



Audit, Risk Management, Compliance, and Ethics Committee Meeting
 April 11, 2019
 Agenda

- | | | |
|-------|---|-------------|
| I. | Approval of November 1, 2018 Minutes | Action |
| II. | Office of Internal Audit - Mr. Wayne Poole | |
| | A. Internal Audit dashboard (see read-ahead materials) | Information |
| | B. Staffing update | Information |
| | C. Update on external audits | Information |
| III. | Research Compliance - Dr. Mike Van Scott | |
| | A. Introduction of new Director of ORIC and Export Controls | Information |
| IV. | IT/Information Security - Mr. Zach Loch, Dr. Mark Webster | |
| | A. Introduction of new Information Security Officer | Information |
| V. | Healthcare Compliance - Ms. Michelle Deville | Information |
| | A. Any questions from read-ahead materials | |
| VI. | Enterprise Risk Management - Mr. Tim Wiseman | |
| | A. Recent ERM activities (see read-ahead materials) | Information |
| | B. Results of Risk Ranking Exercise - Top Risks | Information |
| VII. | Equal Opportunity and Title IX - Ms. LaKesha Forbes | |
| | A. Current year statistics and information | |
| | B. Potential changes from the US Department of Education | Information |
| VIII. | Other Business | |



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	I. Approval of November 1, 2018 Minutes
Responsible Person:	Kel Normann, Chair
Action Requested:	Approval
Notes:	N/A

**Minutes from ECU BOT Audit, Risk Management, Compliance, and Ethics Committee
November 1, 2018
Mendenhall Student Center – ECU Campus**

The Audit, Risk Management, Compliance, and Ethics Committee of the ECU Board of Trustees met in the Mendenhall Student Center on the campus of ECU on November 1, 2018.

Committee members present included Kel Normann (Chair), Bob Plybon, Mark Copeland, Vince Smith, Max Joyner, Jason Poole, and Jordan Koonts.

Other board members present included Kieran Shanahan (Board Chair) and Deborah Davis

Others present included Chancellor Cecil Staton, James Hopf, Donna Payne, Tom Eppes, Michelle DeVille, Tim Smith, Sara Thorndike, Don Sweet, Jack McCoy, Alton Daniels, Megan Ayers, Peter Schmidt, Mike Van Scott, Ron Mitchelson, Jay Surlles, Sarah von Stein, Kevin Newman, and Wayne Poole.

Kel Normann, Chair of the Committee, convened the meeting at 8:15AM. Mr. Normann read the conflict of interest provisions as required by the State Government Ethics Act. Mr. Normann asked if anyone would like to declare or report an actual or perceived conflict of interest. None were reported.

Mr. Normann asked for the approval of the minutes of the September 6, 2018 committee meeting.

Action Item: The minutes of the September 6, 2018 committee meeting were approved with no changes.

Mr. Wayne Poole provided the **Internal Audit** update.

Mr. Poole presented the Internal Audit dashboard for the fiscal year to date. As of this date, Internal Audit has completed 25% of the annual audit plan, the audit staff has achieved a 73% productivity rate, and University management has completed 93% of the corrective actions that Internal Audit has followed up on since July 1. Mr. Plybon asked how the KPIs compare to last year at this time. Mr. Poole stated that he would need to look at last year's numbers and will send that information via e-mail after the meeting.

Mr. Poole and Ms. Sarah von Stein presented the results of the Internal Audit self-assessment, which is required by state law and by the IIA standards. Ms. Von Stein reported that based on her assessment, ECU Internal Audit conforms with the IIA Standards. Ms. von Stein identified two opportunities for continued strengthening of compliance, which she shared with the committee. The next external review of ECU's Office of Internal Audit will be completed in 2021.

Mr. Poole stated that the University's annual financial statement audit, conducted by the Office of the State Auditor, is underway and may be completed before our next committee meeting. Mr. Poole and Vice Chancellor Sara Thorndike will provide the results to the Board when the audit is complete.

