



2024

ANNUAL

COMPLIANCE REPORT

ATSU | A.T. Still
University
FIRST IN WHOLE PERSON HEALTHCARE



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COMPLIANCE REPORT

This report will highlight the compliance achievements at A.T. Still University (ATSU) in 2024, identify key initiatives for 2025, and highlight ATSU’s commitment to creating and maintaining a culture of compliance.

As you may be aware, ATSU operates within highly regulated industries. It is only through the hard work and dedication of the whole ATSU community that we can comply with the many rules, regulations, and best practices of the education and healthcare industries.

2024 brought an unusually high number of regulatory updates. The compliance program has worked with stakeholders across the University to comply with these updates, better align ATSU with the best practices, and increase compliance awareness and knowledge among its stakeholders.

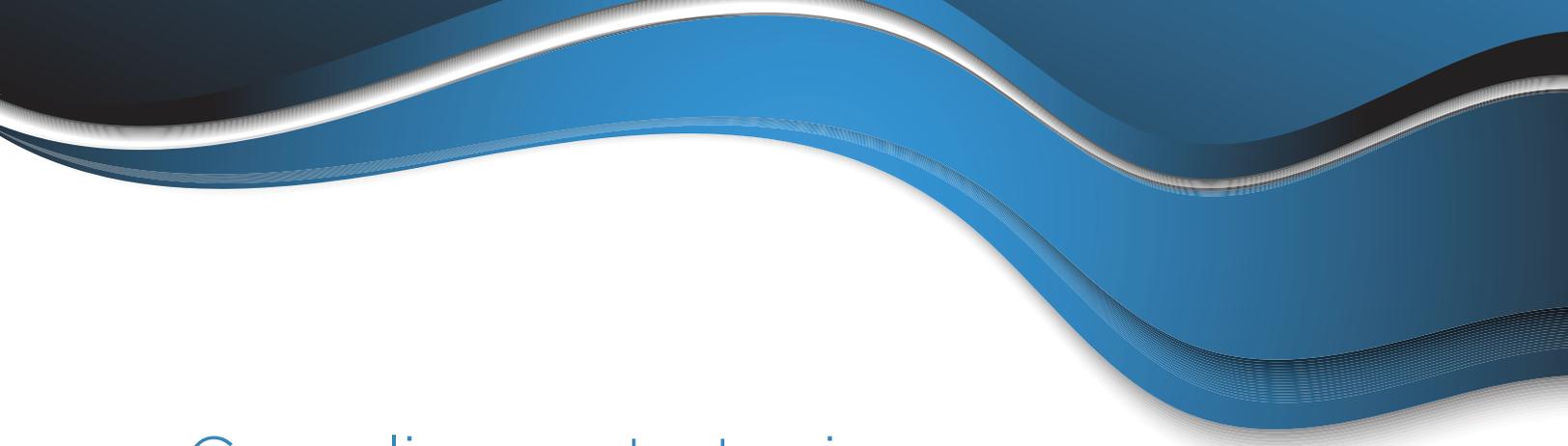
Our work begins first with the vision that is laid out by the Board of Trustees and the University’s Strategic Plan. The compliance strategic plan is developed to align with and support the vision and strategy, while also striving to have an effective compliance and ethics program as outlined by the **Federal Sentencing Guidelines**.

If this report brings questions or suggestions to mind, please reach out to Matthew Heeren, JD, chief operating officer & general counsel, or Michelle Gibson, MAL, CCEP, compliance manager.

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Compliance strategic goals and objectives

1. Development and continuous improvement of compliance practices University-wide.
 - a. ATSU policies are robust and compliant with laws and regulations.
 - b. Compliance progress through data collected and analyzed.
 - c. Compliance and ethics practices monitored.

2. ATSU stakeholders aware of and accountable for compliance roles and responsibilities.
 - a. Compliance and ethics plan developed and maintained.
 - b. Leaders participate in and are accountable to advance compliance in their respective areas.
 - c. Compliance partners (individuals responsible for day-to-day compliance operations) comply with applicable laws and regulations.
 - d. Compliance and ethics education and resources available to new and current employees.



2024 highlights

ATSU had a wide range of accomplishments in 2024, including several supporting the compliance strategic plan. Below is a summary identifying several achievements and the strategic goals each achievement supports.

LogicManger software platform

The compliance program has been building out two modules within the software platform LogicManger. The modules are for governance, risk, and compliance (GRC) management and contract lifecycle management.

Achieved: The GRC module is completed and is being used by ATSU stakeholders to track compliance-related work University-wide. The compliance work is mapped to the applicable federal and state laws and regulations. Information Technology Services is also using this module to track processes on National Institute of Standards and Technology cybersecurity and privacy frameworks. The contract lifecycle management module is still being built.

Strategic plan goal: Development and continuous improvement of compliance practices University-wide. ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.

Internal audit of ATSU's Disease Exposure Prevention and Control Plan

This audit assessed our compliance with ATSU Policy No. 95-10: Disease Exposure Prevention and Control Plan. This plan is designed to comply with Occupational Safety and Health Administration (OSHA) Standard 1910.1030 as well as state regulations on tuberculin skin testing for healthcare workers.

Achieved: The audit found ATSU practices largely aligned with ATSU policy but had some suggested improvements to University practices. These suggested improvements are currently being assessed, and a plan is being formulated to implement the changes. A special thanks to Dawn Shaffer, compliance specialist, for overseeing this audit.

