

Annual Institutional Compliance Report

FY 2021

FUELING TOMORROWS

EXECUTIVE SUMMARY

In fiscal year 2021, Institutional Compliance began issuing annual reports that encompass the joint efforts of all compliance partners across the University of Toledo (UToledo). The annual report provides a comprehensive view of the UToledo-wide Compliance and Ethics (C&E) program and the extensive activities achieved across the campuses. Included in this year's annual report is a summary of the work performed between 2020-21 to meet various regulatory and compliance requirements which demonstrates the unwavering efforts to reaffirm a culture of C&E.

David L. Cutri
Chief Compliance Officer (CCO)

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About the Office of Institutional Compliance





HISTORY

In June 2009, UToledo formed the Office of Internal Audit and Compliance and appointed its first Chief Audit and Compliance Executive, charging him with developing and implementing a comprehensive C&E program based on key elements of the Federal Sentencing Guidelines, Chapter 8, Part B, Section 2.1(b), and the Ohio Ethics Law. The Ohio Department of Higher Education (ODHE) requires all state universities to have compliance programs built on the same standards. Of the 19 measured regulatory components, UToledo is proud to report having all 19 components in place during the 2020-2021 fiscal year.

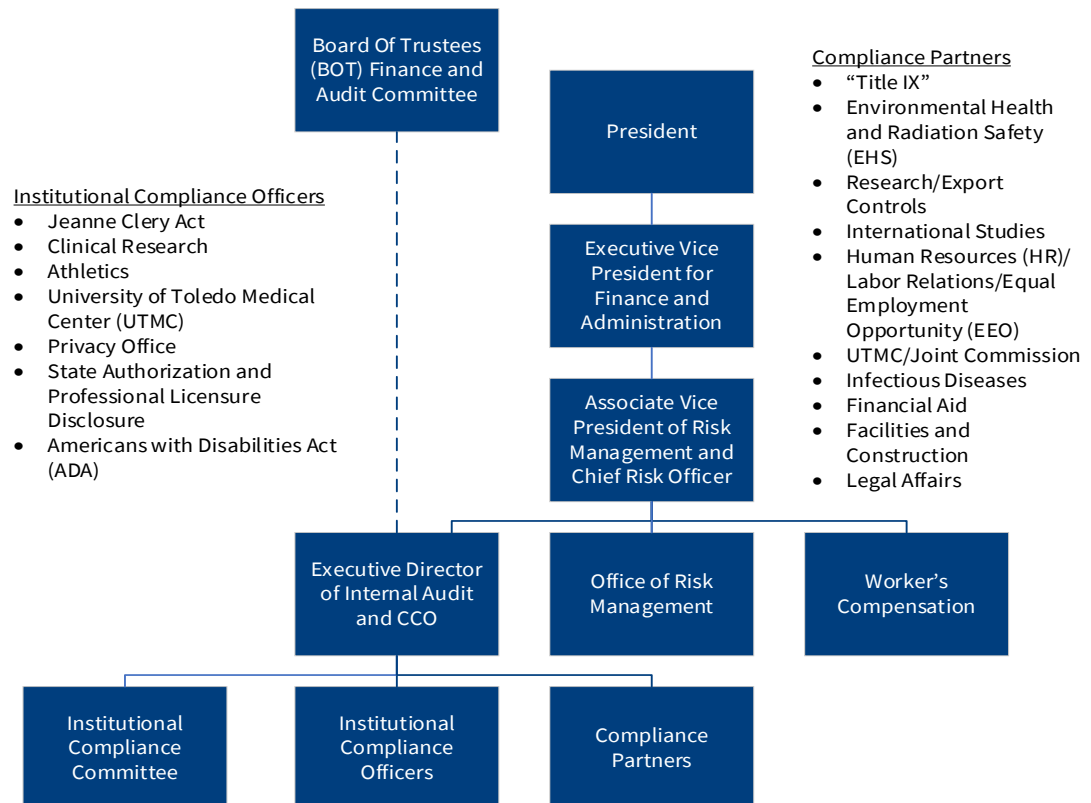


PURPOSE

The Office of Institutional Compliance provides centralized and coordinated oversight of UToledo C&E efforts through the ongoing development of effective policies and procedures, education and training, monitoring, communication, risk assessment, and response to reported issues. The Office also provides oversight and coordination of compliance partners who lead targeted compliance programs across UToledo. Institutional Compliance also established the C&E advisory committee and tasked it with assisting in the development of the comprehensive C&E program.



STRUCTURE



University of Toledo Compliance and Ethics Program



SUCCESS STORIES

OFFICE OF ACCESSIBILITY AND DISABILITY RESOURCES

- Hosted campus partner meetings to discuss web accessibility, the extended time for testing policy, classroom materials accessibility, and accommodations. Implemented/Updated UToledo procedures for emotional support animals and service animals, facility accessibility, and parking for parenting/pregnant students and employees, etc.
- Maintained strong collaboration between the Office of Accessibility and Disability Resources faculty liaisons through the various UToledo Colleges.
- Hired two faculty fellows to enhance collaboration between the Office of Accessibility and Disability Resources and faculty in 2021 through various projects.
- Audited the digital accessibility of new student orientation.

ACADEMIC AFFAIRS

- Below is a list of program accreditation site visits that took place between July 2020 through now.
 - ✓ Medical Physics Master of Science in Biomedical Science, College of Medicine and Life Sciences (COMLS), July 2020 site visit, reaccredited by Commission on Accreditation of Medical Physics
 - ✓ Medical Technology Bachelor of Science, College of Natural Sciences and Mathematics, July 2020 site visit, accreditation continued by National Accrediting Agency for Clinical Laboratory Sciences
 - ✓ Master of Public Health – all tracks, College of Health & Human Services, October 2020 site visit, accredited through Council on Education for Public Health
 - ✓ Law JD, College of Law, October 2020 site visit, accreditation continued through ABA (American Bar Association)
 - ✓ Counselor Education Master of Arts and Doctor of Philosophy, College of Health and Human Services, February 2021 site visit, all standards found in compliance with Council for Accreditation for Counseling and Related Educational Programs accreditation, official board decision scheduled for July 2021.
 - ✓ Medicine Medical Doctorate, COMLS, April 2021 site visit, report expected late June/early July with final Liaison Commission on Medical Education accreditation decision in Fall 2021.



REGISTRAR'S OFFICE

- Assumed responsibility for the NCAA Graduation Success Report.
- Implemented a new athletic eligibility tracking template that will enable a more seamless compilation of Academic Progress Rate data, Graduation Success Rate data, and will allow the advisors and compliance personnel to be aware of the status of student-athletes. This was developed after the Registrar's office assumed responsibility for the NCAA Graduation Success Report.



CENTER FOR INTERNATIONAL STUDIES AND PROGRAMS

- Worked closely with the University of Toledo Police Department and the Dean of Students units to resolve urgent situations involving international students.
- Improved options for international suppliers to provide supplier identification documents.

STUDENT HEALTH AND WELLNESS

- Monitored the following areas and developed annual reports as part of the Student Health and Wellness performance improvement plan: Electronic Medical Record confidentiality, breach determination and documentation, and incident reports.



UNDERGRADUATE ADMISSIONS

- The Admissions team member responsible for Athletics focused primarily on the admission of student-athletes from NCAA initial eligibility determination through enrollment. This position was responsible for ensuring all UToledo policies and procedures were followed in the admission and enrollment of student-athletes.

