Compliance Monitoring Tools in Higher Education: Development and Implementation

September 30, 2010

I. Welcome
   Webinar basics
   David Givens

II. Compliance Monitoring Tools in Higher Education: Development and Implementation
   Luanna Putney
   Peter Cataldo
Webinar Basics

1. Session is currently being recorded, and will be available to UT personnel on our website.

2. Attendees are currently muted. If you wish to ask a question please click on the “Raise Hand” button 🟢. The webinar administrator will un-mute you at the appropriate time. Please be patient as there may be multiple questions pending.

3. Questions may also be typed in the GoToWebinar Question panel. They will be answered at the appropriate time.

4. Be careful of turning down speaker volume to avoid feedback.

5. CPE credit is available for this webinar for attendees who attend the live webinar. Please request credit by sending an email to the SWC Office at systemwidecomp@utsystem.edu.
Compliance Monitoring Tools in Higher Education: Development and Implementation

September 30, 2010

Attendance Poll
Compliance Monitoring Tools in Higher Education

Luanna Putney, Director of Research Compliance
Peter Cataldo, Director of Ethics and Compliance

University of California, Office of Ethics, Compliance and Audit Services
Learning Objectives

1. Recognize when monitoring tools may be needed

2. Identify examples of compliance monitoring tools

3. Determine how compliance monitoring tools are implemented
When are monitoring tools needed?
What is the difference between auditing and monitoring?

- **Auditing**: Formalized approach, independent, objective. Audits are performed by someone who has no vested interest in the outcomes or business area being reviewed. Audits have established approach and methodology for sampling.

- **Monitoring**: Day to day reviews. Not necessarily independent of business unit, i.e., self reviews, peer reviews, etc. Part of doing business and approach may be informal.
A structure for managing regulatory risks within the enterprise
Purpose and Goals of Effective Auditing & Monitoring

No Big Surprises

**Early Warning Systems**
- Systematically identify, assess and prioritize risks
- Avoid unrewarded risks and protect assets in place
- Promote organizational learning
- Reduce chance of repeat problems
Purpose and Goals of Effective Auditing & Monitoring

No Big Mistakes

Integrated Infrastructure

- Ensure bad news travels fast internally first – early warning systems
- Prevent and rapidly respond to potential catastrophic failures
- Improve ability to anticipate and prepare for change
- Establish a risk-based culture
- Provide assurance that key risks and exposures are understood and mitigated
Purpose and Goals of Effective Auditing & Monitoring

No Big Missed Opportunities

Comprehensive Practices & Procedures

- Seek growth but ensure strategic and tactical risks are mitigated
- Maximize chances of success of achieving business plan goals
- Accelerate ability to respond to change and opportunities
- Install an appropriate control infrastructure
Annual Compliance Audit and Monitoring Plan

First Question: Do you have one?

Include the following steps in developing your plan:

- Conduct a risk assessment – consider focus reviews, surveys, individual interviews with key management/board members, known risk areas (initial start)
- Prioritize the risks – be sure to document methodology and close this loop at the end of each year
- Identify resources that will be needed for conducting audits and/or monitors on each of the risk areas
- Ownership and accountability for resolution at appropriate level
Auditing and Monitoring Overview

1. Define
2. Follow Up
3. Define Review Scope & Assumptions
4. Develop Review Criteria
5. Define Review Sample
6. Conduct Review
7. Document Observations & Findings
8. Obtain Management Response
10. Audit

Overview:

Follow
Define
Review Scope & Assumptions
Develop Review Criteria
Define Review Sample
Conduct Review
Document Observations & Findings
Obtain Management Response
Finalize Report & Corrective Actions
Audit
Auditing and Monitoring Overview

**Define Review Scope & Assumptions**
- Conduct interviews with Business Process Owners
- Review Policies & Procedures
- Review Education and Training materials
- Document scope & assumptions