Mr. Wayne Poole provided the **Enterprise Risk Management (ERM)** update.

Mr. Wiseman was unable to join the meeting, so Mr. Poole briefed the committee on the ERM office's recent activities and initiatives. Mr. Poole advised the committee that the ERM office has administered the annual risk survey, has sought the inputs of the ERM Committee, and is compiling the data. This year's exercise included student input, as the Board requested. The top enterprise risks will be presented to the committee at our next meeting. Mr. Poole also reminded the committee members that there were several ERM items in the read-ahead packets for our review.

Dr. Mike Van Scott presented the **Research Compliance** update.

Dr. Van Scott briefed the committee on recent personnel changes in the Office of Research Integrity and Compliance and a heightened focus in the areas of Export Controls and conflict of interest management and research ethics. A search is underway for a new leader of the COI and Research Ethics unit. Dr. Van Scott and Mr. Poole both reminded the committee of the importance of ensuring there are sufficient resources in the area of research compliance, especially in light of the strategic emphasis on doubling the amount of externally funded research.

Dr. Jack McCoy provided an update on **Information Security**.

**Minutes from ECU BOT Audit, Risk Management, Compliance, and Ethics Committee
November 1, 2018
Mendenhall Student Center – ECU Campus**

Dr. McCoy briefed the committee on recent security initiatives, including the implementation of multi-factor authentication for students. This reduced the number of phishing attacks on students by 98%. This capability will be applied to employee accounts in the next few months. Dr. McCoy briefed the committee on the recent assessment that was completed by the Department of Homeland Security. Finally, Dr. McCoy briefed the committee on the University's efforts related to compliance with the European Union's General Data Protection Regulation (GDPR). These regulatory requirements apply to ECU because we have students and employees from the EU and also have an on-site educational program in Italy. Dr. McCoy advised the committee that ECU is ahead of its peers in the UNC system in the efforts related to GDPR. While the regulatory risk is believed to be moderately low for the University, many of the requirements are good business practices and should be implemented to enhance privacy protections.

Ms. Donna Payne provided the annual review of UNC policies on Dual Membership

University Counsel Ms. Donna Payne provided the annual briefing and review of the two UNC system policies that govern the management of board members' conflicts of interest. Ms. Payne reminded the committee members that the requirements outlined in these policies apply to Board of Governors and Board of Trustees members.

Closed Session

At 8:58 AM, Mr. Copeland made a motion that the committee go into closed session in order to discuss items that are protected according to state statutes governing personnel information, internal audit working papers, student records, and/or otherwise not considered a public record within the meaning of Chapter 132 of the North Carolina General Statutes. The motion was seconded by Mr. Joyner and unanimously approved.

Return to Open Session

The Committee returned to open session and continued work on the agenda at 9:18 AM.

Other Business

There was no other business.

There being no further business, the Audit Committee meeting was adjourned at 9:18 AM.

Respectfully submitted,
Wayne Poole
ECU Office of Internal Audit and Management Advisory Services



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	II.A. Internal Audit dashboard
Responsible Person:	Wayne Poole
Action Requested:	Information
Notes:	See read-ahead materials

Internal Audit Dashboard - as of March 25, 2018

Completion of Audit Plan: Completed vs. Planned Projects

<i>Status of Audit Plan</i>	<i>Number of Engagements</i>	<i>Percent of Total Plan</i>	Goal: ≥80% (by Jun 30)
Completed	33	63%	
Reporting Phase	4	8%	
In Process	13	25%	
Pending	2	4%	
Total	52	100%	

Staff Utilization: Direct vs. Indirect Hours

	<i>Entire team</i>	<i>Auditors Only</i>	Goal: ≥75%
Direct Hours	70%	74%	
Indirect Hours	30%	26%	

Consultations

	<i>Number</i>	<i>% of Hours</i>	Should not exceed 20%
Consultations	113	10%	

Management's Completion of Corrective Actions (at the time of IA follow-up)

