

FSU

OFFICE OF COMPLIANCE & ETHICS

2025 Annual Report

and 2025-2026 Work Plan

From the Chief Compliance and Ethics Officer

I am pleased to present to the Board of Trustees an update on the activities of the Office of Compliance and Ethics (OCE) over the last year and programmatic plans for the 2025-2026 year. The last year has been marked by substantial growth to OCE's staffing levels and work capacity, which has elevated awareness of our services and deepened our partnerships across the University community. We look forward to using this momentum to continue to increase our office's visibility and effectiveness.

A key milestone during the year was the successful completion of an external effectiveness review, as required by Board of Governors (BOG) Regulation 4.003. The review affirmed the strength of FSU's compliance and ethics infrastructure, with the University receiving a "generally conforming" rating in 35 of 39 assessed metrics. This outcome reflects FSU's ongoing commitment to fostering a culture of ethical conduct, accountability, and compliance risk mitigation.

We also welcomed the addition of the Student Ombuds Office to OCE. This program is led by the newly-appointed University Student Ombuds, who is charged with fulfilling statutory and regulatory responsibilities to ensure student complaints, appeals, and general questions are properly fielded within the University. This new position has already created substantial value by providing a central resource for students, faculty, and staff, reviewing policies and procedures, and conducting outreach efforts to ensure visibility of the office and continuous improvement of services.

The accomplishments and activities highlighted in this report are organized around the seven elements of an effective compliance and ethics program as outlined in Chapter 8 of the U.S. Sentencing Commission Guidelines. The report also outlines strategic priorities for the 2025–2026 program year, focusing on continuous improvement and institutional collaboration.

We are grateful for the continued support of University leadership and remain committed to advancing FSU's values through a strong, proactive, and collaborative compliance and ethics program.



Robert Large, J.D., CCEP, CHRC
Chief Compliance and Ethics Officer



Program Overview

The FSU Office of Compliance and Ethics provides oversight and guidance to all areas of the institution in matters related to compliance and ethics.

The office provides this oversight through the ongoing development of effective policies and procedures, education, training, monitoring, communication, and response to reported issues, as required by Chapter 8 of the Federal Sentencing Guidelines and Florida Board of Governors Regulation 4.003. The guidelines and regulation set forth the elements of an effective compliance and ethics program that maximizes compliance with laws, regulations, rules, and policies and promote ethical conduct.



Elements of an Effective Compliance and Ethics Program*

1. **Oversight**--Effective oversight with individuals and groups having operational responsibility, autonomy, and authority over the Program.
2. **Standards of Conduct/Policies and Procedures**--Clear, accessible, foundational component of the Program.
3. **Communication and Reporting**--Encourage employees to raise concerns and have investigative procedures in place.
4. **Education and Training**--Effective, ongoing training and establishing open lines of communication.
5. **Monitoring and Auditing**--Internal tools to evaluate effectiveness and detect noncompliant conduct.
6. **Enforcement and Discipline**--Establish appropriate incentives for compliance and disciplinary actions for violations.
7. **Response and Prevention**--Resolve identified problems promptly and add use to inform monitoring activities.

* U.S. Sentencing Commission Guidelines, Ch. 8; Society of Corporate Compliance and Ethics; OCE Program Plan

Our Team

Office of Compliance and Ethics



Caroline Klancke, J.D., CCEP
Associate Compliance Officer, Director of Ethics and Integrity Programs

- State ethics code guidance, COI/COC review, research conflicts, procurement ethics, investigations



Edna Gasque, M.S., CCEP
Associate Compliance Officer, Director of International Affairs Compliance

- Foreign influence, researcher screening, foreign gifts and contracts, general compliance guidance



Rachel Neale, M.A., CCEP
Compliance Program Coordinator

- Foreign researcher screening, outreach, communications



Rainey Basinger
Compliance Systems Specialist

- CAMS system administrator, compliance data reporting



Sherona Tennyson
Administrative Specialist

- Administrative support for OCE

Student Ombuds Office



Grant Escue, J.D.
University Student Ombuds

- Student grievances, complaints and appeals, reports to President on student-related trends and policy/process observations



