

COMPLIANCE AND ETHICS TRAINING IN HIGHER EDUCATION

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Objectives

- Discuss the unique culture of an academic environment and its impact upon training.
- Share our history and experiences.
- Review examples of program elements that have been successful and those that have not.
- Provide practical tips in developing or refining a compliance education program.
- Hear your stories and ideas.

Training in Higher Education - Why is it Different?

- Unique culture in academia
- Tenured Faculty
 - Independent
 - Academic Freedom
 - College/University Profit Center
- Making faculty understand that compliance is important to them and can impact their teaching/research/service.
 - Connect them into the fabric of the organization.

University of Connecticut

- 14 schools and colleges, five regional campuses and Health Center.
- Research awards in 2008 exceeded \$194 million.
- \$2.8 billion, 20-year infrastructure investment from the state.
- Approx. 21,000 undergraduate students; 8,000 graduate students.
- Approx. 10,000 union and non-union employees.

THE STORRS STORY



2005

- The University settled allegations with the EPA Office of Inspector General (OIG) by signing a five year CIA.
- \$2.5 million fine.
- By July 1, 2006, certify “adequate and appropriate compliance program.”
- BOT hired first Chief Audit and Compliance Officer
 - Reorganized Internal Audit department into Office of Audit, Compliance & Ethics
 - Oversight of ALL campuses

Ethics

- June 2004 - CT Governor John Rowland resigns
 - allegations of accepting expensive gifts from employees and contractors.
- July 2004 - Lt. Governor Jodi Rell takes office
 - Executive Order No. 1 - "committed to restoring public trust".
 - Established Special Counsel for Ethics Compliance
- 2005 - dismantled former State Ethics Commission
 - Internal fighting among staff and firing of Director
 - Established new Office of State Ethics and Citizen's Ethics Advisory Board

THE HEALTH CENTER CHRONICLE



University of Connecticut Health Center (UCHC)

- John Dempsey Hospital (JDH) -224 beds.
- Schools of Medicine/Dental Medicine and postgraduate residency programs.
- University Medical Group.
- UConn Health Partners.
- University Dentists.
- Correctional Managed Healthcare.
- Clinical and translational research.

UCHC Compliance History

- Mid-1990's-Existing Internal Auditor assigned additional role of Compliance Officer.
- 2000-EVP of Health Affairs recognized importance of individual Audit and Compliance functions.
 - Compliance Officer named.
 - Training initiated with focus upon academic medical centers and clinical compliance.
- 2005-Program expanded and “domains” were born.
- 2007-Certification of Compliance Agreement (CCA) signed between JDH and Department of Health and Human Services OIG.
 - Existing Compliance Program reduced penalty.

THE COMPLIANCE TRAINING EXPERIENCE





....In the Beginning

- 2006 - Code of Conduct, University Guide to the State Code of Ethics and Federal False Claims Act (UCHC)
- One module for both faculty and staff
- “Roll out” plan
 - Dean’s Council/Faculty Councils/Senior Management
 - Executive Compliance Committees
 - Presented training to the unions
- Online and Classroom Sessions
- General and Individual Department sessions
 - Anytime, anywhere, any place
 - Spanish translation & Sign Language Interpreter sessions

What We Learned the First Year...

- Support from senior management essential.
 - Invite President/Provost/Deans/VPs to make opening remarks.
- Differences between faculty/staff and campuses.
 - Tailor sessions for specific audience
- Individual department sessions not efficient use of resources.
 - Refined classroom sessions
- Make the training relevant.
- Critical to reinforce the role of Compliance.

Online Training

- Key component, but should not be your only method.
- “Home-grown” system vs. outside system.
 - Benefits vs. weaknesses
- Include a post test in your online system.
- Consider your environment.

Regional Campuses and Programs

- Feel like the “step-children” of the University.
- Classroom sessions are important to create a connection.
 - Video conferencing
- Individual culture - including specific examples that are relative to their environment.

The Art of Nagging

- Accurate attendance tracking system is key.
- Frequent attendance reports to Deans, Directors and Department Heads.
 - unions
- Reminder emails and mailings.
- Phone calls.
- Embarrassment/Fear Factor.

Sanctions

- Storrs developed formal Compliance Training Policy in 2008.
 - Input from senior managers and unions.
 - Approved by Executive Compliance Committee
 - Requires annual compliance training.
 - Attestation.
 - Sanctions.
- Due to CIA, any mandatory employees who do not complete specific grant management training will have their grant monies withheld until compliant.

PRACTICAL TIPS



Bodies in the Seats vs. Making an Impact

- “Converts”
 - How you build a “culture of a compliance”
- Employees in the trenches want to comply with the rules.
 - Know how the system works and when there may be a problem.
- Using “hot topics” and frequently asked questions from previous year to create next year’s training.
- Support from your Joint Audit & Compliance Committee.

It's all in the Approach

- Legal/regulatory with Faculty.
- Include the “Who” and the “Why” .
- Real life examples of consequences of non-compliance.
- Subject matter expertise is a plus!
- “We’re here to help” .
- Set standards of behavior upfront in classroom setting.

Knowing the Culture

- Ongoing support from your Joint Audit & Compliance Committee.
- Using your allies.
- Knowing the organizational structure.
- Recognize your audience.
- Picking your battles.

Collaboration

- Other departments may also require mandatory training.
 - Creates confusion/frustration for faculty and staff
- Work with these departments to ensure clarification.
 - Online system
 - Master Calendar
 - Use your training to assist with overall compliance.

What They Don't Tell You

- Never EVER show fear!
- If you don't know the answer, admit it up front.
- "Messenger" approach.
- Develop a thick skin.
- Patience & Humility.
- Be ready to respond to questions about every public figure in your school and state.

Building Trust

- “Face” of the Compliance Program.
 - New Employee Orientation
- Employees will not report to the Compliance Program if they don’t trust YOU.
 - What people tell you during/after sessions.
 - Coming from the ranks helpful.
- We ALL want our university to succeed.

Think Outside the Lecture Hall....

- Newsletters
- Websites
- Broadcast messages
- Posters
- Committee membership
- “Lunch and Learn”
- Collaborating with professional development programs

The Numbers

- 2006-2007
 - Storrs - 95% Completion (67% live, 33% online)
 - » 85 Live Sessions
 - UCHC - 95% Completion
 - » 49 Live Sessions
 - JDH - 100% Completion
- 2007-2008
 - Storrs - 98% Completion (58% live, 42% online)
 - » 67 Live Sessions
 - UCHC -
 - » 44 Live Sessions
 - JDH -
- 2008-2009

Takeaways

- One-size-fits-all does not work in an academic environment.
- Buy-in from Faculty important.
- Support from BOT & senior management.
- Use the experts available to you to help create your training.
- Don't be afraid to make mistakes.
- Persistence.

QUESTIONS?

