AGENDA
BOARD OF VISITORS
AUDIT, RISK AND COMPLIANCE COMMITTEE MEETING
Bishop Kim W. Brown, Chair
Tuesday, November 16, 2021
Time: 10:00 am

Campus Location: Zoom Webinar Participation
Norfolk State University https://nsu-edu.zoom.us/webinar/register/WN_gcKSnYiMQiu6o7X2fMB1TQ
700 Park Avenue, Norfolk, VA  23504
Student Center, Board Room, 3rd Fl., Suite 301

I. Call to Order/Establish Quorum
II. Recommend Approval of Electronic Participation
III. Recommend Approval of the April 27, 2021, Committee Minutes
IV. Discussion Items
   a. University Compliance Program Development
      1. Timeline (10 min)
      2. Calendar and Inventory (10 min)
      3. Compliance Alliance (10 min)
      4. Compliance Assessment Process (10 min)

V. Closed Meeting – Pursuant to §2.2-3711A.1, 4, 7 and 8, Code of Virginia
VI. Open Meeting (10 Minutes)
   - Closed Meeting Certification
   - Actions/Motions

VII. Public Comment
VIII. Adjournment

All times are approximate and the Board reserves the right to adjust its schedule as necessary.
In compliance with the Virginia Freedom of Information Act, please be advised that during the course of this meeting there will be no opportunity for public comment.

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An Equal Opportunity Employer
Audit, Risk and Compliance Committee
Bishop Kim W. Brown, Chair
Heidi W. Abbott
Dr. Terri L. Best
Dr. Deborah M. DiCroce
Delbert Parks
Joan G. Wilmer

Staff:
Derika Burgess, Chief Audit Executive
Dr. Dawn M. Hess, Chief Compliance Officer

The President participates in all Committee meetings.
Agenda

I. Call to Order/Establish Quorum

II. Recommend Approval of the August 27, 2021 Committee Minutes

III. Discussion Items
   a. University Compliance Program Development
      a. Timeline (10 min)
      b. Calendar and Inventory (10 min)
      c. Compliance Alliance (10 min)
      d. Compliance Assessment Process (10 min)

IV. Closed Meeting – Pursuant to §2.2-3711A.1, 4, 7 and 8, Code of Virginia (45 min)

V. Open Meeting (10 min)
   - Closed Meeting Certification
   - Actions/Motions

VI. Public Comment

VII. Adjournment
University Compliance Program Development

= Integrated & On-Going

= Currently Implementing

= Developing

NSU Compliance Ecosystem
# University Compliance Program Development: Timeline

<table>
<thead>
<tr>
<th>Prior to March 2021</th>
<th>Summer/Fall 2021</th>
<th>Winter 2021/Spring 2022</th>
<th>Beyond Spring 2022 - 2024</th>
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</thead>
<tbody>
<tr>
<td><strong>Oversight and Accountability</strong></td>
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<tr>
<td>Audit, Risk and Compliance Committee of the Board of Visitors</td>
<td>Compliance Partners</td>
<td>Compliance Alliance</td>
<td>Compliance Office</td>
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<td>University Leadership</td>
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<td><strong>Policy and Procedures</strong></td>
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<td>Code of Ethics</td>
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<td>NSU Policies</td>
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<td>Written Programs</td>
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<td>Department/Unit Procedures</td>
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<td><strong>Outreach and Education</strong></td>
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<td>Monthly Partner Monitoring</td>
<td>Compliance Alliance</td>
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<tr>
<td><strong>Assessment and Monitoring</strong></td>
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<td>Reporting Calendar</td>
<td>Compliance Partners Education/Outreach</td>
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<td>Requirements Inventory</td>
<td>Compliance Trainings</td>
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<td><strong>Communication and Reporting</strong></td>
<td></td>
<td>Leadership Meetings</td>
<td>Internal Compliance Risk Assessment</td>
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<td>Compliance Website</td>
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**Long Term Strategy**
- Issues Tracking
- Gap Closure Plans
- Evidence and Decision Making

**Gap Closure Plans**
- Incident Response
- Continuous Improvement Goals
- Evolving NSU Strategy, Needs & Dependencies

**Reviews**
- Updating Policy and Procedures
- Forecoming
University Compliance Program

Implementing

= Integrated & On-Going

= Currently Implementing

= Developing

NSU Compliance Ecosystem
Implementing: Compliance Reporting Calendar and Requirements Inventory

<table>
<thead>
<tr>
<th>Title or Compliance Activity</th>
<th>Statute(s)/Other Authority/Regulation/Guidance</th>
<th>Statutory Summary/Description</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Virginia Freedom of Information Act (FOIA) Board Minutes</td>
<td>Code of Virginia §2.2-3708(F)</td>
<td>Code of Virginia §2.2-3707.1</td>
<td>annually</td>
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</tbody>
</table>

### 593 Compliance Related Activities
- **Identified**
  - Inventoried
  - Calendarized
  - Linked Responsibility
  - Determined Due Dates
  - Documented Last Submission
University Compliance Office Program

Developing

= Integrated & On-going

= Currently Implementing

= Developing

NSU Compliance Ecosystem
Compliance Alliance

**Summary Mission Statement:** Understand and effectively manage compliance risks to align with NSU's strategy, seek to protect its reputation and sustain its mission.

- Identify current and emerging compliance risks
- Assist in designing and maintaining programs
- Assist with development/review of policies/procedures
- Assist with gap closure plan monitoring
- Share best practices
- Coordinate across functions
- Review proposed HE legislation
- Discuss HE enforcement actions
Future: Compliance Assessment Process Overview

Overview of Compliance Assessment Process

<table>
<thead>
<tr>
<th>Stage #</th>
<th>Stage Title</th>
<th>Description</th>
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<tbody>
<tr>
<td>1</td>
<td>Planning</td>
<td>Consult with University Compliance and the lead Compliance Partner to plan a specific compliance assessment</td>
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<td>2</td>
<td>Interviews</td>
<td>Compliance Partner and University Compliance coordinate any key interviews to understand the compliance topic</td>
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<td>3</td>
<td>Green Sheet</td>
<td>Compliance Partner and University Compliance collaborate complete the green sheet</td>
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<td>4</td>
<td>Review</td>
<td>Compliance Partner and University Compliance review the completed green sheet and conduct a gap analysis</td>
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<tr>
<td>5</td>
<td>Gap Closure</td>
<td>Compliance Partner develops a gap closure plan with support from University Compliance</td>
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<td>6</td>
<td>Sign Offs</td>
<td>Responsible Executive and Chief Compliance Officer review and sign off on assessment findings and gap closure plan</td>
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Future: Compliance Assessment Focus Areas
“The Green Sheet”

- Oversight and Accountability
  - Single point accountable
  - Gaps
  - Conflicts
  - Connections
  - Scope of Activities

- Regulatory Reports
  - Routine
  - Incidents
  - Due Dates
  - Signatory

- Compliance Management
  - Documentation
  - Outreach and training
  - Systems
  - Gaps

- Compliance Risks
  - Risks associated with non-compliance
  - Proficiency
  - Higher Ed landscape

✓ Overall compliance status
✓ Compliance ecosystem status
✓ Overall compliance gaps and related risks
✓ Risk-based gap closure plans
University Compliance Program

**Near Future**

- = Integrated & On-Going
- = Currently Implementing
- = Developing

NSU Compliance Ecosystem