<i>Action Items by Division:</i>	<i>Completed</i>	<i>Incomplete / Insufficient Progress</i>	<i>% Complete</i>
Academic Affairs	4	0	100%
Administration and Finance	14	0	100%
Athletics	3	0	100%
Chancellor	3	0	100%
Health Sciences	7	0	100%
Research, Econ Dev, Eng'ment	17	0	100%
Student Affairs	2	0	100%
University Advancement	1	0	100%
Total Action Items Followed Up	51	0	
Percent Complete	100%		

Goal = 95%



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	II.B. Staffing update
Responsible Person:	Wayne Poole
Action Requested:	Information
Notes:	N/A



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	II.C. Update on external audits
Responsible Person:	Wayne Poole
Action Requested:	Information
Notes:	N/A



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	III.A. Introduction of new Director of ORIC and Export Controls
Responsible Person:	Mike Van Scott
Action Requested:	Information
Notes:	N/A



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	IV.A. Introduction of new Information Security Officer
Responsible Person:	Zach Loch Mark Webster
Action Requested:	Information
Notes:	N/A



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	V.A. Healthcare Compliance
Responsible Person:	Michelle Deville
Action Requested:	Information
Notes:	N/A

Office of Institutional Integrity **East Carolina University**

Mission: The Office of Institutional Integrity is committed to maintaining the highest standards of ethics, honesty, and integrity. OII supports and enhances the University as it conducts healthcare operations in an ethical and law-abiding manner. The office encourages a culture of compliance among employees, faculty, students, and agents by functioning within applicable state and federal healthcare laws and regulations.

Focus and Guidance: Office of Inspector General; Office of Civil Rights; state & federal statutes; ECU best practices, policies, procedures; and industry standards.

Routine Activities:

- Billing and documentation compliance
- HIPAA Privacy & Security compliance and investigations
- Breach notifications to patients and DHHS
- Clinical trials research billing reviews
- Oversee vendor management process, debarment review process
- Oversee patient chart access logs for inappropriate health record access
- Pharmacy prescription reviews
- Reviews ECU Physicians contracts for potential billing reviews
- Reviews ECU HIPAA Business Associate Agreements for 3rd party relationships
- Education (Cornerstone annual requirements, orientation, ad hoc)
- All compliance investigations (HIPAA, billing, anonymous concerns)
- Data Stewardship initiatives
- Monitor Office of Inspector General monthly work plan
- Chair various compliance committees
- Special internal reviews and external audits

Michelle C. DeVille, MPA, CHC, CHPC

Interim Chief Institutional Integrity Officer, Division of Health Sciences

HIPAA Privacy & Security Officer, East Carolina University

<http://www.ecu.edu/cs-dhs/institutionalintegrity/>

Devillem18@ecu.edu



2018 OII Calendar Year Summary

ECU Provider Billing Documentation Reviews

ECU-Physicians: 209

School of Dental Medicine: 62

College of Allied Health Services: 9

Telepsychiatry: 8

Student Health Services: 8

Each provider consists of 10 charts reviewed.

ECU-Physicians Clinical Trial Billing Reviews

Reviews Completed: 235 patients

Errors found: 47 patients (20%)

OII forwards errors to ECUP Clinical Financial Services for corrections. OII also communicates with study coordinators.

ECU HIPAA

Total Investigations: 146

Total Breach Notifications: 56

Total Violations: 26

Top 3 HIPAA Violation Categories

Inappropriate access, Failure to safeguard PHI, Misdirected data

ECU HIPAA Systems

196 Systems (180 Active, 8 Inactive, 8 Decommissioned)

HIPAA System: defines any hardware, software, server, workstation, or mobile device that a Health Care Component uses in the course of its daily functions to create, receive, transmit, or maintain electronic Protected Health Information (ePHI).