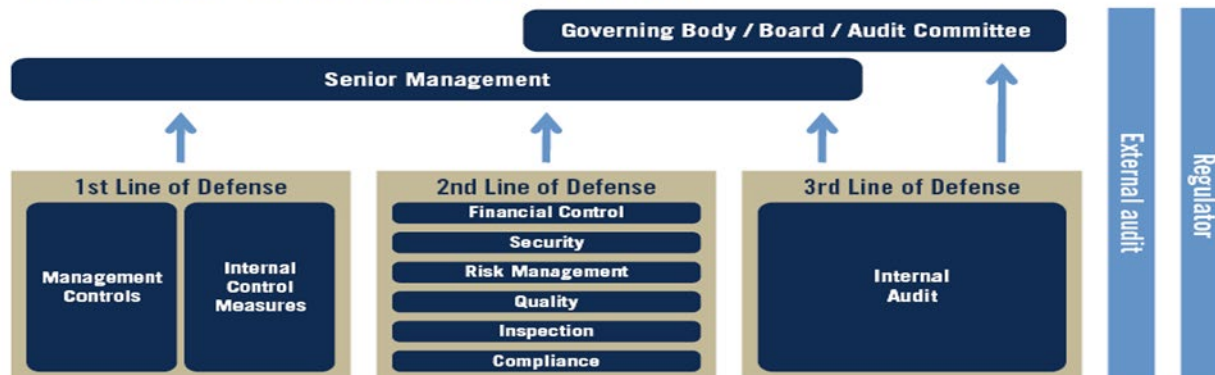
UNIVERSITY OF TOLEDO MEDICAL CENTER

- Received high preliminary marks in the most recent Joint Commission reaccreditation survey, which was completed during a site visit in June.
- Joint Commission reaccreditation surveyors spent four days evaluating UTMC's hospital services, clinics, behavioral health services, durable medical equipment services and facilities, and followed more than 50 patients through their care at UTMC.
- Surveyors commented specifically and positively on the engagement of the anesthesia and surgical services and facilities and health and safety teams, as well as the inpatient and outpatient clinics.
- UTMC's official results from the survey will be available in early fiscal year 2022.

Comprehensive Compliance and Ethics Report

The following is a summary of UToledo comprehensive C&E program accomplishments, to include compliance partner reports from July 1, 2020, to June 30, 2021.

The Three Lines of Defense Model



Adapted from ECIIA/FERMA *Guidance on the 8th EU Company Law Directive, article 41*

The “Three Lines of Defense Model” for Internal Control Governance



“COSO Cube” (Committee Of Sponsoring Organizations of the Treadway Commission)
 The COSO Cube is a diagram that shows the relationship among all parts of an internal control system. Together, they develop guidance documents to aid organizations with risk assessment, internal controls, and fraud prevention.

Education and Training

C&E program. Note that this is intended to be a summation of key compliance-based courses delivered and is not intended to be a comprehensive list.

Division	Topic	Method	Frequency	No. Trained
Institutional Compliance	Staying Healthy in a Changing Environment (Coronavirus Disease 2019 (COVID-19) course)	Web-Course	One-Time	4,516
	Accommodating Disabilities	Web-Course	On Request	2
Academic Affairs	Family Educational Rights and Privacy Act (FERPA) Basics	Web-Course	On Request	1,104
Intercollegiate Athletics	Sexual Assault Prevention for Student-Athletes	Web-Course	Annual	398
	Sexual Assault Prevention for Athletic Staff	Web-Course	Annual	130
Diversity and Inclusion	Diversity and Inclusion Education	Web-Course	UTMC: Annual Others on Hire	3,259
	Managing Bias	Web-Course	On Request	3
Finance	Payment Card Industry Data Security Standards (PCI DSS) Training (required for employees that process credit cards on behalf of customers)	Web-Course	Annual	198
HR	New Employee Orientation • I-Care: Building a Culture of Excellence • Title IX Overview • Institutional Compliance (overview) • Safety and Health • Building a Culture of Diversity and Inclusion	In Person	On Hire	505
	Interviewing Candidates (search committee training)	Web-Course	One-Time	519
	Identifying Candidates	Web-Course	On Request	4
	Code of Conduct: Workplace Conduct	Web-Course	On Request	2
Information Technology (IT)	Data Security and Privacy	Web-Course	On Request	75
Legal Affairs	Code of Conduct: Business Ethics (includes Ohio Ethics Law training and Conflict of Interest survey)	Web-Course	Annual	5,238
Risk Management	Protecting Youth (minors on campus training for those involved in programs that host minor participants)	Web-Course	Annual	520
Student Affairs	Bridges: Building Supportive Communities: Clery Act and Title IX	Web-Course	Bi-Annual	1,871
	Sexual Assault Prevention for Undergraduates	Web-Course	First Semester	1,768
	Sexual Assault Prevention for Graduate Students	Web-Course	First Semester	570
	Staying Healthy in a Changing Environment for Students on Campus	Web-Course	One-Time	10,094
	Alcohol Education for College	Web-Course	First Semester	1,924
	Alcohol Education for Sanctions (multiple courses)	Web-Course	One-Time	180
UTMC	Health Insurance Portability and Accountability Act (HIPAA Basics)/HIPAA Update (includes Medicare Fraud, Waste, and Abuse)	Web-Course	Annual for UToledo "Covered Entity"	4,675
	Safety Test Bank The courses in the Safety Test Bank ensure compliance with various EHS regulatory requirements and house modules required to assure conformance with Joint Commission accreditation expectations. In fiscal year 2021, a total of 62 unique courses housed in the Safety Test bank were taken by UToledo employees.	Web-Course	Various	13,277
TOTAL INDIVIDUALS TRAINED FROM JULY 1, 2020 - JUNE 30, 2021				50,832

OFFICE OF ACCESSIBILITY AND DISABILITY RESOURCES

- Communicated with the ADA Compliance Committee, Deans, Department Chairs, Office of the Provost and Office of the President on student accessibility.
- Communicated directly with approximately 800 faculty members each semester regarding academic accommodations for the approximately 550 students during the fall and spring semesters.
- Provided several resources through a robust website to the UToledo community regarding access, accommodations, ADA compliance, etc.
- Worked with campus partners to review accessibility across campus, particularly regarding website accessibility, and to develop an implementation plan for compliance with ADA, Sections 504 and 508.

REGISTRAR'S OFFICE

- Distributed the FERPA Annual Notification to students.

CENTER FOR INTERNATIONAL STUDIES AND PROGRAMS (CISP)

- Improved CISP forms and the website to include updated immigration compliance information for students, including implementation of an online “Science, Technology, Engineering, and Mathematics Extension Application Form” to provide clear instructions to improve efficiency, transparency, and compliance with immigration regulations.

STUDENT HEALTH AND WELLNESS

- Required employees, upon hire and annually during performance reviews, to complete training for HIPAA and to sign a Student Health and Wellness confidentiality agreement, Student Health and Wellness code of conduct agreement, and Student Health and Wellness security agreement.



HUMAN RESOURCES (HR)

- Updated the HR webpage with instructions on processing of background checks and presented UToledo policy and process changes during an HR liaison meeting. Coordinated State of Ohio Level 2 background checks to comply with the UToledo youth protection program.
- Talent Strategy and Development director served as a search manager for various search committees to support and ensure compliance with UToledo, State, and Federal hiring guidelines.
- Facilitated distribution of the 403(b) Notice of Eligibility memos to 5,986 UToledo employees during fiscal year 2021 and restated the plan on its webpage. Benefits drafted an automated communication message that went to all employees who are receiving the 401(a) Alternative Retirement Plan.
- In conjunction with HR Information Systems, electronically distributed the various 2020 HR annual notices to all employees. The annual notices contain information for all employees such as the President's statement regarding EEO and affirmative action, notice of Drug-Free Workplace policy, 403(b) Plan notice of retirement eligibility, eligibility for overtime compensation, Earned Income Tax Credit, public service loan forgiveness program, information security for faculty and staff, sexual offender notification policy, and UToledo contact information.

SUPPLY CHAIN SERVICES

- Instituted a process for informing leadership of unauthorized procurement actions committed within their Departments/Colleges and offered training.
- Met with Institutional Compliance, Internal Audit, Office of Legal Affairs, Office of the Provost, and Office of the President to discuss unauthorized procurement actions to propose a plan to decrease the number of incidents.

