

# **Middle Tennessee State University Compliance Plan**

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**Middle Tennessee State University**  
Compliance Plan  
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## 1.0 COMPLIANCE PLAN: PURPOSE AND PROGRAM OVERVIEW

### 1.1 Purpose

The Compliance Plan (Plan and/or Program) of Middle Tennessee State University (MTSU or University)) documents the University's compliance program, including its enterprise risk management (ERM) activities, both of which are a part of MTSU's system of internal, operational, and financial controls. The Plan additionally documents the ways in which its operation advances the University's policies, procedures, mission, and community standards related to: ethical conduct; risk identification and mitigation; privacy and confidentiality of student educational records; healthcare privacy and security; conflict of interest management; honesty and integrity; respect for diversity; engagement in the community; and a commitment to non-violence.

### 1.2 Overview

The Plan was designed in alignment with the U.S. Sentencing Commission's Guidelines (Commission Guidelines), which details the elements of an "Effective Compliance and Ethics Program" (U.S. Sentencing Guidelines, Ch. 8, §8B2.1(a-c)). In addition, the Plan and Program incorporates the principles of the Government Accounting Office's (GAO) Green Book, as well as the Committee of Sponsoring Organizations (COSO) of the Treadway Commission's ERM Integrated Framework as outlined in the COSO 2020 ERM Guidance, which was authored by the Society of Corporate Compliance and Ethics (SCCE) and the Health Care Compliance Association (HCCA).

The Commission's Guidelines detail seven (7) elements of an effective compliance program to detect and mitigate organizational risk. Specifically, the Commission's Guidelines require:

1. Implementation of policies, procedures, and standards of conduct.
2. Designation of a Compliance Officer and Compliance Committee.
3. Training and education.
4. Effective communication.
5. Monitoring and auditing.
6. Disciplinary guidelines.
7. Corrective action for detected offenses.

In alignment with the Commission's Guidelines, the following provides an overview of MTSU's Compliance Plan elements:

1. Explanation of general standards
2. COVID-19 and Emergency Management
3. Program oversight and governance
4. Policies and procedures
5. Education and Training
6. Risk Management

7. Communicating Compliance and Risk Issues
8. Investigation and Response
9. Enforcement and Monitoring
10. Effectiveness Measurements: Compliance Analytics
11. Continuous Improvement and Professional Development
12. Additional Resources

## 2.0 GENERAL STANDARDS

### 2.1 Code of Ethics

Faculty, administrators, and staff are expected to promote the best interests of students while treating others with civility and respect and conducting University business with the highest level of ethical standards and integrity. The University's Ethics and Code of Conduct Policy (Policy 10) additionally requires employees to utilize University resources in a manner that avoids fraud, waste, or abuse of MTSU's resources.

The Code of Ethics additionally aligns with the University's community standards and True Blue Pledge by reiterating honesty, integrity, respect for diversity, engagement in the community, and commitment to non-violence. Policy 10 also aligns with the State of Tennessee's Healthy Workplace Act (T.C.A. 50-1-502), which prohibits abusive conduct in the workplace. Although all MTSU employees are responsible for adhering to Policy 10, the Office of Compliance and Enterprise Risk Management (CAERM Office) and the Office of Human Resource Services (HRS) provides review of ethics issues and cases.

Policy 10 is reviewed annually by the CAERM Office; the Vice President for Business and Finance; and the Office of University Counsel (OUC), and any changes to the Policy are presented to the campus for public comment through the University's internal Policy approval process.

The University's Board of Trustees (BOT) also follows a Code of Ethics, which outlines the BOT's responsibilities to MTSU and the State of Tennessee pursuant to T.C.A. 49-8-203 and 204, respectively.

### 2.2 Conflict of Interest

The University's Conflict of Interest (COI) Policy 12 provides information about the annual COI disclosure process, as well as describes the review process for employees to voluntarily inform the University of a COI. Additionally, Policy 12 outlines the scope and review process for the COI Committee (COIC). The COIC is comprised of the University Counsel; Chief Audit Executive; Vice President for Business and Finance; and the Assistant Vice President for Compliance and Enterprise Risk Management.

