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OFFICE OF UNIVERSITY COMPLIANCE

Compliance Chats Podcast

Special Edition: Getting to Know the Office of University Compliance

Podcast Title:	GETTING TO KNOW THE OFFICE OF UNIVERSITY COMPLIANCE	**Podcast Date:**	October 2018
Host:	Omar Andujar	**Guest Speaker(s):**	Kimberly Fearney
Purpose	In this interview with Kim Fearney, listeners will learn about the scope and role of the Office of University Compliance, its key objectives, and helpful tools and resources.		
About Guest Speaker(s)	Kim serves as the Interim Associate Vice President and Chief Compliance Officer for the University of Connecticut and UConn Health in Farmington. Kim is responsible for providing independent oversight and coordination of the University's compliance program, including directing the day-to day operation of the Office of University Compliance. Kim advises senior leaders on the effectiveness of the University's compliance efforts while maintaining collaborative relationships with compliance owners across the institution. Kim has also served as the University's Ethics Liaison to the Office of State Ethics since 2011.		

SUMMARIZED PODCAST

Hello everyone and thank you for tuning into *Compliance Chats*, a podcast series intended to keep faculty and staff up-to-date on various compliance matters. My name is Omar Andujar and I'm joined by Kim Fearney, Interim Chief Compliance Officer and Ethics Liaison with the Office of University Compliance.

Kim, thanks for taking the time to join us today. Let's go ahead and dive-in to today's topic, which will focus on the role and scope of the Office of University Compliance.

1. **Let's start by covering some important context. Earlier this year, the Office of Audit, Compliance and Ethics (OACE) was reorganized into four separate offices. Kim, can you explain?**

   Sure, thank you so much for having me. The Office of Audit, Compliance and Ethics no longer exists. We have four new offices and these offices all have very specific responsibilities, but they also work very closely together. I think the structure actually is very helpful for our faculty and staff.

   We have the Office of Audit and Management Advisory Services headed up by Cheryl Chiaputti. This is your traditional audit function at the university. They have had responsibility at all campuses for a number of years, so not much has changed with that office.

   We also have two new imbedded compliance areas, which are offices that have specific day-to-day responsibilities for high risk compliance areas. The first is the Office of Privacy Protection and Management, which is headed up by Rachel Rudnick. That's a new office and they have responsibilities related to privacy (i.e. protecting information, education, data breaches, HIPAA compliance, etc.).

We also have the Office of Healthcare and Regulatory Compliance, which is headed up by Debra Abromaitis. That area is really focused on the risks associated with the clinical environment and with the hospital at the University. Their responsibilities focus on billing, all the different areas that fall under clinical compliance, as well as responsibilities related to regulatory compliance. In a hospital environment, there are a lot of different regulators that come in to make sure you're meeting those requirements, so this office does a great job of helping to organize everything and helping with the connection between the regulators and the University.

Then we have the Office of University Compliance, which is really focused on the big picture / overarching umbrella compliance program for the institution. We are required to have a compliance program based upon the Federal Sentencing Guidelines. They have a section in the guidelines that talks about an effective compliance program. There's different elements in there that include having an anonymous report line, making sure you have training, making sure you have policies, and making sure that you're monitoring compliance. Those are really the focus areas of what we do. And we have responsibilities at all campuses, including UConn Health and all of our regionals. It's really trying to help bridge that and bring everyone together, so that we have a strong cohesive approach to compliance.

2. **Kim, you've provided our audience with a great overview and I was wondering if maybe you can continue and talk a little bit about the overall objectives of your office?**

Sure. I think the most important objective or what's most important for those of us who work in the office is promoting a university wide culture of compliance and ethics. It's very important to us to be seen as a tool in the toolbox for our employees and for our faculty and staff. Our job is to help promote doing the right thing and making sure that people have the proper training so that they can recognize situations that could be problematic and ask questions. We also help to ensure coordination and consistency among different compliance units across the University.

We have so many rules that we need to follow. Different regulations, laws, policies, and a lot of areas that have very specific requirements. Pretty much almost any unit has a compliance aspect to it. For example, the Department of Human Resources has a large compliance responsibility. We have the Office of Institutional Equity, we have Research Compliance, we have so many different units across the institution and we want to make sure that we can have consistency where we can have consistency, get rid of any duplication of efforts so that our faculty and staff can be the most successful they can be, and fulfill the mission of the institution. So, that really is what I would say is our most important objective. Obviously, we manage the anonymous Reportline. Also, as I mentioned, we do a lot of education. We really push that and work to make it palatable to our faculty and staff and really changing it from what is seen as a tedious exercise, as something that can be very helpful and dare I say, fun.