ENERGY MANAGEMENT

- Maintained certification as a Certified Cross Connection Control tester, and licensed "A" water and wastewater operator in Ohio.
- Completed the Drinking Water Treatment and Distribution Systems Operator course through the California Water Board, in preparation for the "C" level licensed water treatment plant operator test for Ohio, as well as distributed the Consumer Confidence Report on water quality to the UToledo campus community, in compliance with Ohio Environmental Protection Agency requirements.
- Developed the utility concurrency measures and web-portal application in accordance with Ohio Revised Code and developed the draft campus utility service level disclosure document in accordance with Ohio Revised Code.

INFORMATION TECHNOLOGY (IT) SECURITY OFFICE

- Distributed multiple editions of electronic mail communications to all employees, including articles on topics such as the UToledo phishing campaign, PCI compliance, the UToledo vendor risk management program, IT security standards and campus cybersecurity, and published the results of the 2019-20 IT support satisfaction and expectations survey.
- Provided National Institute of Standards and Technology 800-171 briefings to all affected departments.

STUDENT AFFAIRS

- The Higher Education Center for Alcohol and Drug Misuse Prevention and Recovery assessed the effectiveness of UToledo Alcohol and Other Drugs (AOD) processes, and made the following observations:
 - ✓ Expanded programming across campuses and utilized the resources, knowledge, and expertise of experts on the Health Science Campus (HSC), with improved collaboration.
 - ✓ Worked on strengthening and improving its education, prevention and awareness efforts with faculty, staff, and administration, with the assistance of HR.
 - ✓ Hired a compliance officer who works to assist with the biennial review to ensure full compliance of the Drug Abuse and Alcohol Prevention Program (DAAPP) and the biennial review.
 - ✓ Designated both a committee and persons on each campus to assist with data collection related to the biennial review.
 - ✓ Implemented a more effective method of distribution of the annual DAAPP notification to all students, faculty, and staff to ensure each person receives such statement at a minimum of once per year.
 - ✓ Evaluated and worked on process improvements as related to AOD education, policy, and notification.



OFFICE OF STUDENT CONDUCT AND COMMUNITY STANDARDS

- Continued to serve on the medical withdrawal committee to review petitions for students who were seeking to lift their medical hold and return to UToledo; leadership served as the advisor to a committee of students established for the purpose of responding to the changing needs of the student body regarding the policies, procedures, and regulations for students.
- Provided oversight for compliance with the admission clearance process, which involves the review of applicants seeking admission to UToledo with a prior criminal background or educational disciplinary history. Also provided oversight for compliance with the discipline clearance process for students seeking admission into a graduate program, studying abroad, applying to the bar, having a background check completed for employment with the Federal government, or transferring to another institution, etc.
- Disseminated annual updates and access to the UToledo Student Handbook to all students, faculty, and staff members.



OFFICE OF DIVERSITY AND INCLUSION

- Revised and updated the office website to provide clarity on the Office of Diversity and Inclusion's role and processes, and efficiency in accessing appropriate forms and materials.
- Developed standard request forms for obtaining public supportive measures based on pregnancy, pregnancy-related conditions, and/or childbirth.

UNDERGRADUATE ADMISSIONS

- Held annual meeting with the Athletics Compliance Office for training on NCAA compliance issues related to recruitment and admission of student-athletes. Provided updates throughout the year via email to staff, including in the Undergraduate Admissions recruitment training manual.

Data Behind the Numbers

INSTITUTIONAL COMPLIANCE: CLINICAL RESEARCH

- Reviewed patient documentation and claims for patients enrolled in research trials and ensure that services were billed to the proper payer (grant account, Medicare, commercial payer).

Following were the volume of claims reviewed in fiscal year 2021:

Current studies	48
Pre-registration of all research patient visits	389
Reviewed claims for University of Toledo Physicians	1,921
Reviewed claims for UTMC	287

INSTITUTIONAL COMPLIANCE: PRIVACY OFFICE

- Completed the annual HIPAA audit and had 100% compliance in staff observing the HIPAA Privacy law.
- Initiated the Information Security committee that addresses all campus privacy and security risks.

INSTITUTIONAL COMPLIANCE: AMERICANS WITH DISABILITIES ACT (ADA)/ PARTNERS

- Applied for and was granted \$345,000 of Ohio Biannual Budget funding to address accessibility on campus.
- Added additional accessible parking spaces to lots to access UTMC facilities. Overall, HSC has 98 accessible parking spaces above what is required by ADA standards.
- Implemented the process for Voluntary Product Accessibility Templates and accessibility evaluations through the IT ticketing system and processed 49 pieces of software through this system, including several Requests for Proposal.
- The Office of Accessibility and Disability Resources (also known as Student Disability Services) partnered with Residence Life to coordinate housing accommodations in accordance with the Fair Housing Act for 55 students in Fall Semester 2020 and 49 students in Spring semester 2021. Emotional support animals resided with students in the residence halls;30 in Fall semester 2020 and 26 in Spring Semester 2021.
- Provided support to almost 1,000 students who disclosed they were diagnosed with COVID-19 through collaboration with Student Affairs and Academic Affairs.
- Coordinated 104 approved staff ADA Workplace accommodations; 65 of these were related to COVID-19 and 39 were not.

OFFICE OF ACCESSIBILITY AND DISABILITY RESOURCES

- Served 1,187 disabled students, an increase of 107 students as compared to academic year 2019-2020, with accommodations facilitated in 6,362 courses.
- Partnered with the University Teaching Center, UToledo Online, Office of the Provost, and Associate Deans and Department Chairs to provide disability training, resources, and regular updates to the UToledo faculty.

OFFICE OF ACCESSIBILITY AND DISABILITY RESOURCES (CONT'D)

- Delivered 27 educational programs aimed at faculty, staff, and community partners on disability training from a social justice lens, resources, who can utilize accommodations, implementation of accommodations, web accessibility, and response to COVID-19.
- Delivered 27 presentations/events to students at recruitment and orientation events, academic program orientations, guest lecturers for courses, and student groups.
- Continued to explore beneficial access resources for faculty with a video providing communication.
- Presented to future higher education leaders about creating accessibility communication in an inclusive and diverse campus environment. During the presentation, presenters discussed basic skills for creating web accessibility, accessible documents, and different software students may use at their institutions.
- The College2Careers program continued to provide additional support to disabled students to obtain their degree and be placed in gainful employment. This program is a partnership between UToledo and Opportunities for Ohioans with Disabilities. It has been a success, and UToledo has the largest number of participants in the program (75 students) of all 15 institutions participating in Ohio. UToledo is recognized as the model institution for best practices.

INFORMATION TECHNOLOGY SECURITY OFFICE

- Held information security sessions and email communications during the National Cybersecurity Awareness Month in October.
- Delivered security awareness presentations at the HR New Employee Orientation.
- Held three workshops to facilitate and meet merchant's PCI DSS compliance requirements.

REGISTRAR'S OFFICE

- Conducted FERPA training for faculty, as well as FERPA training for all staff requiring Banner security to student records.
- Delivered over 25 FERPA training presentations to families attending orientation.

CENTER FOR INTERNATIONAL STUDIES AND PROGRAMS

- Conducted outreach to UToledo departments and colleges via email and in-person meetings regarding updated immigration regulations.
- Hosted several travel-signature events to ensure ease of compliance with federal immigration regulations regarding travel for F and J visa holders. Achieved a 100% completion rate with the online International Student Orientation which provided information to F-1 and J-1 students on immigration compliance requirements.

STUDENT HEALTH AND WELLNESS

- Required Student Health and Wellness provider and lab staff to complete a lab proficiency training.
- Provided training on immunization compliance with the ODHE requirements and the Advisory Committee on Immunization Practices and Centers for Disease Control and Prevention recommendations.



STUDENT AFFAIRS

- Alcohol and marijuana possession, use, and consumption all decreased in fiscal year 2021. See the results in the published UToledo AOD “Biennial Review” (<https://www.utoledo.edu/offices/compliance/pdf/aod-biennial-report-2020.pdf>) There were also fewer counseling referrals and completions of referrals in fiscal year 2021 due to the pandemic.