While COI disclosure is voluntary for all employees, those needing to disclose a COI are provided information about the COIC's decision, which includes COI mitigation, elimination of the COI, or referral to Academic Affairs, Athletics, Research Services and Sponsored Programs, or other departments for further COI management. Human Resources Services also provides an annual notice to employees to disclose any COI for which the employees believe is necessary to disclose.

Annually, a COI Report is presented to MTSU's Audit and Compliance Committee of the BOT for review. The COI Report includes the number of cases involving familial relationships; educational materials; consensual relationships; acceptance of gifts; financial/business interests; or COIs that are either de minimis or that fall under a different category.

## 2.3 Privacy and Confidentiality

The safeguarding of student educational records and personal identifying information (PII) is an important component of MTSU's internal control system. The privacy of student educational records and PII is also a main element of the University's cybersecurity protocols and procedures. Included in MTSU's cybersecurity framework is the safeguarding of the University's financial data, which includes student financial data, merchant services, payment card information, and other banking and financial transactions regulated under the Gramm Leach Bliley Act (GLBA). Additional documentation and internal controls regarding access to student educational records, PII, and privacy of information are detailed in University Policy 500, [Access to Education Records](#), as well as in other University Policies (i.e. Policies 121, Privacy of Information; 120, Public Records; and 920, Information Security, among others).

Privacy and confidentiality of University records also extends to the records maintained by MTSU Student Health Services and Campus Pharmacy. Specifically, Campus Pharmacy works collaboratively with ITD and the CAERM Office to ensure the privacy and security of pharmaceutical and medical records pursuant to the Health Insurance Portability and Privacy Act (HIPAA, Pub. L. 104-191 (1996)). Such safeguarding of the healthcare records of MTSU's students and staff contributes to the University's internal control system.

Additionally, employees are instructed to maintain the confidentiality of University financial and operational records, which helps further advance the safeguarding of State records and property.

## 3.0 COVID-19, EMERGENCY MANAGEMENT, AND SOCIAL JUSTICE

### 3.1 COVID-19

Since the beginning of the coronavirus pandemic (COVID-19) and other national/global events, including natural disasters and social justice issues, the University's leadership, faculty, and staff remain committed to working with local, state, and federal healthcare and emergency management agencies to ensure the safety and security of all students, as well as the entire campus community. As part of the University's Compliance Program, COVID-19 response protocols and procedures were developed, and continue to be utilized, to: reduce the spread of viral infection; safeguard vulnerable students and staff; monitor the rates of infection on campus; offer COVID-19 testing and vaccination pursuant to State of Tennessee Health Department and federal Centers for Disease Control and Infection (CDC) guidelines and

requirements; keep the MTSU BOT informed of COVID-19 response activities on campus, as well as changes in University operations; ensure the continued HIPAA privacy and security of healthcare records; and adjust operations and vaccination offerings as the CDC and other agencies amend guidelines and best practices.

### 3.2 Emergency Management

The Emergency Management and Executive Leadership Teams also continue to adjust protocols, policies, and procedures regarding MTSU's responses to natural disasters in, and around, the campus community, including in nearby cities and counties that may adversely affect MTSU students, faculty, and staff. Similar to information about COVID-19 protocols, the BOT, students, staff, and campus community are informed of emergency weather events and other related emergencies through MTSU's critical response alert system known as Alert4U or Rave Alerts, which is managed by the University Police Department and Vice President for Business and Finance in coordination with the University's President and other Division Vice Presidents.

### 3.3 Social Justice

In addition, continued monitoring of social justice issues, as well as open and constructive discussions about diversity and inclusion occur at BOT meetings, as well as at other leadership and campus meetings. Most recently, the University's President developed a Social Justice and Equality Initiative, which is led by a distinguished faculty member, to develop strategies for addressing diversity and inclusion in all of MTSU's operations.

Each of the aforementioned areas contributes to the University's mission, internal controls, and operations, as well as advances the effectiveness of MTSU's Compliance Program and risk management activities.

## 4.0 PROGRAM OVERSIGHT AND SHARED GOVERNANCE

### 4.1 Program Oversight

The Compliance Program and risk management activities are reviewed by multiple offices and executive leadership. The following outlines the offices and executive leadership members who review the University's Compliance and Enterprise Risk Management Program and activities. These offices and executive leadership members also regularly collaborate with the CAERM Office of compliance and ERM matters, as well as special investigations and/or projects.