Vacant (search underway)
Administrative Specialist

- Administrative support for Student Ombuds Office

Element One: Compliance Leadership and Executive Oversight

The Compliance and Ethics Program underwent an **external effectiveness review** conducted by Huron Consulting. The outcome of this review affirmed FSU's commitment to a strong culture of compliance and ethics. FSU's compliance and ethics program was found to generally conform to program requirements and expectations of the Board of Governors and the elements of an effective program found in Chapter 8 of the Federal Sentencing Guidelines. This review is required by Board of Governors Regulation 4.003 to occur every five years. Therefore, the next external effectiveness review will occur in 2030.

The **Compliance Partnership Committee (CPC)** was reconvened and meets quarterly to discuss University-wide compliance issues, such as policy development, conflict of interest and commitment, and other matters relevant to the group.

A subcommittee of the CPC has also developed the first **compliance and ethics awards program**, which will be presented in November.

In cooperation with the Office of the Provost, the Office of Compliance and Ethics (OCE) added the **Student Ombuds Office**, which provides a neutral point of contact for students who have questions, complaints, grievances, or appeals involving their academic experience. In addition to providing direct services to students, the Student Ombuds Office will also help enhance the activities of the compliance and ethics program by providing insight into policy issues that may need attention by the administration and supplying data that will help inform the University's accreditation process.

2025-2026 Work Plan Items

- Discuss opportunities to bring additional informational resources and training to the Board of Trustees and Cabinet, such as ethics refreshers and updates on specific compliance-related topics.
- Continue discussions with leadership regarding any programmatic changes to the compliance and ethics program based on the external review.
- Revise Program Plan to encapsulate any revisions requested by the OCE following discussions with leadership.
- Continue to engage with the CPC and find new ways for the committee to add value to the University's overall compliance program.
- Review potential frameworks for conducting compliance reviews within key compliance areas based on need. This framework may be informed by data received from the University's institutional risk management activities or other priorities identified in conjunction with management.
- Increase coordination between OCE staff and compliance parntners in the area of foreign influence and international activities (e.g. international travel and training).

Element Two: Written Standards of Conduct and Policies and Procedures

The OCE has partnered with the Office of the Provost to develop a **University-wide policy library** that will centralize resources and provide greater ease of access to University policies and increase efficiency and accountability for policy owners.

The OCE has also reviewed **conflict of interest and commitment policies** with the goal of recommending revisions to streamline and clarify disclosure requirements and align relevant policies with current practices.



2025-2026 Work Plan Items

- Complete review, revision, and creation of ethics-centered policies and recommend policy revisions to leadership.
- Review University-wide policies involving compliance and ethics matters to ensure consistency and currentness. (carry-forward from 2024-2025 Work Plan).
- Continue supporting the efforts of the Office of the Provost to transition FSU's policies to a central policy library.

Element Three: Effective Lines of Communication; Reporting

The Chief Compliance and Ethics Officer (CCEO) maintains regular monthly meetings with the Chief Audit Executive, the Associate Vice President for Human Resources/Chief of Staff for the Vice President of Finance and Administration, the Associate Athletics Director for Compliance, the Title IX Director, and the Student Ombuds. The Chief Compliance and Ethics Officer has an EthicsPoint license and access to the EthicsPoint site to review complaints that arrive via the online portal. Regular meetings with the Chief Audit Executive and the Associate Vice President for Human Resources assist with workload issues and identification of the correct office to conduct investigatory activities and respond to complaints.

In addition, the CCEO consults with other departmental compliance partners on an as-needed basis. The OCE also responds daily to inquiries and requests for assistance from departments across the University, reflecting growing awareness of the office's services. The OCE benefits from strong professional relationships with the President, Cabinet members, and the Board of Trustees' Audit and Compliance Committee. Members of the Board of Trustees also frequently seek the CCEO's guidance on ethics-related matters.