OFFICE OF STUDENT CONDUCT AND COMMUNITY STANDARDS

- Delivered annual training to the Student Conduct Review Board on compliance with the UToledo conduct review processes and procedures for 50 students, 20 faculty and 25 staff members.

OFFICE OF DIVERSITY AND INCLUSION

- Collaborated with HR to deliver in-person search training to 14 departments.
- Facilitated equity and diversity training upon request to nine campus departments.
- Developed an in-house online module for incoming undergraduates and graduate students.

FINANCE

- Developed and facilitated training for the BOT, Deans, and Vice Presidents in relation to budgeting processes and requirements of ODHE regulations or applicable statutes.

UNIVERSITY OF TOLEDO POLICE DEPARTMENT

- See <https://www.utoledo.edu/offices/internalaudit/clery-act/docs/security-fire-safety-report-2020.pdf> for information regarding emergency responses, fire alarm systems, and crime-statistics.

UNDERGRADUATE ADMISSIONS

- Held annual meeting with Athletics Compliance for training on NCAA compliance issues related to recruitment and admission of student-athletes.
- Provided updates via email to staff and updated the Admissions recruitment training manual.

Policy Review and Development

Ensured policies and procedures reflect the commitment of UToledo to ethical conduct and compliance with applicable laws and regulations. During fiscal year 2021, 14 new policies were implemented throughout UToledo. In addition, 116 policies were reaffirmed, 117 were revised, and 17 were rescinded/superseded. The Purposes, as documented in the 14 new policies, are excerpted below.

COMPLIANCE

- 3364-15-18 Financial fraud prevention: This policy provides all UToledo employees and third-party contractors information about Federal and State laws pertaining to financial fraud, including protections for whistleblowers. UToledo prohibits any kind of fraud, waste, and abuse of resources by any Trustee or employee, including but not limited to vendors and contractors.
- 3364-15-19 Foreign gifts and contracts reporting: To ensure compliance with Section 117 of the Higher Education Act.

HUMAN RESOURCES

- 3364-25-70 Flexible work: The purpose of this policy is to establish guidelines for flexible work arrangements for UToledo.





STUDENT LIFE

- 3364-30-23 Student employment policy: Oversight for the recruitment, selection, and management of a student employee is the responsibility of the appropriate administrative authority within the various Colleges, Departments, and offices.
 - ✓ The hiring unit must adhere to all applicable Federal and State employment laws when hiring student employees.
 - ✓ The hiring unit must adhere to all UToledo HR policies and procedures when hiring student employees.
 - ✓ Students appointed to work-study positions must meet Federal work-study program eligibility requirements as determined by the Student Financial Aid office.
 - ✓ Student employment positions must not conflict with UToledo collective bargaining agreements.
 - ✓ Students are not eligible to begin working until all the required actions have been completed, and they have received all required approvals.

GENERAL ACADEMIC

- 3364-71-27 Classroom Attendance: To ensure UToledo compliance with Federal “Title IV” regulations.
- 3364-71-28 The University of Toledo Senior Reserve Officer Training Corps (SROTC) housing financial offset incentive policy: To establish procedural guidelines and requirements cadets must meet to receive the ROTC housing financial offset incentive, which is not a guaranteed incentive. The housing financial offset incentive is awarded each semester and is subject to change based upon availability of funds.

UNIVERSITY FACULTY

- 3364-72-54 Assessment of Student Learning: To articulate the requirements for assessment of student learning outcomes and the use of results to improve curricular and co-curricular programs; and to specify the roles and responsibilities for implementing and overseeing assessment processes to assure UToledo fulfills its primary mission as an educational institution.

COLLEGE OF MEDICINE AND LIFE SCIENCES (COMLS)

- 3364-81-24 Narrative Descriptions of Performance During the Foundational Science and Clinical Curriculum: Narrative assessment that includes formative and summative feedback is intended to provide students with information about their knowledge, behavior, attitude, interpersonal skills, interactions with peers and faculty, professionalism and the aptitude for life-long learning and continued improvement based upon direct observations. *Related policies include the following:*
 - ✓ Formative feedback during foundational science curriculum (3364-81-16).
 - ✓ Formative feedback- Clerkships (3364-81-04-013-00).
- 3364-81-25 - Faculty Review Policy: The purpose of this policy is to support formal feedback for all COMLS faculty members.
- 3364-81-26 Conflict of Interest Avoidance on Committees: To provide standards of conduct for faculty, staff, students, and community members serving on COMLS committees.
- 3364-81-27 Standing Committees: To establish the name, membership, manner of membership selection, appointment, removal, and voting rights; to delineate the charge and authority of the Standing Committees of COMLS.
- 3364-81-28 Admissions Committee Authority and Structure: To establish the final authority, composition, and structure of the Admissions Committee and its subcommittees; to outline the rules of operation for the Admissions Committee and its subcommittees, including voting privileges and definition of a quorum; and to establish the policies and procedures to prevent conflicts of interest.

MEDICAL STAFF

- 3364-87-45 Escort Policy - General Anesthesia, Opioid, Sedative Administration: UPMC is dedicated to patient safety, recognizing that after-hospital care is an essential part of the patient's care. Because of this, coordinating transportation by a responsible adult requires a certain amount of planning on the patient's part.

HOSPITAL ADMINISTRATION

- 3364-100-70-17 Pain Management Stewardship Program: The opioid crisis that currently affects the United States of America (U.S.) has been declared a public health emergency by the U.S. Department of Health and Human Services.





University of Toledo Anonymous Reporting Line and Investigations

Responding to detected problems and undertaking corrective action.

INSTITUTIONAL COMPLIANCE

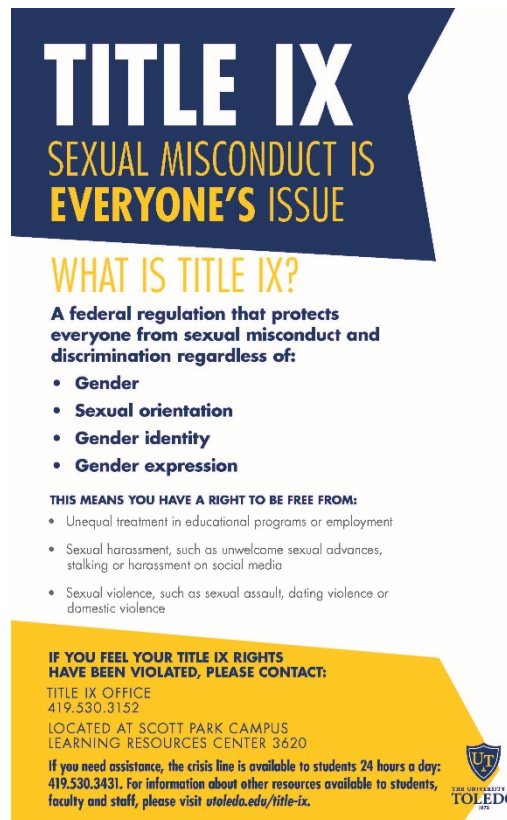
- Provided administration and oversight of the UToledo Anonymous Reporting Line to include review and tracking of all reports until completion, data compilation, trend review, and reporting. Received 20 reports in 2021 through the UToledo Anonymous Reporting Line alleging misconduct (versus 25 cases in 2020).
- Investigated all allegations of misconduct received directly by Institutional Compliance, when appropriate, with recommendations for corrective actions and improvement of ethical conduct.
- Identified a trend of increased student complaints unrelated to potential employee misconduct submitted through the Anonymous Reporting Line; to address the issue the office revised the website landing page by identifying issues which should not be reported to the Anonymous Reporting Line.
- Identified one College and one UToledo department with lower awareness of the gift and honoraria rules, through inquiries made to the office and Anonymous Reporting Line cases. Worked with the Dean and Associate Vice President in those two areas to initiate mandatory gift and honoraria training for their employees.
- Continued promoting the UToledo Anonymous Reporting Line in *The Compass* newsletter; on the UToledo Institutional Compliance website; on the websites of compliance partners; and tabling events and new employee orientation.
- Included a section on the UToledo Anonymous Reporting Line and reporting misconduct in the UToledo faculty handbook.