- a. Vice President for Business and Finance. The CAERM Office reports to the Vice President for Business and Finance (VPBF). The VPBF provides direct oversight of the development of compliance and ERM tools and controls, as well as monitors the effectiveness of Program and risk management activities.

- b. Office of University Counsel (OUC). While the department does not directly manage the CAERM Office, the OUC provides collaborative information and guidance on any compliance and risk management activities, policies, tools, and communications provided for the benefit of MTSU's operations and internal control system.
- c. Audit and Consulting Services. The University's Chief Audit Executive (CAE) provides additional, collaborative information, input, and guidance on compliance and risk management activities, policies, and communications to ensure such activities align with MTSU's system of internal controls and mission.
- d. Audit and Compliance Committee. The BOT's Audit and Compliance Committee (ACC) provides oversight of all compliance and audit functions and operations of the University. Program activities, including the review of annual risk assessments, are presented at quarterly meetings of the ACC to provide transparency about the University's risk levels and risk mitigation strategies.

#### 4.2 Shared Governance

The Program's success relies upon the collaboration and shared governance of multiple, internal constituents, which includes representation from the University's divisions and departments. To advance the Program's effectiveness, the University's Enterprise Compliance and Risk Management Committee (ECRMC) provides representation from the following departments and/or divisions, who provide feedback on the Program, as well as provide input on campus-wide activities effecting internal controls and operations.

The ECRMC consists of representation from the following areas:

- a. Faculty Senate President
- b. Audit and Consulting Services (the CAE or designee)
- c. Office of University Counsel (University Counsel or designee)
- d. Student Affairs (Dean of Students or designee)
- e. Campus Planning (Assistant Vice President or designee)
- f. Facilities/Environmental Health and Safety (EHS)
- g. Information Technology Division (ITD)
- h. Business and Finance – Finance and Accounting (Director or designee)
- i. Academic Affairs – Graduate Studies/Research (Vice Provost or designee)
- j. Academic Affairs – Student Success (Vice Provost or designee)
- k. Office of Research and Sponsored Programs
- l. University Police
- m. Office of Institutional Equity and Compliance (Assistant to the President or designee)
- n. Athletics Department (Associate Athletics Director or designee)
- o. Department of Human Resource Services (Assistant Vice President or designee)



The implementation and effectiveness of the Enterprise Compliance and Risk Management Committee (“ECRMC”) is supervised by the Assistant Vice President for Compliance and Enterprise Risk Management.

## 5.0 POLICIES AND PROCEDURES

The operation of the University’s Compliance Program incorporates, by general reference, all applicable policies and procedures approved by the President and/or BOT. The policy approval process established by the OUC provides for review of policies both annually, and, as needed, by departments and divisions. The policy review process also includes a University comment period, which allows faculty and staff to provide feedback and questions.

While the CAERM Office promotes compliance with all policies of the University in alignment with the Compliance Program, the following are specific MTSU policies managed by the CAERM Office:

- a. Policy 10 Ethics and Code of Conduct
- b. Policy 12 Conflict of Interest
- c. Policy 85 HIPAA
- d. Policy 90 Athletics Integrity and Conduct of Athletics Staff
- e. Policy 129 Records Management and Disposal of Records

As operational and/or regulatory needs changes, additional policies may be added through the policy approval process.

## 6.0 EDUCATION AND TRAINING

### 6.1 Annual Training

Annual, video compliance training is provided to MTSU employees on the following topics:

- a. Family Educational Rights and Privacy Act (FERPA) – offered by the CAERM Office.
- b. Ethics – offered by the CAERM Office.
- c. HIPAA Privacy and Security – offered by the CAERM Office.
- d. Athletics Integrity and Policy 90 – offered by the CAERM Office.
- e. Summer Camp Safety and Risk Management – offered by the CAERM Office.
- f. Title IX, Title VI, Title VII, and the Americans with Disabilities Act – offered by the Office of Institutional Equity and Compliance.
- g. Storm Water and Emergency Management – offered by Facilities and EHS.
- h. Information Technology and Cybersecurity – offered by ITD.

