



2023

ANNUAL

COMPLIANCE REPORT

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



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COMPLIANCE REPORT

This A.T. Still University (ATSU) 2023 Annual Compliance Report provides highlights of ATSU’s compliance achievements this past year, identifies key 2024 initiatives, and highlights ATSU’s commitment to creating and maintaining a culture of compliance.

Compliance is a collective effort, requiring leaders at the board level and employees at all levels to commit to excellence and do things the right way. All ATSU compliance work starts with the vision set by the University’s Board of Trustees. This vision sets the course of the University’s strategic work.

The Compliance Strategic Plan is created to align with University-wide strategic work and with the elements of an effective compliance and ethics program as outlined in the **Federal Sentencing Guidelines**. Through the collective hard work of all ATSU, the Office of Vice President & General Counsel (VPGC) is able to highlight some of the 2023 accomplishments and give context as to how it supports the Compliance Strategic Plan.

If this report brings questions or suggestions to mind, please contact Matthew Heeren, JD, vice president & general counsel, or Michelle Gibson, MAL, CCEP, compliance manager, at 660.626.2522

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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. Potential compliance and ethics violations reported free from retaliation.
 - c. Compliance and ethics practices monitored.
 - d. Detected compliance offenses remediated in a timely manner.

2. ATSU stakeholders aware of and accountable for compliance roles and responsibilities.
 - a. Governing body knowledge about compliance program and exercises reasonable oversight.
 - b. Leaders participate in and are accountable to advance compliance in their respective areas.
 - c. Compliance partners comply with applicable laws and regulations.
 - d. Compliance and ethics training and resources available to new and current employees.

2023 highlights

ATSU had a wide range of accomplishments in 2023 supporting the Compliance Strategic Plan. Below is a summary that identifies several achievements and strategic goals each achievement supports.

Contract lifecycle management software

ATSU processes a wide array of contracts each year. The process of reviewing and approving each contract request involves input from several University stakeholders. Contract lifecycle management software is designed to assist ATSU in automating the contract routing process while also allowing for future growth in the area of vendor management. It was determined the current contract repository was unable to meet ATSU's routing and tracking needs.

Achieved: A new vendor, LogicManager, was identified. This vendor will allow several other compliance-related tasks to occur on one software platform. Several months have been spent on properly building out the new platform. In 2024, the platform will be rolled out to users, and training on using the system will be provided

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

Governance, risk, and compliance software

Governance, risk, and compliance (GRC) software is a platform to track compliance-related work University-wide. It allows stakeholders to track their compliance work, provides task reminders, and stores evidence of completed work. In 2023, we received notice that our current platform was being sunset; this prompted a halt of the rollout process, and the search for a new vendor was performed.

Achieved: A new platform, LogicManager, was identified. Information has been exported from the old platform to the new platform. ATSU compliance information and activities are being mapped to applicable federal and state laws and regulations. Information Technology Services will also use this platform to track ATSU's progress with the National Institute of Standards and Technology cybersecurity and privacy frameworks. In 2024, the platform will be rolled out.

Strategic plan goal: ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.

2023 highlights

Internal audit of compliance with the Drug-free Workplace Act of 1988 and Drug-free Schools & Community Act of 1989

The Drug-free Workplace Act of 1988 and Drug-free Schools & Community Act of 1989 both direct ATSU to prevent and address the misuse of drugs and alcohol within ATSU's community. ATSU is required to have an alcohol and drug abuse prevention program. The program must include specific annual notifications to students and employees and a biennial review of the program's effectiveness and the consistency of enforcement of sanctions.

Achieved: ATSU was found to be compliant with both laws. An action plan with minor suggested changes was developed and is in the process of being implemented. A special thanks to Dawn Shaffer, compliance specialist, for overseeing this audit.

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

Drug and Alcohol Abuse Prevention Program changed to Drug and Alcohol Misuse Prevention Program

As stated above, ATSU is required under federal law to have an alcohol and drug abuse prevention program. This program has been in existence for many years. However, over the last few years, several complaints have been received that the word "abuse" is stigmatizing and prevents ATSU stakeholders from seeking help.

Achieved: After reviewing the complaints, several documents were updated to reflect the program's name change to Drug and Alcohol Misuse Prevention Program (DAMPP). A special thanks to the DAMPP Biennial Review Committee for their assistance with these changes.

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

2023 highlights

Gramm-Leach-Bliley Act update

This year, updates to the safeguards rule of the Gramm-Leach-Bliley Act were announced by the Federal Trade Commission. This rule is designed to ensure the security and confidentiality of student consumer information, as well as protect such information from threats, hazards, and authorized actions.

Achieved: A review of ATSU Policy No. **50-326**: Financial Information Safeguards Program was completed. Updates were made to reflect ATSU's compliance with the nine elements of an effective safeguards program. A special thanks to the Information Security Council, Bryan Krusniak, MBA, vice president of information technology, and Dustin Usher, MSCIS, CEH, ECSA, CCISO, deputy information security officer, for their assistance with these updates.

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

Enterprise risk management

The Office of VPGC oversees the Enterprise Risk Management (ERM) process with the assistance of the Risk Management & Compliance Committee. These efforts are managed through a biennial ERM process. In 2023, new risks were identified, and risk owners were assigned to lead risk mitigation efforts. Assigned risk owners are developing and implementing risk response plans for their areas.

Achieved: The following risks were identified: (1) Patient care centers: Failure to maximize the operational effectiveness of ATSU's patient care centers in support of the University's mission in clinical education, research, and service. (2) Student recruitment and retention: Failure to maintain a large enough and diverse applicant pool to fill all programs with students who can progress academically through ATSU programs. (3) Workforce: Disruption of operations due to the loss of key employees with institutional knowledge and/or the inability to fill positions with diverse and qualified applicants

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

Certified Compliance and Ethics Professional

The Certified Compliance and Ethics Professional (CCEP) certification is obtained through the Society of Corporate Compliance and Ethics. To obtain this certification, one must meet continuing education units and work experience requirements and pass the CCEP exam.

Achieved: Michelle Gibson, MAL, CCEP, compliance manager, met all the requirements listed above and obtained the certification.

Strategic plan goal: ATSU stakeholders are aware of and accountable for compliance roles and responsibilities.

Key 2024 initiatives

The following are identified focus areas for 2024 that will continue the strategic improvement of ATSU's compliance program.

Contract lifecycle management software

In 2024, the Office of VPGC will roll out the new contract management software that will allow for the automation of the contract routing process. Training will be provided for all stakeholders during the roll out.

GRC software

In 2024, the GRC platform will be built and rolled out to all stakeholders, and training will be provided for all users as they are assigned access. After this rollout, the Office of VPGC will stop manually tracking compliance matrix items. A system will also be implemented to ensure the software is routinely updated as regulations change.

Audits

In compliance with ATSU's audit schedule, audits will be performed to assess our compliance with the following laws: the Clery Act, HIPAA, and Title IX of the Education Amendments Act of 1972.

Culture of compliance

ATSU strives to have a culture of compliance. This means every member of ATSU's 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 ATSU's vice president & general counsel. All reports are taken seriously and will be investigated. Employees have the right to 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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