LEGAL AFFAIRS

- Assisted with breach investigations and coordination with outside legal counsel.
- Supported HIPAA and other potential breach investigations and provided management and advice.

STUDENT AFFAIRS

- Conducted investigations of hazing allegations through the hazing response protocol.



TITLE IX
SEXUAL MISCONDUCT IS
EVERYONE'S ISSUE

WHAT IS TITLE IX?

A federal regulation that protects everyone from sexual misconduct and discrimination regardless of:

- Gender
- Sexual orientation
- Gender identity
- Gender expression

THIS MEANS YOU HAVE A RIGHT TO BE FREE FROM:


- Unequal treatment in educational programs or employment
- Sexual harassment, such as unwelcome sexual advances, stalking or harassment on social media
- Sexual violence, such as sexual assault, dating violence or domestic violence

IF YOU FEEL YOUR TITLE IX RIGHTS HAVE BEEN VIOLATED, PLEASE CONTACT:

TITLE IX OFFICE
419.530.3152

LOCATED AT SCOTT PARK CAMPUS
LEARNING RESOURCES CENTER 3620

If you need assistance, the crisis line is available to students 24 hours a day: 419.530.3431. For information about other resources available to students, faculty and staff, please visit utoledo.edu/title-ix.



COLLEGE OF MEDICINE AND LIFE SCIENCES

- In fiscal year 2021, the Ohio Auditor of State completed a review in response to an investigation initiated by the Internal Audit department in 2017. A finding for recovery of \$248,197 was issued, addressing improper purchases authorized by the former assistant professor of psychiatry and director of public and community psychiatry. Additional information on the finding for recovery is documented on the third page of the fiscal year 2020 Annual Financial Report at https://www.utoledo.edu/offices/controller/accounting_reporting/pdfs/financial-report-fy20.pdf

INTERCOLLEGIATE ATHLETICS

- In fiscal year 2021, the Ohio Auditor of State completed a review in response to an investigation initiated by the Internal Audit department in 2016, in Intercollegiate Athletics. The Auditor of State issued a finding for recovery for \$28,760 against the UToledo former associate athletics director of finance, who was responsible for managing day-to-day business operations for the department of Intercollegiate Athletics and was found to improperly give himself a cash advance and fail to deposit cash receipts from parking fees for athletic events. Additional information on the finding for recovery is documented on the fourth page of the fiscal year 2020 Annual Financial Report at https://www.utoledo.edu/offices/controller/accounting_reporting/pdfs/financial-report-fy20.pdf

Government Reporting and Regulatory Activities

Supporting reports/activities related to government and regulatory agencies.

INSTITUTIONAL COMPLIANCE: PRIVACY OFFICE

- Completed annual report of HIPAA auditing activities for the Office of Civil Rights and DOE.

INSTITUTIONAL COMPLIANCE: STATE AUTHORIZATION

- Professional licensure disclosure requirements apply to all programs leading to professional licensure or certification/advanced practice or marketed as or described on program websites as leading to licensure or to a career in a licensed profession, regardless of modality of delivery. On July 1, 2020, the UToledo Professional Licensure Information webpage with hyperlinks to each UToledo program leading to licensure and/or certification/advanced practice went live. These pages fulfill the requirements for compliance with the Federal regulation, 34 Code of Federal Regulations 668.43(a)(5)(v), and State Authorization Reciprocity Agreement that require public and general notifications.

OFFICE OF ACCESSIBILITY AND DISABILITY RESOURCES

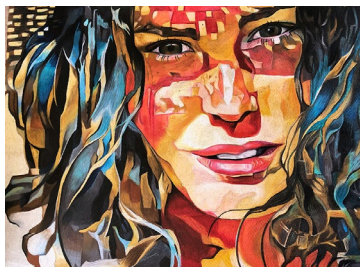
- Conducted an internal review to gauge Section 508 compliance by UToledo affiliated websites.

STUDENT AFFAIRS

- The Drug-Free Schools and Communities Act (DFSCA) require a review of Alcohol and Other Drugs (AOD) programs and policies every two years. This is documented in the 2018-2020 Biennial Review report, at <https://www.utoledo.edu/offices/compliance/pdf/aod-biennial-report-2020.pdf>
- UToledo has 13 active policies related to AOD prevention.

OFFICE OF STUDENT CONDUCT AND COMMUNITY STANDARDS

- Reviewed the student conduct review process and confirmed that Student Code of Conduct complied with the Department of Education (DOE) student discipline section. Oversaw the dissemination of the content of the Student Handbook to faculty, staff members and students.



ACADEMIC AFFAIRS

- The Higher Learning Commission will visit campus on November 8-9, 2021 as part of the continuing accreditation process of UToledo. The UToledo assurance argument was prepared in fiscal year 2021 and will be submitted prior to the site visit. Key components of the Federal Compliance section include Assignment of Credits, Program Length, and Tuition; Institutional Records of Student Complaints; Publication of Transfer Policies; Practices for Verification of Student Identity; Publication of Student Outcome Data; and Standing with State and Other Accrediting Agencies.

OFFICE OF THE TREASURER

- Oversaw UToledo compliance regarding debt covenants to ensure that certain activities were or were not carried out on behalf of UToledo, along with contract compliance with UToledo business partners.
- Managed financials for several UToledo Direct Service Organizations and worked closely with UToledo-contracted financial advisers ensuring that appropriate and sound debt management practices were in accordance with the guidelines of both the UToledo Board of Trustees (BOT) and the Ohio Department of Higher Education.

HUMAN RESOURCES

- Maintained effective compliance oversight for employment laws, collective bargaining agreements, UToledo regulations and UToledo policies, as well as provided research and support to partner with offices across campus (i.e., Office of Legal Affairs, Internal Audit, Office of Diversity and Inclusion, Institutional Compliance).
- Participated in financial focus group facilitated by Finance to disseminate information regarding UToledo financial procedures and compliance updates to State or Federal legislation that has a direct impact on UToledo and its processes.

UNIVERSITY OF TOLEDO POLICE DEPARTMENT

- Collaborated with Institutional Compliance to issue the 2020 Annual Security and Fire Safety Report (ASFSR) in October and include crime statistics for calendar years 2017 through 2019.
- Following are the significant events that have occurred since the issuance of the 2019 ASFSR:
 - ✓ Ended its affiliation with Schoolcraft College in 2016. Since the 2020 ASFSR includes activity from 2017, 2018 and 2019, the Clery Act does not require Schoolcraft's campus safety practices or crime statistics to be included in the 2020 report.
 - ✓ Began its Academic Affiliation agreement with ProMedica, which includes ProMedica Toledo Hospital, in 2015. As such, ProMedica's security practices and crime statistics for those areas frequented by students and staff are included in this report.

ENVIRONMENTAL HEALTH AND RADIATION SAFETY

- Served in pivotal roles in the incident command structure during the COVID-19 pandemic providing guidance and tools to assist in compliance with Ohio Department of Health (ODH) health orders to provide a safe and healthy work environment for faculty, staff, students, patients, and visitors.
- Submitted renewal application for the Synthetic Minor “Title V” air permit.
- Submitted renewal application for UToledo ODH Radioactive Materials License (every five years); submitted October 2020, renewal accepted December 2020.
- Implemented the Radiation Dose Review committee to satisfy the new ODH regulations for computerized tomography and fluoroscopy.
- Completed surveys with six external agencies. All items were found to comply (i.e., no citations).

