

Administrative and Educational Support Report

Compliance Support Services

Annual Action Plan
Annual Assessment Report

June 2006 – May 2007



Annual Action Plan: June 1, 2006–May 31, 2007

Unit: Office of VPBA- 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*)

University Goal: Optimize institutional effectiveness and efficiency consistent with high quality organizational standards.

Division Objective: Increase the value added, customer service, and goodwill value to business practices.

Unit Objective	Strategy(ies) to Achieve Unit Objective	Measurable Outcome for Unit Objective	Assessment Criteria, Evaluation Methods for Measurable Outcome	New Resources Needed in FY07
Formalize annual compliance risk assessment to meet or exceed UT System expectations. (1)	Implement formal process for identifying “A” list risk areas based on investigation of processes used at some of the other UT academic institutions.	Identification of “A” list risks based on formal compliance risk assessment process.	<ul style="list-style-type: none"> • Risk assessment results turned in to UT System by date committed. • Relative strengths of UTPA process as shown on a process comparison with other UT academic institution(s) as reported in agenda materials of the 2nd Qtr meeting of the Institutional Compliance Committee. 	No new resources needed (We do need continuity of current staffing).

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Unit Objective	Strategy(ies) to Achieve Unit Objective	Measurable Outcome for Unit Objective	Assessment Criteria, Evaluation Methods for Measurable Outcome	New Resources Needed in FY07
	<p>Update the detailed risk assessments in each risk area in collaboration with risk area responsible parties.</p>	<p>Extent of “A” and “B” risk areas updated.</p>	<ul style="list-style-type: none"> 100% of detailed risk assessments of “A” and “B” list risk areas updated as reported in agenda materials of the 3rd Qtr meeting of the institutional Compliance Committee. 	
<p>Support excellent management of compliance high risk areas. (2)</p>	<ul style="list-style-type: none"> Work with areas that manage high risks to develop and implement training, monitoring, and reporting plans, focusing on the most critical high risk items first. Increase reporting and focus of designated responsible parties by greater involvement assessing quarterly results. Focus Institutional Compliance Committee on high risk items. 	<p>Extent of “A” and “B” list risk areas covered by quarterly compliance assurance reporting.</p> <p>Extent of probability of occurrence assessed as “low” or “low except for...” for high risk area reported items.</p>	<p>All “A” and “B” list risk areas covered by quarterly compliance assurance reporting.</p> <p>Assessed probability of occurrence for all “A” and “B” list risks of “low” or “low except for...”</p> <p>Use assessment as prepared quarterly in collaboration with risk area responsible parties for meeting of Institutional Compliance Committee.</p>	<p>No new resources needed (We do need continuity of current staffing).</p>
<p>Ensure high quality evaluation of compliance questions raised by campus employees.</p>	<ul style="list-style-type: none"> Continue existing process for evaluating compliance questions raised via hotline, email, telephone, in person, etc. Consistent survey tool follow up on items pending completion of 	<ul style="list-style-type: none"> Volume of questions handled. Consistency in following existing process. Timeliness of closure of compliance question action 	<ul style="list-style-type: none"> Equal or greater volume of compliance questions compared to prior year as reported in the agenda materials of the 3rd quarter meeting of the Institutional Compliance Committee. Zero departures from existing process as 	<p>No new resources needed (We do need continuity of current staffing)</p>

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	<p>decided actions.</p> <ul style="list-style-type: none"> Distribute office responsibilities so Compliance Coordinator can focus more effectively on compliance questions. Defend UTPA “raise compliance question” approach. 	<p>items.</p> <ul style="list-style-type: none"> UT System acceptance of UTPA’s “raising compliance question” approach. 	<p>reflected in documentation of each question raised.</p> <ul style="list-style-type: none"> Improved timeliness compared to prior year as reported on Aging of open items and items closed on report of status prepared quarterly for meeting of Institutional Compliance Committee. OGC approval of our Revised HOP 2.4.1 in a form that leaves the “raising compliance question” approach intact. 	

University Goal:

Empower individuals to implement high quality standards and processes.

Division Objective:

Identify and provide staff professional development opportunities in and outside of the Division.