**Develop Review Criteria**
- Test Review Criteria
- Enter criteria into database

**Conduct Review**
- Review recent audit related documentation
- Enter findings into database

**Document Findings and Observations**
- Query database for exception findings
- Summarize observations
- Develop recommendations

**Obtain Management Response**
- Share findings with Business Process Owners
- Obtain reactions to recommendations
- Draft a Corrective Action Plan

- Remediate
- Finalize Report & Corrective Action Plan
- Re-audit/Follow Up
The Monitoring Plan

Monitoring never ends - each review leads to the next, and the monitoring plan and unplanned issues drive additional reviews. It is a continuous process.
Audit and Monitoring: Summary

Effective Auditing and Monitoring approach provides a method to:

- Assist in identifying risk to the business that may have been otherwise undetected internally
- Assist by identifying if the controls developed to remediate a risk are working and have actually helped to mitigate the risk
- Assist with preventing a real and/or potential risk from escalating by early detection through monitoring and auditing which may help avoid additional harm to the University
- Provides a “good faith” organization the ability to approach their real and/or potential risk weaknesses with a reasonable, scaleable method

Auditing and Monitoring is a critical element for an effective compliance program which helps to drive compliance and behavior.
Uses for Monitoring Tools

Tracking implementation progress for new regulations (i.e., NSF RCR training, HEOA, Red Flags Rule, ARRA reporting)
Assessing compliance with narrow policy/reg (i.e., IP assignment monitoring)
Collecting monitoring data from multiple subjects (i.e., royalty questionnaire)
Assessing compliance under reactive circumstances (i.e., ARRA reporting)
Assessing compliance on recurring basis (i.e., compliance with training requirements)
What are some examples of monitoring tools?
Compliance with NSF Responsible Conduct of Research (RCR) Training Requirement

**Requirement:** For National Science Foundation (NSF) research proposals submitted ON or AFTER January 4, 2010:

1. An institution must have a plan in place to provide appropriate training and oversight in the responsible and ethical conduct of research to undergraduates, graduate students, and postdoctoral researchers who will be supported by NSF to conduct research.

2. An institution must designate one or more persons to oversee compliance with the RCR training requirement.

3. Institutions are responsible for verifying that undergraduate students, graduate students, and postdoctoral researchers supported by NSF to conduct research have received training in the responsible and ethical conduct of research.
Compliance with NSF RCR Training Requirement

- Office of Ethics, Compliance and Audit Services:
  - Facilitated systemwide calls to discuss requirement and possible implementation approaches
  - Ongoing documentation of implementation plans and monitoring through calls and informal inquiries
NSF America COMPETES Act – Section 7009 RCR Training

Campus Implementation Plans/Processes

1. UCB
   - Content: Initial use of CITI RCR modules; consider use of new UCR RCR content once developed. UCB RCR website: http://csc.berkeley.edu/orcr.html
   - Identification/Notification: Human subjects protection unit develops list of NSF funded students/postdocs from payroll and will run the list periodically; once new UCR RCR content is developed and loaded onto LMS, use PPS in conjunction with automated features of LMS to identify/remind learners
   - Compliance Assurance/Monitoring: PIs will be responsible for ensuring training and will certify on a periodic basis

2. UCD
   - Content: May want to use CITI RCR modules since currently use CITI for IRB training; consider use of UC RCR content
   - Identification/Notification:
   - Compliance Assurance/Monitoring:

3. UCI
   - Content: Will use LMS to deliver RCR training to ALL undergraduates, graduates and postdoctoral scholars, regardless of funding source. UCI RCR Plan: http://www.research.uci.edu/orcr/forms/rcr/RCRimplementation.pdf
   - Identification/Notification:
   - Compliance Assurance/Monitoring:
Compliance with Intellectual Property Assignment Policy

• Compliance with University policy
  – Policy statement:
    • “I acknowledge my obligation to assign inventions and patents that I conceive or develop while employed by University or during the course of my utilization of any University research facilities or any connection with my use of gift, grant, or contract research funds received through the University.”
    • Duty to assign those inventions to University that are within scope of work