Training on such topics as fraud, waste, and abuse prevention and information on finance and accounting topics is available to all staff and student workers and is provided by department directors. Certain departments, such as Athletics, receive additional training on Title IX and NCAA compliance.

As additional training needs are determined, the Program will be updated to reflect any new offerings.

## 6.2 Compliance Tips and Newsletter

A value-added component of the Program's education and training area is the dissemination of monthly Compliance Tips to MTSU employees. The Compliance Tips are distributed at the beginning of each month and cover various compliance and risk management topics.

Below are examples of some of the topics covered by the monthly Compliance Tips provided to employees:

- a. Fraud, Waste, and Abuse prevention
- b. Insurance coverage under the State's Certificate of Self-Insurance
- c. Records Management
- d. Conflict of Interest disclosure procedures
- e. Privacy and Confidentiality
- f. Summer Camp Safety and Risk Management
- g. Data Access and Cybersecurity
- h. FERPA
- i. Auto-accident reporting procedures
- j. Supplemental Insurance request procedures
- k. HIPAA
- l. Drug-Free Schools and Campuses Act reporting and prevention programming

In addition to the distribution of monthly Compliance Tips, a Compliance and Ethics Newsletter (Newsletter) is provided to campus for educational and information purposes during the Fall and Spring semesters to further reiterate the University's Compliance Program activities. The Newsletter also provides brief information on regulatory updates applicable to higher education and gives MTSU employees an opportunity to answer brief compliance "quiz" questions (answers are provided within the Newsletter for all quiz questions).

## 6.3 Webinars and Seminars

The University's departments, divisions, and colleges provide webinars and seminars on topics that promote, and advance, MTSU's mission. While not all of the webinars and seminars are on compliance and risk management topics, the University's offerings contribute to the Program's overall operation, which supports student success and retention, as well as faculty and staff engagement.

## 6.4 Annual Compliance and Ethics Event

During the late Fall semester, an annual event is offered to MTSU employees in recognition of National Compliance and Ethics Week, which typically occurs during the first week of November. The event offers information from State of Tennessee leaders from the Claims and

Risk Management Division and the Tennessee Human Rights Commission. Information about cybersecurity and international affairs (related to higher education) is also offered to MTSU employees. Concurrent break-out sessions additionally cover topics on ADA accessibility; Safety and Security on campus; Travel Reimbursements procedures; Tax compliance; and discussions on diversity and inclusion.

The University's annual Compliance and Ethics event was converted to a virtual webinar in 2020 to comply with COVID-19 protocols and procedures.

## 7.0 RISK MANAGEMENT

### 7.1 Annual Risk Assessments

University-wide risk assessments are performed annually to ensure review of internal controls and to identify residual, reputational, and potential future risks. In addition, the University's individual division's perform risk assessments biennially and summarize the risks and controls for the departments within those divisions.

The University-wide and divisional risk assessments are reviewed by the Vice President for Business and Finance; the OUC; and Audit and Consulting Services prior to presentation at the BOT. The University's President and the BOT's Audit and Compliance Committee provide final review of the annual risk assessments. The risk assessments are made available to State auditors and regulators upon request.

While the performance of risk assessments was not included in the original Commission Guidelines, enterprise risk management, including the performance of risk assessments, is among the key principles of the COSO ERM framework and has become a best practice in promoting a culture of compliance, as well as an operational environment that monitors and continually improves its internal control system for business continuity planning.

### 7.2 Insurance

An additional element of the University's risk management process and Compliance Program is event and third-party vendor insurance management, as well as dissemination of the State's insurance coverage and requirements.

The CAERM Office provides review of certificates of insurance and supports the University's efforts in mitigating risk related to liability and claims, among other departments and divisions.

### 7.3 Healthcare and HIPAA Compliance

Healthcare compliance training regarding the privacy of healthcare billing, treatment, and operations records is provided to all Campus Pharmacy and Student Health Services staff. While HIPAA Privacy and Security regulations are only applicable to Campus Pharmacy, healthcare related activities such as billing and medical records transfer requires the training of all Student Health Services staff. Medical record and healthcare privacy protocols continue to be monitored with the introduction of the COVID-19 pandemic in 2020. Representatives from the University's Student Health Services, Campus Pharmacy, ITD, HRS, OUC, and the CAERM Office work collaboratively to promote, and ensure, the privacy of medical records, as well as the confidentiality of therapy records within the Counseling and Testing Services Center.