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	VI.A. Recent ERM activities
Responsible Person:	Tim Wiseman
Action Requested:	Information
Notes:	N/A

03/09/2019

INFORMATION PAPER

SUBJECT: Enterprise Risk Management (ERM) Update for the BOT-Audit, Risk Management, Compliance and Ethics Committee April 2019 Meeting

1. Purpose. To advise BOT-ARMCE committee members of significant ERM activities from the past two months and those planned or anticipated for the next two months.

2. Action Recapitulation:

a. Significant ERM Activities from the Past Two Months:

- Presented ERM Update to UNC Auditors Association @ UNC-W (Dec)
- Submitted Top 5 Risks to UNC-System Office for Initial System-wide Risk Register Build (Dec)
- Published ERM “Five Things” Executive Newsletter/Tip Sheet (Jan)
- Quarterly ERM Committee Meeting & Top Risks Presentation (Feb)
- Top Risks Survey Results and Report Given to Executive Council (Feb)
- Hurricane Florence FEMA Claim Coordination
- Risk Presentation to Academic Deans and Directors
- Provided Instruction for ERM in Higher Ed Regional Workshop (PRIMA & URMIA)
- ERM Consultation and Assistance to UNC-Support Office – Ongoing
- ERM Consultations/Research/Inquiries – Various Departments

b. Significant ERM Activities Next Two Months:

- Top Risks Survey Results Presentation to the BOT-ARMCE (April)
- ERM Presentations at UNC Finance & UNC Safety and Security Conferences
- Risk Management Plan Development for Select Top Risks – Oversee/Coordinate
- Assist in Planning Annual UNC System ERM Retreat/Workshop – April
- University Admissions Safety and University Employee and Student Behavior Concern Teams Meetings and Actions
- ECU ERM Philosophy, Mandate and Framework Reboot/Update
- ERM Consultation and Assistance to UNC-Support Office – Ongoing
- ERM Consultations/Research/Inquiries – Various Departments

3. Other: Attached for reference are 1) Copies of the ERM Top Risks Presentation; 2) Highlights of 2019 Risk Reports; and 3) 2019 NACUBO Perceptions and Priorities Presentation.



ACTION OFFICER: Tim Wiseman
Assistant Vice Chancellor for ERM & Military Programs
Spilman Bldg., Room 214, 252-737-2807



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	VI.B. Results of Risk Ranking Exercise – Top Risks
Responsible Person:	Tim Wiseman
Action Requested:	Information
Notes:	N/A

Enterprise Risk Management

AY 2018-19 Top Risks Review

BOT-ARMCE Presentation

April 11, 2019

Agenda

- Evolution of Risk Management
- Opportunities, Threats, Risk Appetite & Risk Tolerance
- Two Year ERM Activities Model & Risk Survey Methodology
- Current AY '18-'19 Risk “Landscape” and Survey Results
 - Higher Ed Trends to Watch
 - Top Strategic Risks for Higher Ed Boards
 - Top Ten Enterprise-Wide Risks/Concerns
 - UNC System-wide Risk Survey Common Issues
 - SGA Risk Survey Results
- Significant ERM Actions

The Evolution of RM



Historic Risk Management

- Insurance
- Specific hazards minimized
- No compliance input
- Separate safety & emergency management
- “Silo” approach
- Risk Manager = insurance buyer

Risk is bad – focus is on transferring risk

Advanced Risk Management

- Alternative risk transfer techniques
- Proactive prevention & risk reduction
- Integrated approach to claims, contracts, insurance, etc.
- Increased education & accountability
- Collaboration across departments
- Risk Manager *may* be the risk owner