• Compliance with Bayh-Dole
  – Duty of University to report inventions funded with federal $$ to the funding agency
  – Duty of University NOT to assign away rights in federally funded inventions, and to actively promote and commercialize them
  – Duty of University to provide federal sponsor of invention with free license to use invention

• Stewardship of public assets
Compliance with Intellectual Property Assignment Policy

- Used systemwide approach (10 campuses)
- Conducted data merge
  - USPTO data (833K data lines; CY08 published patent applications)
  - UC payroll data of researchers (35K data lines; FY08 & 09 data)
    - Matched first, last names and city of residence
- Informed leadership
- Requested follow-up from Technology Transfer Offices
Monitoring Questions to Campuses--Proper Intellectual Property Assignment

- Requested follow-up from each campus Technology Transfer Office:
  - Is individual listed a current UC employee (follow-up with HR)
  - If so, is identified IP *currently* assigned to UC (used CY08 USPTO data)
  - If not, *should* identified IP be assigned to UC (follow-up with inventor; possible follow-up with consulting company and/or dept. chair)
## Monitoring Tool--Proper Intellectual Property Assignment

<table>
<thead>
<tr>
<th>LOC</th>
<th>LAST_NAME</th>
<th>FIRST_NAME</th>
<th>PERMCITY</th>
<th>Last Name</th>
<th>First Name</th>
<th>City</th>
<th>Title</th>
<th>Assignee</th>
<th>Is/Was Inventor UC employee?</th>
<th>If yes, is property currently assigned to UC?</th>
<th>If no, should property be assigned to UC?</th>
<th>Y/N</th>
<th>Y/N</th>
<th>Y/N*</th>
</tr>
</thead>
<tbody>
<tr>
<td>10</td>
<td>LU</td>
<td>JENNIFER</td>
<td>MILPITAS</td>
<td>Lu</td>
<td>Jennifer Q.</td>
<td>Milpitas</td>
<td>System and method for controlling the size and/or distribution of catalyst nanoparticles for nanostructure growth</td>
<td>The Regents of the University of California</td>
<td>YES</td>
<td>YES</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>WINSTON</td>
<td>ROLAND</td>
<td>MERCED</td>
<td>Winston</td>
<td>Roland</td>
<td>Merced</td>
<td>CONCENTRATING PHOTOVOLTAIC SYSTEM USING A FRESNEL LENS AND NONIMAGING SECONDARY OPTICS</td>
<td>The Regents of the University of California</td>
<td>YES</td>
<td>YES</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>WINSTON</td>
<td>ROLAND</td>
<td>MERCED</td>
<td>Winston</td>
<td>Roland</td>
<td>Merced</td>
<td>Liquid light pipe with an aplanatic imaging system and coupled non-imaging light concentrator</td>
<td>Solargenix Energy LLC</td>
<td>YES</td>
<td>YES</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>WINSTON</td>
<td>ROLAND</td>
<td>MERCED</td>
<td>Winston</td>
<td>Roland</td>
<td>Merced</td>
<td>MULTI-JUNCTION SOLAR CELLS WITH A HOMOGENIZER SYSTEM AND COUPLED NON-IMAGING LIGHT CONCENTRATOR</td>
<td>Regents of the University of California</td>
<td>YES</td>
<td>YES</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>WINSTON</td>
<td>ROLAND</td>
<td>MERCED</td>
<td>Winston</td>
<td>Roland</td>
<td>Merced</td>
<td>SOLAR COLLECTORS WITH EVACUATED RECEIVER AND NONIMAGING EXTERNAL REFLECTORS</td>
<td>Solargenix Energy LLC</td>
<td>YES</td>
<td>YES</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Monitoring Tool-Proper Intellectual Property Assignment