### 7.4 Athletics Integrity and Coaching Conduct

In 2019, the University developed Policy 90, Athletics Integrity and Conduct of Athletics Staff, which provides expectations for the ethical conduct of Athletics Staff, as well as a conflict-resolution process for student-athletes related to coaching conduct matters and complaints. Policy 90 was additionally developed as part of the University's need for a separate ethics policy to address the conduct of Athletics staff. Training information, practice/tournament observations, and other resource information are provided to Athletics coaches, administrative staff, and student-athletes to advance the University's Compliance Program and risk management activities.

## 8.0 COMMUNICATION OF COMPLIANCE AND RISK ISSUES

While the CAERM Office is responsible for the communication of compliance and risk management issues to MTSU employees, regular communication is additionally provided by the President's Office, the Provost's Office, OUC, Student Health Services, Marketing and Communications, University Police, and the Finance and Accounting department to ensure all campus employees and students remain informed on current campus developments, policies, safety protocols, and financial/operational procedures. Students and employees are also kept informed of COVID-19 protocol changes, as well as other federal and state public health emergencies.

## 9.0 INVESTIGATION AND RESPONSE

University policy and procedure outlines investigation processes and responses based on the complaint subject matter and allegations. While the following is not exhaustive of MTSU's investigation types, the offices mentioned below contribute to the Compliance Program's operation:

- a. Office of University Counsel. Investigates matters directed by the Office of the President and Board of Trustees. Reviews case investigations, hearing processes, and recommendations facilitated by the Office of Institutional Equity and Compliance; the Office of Student Conduct (if applicable); and the CAERM Office.
- b. CAERM Office. Investigates matters as directed by the OUC; President; or VPBF, including the following areas: FERPA; Athletics coaching integrity; and special investigations.
- c. Office of Institutional Equity and Compliance. Investigates all matters involving sexual violence, sexual misconduct, and other Title IX-related complaints. The IEC also investigates complaints involving Title VI and Title VII discrimination, as well as concerns or allegations of noncompliance regarding ADA accessibility.
- d. Audit and Consulting Services. Audits, and investigates, financial operations in compliance with State Audit regulations/requirements and allegations regarding fraud, waste, or abuse.
- e. Office of Student Conduct. Investigates complaints and allegations regarding student conduct.
- f. Academic Integrity Office Investigates all matters by Faculty regarding student dishonesty and plagiarism in academia.
- g. Human Resource Services. Investigates employee relations matters, including allegations of employee misconduct and supervisory abusive conduct under Ethics Policy 10.

The final authority regarding corrective action determinations from any alleged violation of University Policy resides with the Office of the President; however, division vice presidents, vice-provosts, deans, and immediate supervisors (in collaboration with OUC and HRS) may also provide corrective action to employees and/or request an investigation by any of the aforementioned offices.

## 10.0 ENFORCEMENT AND MONITORING

MTSU's Compliance Program is enforced and monitored by multiple offices and departments, as noted in the description of the Investigations and Responses Section above. University policy further informs, and identifies, the departments responsible for monitoring MTSU's operations. The BOT and its subcommittees provide additional monitoring of academic, financial, governance, and athletics operations, and reviews the Compliance Program for effectiveness.

## 11.0 EFFECTIVENESS MEASUREMENTS AND COMPLIANCE ANALYTICS

The University's Program utilizes data to identify and detect patterns and/or issues of fraud, waste, abuse, misconduct, and policy violations. Utilization data is also reviewed and assessed to determine employee participation in, and completion of, Program trainings and adherence to financial and operational procedures.

While the CAERM Office provides effectiveness measurements related to risk management and compliance trainings, other University departments and divisions additionally utilize data analytics to measure graduate and undergraduate student success, persistence, and completion; donor and fundraising development; adherence to financial policies; and crime statistics.