3. Kim, I also understand that you are the Ethics Liaison at all campuses, including UConn Health. Can you explain that role to our audience? What exactly is an Ethics Liaison?

Sure. It's actually a very specific designation and having the word ethics in it can cause confusion for our faculty and staff, so I'm glad I get a chance to talk about this. As state employees, we are bound by a state law called the State Code of Ethics for Public Officials. That law has actually been in place since the mid-seventies. It was passed after Watergate. The main point of that law is making sure that as state employees, we are not using our position or authority for personal financial benefit for ourselves, for family members, or businesses we may be associated with. So, it really is about avoiding conflicts of interest and not impairing our independence of judgement related to our responsibilities at the institution. With that law, there is an Office in Hartford that has responsibility for interpreting and enforcing the law and it's the Office of State Ethics.

The Office of State Ethics has a lot of requirements related to the Code of Ethics. One of those requirements is that each state agency have an Ethics Liaison and that role is really responsible for sharing information related to the Code of Ethics with its employees and making sure that we are providing guidance and helping to answer questions. It's really an advisory role. For example, we put out information related to accepting gifts. What you can or can't accept or what kind of outside employment you can have that's not a conflict of interest with your state responsibilities. Again, it's really geared towards helping people manage conflicts of interest and not really something that's related to ethics or morality, which I think is where some folks can get confused and I completely understand that. In a nutshell, that role really is about helping people navigate the requirements of the State Code of Ethics.

4. As you know, we have a broad and widely diverse audience ranging from new to more seasoned employees, individuals in different functional areas, and those with varying degrees of involvement in compliance matters. What are two or three key takeaways regarding compliance that you would like to emphasize for our listeners today?

The first one that comes to mind is don't be afraid of compliance. There are a lot of people that have the knowledge and expertise in the different rules that we need to comply with. So, don't be afraid to ask questions. That's what we're here for and if we can't answer your question, we'll find the right place to direct you for guidance. It's always best to ask questions first before you do anything that may put you or the institution at risk.

Also, make sure you're familiar with policies and you are doing your training. I know there are a lot of different compliance trainings, but there's a reason that we have them. Take advantage of that and the offices that exist to help support compliance. Also, remember that compliance flows into making sure that we're doing the best we can for the institution as a whole. The University of Connecticut has great things that it does. We have so many different pieces of our institution. We work with students, patients, the public, and there's a lot of responsibility that comes with that and compliance is a piece of it.

5. **Excellent. You mentioned several resources and important information. In the past, such types of resources were available at audit.uconn.edu, but you have a new website now. Correct?**

   Yes. We are very excited to have a website that actually has the word compliance in it now. Each of the offices have their own dedicated website, our website is compliance.uconn.edu. We really are trying to build a strong library of resources. For example, we have a compliance matrix which summarizes compliance obligations and who to contact. We also have different educational resources like these podcasts and animated videos. We also have Compliance Chatter -a new email educational tool - which I love and is a great way to get information out to our employees so they can be aware of different compliance responsibilities and policies.

Conclusion:

Several of those resources will be linked and included along with the podcast summary that accompanies this podcast. We are going to end here for now. Kim, thanks again for taking time to talk to us today, and thanks to all of you for listening. Stay tuned for our next compliance chats. I'm Omar Andujar with the Office of University Compliance saying, until next time.

RESOURCES MENTIONED BY SPEAKERS:	MUSIC CREDITS:
https://audit.uconn.edu/ https://compliance.uconn.edu/ Compliance Chatter (Educational Emails) Compliance Clips (Animated Videos) Compliance Chats (Compliance Podcasts) Compliance Matrix https://health.uconn.edu/healthcare-regulatory-compliance/ https://privacy.uconn.edu/	On the Ground. Kevin MacLeod. Royalty Free 2014. Retrieved from: http://incompetech.com/music/royalty-free/index.html?genre=Jazz Rollin at 5. Kevin MacLeod. Royalty Free 2014. Retrieved from: http://incompetech.com/music/royalty-free/index.html?genre=Jazz