Risk is an expense – focus is on reducing cost-of-risk

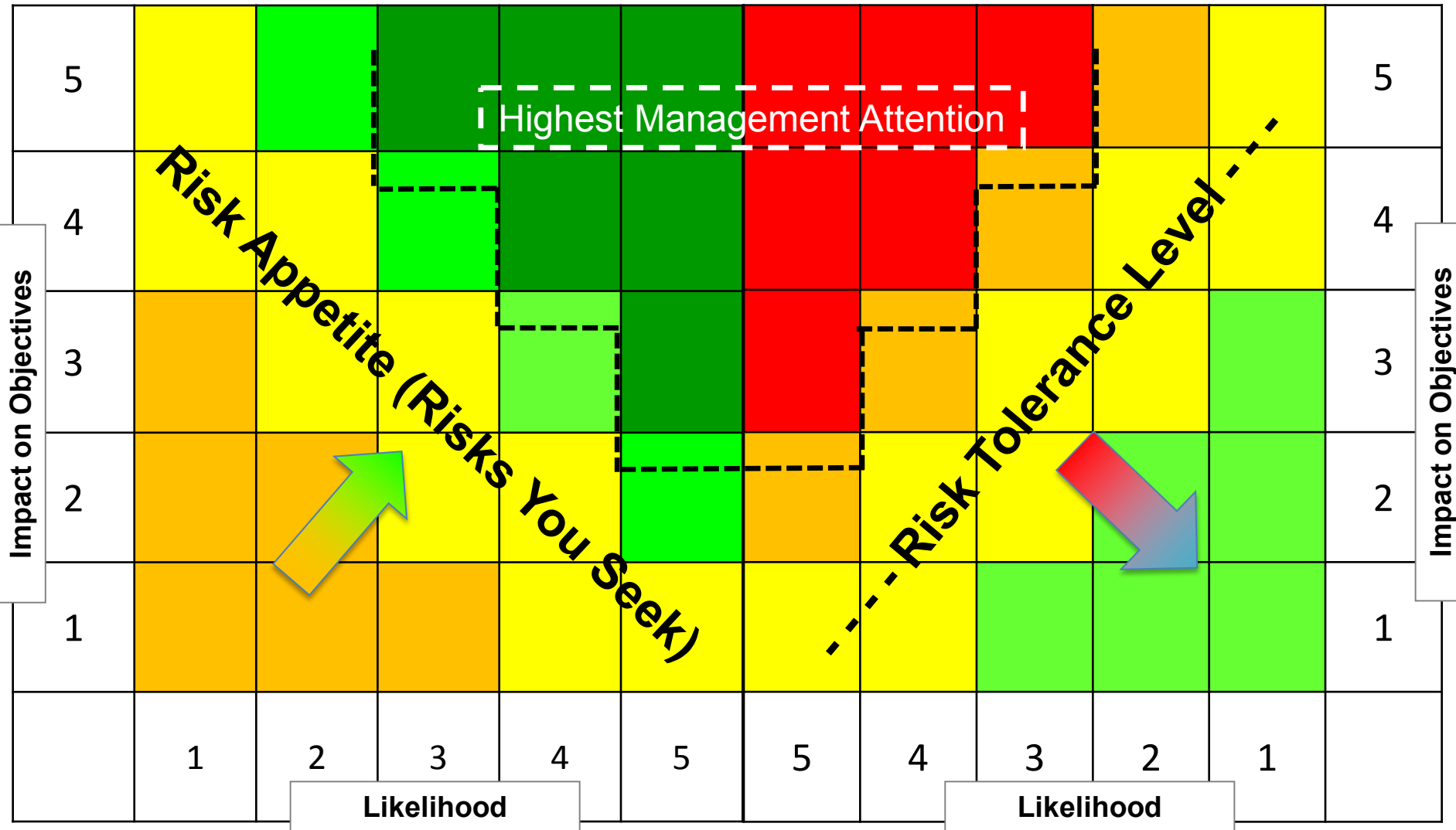
Enterprise-Wide Risk Management

- Broad range of risks analyzed
- Combination of risk controls & opportunities
- Aligned with strategy & objectives
- Helps manage growth, allocate capital & resources
- Risks owned by subject matter experts
- Greater availability of risk mitigation and analytical tools
- Risk Manager = risk moderator, partner, leader; *not* the owner of every risk