<p>Provide and/or support appropriate compliance training. (4)</p>	<ul style="list-style-type: none"> Conduct general compliance training. Conduct compliance 	<ul style="list-style-type: none"> Extent of completed general compliance training of benefits eligible employees. Extent of completed 	<ul style="list-style-type: none"> 95% or more of all benefits eligible employees reported complete in the agenda materials for the 3rd quarter meeting of the institutional Compliance Committee. 95% or more of supervisors 	<ul style="list-style-type: none"> No new resources needed (We do need continuity of current staffing)
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	<p>training for new supervisors.</p> <ul style="list-style-type: none"> • Focus attention and support on designated responsible parties who are not developing and deploying training plans for their high risks. • Develop capabilities within Oracle for management and delivery of compliance training. • Update general compliance training for campus wide renewal in Oracle. 	<p>compliance training for supervisors of benefits eligible employees.</p> <ul style="list-style-type: none"> • Extent of appropriate Training plans implemented for “A” and “B” high risk areas. • Implementation of Oracle iLearning. • Extent of Update of general compliance training. 	<p>of all benefits eligible employees reported complete in the agenda materials for the 3rd quarter meeting of the Institutional Compliance Committee.</p> <ul style="list-style-type: none"> • Zero high risk areas with training plans not implemented as reported in the agenda materials for the 3rd quarter meeting of the Institutional Compliance Committee. • iLearning implemented and managing/delivering the training where appropriate by the 3rd quarter meeting of the Institutional Compliance Committee. • Update of general compliance training complete by the 3rd quarter meeting of the Institutional Compliance Committee. 	<ul style="list-style-type: none"> • Implementation support for Oracle iLearning.
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University Goal:	Become an outstanding research institution, emphasizing collaborative partnerships and entrepreneurship.
Division Objective:	Improve partnership between Grants and Contracts and Office of Research and Sponsored Projects to facilitate the dynamic nature of a research institution

Unit Objective	Strategy(ies) to Achieve Unit Objective	Measurable Outcome for Unit Objective	Assessment Criteria, Evaluation Methods for Measurable Outcome	New Resources Needed in FY07
Initiate a collaborative environment with all divisions to implement UT System Time and Effort Initiative. (6)	Focus compliance efforts related to the UT Time and Effort initiative to foster collaboration between all divisions in achieving this task.	Implementation of the initiative across the university.	<p>Zero pending action items for the implementation of BPM as reported in agenda materials for 3rd quarter meeting of Institutional Compliance Committee based on consensus of Compliance and Associate VP for Research.</p> <p>Number of Compliance Support Service hours devoted to the Time and Effort initiative will exceed one person-month.</p>	No new resources needed (We do need continuity of current staffing).



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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*)

University Goal: Optimize institutional effectiveness and efficiency consistent with high quality organizational standards.

Division Objective: Increase the value added, customer service, and goodwill value to business practices.

Unit Objective	Measurable Outcome for Unit Objective	Assessment Criteria, Evaluation Methods for Measurable Outcome	Assessment Results (Use actual data to describe annual performance)	Use of Results (What change was made?)
Formalize annual compliance risk assessment to meet or exceed UT System expectations. (1)	Identification of “A” list risks based on formal compliance risk assessment process.	<p>Risk assessment results turned in to UT System by date committed.</p> <p>Relative strengths of UTPA process as shown on a process comparison with other UT academic institution(s) as reported in agenda materials of the 2nd Qtr meeting of the Institutional Compliance Committee.</p>	<p>Turned in prior to 2nd Qtr meeting as committed</p> <p>Process comparison as reported in 2nd Qtr meeting of Institutional Compliance Committee shows UTPA process comparing favorably to two peer UT Academic institutions."</p>	Build on formal process established by identifying and advantage of additional opportunities to improve the process.

