• Does UNK have an organization for dealing with compliance (is there a compliance officer, a compliance committee, delegated to a variety of departments, etc.)?
  • Dr. Neal Schnoor, Sr. Advisor to the Chancellor, was identified as UNK’s compliance officer (F’15).
  • A campus compliance committee, which meets monthly, was formed and charged (F’15) for the purpose of enhancing a culture of compliance on the UNK campus.
  • Compliance is delegated to a variety of departments/units and representatives of the same are members of the compliance committee.

• How does UNK use its Compliance Officer?
  The role of compliance officer is to coordinate and support UNK’s numerous existing compliance efforts, assess campus-wide performance, and provide senior leadership with a comprehensive view of the University’s compliance activities. The officer does not assume the duties of the various substantive compliance areas as compliance activities continue in existing reporting structures.

  The compliance officer works closely with senior leadership and management, all of whom are guided by the premise that they are responsible for:
  • identifying, understanding, and complying with compliance requirements
  • establishing/maintaining effective controls that provide reasonable assurance of compliance
  • evaluating and monitoring compliance, and
  • taking corrective action when instances of noncompliance are identified.

• How does UNK use its Compliance Committee?
  1. The Committee’s general charge is to be responsive to the Board of Regents Audit, Risk and Compliance Committee and its responsibilities.
  2. The Committee’s specific charge is to promote and support at UNK, a culture in which employees will operate in compliance with all applicable laws, regulations, policies and established standards of ethical conduct. To this end the committee will:
    • enhance UNK’s overall compliance culture by establishing a collaborative and supportive committee whose members bear significant responsibilities and/or oversight for compliance.
    • ensure that the UNK community has ready access to all policies and that these policies will be easy to find, read and understand—it will oversee the establishment and management of a well-organized website repository for all approved policies with links to related guidelines.
    • promote transparency by establishing and managing a website repository on which campus operational policies will be posted prior to being enacted, to provide opportunity for campus review and feedback.
    • promote timely review and archiving (annually) of UNK policies.
    • provide feedback to policy makers/owners as requested.

• Has UNK formally adopted a compliance policy?
  • Chancellor’s Cabinet (F’15) approved the following policy statement: UNK and its employees will operate in compliance with all applicable laws, regulations, policies and established standards of ethical conduct.
  • UNK’s compliance policy (procedures for developing and approving policies and a standard policy template for operational policies) was developed by the UNK Compliance Committee, shared with the campus community for a 30-day period for feedback, and approved by the Chancellor’s Cabinet F’15.

• List of significant compliance requirements and the responsible person on the campus for each.
  See updated matrix.
• How are new requirements identified?
  Responsible campus managers, as identified on matrix, report new requirements to Auditor for inclusion on matrix.

• Does UNK analyze/complete risk assessments to identify which compliance issues are most likely to impact a campus/the university in a significant way?
  The campus Auditor annually engages key campus leaders/managers to develop overall risk assessment, which is approved by the Chancellor and presented to the Regents. We seek to deepen engagement across campus and address issues in a timely and effective manner.

• Is there a policy/process for communicating compliance issues/violations to UNK/University administration?
  The current Compliance Officer is a member of the Chancellor’s Cabinet and members of the Compliance Committee report directly to members of the Chancellor’s Cabinet, providing redundancies for communicating issues/violations to senior administration.

• Key current compliance issues.
  • The campus is in the process of updating all policies to a common template as per new policy/process (adopted F’16). This process includes appropriate oversight of development, 30-day public posting for feedback, and documented approval by senior administration. Policies will be evaluated every three years at a minimum.
  • Finalizing organizational and policy/procedural updates relative to Title IX compliance.
  • Ongoing efforts to “close the accountability loop” for timely rectification of identified concerns/policies/procedures.
  • Strong focus on training for campus personnel as requirements have increased exponentially.
  • Develop matrix of state compliance requirements or add state requirements to the current matrix.

• Impediments to progress?
  UNK strives to meet the same compliance requirements as other NU campuses with limited resources, without the benefit of economies of scale, and with a “thin bench”—many of our managers wear many hats and have limited support personnel.

• What are the key new compliance issues?
  • Preparing to comply with new requirements of the Fair Labor Standards Act, pending further legislative action.
  • Addressing changes in Affirmative Action requirements—employment goal of 7% each, for veterans and individuals with a disability.

• How are we collaborating on issues?
  • Compliance Officer participates in monthly university-wide compliance meetings.
  • Compliance Committee is serving its charge well—creating a collaborative group of individuals who bear significant compliance responsibilities; taking multiple steps to promote and support at UNK, a culture in which employees will operate in compliance with all applicable laws, regulations, policies and established standards of ethical conduct; making policies readily available to the campus via the website; archiving existing policy; and promoting transparency and accountability.
  • Members of the Compliance Committee report excellent collaborations with NU central administration and NU campus colleagues across numerous areas of operations and policy.
  • Protiviti was engaged by NU to perform a review of existing IT security policies to assess the overall security posture in relation to policy maturity, identify gaps—policies that are non-existent or insufficient based on industry best practices, and identify opportunities for consolidation of policies among campuses. UNK will be using Protiviti’s review specific to UNK policies and consolidation of policies within the system.