Strategic plan goal: Development and continuous improvement of compliance practices University-wide. ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.



2024 highlights

Internal audit of business associate agreements

A business associate agreement (BAA) is a legal contract required under the Health Insurance Portability and Accountability Act (HIPAA). A BAA is required anytime ATSU contracts with a third party to complete work requiring the outside vendor to use or disclose any protected health information (PHI) on behalf of ATSU. These agreements are designed to ensure PHI is appropriately safeguarded and confidentiality is maintained.

Achieved: Dawn Shaffer, compliance specialist, completed this audit. All areas of noncompliance or gaps have been mitigated, and ATSU is in compliance with BAA requirements.

Strategic plan goals: Development and continuous improvement of compliance practices University-wide. ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.

Biennial HIPAA risk assessment

ATSU contracts with an outside consultant every two years to complete a HIPAA risk assessment. This assessment measures the risks and vulnerabilities to all systems and processes associated with access to PHI.

Achieved: The biennial HIPAA risk assessment was conducted, and a risk profile was generated. The following areas were assessed: business associates, security, and operational practices. In 11 of the 22 assessed areas, no unique and/or significant vulnerabilities were identified. The identified risks are prioritized and will be addressed by the appropriate department or area.

Strategic plan goal: Development and continuous improvement of compliance practices University-wide.



2024 highlights

Regulatory updates

This year brought several regulatory updates. Compliance partnered with several different ATSU departments and subject matter experts. Updates included but were not limited to third-party content disclosures, Section 1557 of the Affordable Care Act, California Workplace Violence Prevention Act, Financial Values Transparency and Gainful Employment Act, professional licensure disclosures, Title IX, and reproductive healthcare privacy updates.

Achieved: With the assistance of multiple ATSU stakeholders and many hours of work, progress has been made to comply with various requirements of these updates.

Strategic plan goal: Development and continuous improvement of compliance practices University-wide. ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.

Compliance discussion guides

In an effort to encourage compliance-related discussions and raise awareness on compliance-related topics, this year, the compliance program introduced the use of a monthly compliance discussion guide. Each guide covers one compliance-related topic and is designed to take five minutes or less of already existing meetings.

Achieved: Each month, administrators are emailed a guide to disseminate and incorporate into meetings in ways that work best for their departments.

Strategic plan goal: Development and continuous improvement of compliance practices University-wide. ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.

2024 highlights

Chemical hygiene plan

This year, ATSU engaged the services of an outside vendor to assist in creating a chemical hygiene plan. The plan will assist the University in meeting multiple OSHA standards and ensure ATSU maintains the health and safety of its employees and students.

Achieved: The consultant toured the Kirksville, Missouri, campus and assisted ATSU in developing a draft plan. Currently, Clayton Furman, director of environmental health and safety, is in the process of refining the draft plan and preparing for implementation.

Strategic plan goal: Development and continuous improvement of compliance practices University-wide. ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.

Advisory services

The compliance program not only leads the strategic compliance efforts University-wide but also serves as a resource for stakeholders on a wide range of compliance-related topics. This year, we have provided advisory services over 100 times on topics that include but are not limited to hazardous chemical management, third-party servicers, state licensure, records retention, clery, privacy laws, lease agreements, intellectual property, HIPAA, FERPA, environmental health and safety, artificial intelligence, Gramm-Leach-Bliley Act, and employee education.

Achieved: The Office of the Chief Operating Officer & General Counsel strives always to be a helping hand for all compliance partners and ATSU stakeholders. It is through the hard work of the whole university that ATSU is able to be compliant with rules, regulations, and best practices.

Strategic plan goal: Development and continuous improvement of compliance practices University-wide. ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.



Key 2025 initiatives

The following are identified focus areas for 2025 that will continue the strategic improvement of ATSU's compliance program.

Contract lifecycle management software

In 2025, the Office of the Chief Operating Officer & General Counsel will roll out the new contract management software allowing for the automation of the contract routing process. Instructions will be provided for all stakeholders during the rollout.

Written compliance plan

In 2025, a written plan will be developed detailing the function and work of the compliance program. This plan will house the policies, standard operating procedures, and workflows used within the compliance program. It will also record the elements comprising this program.

Audits

In compliance with the ATSU audit schedule, audits will be performed to assess ATSU's compliance with the following laws: the Clery Act, OSHA, and the Gramm-Leach-Bliley Act.



Culture of compliance

ATSU strives to have a culture of compliance. This means every member of the ATSU community, regardless of position or title, feels their observations and concerns are welcome and valued. Any employee who observes a potential compliance violation or is concerned about any action is not only invited but also required under ATSU policy to bring their concern to the attention of appropriate individuals. Reports may be made to supervisors, Human Resources, or the chief operating officer & general counsel. All reports are taken seriously and will be investigated. Employees can feel safe to report without fear of retaliation or a negative impact on their job or work environment. ATSU employees are protected by law and under ATSU policy from discrimination and retaliation when making a good-faith report.

ATSU provides options for anonymous reporting, including a secure online reporting form at fraudhl.com and 24-hour telephone services at 1.855.FRAUDHL (reference company ID “ATSU”). While an anonymous report is harder to investigate, it is better than no report.

See:

Policy No. 10-220: ATSU Code of Ethical Standards

Policy No. 10-216: Whistleblower Policy

Policy No. 90-210: Prohibition of Discrimination, Harassment, and Retaliation

Contact us

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