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Unit Objective	Measurable Outcome for Unit Objective	Assessment Criteria, Evaluation Methods for Measurable Outcome	Assessment Results (Use actual data to describe annual performance)	Use of Results (What change was made?)
	Extent of “A” and “B” risk areas updated.	100% of detailed risk assessments of “A” and “B” list risk areas updated as reported in agenda materials of the 3 rd Qtr meeting of the institutional Compliance Committee.	Pending as of 5/31/07 1] High risk personal identifiers 2] Sponsored Projects 3] Departmental reconciliations (B list risk)	Focus on High Risk Personal Identifiers in the upcoming year. This is going to require establishing a collaborative relation with IT Security
Support excellent management of compliance high risk areas. (2)	Extent of “A” and “B” list risk areas covered by quarterly compliance assurance reporting. Extent of probability of occurrence assessed as “low” or “low except for...” for high risk area reported items.	All “A” and “B” list risk areas covered by quarterly compliance assurance reporting. Assessed probability of occurrence for all “A” and “B” list risks of “low” or “low except for...” Use assessment as prepared quarterly in collaboration with risk area responsible parties for meeting of Institutional Compliance Committee.	Pending as of 5/31/07 1] High risk personal identifiers Assessment as of 3rd Qtr meeting of institutional compliance committee: 1] Facilities Safety - Opportunity for improvement 2] Hazardous Materials - Well Controlled 3] Child Dev Center - Well Controlled 4] Time and Effort - Significant opportunity for improvement 5] Personal identifiers - Significant opportunity for improvement	Complete update of detailed risk assessments in summer. Focus on High Risk Personal Identifiers in the upcoming year. This is going to require continually enhancing the effectiveness of collaboration with IT Security
Ensure high quality evaluation of compliance questions raised by campus employees.	Volume of questions handled.	Equal or greater volume of compliance questions compared to prior year as reported in the agenda materials of the 3rd quarter meeting of the Institutional Compliance Committee.	121 questions May 05-April 06 reduced to 98 questions May 06-April 07	"Difference due to reduced activity in Sept through Feb (67 last year vs. 39 this year). The reduction does not necessarily indicate a problem. However, it

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	<p>Consistency in following existing process.</p> <p>Timeliness of closure of compliance question action items.</p> <p>UT System acceptance of UTPA's "raising compliance question" approach.</p>	<p>Zero departures from existing process as reflected in documentation of each question raised.</p> <p>Improved timeliness compared to prior year as reported on Aging of open items and items closed on report of status prepared quarterly for meeting of Institutional Compliance Committee.</p> <p>OGC approval of our Revised HOP 2.4.1 in a form that leaves the "raising compliance question" approach intact.</p>	<p>Zero known departures from existing process</p>	<p>may be due to less awareness of the program due to late administration of the compliance acknowledgements.</p> <p>For next year, administer compliance acknowledgements in September. Also carry out a total campus re-administration of the general compliance training based on re-written material.</p>

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Empower individuals to implement high quality standards and processes.

Division Objective:

Identify and provide staff professional development opportunities in and outside of the Division.

<p>Provide and/or support appropriate compliance training. (4)</p>	<p>Extent of completed general compliance training of benefits eligible employees.</p> <p>Extent of completed</p>	<p>95% or more of all benefits eligible employees reported complete in the agenda materials for the 3rd quarter meeting of the institutional Compliance Committee.</p> <p>95% or more of supervisors of all</p>	<p>Cannot measure. Interface necessary to support accurate reporting by Training Post (by purging terminated employees) is not implemented.</p> <p>99.2 % complete as of</p>	<p>Obtain support to implement interface necessary to support accurate reporting by Training Post</p> <p>We need to provide a</p>
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	<p>compliance training for supervisors of benefits eligible employees.</p> <p>Extent of appropriate Training plans implemented for “A” and “B” high risk areas.</p> <p>Implementation of Oracle iLearning.</p> <p>Extent of Update of general compliance training.</p>	<p>benefits eligible employees reported complete in the agenda materials for the 3rd quarter meeting of the Institutional Compliance Committee.</p> <p>Zero high risk areas with training plans not implemented as reported in the agenda materials for the 3rd quarter meeting of the Institutional Compliance Committee.</p> <p>iLearning implemented and managing/delivering the training where appropriate by the 3rd quarter meeting of the Institutional Compliance Committee.</p> <p>Update of general compliance training complete by the 3rd quarter meeting of the Institutional Compliance Committee.</p>	<p>5/31/07.</p>	<p>general re-write of compliance training materials and carry out a total campus re-administration of the general compliance training.</p> <p>Stay the course</p>
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University Goal:

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Initiate a collaborative environment with all divisions to implement UT System Time and Effort Initiative. (6)	Implementation of the initiative across the university.	<p>Zero pending action items for the implementation of BPM as reported in agenda materials for 3rd quarter meeting of Institutional Compliance Committee based on consensus of Compliance and Associate VP for Research.</p> <p>Number of Compliance Support Service hours devoted to the Time and Effort initiative will exceed one person-month.</p>		