• Pilot approach requiring only 2 campuses to use central data to assess compliance
• Oversight and Direction by Compliance Office (ECAS)
• Pilot monitoring results submitted to ECAS for review to determine usefulness of central data, and risk/benefit analysis in expending resources on the monitoring activity
Compliance with the HEOA

- Higher Education Opportunity Act (HEOA)
- Office of Ethics, Compliance and Audit Services:
  - assisted campuses in the development of monitoring plans
  - helped campuses develop monitoring tools
**HEOA Monitoring Tools**

- Different Tools depending on audience
  - **System-wide Tool**
    - Help central office
  - **Campus High-level Tool**
    - More detail for campus
  - **Specific Monitoring**
## System-wide Tool

### Campus Higher Education Opportunity Act Monitoring Grid - Systemwide

<table>
<thead>
<tr>
<th>Principal Campus Contact</th>
<th>Campus</th>
<th>Berkeley</th>
<th>Davis</th>
<th>Irvine</th>
<th>Los Angeles</th>
<th>Merced</th>
<th>Riverside</th>
<th>San Diego</th>
<th>San Francisco</th>
<th>Santa Barbara</th>
<th>Santa Cruz</th>
</tr>
</thead>
</table>

### 1. Financial Aid Requirements

**Requirements Effective as of August 14, 2008**

- **Entrance Counseling to Borrowers**
  - Program Applies to Campus
  - Campus Implementation Complete (date)
  - Campus Responsible Person (w/ email address)

- **Exit Counseling to Borrowers**
  - Program Applies to Campus
  - Campus Implementation Complete (date)
  - Campus Responsible Person (w/ email address)

- **Preferred Lender Arrangements**
  - Program Applies to Campus
  - Campus Implementation Complete (date)
  - Campus Responsible Person (w/ email address)

- **Ban of Private Lender Gifts**
  - Program Applies to Campus
  - Campus Implementation Complete (date)
  - Campus Responsible Person (w/ email address)
## Campus Tool

<table>
<thead>
<tr>
<th>Requirement</th>
<th>General Description</th>
<th>Affected Department(s)/ Responsible Person</th>
<th>Identified Issues</th>
<th>Action/Status</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Hate Crime Reporting</strong></td>
<td>• Define and publish “enforcement authority” of campus security</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Add to hate crime statistics larceny-theft, simple assault, intimidation, vandalism</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **Emergency Response and Evacuation Procedures** | • Disclose policies annually  
• Immediate notification to campus community  
• Test response and evacuation procedures annually |                                            |                   |               |
| **Missing Persons Procedures**   | • Establish notification policy for students  
• If missing for more than 24 hours and has not returned to campus, the institution to initiate the emergency contact procedures |                                            |                   |               |
# Requirement Specific Monitoring

**Test of Emergency Response and Evacuation Procedures: Annual Review**

- **Review Conducted By:** __________
- **Date of Review:** __________
- **Previous Review Date:** ________

## Findings Noted During Program Review:

<table>
<thead>
<tr>
<th>Finding</th>
<th>Corrective Action</th>
<th>Responsible Person</th>
<th>Date CA Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## Revised Procedure

<table>
<thead>
<tr>
<th>Revised Procedure</th>
<th>Was the New Procedure Effective?</th>
<th>Procedure needs additional Revisions?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## List Any New Procedures to be Modified

1. __________________________ Date Modified ______
2. __________________________ Date Modified ______
Tool for Red Flag Rule Compliance

- Each UC Campus required to develop a compliance plan for Red Flags Rule
- Oversight and Direction by Compliance Office (ECAS)
- Campus final plans submitted to ECAS for review and Final Report to The Regents on systemwide compliance
How are monitoring tools implemented?
Implementation of Monitoring Tools

Surveys
- IT considerations (platform, user seats)
- Determining appropriate audience to receive survey

Questionnaires/Assessments
- Same as above
- Added resources to assess responses in free-form text