STUDENT FINANCIAL AID

- Participated in a Federal program review in which there were seven findings. The findings were: attendance/enrollment status not verified; Title IV, Higher Education Act funds used for non-program purposes; verification violations; institution failed to report change/update application; student status – inaccurate reporting; exit loan counseling deficiencies; and bank accounts Federal funds not identified. UToledo has been asked to submit additional information. Assuming that information is acceptable, UToledo will have 60 days to return inaccurate payments to the department before the February 2020 Federal Program Review will be considered complete. While a subsequent review during FY22 is possible, expectations are that the review will occur in FY23 or FY24 for award years 2021-22, 2022-23, and possibly 2023-24 (it would be active and open at the time of the review).
- CliftonLarsonAllen identified a finding relating to National Student Loan Data System (NSLDS) reporting. The DOE is requiring UToledo to perform a full file review of all Title IV recipients for the 2019-20 fiscal year and identify all Title IV recipients whose enrollment effective date and/or enrollment status was either not reported/updated or reported/updated incorrectly. As NSLDS enrollment reporting is the responsibility of the Registrar’s office, that office has requested and received an extension for expected completion, which is August 9, 2021. Internal Audit will conduct a follow-up audit in fiscal year 2022.



Compliance and Ethics Program Development

Developing and sustaining an effective C&E culture.

The following committees exist to support UToledo C&E efforts and programs. Compliance partners and UToledo staff either chair or serve as members these committees.

- | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• UToledo C&E Advisory Committee• UToledo Policies and Procedures Committee• UToledo Title IX Workgroup• UToledo Title IX Advisory Council• UToledo Youth Protection Program Committee• UToledo Diversity and Inclusion Workgroup• UToledo President's Advisory Council• UToledo Records Management Advisory Committee• UToledo Online Appeals Committee• Residency Appeals Committee• Fee Appeals Committee• Athletics Compliance Committee | <ul style="list-style-type: none">• Merchant Services Committee for PCI DSS Compliance• Federal Trade Commission's Red Flags Compliance Committee• UToledo Tax Peer Group• UToledo Financial Conflict of Interest (COI) Committee• UToledo Data Privacy Incident Response Committee |
| <ul style="list-style-type: none">• UToledo Safety Committee• UToledo Laboratory Safety Committee• UToledo Radiation Safety Committee• UToledo Institutional Biosafety Committee (IBC)• UToledo Institutional Animal Care and Use Committee (IACUC)• UToledo Institutional Safety Council | <ul style="list-style-type: none">• UToledo Institutional Review Board (IRB)• UToledo Health Services HIPAA Collaborative Group• UToledo Institutional Safety Council• UToledo Student Health Services Breach Committee• UToledo COMLS Clinical Services Compliance Program Committee• UToledo Student Health Services Patient Advocate Reporting• UToledo DFSCA Biennial Review Committee• UToledo Bias Incident Communications Group• UToledo Student Conduct Board• UToledo Assessment Committee |

INSTITUTIONAL COMPLIANCE

- Updated the UToledo Standards of Ethical Conduct document, which has been in effect since 2014 and provides overarching guidance on employee responsibilities under the Ohio Ethics Law, as well as UToledo policy and procedure. Action items implemented during the year which underlie the Standards of Ethical Conduct are summarized below.
- Developed and launched the new UToledo youth protection program in July 2020, including an online training module, in-person presentations, a webpage dedicated to youth protection, and standardized forms for use by programs involving youth participants. Processed 104 registrations from July 2020 thru June 2021.
- Met with Vice Presidents, key administrators, and compliance partners to provide updates on C&E initiatives and respond to any concerns or issues.
- Chaired Institutional Ethics and Compliance Committee meetings and outlined the requirements for an effective C&E program and compliance partner responsibilities. Also provided updates on compliance accountability awareness and code of conduct, attended BOT Finance and Audit Committee meetings, conducted C&E Week awareness campaigns, and launched youth protection and background check policies.
- Served on the Data Privacy Incident Response team and provided review and guidance associated with Federal and State privacy and data breach requirements.
- Developed and disseminated four editions of the C&E newsletter, The Compass. The Compass has published articles relating to export compliance programs; under-reporting of foreign funding; ransomware recovery; lean six sigma tools for planning and execution; and other audit, compliance, and risk management topics.

INSTITUTIONAL COMPLIANCE: PRIVACY OFFICE

- In January of 2021, collaborated with the Information Security office and Institutional Compliance to initiate the campus-wide Information Security and Privacy committee. The information security and privacy programs strive to ensure that information security and privacy efforts consistently demonstrate a commitment to the core mission and principles of UToledo while protecting the overall security and privacy of information.
- Led and supported the Main Campus and HSC HIPAA and FERPA collaborative efforts to develop a uniform set of privacy and security policies for relevant component parts of UToledo.
- Served on the COMLS industry relations committee and the COMLS clinical services compliance program.
- Promoted compliance during UTMC physician and staff meetings.
- Developed and maintained for the Healthcare Compliance Program a listing of compliance resources on the Privacy office webpage, which is accessible by all employees.
- Communicated available resources for C&E topics, to include issues regarding gift and honoraria acceptance and other topics not directly related to data privacy.
- Provided guidance and advised the office of the Chief Medical Officer and COMLS leadership and coordinated with the Office of Research and COMLS leadership regarding research compliance, fraud and abuse involving arrangements with health care providers and health care industry vendor relations, HIPAA, State privacy laws, and potential breaches.

ACADEMIC AFFAIRS

- Members of the Office of the Provost, leaders in the academic Colleges, and members of the Division of Student Affairs served on the professional organization International Center for Academic Integrity and as co-administrators for UToledo accounts preventing plagiarism.

STUDENT-ATHLETE ACADEMIC SERVICES

- Participated in bi-weekly staff meetings with a representative from Athletics Compliance.

CENTER FOR INTERNATIONAL STUDIES AND PROGRAMS

- Met regularly to discuss compliance matters.
- Regularly held meetings to discuss “I-9” regulations and processes related to payroll sign-ins.

OFFICE OF DIVERSITY AND INCLUSION

- Collaborated with campus partners to conduct an in-depth review of the UToledo search and hiring processes to assess improvements to increase efficiency, recruitment efforts and diversification of applicant pools.
- In partnership with HR and the Office of the Provost, partnered to improve the search process to ensure equal opportunity for employment; compliance with regulations and guidance from the Office of Federal Contract Compliance Programs; and specifically identified, traditionally underrepresented groups are aware of employment opportunities and actively encouraged to pursue them.

OFFICE OF THE TREASURER

- Participated in monthly meetings hosted by Budget and Planning where users were informed of any policy and procedure updates or new compliance requirements relating to finance and accounting matters.

BUDGET AND PLANNING

- Hosted quarterly meetings where users were informed of any policy and procedure updates or new compliance requirements relating to the Division of Finance and Administration. The Budget and Planning department also led business managers meetings to discuss topics impacting departmental operations.

HUMAN RESOURCES

- Maintained effective compliance oversight for employment laws, collective bargaining agreements and UToledo policies, and provided research and support to partner with offices across campus (i.e., Offices of Legal Affairs, Internal Audit, Diversity and Inclusion, Institutional Compliance).
- Participated in a financial focus group facilitated by Finance to disseminate information regarding UToledo financial procedures and compliance updates to State or Federal legislation.

UNIVERSITY OF TOLEDO POLICE DEPARTMENT

- Improved communications with Student Conduct by criminal investigators attending student conduct partnership meetings and met with Internal Audit to establish lines of communication.

ENVIRONMENTAL HEALTH AND RADIATION SAFETY

- Participated in the following off-campus compliance organizations: American Biological Safety Association, American Industrial Hygiene Association, American Society of Safety Professionals, Ohio Building Officials' Association, Campus Safety Health and Environmental Management Association, State of Ohio University Environmental Health and Safety Directors' Roundtable, Local Emergency Planning Committee, and Midwest Area Biosafety Network.
- Promoted awareness of EHS compliance programs through outreach events: Faculty Relations new faculty orientation, faculty meetings, HR Benefits sessions, and new employee orientation.
- Published handouts/EHS bookmarks to promote awareness of EHS compliance programs.

