student-athletes and for Athletics staff

- Provided guidance to campus partners on hiring of relatives, drafting of COI management plans, acceptance of gifts, and filing of required forms with the Florida Commission on Ethics

#### 5. Audit and Monitoring

- Provided quarterly compliance updates to BOT Audit and Compliance Committee
- Continued to enhance the compliance directory to identify federal and state higher education compliance requirements and the University's responsible party
- Monitored the university calendar for civil discourse-related items and assisted with drafting of UNF's Summer 2024 Civil Discourse Recommendations Update, ensuring continued compliance with BOG requirements
- Tracked compliance issues arising from internal and external audits, and other program reviews and monitored corrective action
- Continued monitoring of the student-athlete concerns portal and responded to reports

#### 6. Enforcement and Discipline

- Promoted awareness of UNF policies and procedures and regulatory requirements via Osprey Update and in-person meetings
- Assisted with providing of recommendations to supervisors regarding appropriate corrective action for policy violations arising from Office investigations

#### 7. Response and Prevention

- Issued update notices and other alerts to compliance partners regarding regulatory changes
- Participated in discussions regarding UNF's protections and responses to cyberthreats and cyberattacks

### Goals for 2024-2025

1. Expand the Office by hiring a general compliance officer, privacy officer, and Clery coordinator (\*Clery Act Compliance Manager starts September 16, 2024)
2. Continue progress in meeting the requirements of the UNF Compliance and Ethics Program and implement recommendations from the five-year review
3. Continue efforts to mature UNF's Enterprise Risk Management Program via CEROC
4. Review new Title IX rules and lead any policy or regulation revision efforts, if necessary (Title IX rules were issued in Spring 2024 with an effective date of August 1, 2024, but are currently enjoined by federal courts)
5. Review new federal third-party servicer regulations and lead any policy, regulation, or procedure revision efforts (regulations are still pending at the federal level)

6. Enhance compliance and ethics training, education, and awareness programs across campus (carry-forward from previous Annual Report)
7. Complete the project to automate the policy review process (carry-forward from previous Annual Report)
8. Reengage the monthly discussion forum bringing together compliance partners from across campus to discuss on-going and emerging compliance issues (carry-forward from previous Annual Report)

Respectfully Submitted,

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