Spreadsheets
- Manual population
- Constant follow-up

Additional Considerations:
- Communication strategy
  - Who: senior leadership, operational leads
  - When: before, during, after, ongoing
Use of Electronic Assessment Tool: Red Flag Rule Compliance

- ECAS used AXENTIS
- Part of ARC Logics
  - CCH Teammate
  - Sword
  - Axentis
- Axentis
  - Document policies
  - Assessments
  - Surveys
  - Work Flows
Red Flag Rule Compliance Tool

• Red Flags Rule Compliance
  ▪ Developed an “assessment” questionnaire
  ▪ Assessment distributed to campus POCs (email)
  ▪ POCs answered questions
  ▪ Attached campus documents
  ▪ Completed assessments routed to Reviewer
  ▪ Campus documents reside in a “Knowledge Management” folder
Red Flag Rule Compliance Tool

- RFR Assessment
  - Email notification sent to POC
  - Assessment delivered to POC email
  - Click on link brings up users Ax homepage and would list outstanding requirements (i.e., assessment)
Screen Shot of Ax Assessment

Intro and Directions included

Assessment consisted of 5 questions

Drop Down menu for answers

Attachment box when applicable
Assessment for Red Flag Rule Compliance

Completed Question
Including explanation and estimated completion date

Can identify “required” elements
Administrator(s) can see what locations/users have responded
Assessment for Red Flag Rule Compliance

### Filter Options
- **Period:** RFR 2009
- **Cert. Type:** RFR Monitoring
- **CF Node:**
- **BU Node:**
- **Type:** Control
- **Status:**
- **Rating:**

### Status
- **Detailed Status**

### Table
<table>
<thead>
<tr>
<th>ISN</th>
<th>Control Framework</th>
<th>Business Unit</th>
<th>Assessor</th>
<th>Reviewer</th>
<th>Date Assigned</th>
<th>CAS</th>
<th>Asmt Type</th>
<th>Status</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>Office of the President</td>
<td>Cataldo, Peter</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
<tr>
<td>2</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>UC Berkeley</td>
<td>Williams, Linda</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
<tr>
<td>3</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>UC Davis</td>
<td>Loessberg-Zahl, Robert</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
<tr>
<td>4</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>UC Irvine</td>
<td>Andrews, Rich</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
<tr>
<td>5</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>UC Los Angeles</td>
<td>Abeles, Sue</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
<tr>
<td>6</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>UC Merced</td>
<td>Ahmed, Monir</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
<tr>
<td>7</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>UC Riverside</td>
<td>Bolar, Gretchen</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
<tr>
<td>8</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>UC San Diego</td>
<td>Rico, Debbie</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
<tr>
<td>9</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>UC San Francisco</td>
<td>Nakashige, Jocelyn</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
<tr>
<td>10</td>
<td>Red Flags Rule Monitoring Plan</td>
<td>UC Santa Barbara</td>
<td>Borah, Farfalla</td>
<td>Cataldo, Peter</td>
<td>09/30/09</td>
<td>✓</td>
<td>CTL</td>
<td>RVWD</td>
</tr>
</tbody>
</table>

### Quick Links/Actions
- Create Assessments
- Assessment Status
- View Documents
- Search Documents
- Copy Period Objects

### See who assigned to

### Link to results
Assessment for Red Flag Rule Compliance

Document Repository - Documents submitted by each location maintained centrally

Set up your own folder structure

Can limit accessibility centrally (i.e. - UCB only see UCB submissions)
# Assessment for Red Flag Rule Compliance