Over the past year, the OCE expanded its outreach efforts through the launch of a **quarterly newsletter**, **"The Third Torch,"** featuring timely compliance and ethics topics. This publication has enhanced faculty and staff awareness of OCE resources and contacts. The renewed engagement of the CPC has further strengthened collaboration between departmental compliance offices and the OCE.

Looking ahead, the OCE is preparing to host a new signature event during Compliance and Ethics Week—the **"FSU Compliance and Ethics Expo"**—scheduled for the first week of November. This initiative is designed to increase visibility of compliance resources, highlight institutional values, and provide new opportunities for campus engagement. The OCE will also co-host an **educational workshop** with the Office of Research Integrity, Security, and Ethics (RISE) on foreign influence, conflicts of interest, and gifts laws.

2025-2026 Work Plan Items

- Host workshops and other informational sessions, in addition to planned Compliance and Ethics Week activities.
- Enhance the OCE's web presence with timely resources and infographics and provide a hub for contacting other campus compliance departments.
- Leverage events and promotional items to bring awareness to faculty and staff on compliance and ethics-related topics.
- Discuss opportunities for more regular updates and trainings for leadership and the BOT, based on leadership priorities. (See also Element One).

Element Four: Education and Training

The OCE provides **training on conflicts of interest and commitment** through the University's Conflicts Administration Management System (CAMS), which is the mechanism for employees to disclose outside activities and other financial interests per University policy. This training was revised in early 2025 to ensure currentness and reflect current practices in the review process.

Reviewer training was also enhanced to give more practical tools for administrators reviewing outside activity requests. Visual aids also help both disclosers and reviewers navigate the system efficiently.

In the area of foreign influence, the OCE has partnered with HR and RISE to bring regular trainings to HR departmental representatives regarding the foreign researcher screening process, as well as ad hoc trainings for various college and department level-staff.

The OCE was invited to participate on the procurement review committee for a University-wide Learning Management System (LMS), which will create new opportunities for streamlining and tracking training requirements. This system could be leveraged in the future for delivery of compliance-related trainings.

OCE has developed new **reference guides on ethics-related topics**, such as gift guides, a conference attendance guide, and a Form 1 Filer Toolkit. These resources take what are often confusing and complex ethics requirements and distill them into a more user-friendly and digestible format for employees. We have also been pleased to present educational presentations to the SGA on ethics topics relevant to student leadership and look forward to future opportunities to engage with students.

2025-2026 Work Plan Items

- Create new and revised training programs for compliance-related activities utilizing a new LMS platform once available.
- Host workshops and other informational sessions on timely compliance and ethics topics. (See also Element Three).
- Create a general ethics training module for faculty and staff, separate from CAMS user trainings (carry-forward from 2024-2025 work plan).
- Improve and promote Office of Compliance and Ethics website.
- Enhance training opportunities/requirements for foreign travel in conjunction with RISE and the Office of the Provost.

Element Five: Audits and Evaluation Techniques to Monitor Compliance

The OCE is often part of the management response to reports of the Office of Audit and Advisory Services (OAAS), working to implement recommendations and address follow-up concerns resulting from internal audits or investigations. In addition to independent audits conducted by the OAAS, the OCE plays a role in monitoring compliance with University programs in other, more informal ways, or in the context of formal investigations of reports of unethical conduct.

FSU has established an **Institutional Risk Management** framework led by the Senior Vice President for Finance and Administration and the Chief Audit Executive, and units across the University have participated in a risk assessment. OCE will benefit from the information gathered through this process to inform compliance-related activities.

The OCE underwent an **audit of foreign influence programs** as required by statute. This audit involved a review of the foreign researcher screening process and the foreign travel approval process. Both audits yielded action items for improvement and enhancement of those activities. The OCE is also working with Information Technology Services, Human Resources, and RISE on implementation of a new software platform—Decisions—that will provide increased efficiency and a better mechanism for managing the workflow of the foreign researcher screening process.

2025-2026 Work Plan Items

- Continue working with the IRM team to identify ways OCE can utilize compliance-related risk data gleaned from the risk assessment process to inform compliance oversight activities.
- Continue monitoring the foreign researcher screening process in conjunction with the Office of Human Resources and RISE and improve processes where possible.
- Continue with tasks necessary to implement the Decisions platform for foreign researcher screenings.

