





**Annual Action Plan: June 1, 2004–May 31, 2005**

**Unit:** Compliance Support Services

**UTPA Mission:** The University of Texas-Pan American (UTPA) serves the higher education needs of a rapidly growing, international, multicultural population in the South Texas Region. The University preserves, transmits and creates knowledge to serve the cultural, civic, and economic advancement of the region and the state. The University provides students advanced instruction in academic programs offered through innovative delivery systems that lead to professional certification, and baccalaureate, master’s and doctoral degrees. Through teaching, research, creative activity and public service, UTPA prepares students for lifelong learning and leadership roles in the state, nation and world community.

**Division:** Business Affairs      **Unit Head:** Wilson Ballard

**Unit Mission:** The University of Texas-Pan American endeavors to fulfill all of its responsibilities to the people of Texas in an environment based on ethical behavior and compliance to applicable laws and rules (BPM 63, HOP 2.4.1).

**Unit Goal:** The Institutional Compliance Program will provide:

- assurance that all faculty and staff are aware of their duties and responsibilities in establishing and sustaining the desired compliance environment
- a mechanism for continuously assessing the effectiveness of that environment in assuring that all UT Systems business is conducted with integrity.

**Link to UTPA Goal(s):** 3. Improve UTPA’s organizational effectiveness

Unit Objective (Action Priority: #1 is highest)	Link to UTPA Objective	Expected Outcome for Unit Objective (AA-Measurable Objective)	Strategy(ies) to Achieve Expected Outcomes	Assessment Criteria, Evaluation Methods for Expected Outcome	New Resources Needed in FY05
Establish an institutional compliance infrastructure that will include (each with defined duties and responsibilities): <ul style="list-style-type: none"> <li>• Compliance officer</li> <li>• Compliance committee</li> </ul>	7	All elements present and working effectively in achieving the goals of the program	<ul style="list-style-type: none"> <li>• Compliance Officer function to be filled by VPBA</li> <li>• Compliance Committee function to be filled by executive committee, with quarterly meetings</li> <li>• Compliance office function filled by</li> </ul>	Peer Review (Report dated February 2004), and supporting preliminary self-assessments.	No Additional resources

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<ul style="list-style-type: none"> <li>Compliance office (1)</li> </ul>			Compliance Coordinator		
Develop a risk-based compliance plan to be updated annually. It will include the following for each 'high risk' area: <ul style="list-style-type: none"> <li>Responsible party</li> <li>Monitoring plan</li> <li>Training plan (2)</li> </ul>	7	All elements present and appropriately comprehensive.	<ul style="list-style-type: none"> <li>Gradually develop risk assessment and compliance plans to address high risk areas.</li> </ul>	Peer Review (Report dated February 2004), and supporting preliminary self-assessments.	No Additional resources
Provide compliance-related training and information to ensure understanding of their duties and responsibilities for ethical and legal behavior (3)	7	Tracking of extent training has been imparted, and evaluation that it has been effective	<ul style="list-style-type: none"> <li>Use Training Post to deliver general compliance training</li> <li>Give all new employees introduction to compliance program in their new employee orientations.</li> <li>Annual compliance assurance statements signed by all employees to reinforce their responsibilities</li> <li>Support responsible parties in developing and deploying specialized training for high risk areas.</li> </ul>	Peer Review (Report dated February 2004), and supporting preliminary self-assessments.  Reviewing specific risk area training results with responsible parties each quarter	No Additional resources
Establish a network of monitoring, reporting and training methods to maximize compliance (4)	7	All elements present and working effectively in achieving the goals of the program	<ul style="list-style-type: none"> <li>Use "Raise Compliance Questions" approach for employee reporting</li> </ul>	Test evaluation of survey software to improve ease of completing and analyzing Quarterly	No Additional resources



**Annual Assessment Report: June 1, 2004–May 31, 2005**

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**Link to UTPA Goal(s):** 3. Improve UTPA’s organizational effectiveness

Unit Objective (Priority: #1 is highest)	Link to UTPA Objective	Expected Outcome	Assessment Criteria, Evaluation Methods	Assessment Results (Use actual data to describe annual performance)	Use of Results (What change was made?)
Establish an institutional compliance infrastructure that will include (each with defined duties and responsibilities): <ul style="list-style-type: none"> <li>• Compliance officer</li> <li>• Compliance</li> </ul>	7	All elements present and working effectively in achieving the goals of the program	Peer Review (Report dated February 2004), and supporting preliminary self-assessments.	All elements were found to be present.  However, the Peer Review found: <ul style="list-style-type: none"> <li>• that the compliance office lacked adequate</li> </ul>	Hired an additional staff person starting 10/1/04  Changed publicity for the program to make clear that the President was at the head of the program.  Implemented enhanced