## Assessment Results

### Red Flags Assessment - October 2009

<table>
<thead>
<tr>
<th>Assessment Template</th>
<th>Measure Group Name</th>
<th>Measure Group Description</th>
<th>Assessment Name</th>
<th>Questions Name</th>
<th>Questions Description</th>
<th>BI Path</th>
<th>RF CGI</th>
<th>Please select the status that best describes the Campus progress to date</th>
<th>RF CGI</th>
<th>Please select the status that best describes the Campus progress to date</th>
<th>RF CGI</th>
<th>Estimated Completion Date (mm/dd/yyyy)</th>
<th>Assessment Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>RFR Monitoring Rule Monitoring Plan</td>
<td>Red Flags Rule Monitoring Plan</td>
<td></td>
<td>2</td>
<td>Covered Accounts - Has the campus completed an inventory of covered accounts? If you would like to share a copy of your covered accounts inventory, please select Add/View Attachment below.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>UC - Systemwide</td>
<td>UC - Systemwide</td>
<td>Completed Meeting Requirement</td>
<td></td>
</tr>
<tr>
<td>RFR Monitoring Rule Monitoring Plan</td>
<td>Red Flags Rule Monitoring Plan</td>
<td></td>
<td>3</td>
<td>Training - Has the campus trained staff in departments with covered accounts? If you would like to share a copy of your campus training materials, please select Add/View Attachment below.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>UC - Systemwide</td>
<td>UC - Systemwide</td>
<td>Completed Meeting Requirement</td>
<td></td>
</tr>
<tr>
<td>RFR Monitoring Rule Monitoring Plan</td>
<td>Red Flags Rule Monitoring Plan</td>
<td></td>
<td>4</td>
<td>Occurrences - Has the campus had occurrences of Red Flags and, taken action when appropriate?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>UC - Systemwide</td>
<td>UC - Systemwide</td>
<td>Not Applicable Santa Barbara</td>
<td>No red flag events in the first quarter.</td>
</tr>
</tbody>
</table>

Run Standard or Custom Reports on Results of Assessment
Other Functions Within Ax

- Surveys
  - No attachments like assessments
- Action Items
  - Assign tasks
- Work Flows
  - Document revisions
Axentis Compliance Tool

Sample Ax Survey

ECAS Risk Assessment Survey
May 2009

1. Has your campus initiated a compliance risk assessment process this past fiscal year?
   - Yes
   - No

2. If answer to Question 1 is yes, please indicate which stage the process is in. If the answer to Question 1 is no, please select "N/A":
   - Planning
   - Developing Risk Assessment Tool
   - Implementing Risk Assessment Tool
   - Analyzing Data Gathered
   - Developing Risk Mitigation Plan
   - N/A

3. What do you feel are the top three risks facing your organization?
## Axentis Compliance Tool

### Survey Results Summary

#### Distribution Overview

<table>
<thead>
<tr>
<th>Survey</th>
<th>Total</th>
<th>Open</th>
<th>Submitted</th>
<th>Response Rate</th>
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</thead>
<tbody>
<tr>
<td>UC ECAS Risk Assessment Survey (a 6)</td>
<td>17</td>
<td>0</td>
<td>17</td>
<td>100 %</td>
</tr>
</tbody>
</table>

#### Results Summary

<table>
<thead>
<tr>
<th>Question / Answer</th>
<th>Response Ratio</th>
<th>Number of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Has your campus initiated a compliance risk assessment process this past fiscal year?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>100 %</td>
<td>17</td>
</tr>
<tr>
<td>No</td>
<td>0 %</td>
<td>0</td>
</tr>
<tr>
<td>2. If answer to Question 1 is yes, please indicate which stage the process is in. If the answer to Question 1 is no, please select “N/A”:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Planning</td>
<td>29 %</td>
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<td>Analyzing Data Gathered</td>
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Axentis Compliance Tool

Report on all outstanding requirements

Surveys and Assessments

### Requirement Summary

Prepared by Peter Cataldo for University of California on 7/21/2010

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<tr>
<th>Requirement Name</th>
<th>Recurring</th>
<th>Assigned</th>
<th>Completed</th>
<th>% Completed</th>
<th># In Progress</th>
<th>% In Progress</th>
<th># Overdue</th>
<th>% Overdue</th>
<th># Expired</th>
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Axentis Compliance Tool