FACILITIES ADMINISTRATION

- Chaired the committee pertaining to continuity of operations space planning and allocations.
- Utilized monthly staff meetings to communicate compliance and ethics topics to the department.

FACILITIES OPERATIONS

- Communicated compliance and ethics topics through email, staff meetings, and training sessions.
- Held meetings for teams (daily), senior management (weekly), and all staff (annually).
- Ensured code compliance for life safety inspections through key performance indicator reporting.

ENERGY MANAGEMENT

- Served as members of the following outside organizations: the American Society of Heating, Ventilation and Refrigeration Engineers, the International District Energy Association, the United States Green Building Council Ohio Chapter, the Association of Energy Engineers, the Project Management Institute, the Ohio Water Environment Association, and OHIO811.

UNDERGRADUATE ADMISSIONS

- Served on the committees on admissions and standards, residency appeals, and online appeals.

OFFICE OF UNDERGRADUATE ADMISSION

ADMISSION AMBASSADORS



HANDSHAKE POSITION:
2716094

**THE OFFICE OF UNDERGRADUATE ADMISSION IS SEEKING HIGHLY
MOTIVATED, SPIRITED AND FOCUSED UTOLEDO STUDENTS TO
SERVE AS ADMISSION AMBASSADORS TO AID IN THE
RECRUITMENT OF DIRECT FROM HIGH SCHOOL PROSPECTIVE
STUDENTS.**



Targeted Compliance Risk Areas



Clery, VAWA, and Title IX Compliance

INSTITUTIONAL COMPLIANCE: CLERY ACT/UNIVERSITY OF TOLEDO POLICE DEPARTMENT

- Keeping the campus community safe is a top priority at UToledo and requires ongoing collaboration among students, employees, and external partners, such as local law enforcement agencies, block watch leaders and emergency responders. As part of its efforts to keep stakeholders informed about the security and safety of its campuses, each year UToledo prepares the Annual Security and Fire Safety Report (ASFSR). It includes information about UToledo crime prevention, emergency procedures, incident reporting and crime statistics, both on and adjacent to our campuses. Pursuant to the Clery Act, this annual report also includes reported campus crime statistics for the past three years (2019, 2018 and 2017), plus information about campus safety and security policies. The 2020 ASFSR (released during fiscal year 2021) is available at <https://www.utoledo.edu/offices/internalaudit/clery-act/docs/security-fire-safety-report-2020.pdf>

TITLE IX

- Increased targeted messaging regarding year-round campaign awareness on multiple social media platforms.
- Increased local and national media presence and visibility of the Title IX office.
- Expanded offerings of online and virtual bystander intervention trainings (66 trainings conducted with 626 attendees).
- Produced 12 targeted videos with campus partners to provide resource information.
- Presented on Title IX and prevention at the national conference level.
- Enhanced data collection for assessment of Title IX and prevention purposes.
- Provided monthly awareness campaigns and events including social media campaigns, Red Flag Campaign, Cup of Prevention, Empty Place at the Table, Virtual Sexual Assault Awareness Month engagement, and more.





TITLE IX (cont'd)

- Hosted the fourth annual What Were You Wearing exhibit with the creation of the message of hope quilt, face coverings and national recognition of the event during Sexual Assault Awareness Month.
- Made major revisions to the Title IX policy and created Title IX procedures to maintain compliance with the new Federal regulations which went into effect August 14, 2020.
- Identified institutional Title IX advisors and trained them on the Title IX process in compliance with new Federal regulations.
- Redesigned and updated the Title IX website.
- Updated the Title IX Resource Guide.
- Increased Title IX training at New Employee Orientation (23 trainings in fiscal year 2020 and 65 trainings in fiscal year 2021/182.6% increase).
- Created Title IX training video for vendors working on our campus.
- Hosted Equal Employment Opportunity discrimination training for staff, faculty, and students.
- Received a 5-star rating for our efforts in prevention and responding to sexual misconduct for the sixth consecutive year.
- Offered a total of 180 trainings of 5,239 faculty/staff/students compared to 122 trainings (fiscal year 2020).
- Through trainings, education, and awareness campaigns, the Title IX office provided 20,230 touch points with students, faculty, and staff during the pandemic.

Conflict of Interest (COI) and Commitment

Ensuring compliance with state and federal requirements on disclosing and managing COI and commitment.

INSTITUTIONAL COMPLIANCE

- Revised seven training modules to reflect updates from the previous year and provided to faculty and staff members as an online resource, each pertaining to COI.
- Distributed several communications, monitored online disclosure submissions, conducted reviews, and worked with faculty and administrators to resolve potential conflicts, as well as tracked compliance rates and worked with Academic Affairs to address noncompliance.

RESEARCH

- Updated forms and processes for financial disclosures for research participants in sponsored (externally funded) programs for implementation in new Research Office database (“InfoEd”).
- Research Policy 3364-70-01, Financial COI, was updated to reflect current Federal agency regulations and policies.
- Automated daily and monthly e-mail notifications sent to sponsored program personnel regarding renewal of pending and expired COI disclosures.
- Research submitted six cases of potential financial COI to the UToledo COI Review Committee in support of sponsored programs and Institutional Review Board (IRB) protocols from five Colleges. Two of these reviews resulted in management plans, another two were recommended for management plans pending IRB study status, one review determined that the external interest was not sufficiently related to the sponsored program to require management, and the remaining case was closed when the investigator divested in the external financial interest.



Research Compliance

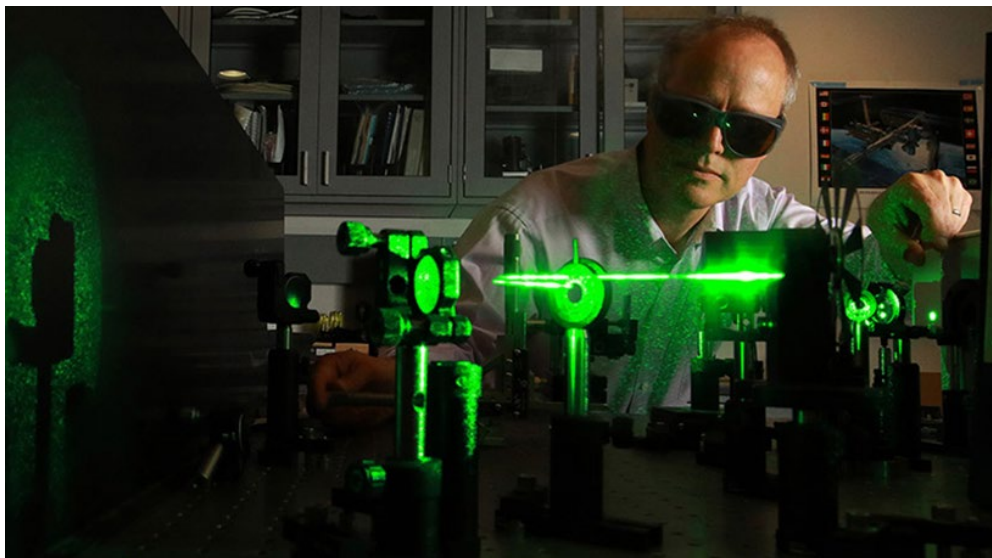
Supporting the UToledo research compliance program.