## 12.0 CONTINUOUS IMPROVEMENT AND PROFESSIONAL DEVELOPMENT

The University promotes continuous improvement of its employees and operations, which is a final, and vital, component of its Compliance Program. The MTSU President, BOT, and executive leadership teams encourage continuous review and improvement of the internal control system to safeguard State resources and to better serve the University's customers – its students.

## 13.0 ADDITIONAL RESOURCES

The following offices and departments are among the University's many resources that help maintain, promote, and advance MTSU's Compliance Program activities:

**For Compliance and Risk Management Concerns:**

Office of Compliance and Enterprise Risk Management

2269 Middle Tennessee Blvd.

Sam Ingram Building, Suite 101

Murfreesboro, TN 37132

Office: (615) 494-8812

Compliance and ERM Hotline Voicemail: (615) 898-5772

[caerm@mtsu.edu](mailto:caerm@mtsu.edu)

**For MTSU Fraud, Waste, and Abuse Concerns:**

Audit and Consulting Services

1301 East Main Street

Murfreesboro, TN 37132

Office: (615) 898-2914

[reportfraud@mtsu.edu](mailto:reportfraud@mtsu.edu)

**For Legal Concerns, Litigation, and Public Records Requests:**

Office of University Counsel  
1301 E. Main Street  
Cope Administration Building, Suite 209  
Murfreesboro, TN 37132  
Office: (615) 898-2025  
[sherry.preston@mtsu.edu](mailto:sherry.preston@mtsu.edu)

**For Human Resources:**

Human Resource Services  
2269 Middle Tennessee Boulevard  
Sam Ingram Building, Suite 204  
Murfreesboro, TN 37132-0001  
Office: (615)-898-2929  
[hrs@mtsu.edu](mailto:hrs@mtsu.edu)

**For Title IX, Title VI, Title VII, Accessibility, and Affirmative Action:**

Office of Institutional Equity and Compliance  
1301 E. Main Street  
Cope Administration Building, Room 116  
Murfreesboro, TN 37132  
Office: (615) 898-2185  
[iec@mtsu.edu](mailto:iec@mtsu.edu)

**For Campus Safety and Security:**

University Police  
1412 E. Main Street  
Murfreesboro, TN 37132  
Office: (615) 898-2424  
[dispatch@mtsu.edu](mailto:dispatch@mtsu.edu)

***For Emergencies: 911***

**For Environmental, Health, and Safety:**

Facilities Services  
Holmes Maintenance Building  
Murfreesboro, TN 37132  
(615) 898-2392, for EHS  
(615) 898-2414, for Facilities and Maintenance  
[facilities.services@mtsu.edu](mailto:facilities.services@mtsu.edu)

**For Student Academic Integrity:**

Office of the Vice Provost for Faculty Affairs  
Director of Academic Integrity

Cope Administration Building, Room 111  
Murfreesboro, TN 37132  
Office: (615) 898-2533

**For Student Conduct:**

Office of Student Conduct  
Keathley University Center, Room 208  
Murfreesboro, TN 37132  
Office: (615) 898-2750  
[studentconduct@mtsu.edu](mailto:studentconduct@mtsu.edu)

**For Athletics or NCAA Compliance:**

Athletics Compliance Office  
Associate Athletics Director  
Murphy Center Complex  
2650 Middle Tennessee Blvd.  
Murfreesboro, TN 37132  
Office: (615) 898-5491

**For Veterans Affairs:**

Daniels Veterans and Military Family Center  
1301 East Main Street  
P.O. Box 74  
Keathley University Center, Room 124  
Murfreesboro, Tennessee 37132  
Office: 615-904-8347

**For Information Technology and Cybersecurity:**

Information Technology Division  
Cope Administration Building, Suite 217  
Murfreesboro, TN 37132  
Office: (615) 898-5570  
[help@mtsu.edu](mailto:help@mtsu.edu)

For questions regarding this Compliance Plan, please contact:

Office of Compliance and Enterprise Risk Management  
Middle Tennessee State University  
2269 Middle Tennessee Blvd.  
Sam Ingram Building, Suite 101  
Murfreesboro, TN 37132  
Compliance and ERM Hotline Voicemail: (615) 898-5772  
Office: (615) 494-8812  
[caerm@mtsu.edu](mailto:caerm@mtsu.edu)