Assign and track action items or “tasks”

![Axentis Compliance Tool](https://www.axentisenterprise.com/ActionItem/Al_Frame.aqx?caseID=76787793-541F-4f9d0-89c8-9eeb4a1396fd&it=UC+Action+Items&classID=d30)

**Action Item Number: # 1**

- **Action Item Name:** Red Flags Summary
- **Action Item Owner:** Cataldo, Peter
- **Delegated To:** Jeppson, Rachelle
- **Reviewer:**
- **Type:** Auditing and Monitoring
- **Action Item Description:** Summary of the Red Flags Rule (RFR) project and the campus assessment results
- **Action Plan:** Present the system-wide results to The Regents. Get RJ and LH to review the powerpoint document.

**Process Summary**

- **Priority:** High
- **Original Target Due Date:** Oct-20-2009
- **Revised Target Due Date:** Oct-20-2009
- **Progress:** In Process/On Target
- **Source:** ECAS Special Projects

**Business Unit(s):**
- Office of Ethics, Compliance and Audit Services

**Control Node(s):**
- Red Flags Rule Monitoring Plan

**Business Unit(s) Path:**
- UC - System-wide \ Regental Offices \ Office of Ethics, Compliance and Audit Services

**Control Node(s) Path and Description:**
- Red Flags Rule Monitoring Plan

**Submit**  **Save**  **Exit**  **Report**  **Delegate**  **Spell Check**
Axentis Compliance Tool

Workflow Number: # 2009-000001
Workflow Type: UC Document Approval
Workflow Date Created: Oct-19-2009
Workflow Initiated By: Cataldo, Peter
Status: Closed

Approval Documents
Upload and Attach External Document
Attach Axentis Resource Document

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<thead>
<tr>
<th>Number</th>
<th>Resource Name</th>
<th>Attach Date</th>
<th>User</th>
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<tr>
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<td>RFR Summary</td>
<td>Oct-19-2009</td>
<td>Cataldo, Peter</td>
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Supplemental Documents
Upload and Attach External Document
Attach Axentis Resource Document

Document Approval
Similar concept as Action Items
Check out/in document
Version control
Axentis Compliance Tool

- Track Compliance issues
- Produce surveys and assessments
- Reporting capabilities
- Set up own security rules
- Policy Management aspect
- Interfaces with Teammate and other systems (Ethics Point)
Use of Manual Assessment: Monitoring Approach for Proper Royalty Payments

- **Objective:** Inform licensee about impending formal audit program and prompt licensees to review royalty reports in light of contract terms; use information to inform audit selection
- **Approach:**
  - Questionnaire sent by mail to 500 active licenses
    - Approach (centrally administered with campus review of questionnaire prior to implementation)
    - Response rate (43%)
    - Recovery ($55,000)
    - Information provided by licensees used in audit selection
Monitoring Tool for Proper Royalty Payments

**LICENSEE QUESTIONNAIRE**

1. What is the name and title of the individual responsible for calculating the amount of royalties to be remitted under the License Agreement?
   - Name: 
   - Telephone: 
   - Title: 
   - Email: 

2. Does this individual possess a copy of the License Agreement and amendments, if any? Please check Yes or No.
   - Yes
   - No

3. Are there any questions regarding the definition of Licensed Product or the manner in which the royalty payment is to be calculated?
   - Yes
   - No

4. Are there any sublicensees to the License Agreement?
   - Yes
   - No

5. If the answer to question 4 is Yes, please identify the name of the sublicensee and the effective date of the sublicense agreement(s).
   - Sublicensee name: 
   - Sublicense effective date: 

6. Has your Company entered any agreements other than a sublicense that involves a grant or license, use, or sale of the Licensed Property?
Summary

• Determine when monitoring may be needed
• Think about the best monitoring tool to use to meet objectives
• Choose an effective implementation approach