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committee <ul style="list-style-type: none"> <li>Compliance office (1)</li> </ul>				staff <ul style="list-style-type: none"> <li>that the perception on campus was that the program belonged to Business Affairs instead of the institution as a whole.</li> </ul>	tracking of actions in response to compliance questions raised with metrics as to timeliness vs. targeted deadlines. Initiated training for all supervisors, starting with the top managers in each division together with their respective Vice President. Sessions were introduced by the President.
Develop a risk-based compliance plan to be updated annually. It will include the following for each 'high risk' area: <ul style="list-style-type: none"> <li>Responsible party</li> <li>Monitoring plan</li> <li>Training plan (2)</li> </ul>	7	All elements present and appropriately comprehensive.	Peer Review (Report dated February 2004), and supporting preliminary self-assessments.	The required elements are present.  However, gaps exist:  The risk analysis needs to be more comprehensive.  Training and monitoring plans need to be developed for 10 identified high risk areas.	Greatly expanded the comprehensiveness of UTPA's risk assessment.  Of 10 areas requiring development of training and monitoring plans, 5 are complete and 2 are receiving active attention. 3 are currently deferred so as not to compete for resources with administrative computer system implementation in process.
Provide compliance-related training and information to ensure understanding of their duties and responsibilities for ethical and legal	7	Tracking of extent training has been imparted, and evaluation that it has been effective	Peer Review (Report dated February 2004), and supporting preliminary self-assessments.	The Peer Review found that the general compliance training treats each topic too briefly.	Retain the brief format, but when implementing new computer system's iLearning module, augment material accessible by hyperlink.

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behavior. (3)			Reviewing specific risk area training results with responsible parties each quarter	Responsible parties find it difficult to track training results for specific risk area training, especially if it involves the campus community beyond their own departments.	Dedicated up to 40% of a compliance coordinator's time to serving on iLearning implementation team to accomplish these objectives.
Establish a network of monitoring, reporting and training methods to maximize compliance. (4)	7	All elements present and working effectively in achieving the goals of the program	<p>Test evaluation of survey software to improve ease of completing and analyzing Quarterly Compliance Reports, as well as the sense of ownership of the assertions reported.</p> <p>Quarterly review of agenda materials provided to Institutional Compliance Committee.</p> <p>Analysis of Compliance Questions process for compliance to requirements of new <i>BPM 67</i> and changes to Uniform Sentencing Standards Guidelines</p>	<p>The test group told us this was an improvement; subsequent processing by Compliance Support Services proved that it would be easier on the back end also.</p> <p>Poor integration of our more comprehensive basis for risk assessment with the rest of the agenda materials</p> <p>Several enhancements to process identified. Also we noted that where the <i>BPM</i> assumed a reporting program for employees to report allegations of wrong-doing, the Uniform Sentencing Standards Guidelines required channels for employees to raise compliance questions</p>	<p>Software has been purchased so that conversion of Quarterly Compliance Reports can commence.</p> <p>Tested and deployed an integrated format for reporting results of high risk area management in the context of the risk assessment information.</p> <p>Revised <i>HOP 2.4.1</i> to reflect enhancements to process, and to reflect the spirit of the <i>BPM</i> while retaining the successful "Raise Compliance Questions" approach of the program. The revised processes have been put into practice; the updated <i>HOP</i> has been approved at the campus</p>

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				(consistent with UTPA's program) as well as report wrongdoing.	level, and is now pending UT System OGC approval.

**Additional Resources Needed (if any) that were requested for FY06 during the budget cycle:** \$1,800 for annual survey software maintenance fee.

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			<p>of compliance concerns, supported by <i>HOP</i> requirement that everyone raise compliance questions they are aware of, and signed annual compliance assurance statements that they have done so.</p> <ul style="list-style-type: none"> <li>• Use Excel-base quarterly compliance report to support continuous process improvement in high risk areas</li> <li>• Consistently high-quality agenda materials distributed to Compliance Committee members in advance of each meeting.</li> </ul>	<p>Compliance Reports, as well as the sense of ownership of the assertions reported.</p> <p>Quarterly review of agenda materials provided to Institutional Compliance Committee.</p> <p>Analysis of Compliance Questions process for compliance to requirements of new <i>BPM 67</i> and changes to Uniform Sentencing Standards Guidelines</p>	