RESEARCH

- Conducted weekly Research staff meetings and monthly meetings for key college leaders on research administration and compliance issues.
- Integration of InfoEd research administration database with IRB Manager and UToledo systems initiated. Launch of InfoEd system expected in early 2022.
- Continued serving as the point of contact and source for guidance to research compliance and protocol preparation related to scientific misconduct, export controls, COI, human subject research, animal research and care, biosafety and development of policies and procedures for sponsored research.
- Research prepares reports for and corresponds with Federal and institutional regulators, accreditation and certification entities and external sponsors (i.e., NSF, National Institute of Health) for a broad range of research compliance areas (e.g., NSF notification of sexual harassment by funded Principal Investigators, animal research and welfare, reportable non-compliance in protocols, human subject research, biosafety deviations).
- Coordinated Responsible Conduct of Research graduate student training with College of Graduate Studies in the Spring 2021 semester. Delivered presentations for New Faculty Orientation.
- Continuous education and professional development of the animal research and the Human Research Protection Program (HRPP) compliance staff included virtual attendance at the annual Public Responsibility in Medicine and Research (PRIM&R) IACUC and the PRIM&R Advancing Ethical Research conferences. Compliance staff members also watched free webinars on a variety of topics. Additional staff studied for and passed the PRIM&R Certified IRB Professional exam. Four HRRP staff hold professional certification.
- HRPP staff participate in the Institutional Research Survey Committee to reduce non-compliance in human subject research associated with UToledo surveys.
- Educational outreach to faculty, staff, and students in HRPP included virtual training and office hours weekly during periods of high activity. HRPP continues to build relationships/procedures with other offices such as the Jacobson Center for Clinical and Translational Research (e.g., Clinical Trial Agreement reconciliation) and the HIPAA Compliance Officer for approvals associated with IRB protocols.
- Revised existing and created new IRB written procedures. New and revised written procedures will be disseminated in the Fall 2021.
- Research compliance staff conduct IACUC post-approval monitoring which includes periodic monitoring of IACUC protocols for compliance and biannual inspection of all animal care housing and use areas. Compliance staff also conduct IBC periodic post-approval monitoring of IBC protocols for compliance.
- Congruency analysis of sponsored projects with/for required protocols (i.e., IRB, IACUC, IBC) is performed for incoming awards (~340 awards annually).
- Controlled substance and dangerous drug records/infrastructure are reviewed biannually.
- Research staff are subject matter experts in human subject research, animal research, biosafety, and controlled substance regulations and provide professional support for IRB, IACUC and IBC.

RESEARCH (CONT'D)

- Ensured UToledo complied with federal Bayh-Dole reporting requirements for subject inventions that were developed on campus. Conducted presentations and training for New Faculty/ New Employee Orientations and in other venues and meetings regarding the UToledo intellectual property policy, state law regarding intellectual property and the Bayh-Dole Act.
- Provided training to faculty and students for research projects requiring a Technology Control Plan or data management plan as required under the Export Administration Regulations (EAR)/International Traffic in Arms Regulations.
- Conducted one-on-one training to faculty members requiring enhanced export control awareness and provided export control refresher training to existing and newly hired contract and grant staff members.
- Renewed the UToledo software subscription to Visual Compliance for export control and restricted party screening for 11 participating departments.
- Reviewed seven Experimental/Technical Service Agreements subject to regulation by the EAR from four Colleges to determine that no export licenses were required for release of related technology to foreign nationals working or studying at UToledo.
- Processed approximately 150 Material Transfer Agreements (MTAs) annually. Reviewed five MTAs from three Colleges for material exports subject to the EAR to determine that no export licenses were required by UToledo to send approved materials to foreign recipients in five destination countries.
- Coordinated with UToledo investigators and sponsor contract management to scope a Department of Defense-funded program as “fundamental research”, thereby removing certain publication restrictions and program security requirements imposed by federal contract clauses.
- Reviewed 34 Deemed Export Certification requests for “H-1B” visa petitions from 11 Colleges/units to determine that no export licenses were required by UToledo to release technology to foreign nationals employed by UToledo.
- Submitted 38 new federal E-Verify cases for 10 active sponsored programs with the Federal Acquisition Regulation 52.222-54 Employment Eligibility Verification contract clause from three Colleges and units.





Athletics Compliance

Providing oversight and management of the athletics compliance program.

INSTITUTIONAL COMPLIANCE: ATHLETICS

- All sub-areas within National Collegiate Athletics Association (NCAA) Bylaw 11 (Personnel) were monitored by the Athletics Compliance office, beginning at the onset of the academic year when each sport submits a staff listing of coaching and non-coaching personnel. Limits on the number of coaches in each sport are verified, and non-coaching staff are obligated to sign off on a statement that lists all the permissible activities in which they may engage.
- Regarding Bylaw 12 (Amateurism), as student-athletes completed initial eligibility through the Eligibility Center, their amateur status is also evaluated and certified by the NCAA. Once the student-athlete is enrolled at the institution as a full-time student, Athletics Compliance monitors the amateur status of the student-athlete to ensure that he or she has not professionalized himself or herself in any way. Areas of oversight included student-athlete employment, promotional activities and, lastly, around the “five-year clock” of athletics eligibility.
- Regarding Bylaw 13 (Recruiting), Athletics Compliance disseminated recruiting calendars and important NCAA recruiting information to each coaching staff in the 16 sponsored sports. Compliance maintained recruiting oversight via the JumpForward software system, which has been in effect as of the summer of 2015. Coaches and staff were required to document all recruiting activities through this database.
- Regarding Bylaw 14 (Eligibility), incoming freshmen student-athletes were certified by the NCAA Eligibility Center to fully participate. Transfer student-athletes were certified by the institution, based upon completed coursework at their previous institution(s) and the transferability of said coursework to UToledo. These evaluations were conducted by the transfer eligibility coordinator for the institution.
- All sub-areas within Bylaw 15 (Financial Aid) were monitored by the Athletics Scholarship Coordinator in Athletics and Athletics Compliance to ensure financial aid was permissibly awarded to student-athletes and team financial aid limitations were not exceeded. Each coach met with the scholarship coordinator to determine the amount of financial aid that each student-athlete would receive for the upcoming academic year.
- All sub-areas within Bylaw 16 (Awards and Benefits) were monitored by Athletics Compliance to ensure impermissible, or “extra” benefits were not provided to student-athletes. Head coaches submitted participation awards, which identified the amounts and types of awards provided to student-athletes.
- Bylaw 17 (Playing and Practice Seasons) was overseen by Athletics Compliance through practice logs submitted electronically by coaches through the athletics department’s Teamworks web-based software. At the beginning of the academic year, each sport program submitted their playing and practice season declaration to the Compliance office for approval and upload into the Teamworks system.

ACADEMIC AFFAIRS

- The eligibility of all student-athletes was certified by the eligibility certification officer in the Registrar’s office.

Healthcare Compliance

INSTITUTIONAL COMPLIANCE: UNIVERSITY OF TOLEDO MEDICAL CENTER (UTMC)

- Engaged United Audit Systems, Inc. (UASI) in an external audit of coding/documentation accuracy for inpatient and outpatient services at UTMC. Audited UTMC coders for benchmarking.
- Engaged UASI in an audit of coding/documentation accuracy for inpatient and outpatient services at UTMC done by Salud, contracted coders for UTMC.
- Investigated allegations of violations of the Emergency Medical Treatment and Labor Act and provided education for Emergency Department staff and physicians.
- Completed a process improvement audit of cardiac devices, which resulted in a refund to Medicare and other payers.
- Drafted revisions to the History and Physical Documentation policy and conducted physician training on the resultant policy.
- Worked with IT to issue a “Compliance Alert” pertaining to the Interoperability and Patient Access Rule/Cures Act.
- Verified, signed, and returned the Ohio Vaccine Policy Certificate of Compliance to the State.
- Investigated allegations of age and race discrimination in accordance with Section 1557 of the Patient Protection and Affordable Care Act.
- Audited for compliance with Health and Human Services and the Centers for Medicare and Medicaid Services (CMS) regulations for provider-based clinics.
- Assessed UTMC conformance to telemedicine regulations by state. Regulations vary by state, and such an assessment was necessary, as Cardiology staff currently see patients throughout the country.
- Verified compliance with CMS regulations pertaining to billing/location for the New Student Counseling Clinic (HSC).
- Assisted Patient Financial Services in meeting Federal regulations pertaining to transparency in hospital pricing.
- Assisted in drafting a new policy and process for managing the Fair Market Value of provider compensation.
- Reviewed registration and consents for Main Campus COVID-19 testing of student athletes.