Element Six: Appropriate Enforcement, Disciplinary Mechanisms, and Incentives



The OCE's investigation procedures provide that the OCE will refer the results of any investigation it conducts to the appropriate administrator(s) for further review or action. When discipline is recommended as an outcome of an investigation, the OCE works with the departmental supervisor and the Office of Human Resources to ensure that discipline is consistent and proportional.

In addition to consistent disciplinary action, creating incentives for good conduct can be just as important as deterring poor conduct. The OCE has developed the **inaugural Compliance and Ethics Awards**, which are designed to recognize exemplars from the FSU community in the area of compliance and ethical conduct. A total of three awards are planned, which will be awarded during Compliance and Ethics Week in November 2025.

2025-2026 Work Plan Items

- Continue to identify new training opportunities to highlight the importance of ethical conduct.
- Review possibilities to use enforcement data to spot trends and inform targeted training and oversight activities.
- Highlight champions of compliance and ethics through the inaugural awards program.

Element Seven: Investigation and Remediation of Systemic Problems

The **CAMS system** has made important improvements to FSU's outside activity and conflict of interest disclosure processes. The OCE continues to explore ways to use data from that system to ensure transparency with regard to employee outside activities and monitor compliance with state law and federal programs, which routinely include conflict disclosure requirements. RISE has created a **Research Conflict of Interest Committee**, on which an OCE staff member will serve, to provide for a more thorough review of proposed activities that may present a conflict of interest in research programs.

The OCE has worked with the Office of Faculty Development and Advancement to ensure reviews of disclosures in CAMS are properly analyzed and that appropriate follow-up is conducted to ensure reviewers have the tools and information they need to review disclosures.

To that end, the review workflow has been fine-tuned to ensure requests are properly routed in the CAMS system, and reminders are sent to reviewers regarding any un-reviewed requests.

The OCE created an internal **Standard Operating Procedure for investigating reports of conflicts of interest or commitment, misuse of public position or information, or other unethical conduct**. The OCE conducted two ethics/outside activity-related investigations (one reported through EthicsPoint and one at the request of internal administrators) and two independent reviews at the request of the Chief Procurement Officer.

2025-2026 Work Plan Items

- Use information gleaned from investigation outcomes to inform targeted compliance efforts in the area of conflicts of interest and commitment.
- Continue using CAMS data and information from the newly-established Research Conflict of Interest Committee to enhance targeted resources and training for frequently encountered scenarios.
- Increase CAMS disclosure compliance rates through targeted education and departmental outreach.

Other Highlighted Activities

Matters Tracked*	
Foreign Researcher Screenings	**670**
Foreign Travel Request Reviews	**1,560**
Procurement-Related Ethics Inquiries	**43**
Ethics/Outside Activity Investigations	**2**
Independent Reviews of Procurement Awards	**2**
Research Management Plans/Exemption Reviews	**2**

*Represents items actually tracked. A large number of other inquiries, including Form 1 technical guidance, outside activity reviews, and general compliance consultations, occurred during this time frame.

Professional Development and Service:

- Two staff members obtained **Certified Compliance and Ethics Professional (CCEP)** designations through the Society for Corporate Compliance and Ethics (SCCE).
- The CCEO obtained the **Certified in Healthcare Research Compliance (CHRC)** designation through the Health Care Compliance Association.
- One staff member completed online coursework toward **eSPEAR Certification** through the Office of Sponsored Research Administration.
- Three staff members attended the **SCCE 2025 Higher Education and Research Conference**.
- Two staff members attended the **2025 University Risk Management and Insurance Association (URMIA) Annual Conference**.
- Director of Ethics and Integrity Programs serves as FSU's representative on the **City of Tallahassee Independent Ethics Board** and co-chairs the ethics subcommittee of the **State University System Compliance Consortium**.
- The CCEO moderated a panel session at the **National Association of College and University Attorneys (NACUA) 2025 Annual Conference**.

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