Risk is uncertainty – focus is on optimizing risk to achieve goals

Opportunities

Threats



Two Year ERM Activities Model

Year	Primary Activities	Focus
Even "On" Year (example: '18-'19)	<ul style="list-style-type: none"> • Full ERM Risk Survey • Full Risk Prioritization Exercise • Reset • EC & BOT Presentations and Involvement • Risk Management Plans Creation (or Updates) 	<ul style="list-style-type: none"> • Engaging Key Sensors • Assessment Process (Rigor and Detail) • Risk Register Update • Fresh Look at Current and Anticipated Risk Environment
Odd "Off" Year (example: '19-'20)	<ul style="list-style-type: none"> • Smaller Scale Re-Prioritization/Re-Validation Exercise • Departmental Workshops • Interviews and Sensing Sessions • Presentations to Other Key Committees/Groups 	<ul style="list-style-type: none"> • Risk Management Plans Update/Adjustment • "By Exception" Reviews • Select Risk Management Project Work • ERM "Maturity" Assessment(s) • Education

Risk Survey Methodology

- Survey Participants:
 - ERM Committee Members
 - EC Members
 - Academic Deans and Directors
 - BOT-ARMEC Committee Members
- Qualtrics Online Survey Tool
- One-on-One Interviews (limited)
- Results (Risk Register) Shared with ERM
- Risks “Scored” Using Scales of 1 – 4 for Probability and Impact
- Results Tabulated and Sorted from Highest to Lowest Composite Scores
- Top Ten Risks Identified

AY 2018-2019 Risks



9 Higher Ed Trends to Watch in 2019

1.	Capital campaigns will get more ambitious
2.	Many of those big gifts will come with strings attached
3.	Colleges will feel pressure to prove graduates are job ready
4.	The college presidency will be a revolving door
5.	New credentials will flood the market
6.	For- profits will seek new business models
7.	OPMs will play a big role as colleges expand online
8.	Colleges will hone data use to improve outcomes
9.	Augmented and Virtual Reality experiments will continue, but scale will remain elusive

(Source: 9 Higher ed Trends to Watch in 2019- Education Dive <http://www.educationdive.com/news/9-higher-ed-trends-to-watch>)

Top Strategic Risks for *Higher Ed Boards*

	Risk Description/Title
1.	Educational Quality
2.	Financial Stability
3.	Freedom of Speech
4.	Innovation
5.	Presidential Leadership
6.	Relevance

(Source: 2018-2019 Association of Governing Boards)

AY 2018-2019 Top Ten Enterprise-Wide Risks/Concerns

(Based Upon Consideration of Both Probability of Occurrence and Impact/Severity of Potential Negative Consequences)

Survey – Fall 2018

	Risk Description/Title	Major Risk Category	Previous Top Ten List?
1.	Budget Cuts and Continued Erosion of State/Public Funding	Financial	YES (#1)
2.	Declining Undergraduate and Graduate Enrollment in Competitive Market	Operational	NO
3.	Athletics Department Financial Challenges, Reputation, and Direction	Financial	NO
4.	Retaining and Recruiting Qualified Faculty , Administrators and Staff	Operational	YES (#9)
5.	Future of ECU Physicians	Strategic	YES (#2)
6.	ECU’s Reputation in Large Urban Areas/Competitive Markets	Reputational	NO
7.	Current and Future Political Environment and Uncertainty	Strategic	NO
8.	Ability to Improve and Sustain BOG and BOT Relations - Leadership Effectiveness/Communication	Strategic	NO
9.	Workforce Succession Planning Adequacy	Operational	YES (#9)
10.	Cyber Threats and Cyber Security – Data Systems Exploitation	Operational	YES (#3)

UNC System-wide Risk Survey Common Issues

	Risk Description/Title
1.	IT systems that meet operational needs and cyber security
2.	Recruiting and retaining qualified staff
3.	Financial sustainability/ budget cuts
4.	Balancing enrollment, retention and recruiting
5.	Physical plant: new infrastructure and deferred maintenance
6.	Campus safety and incident response
7.	Brand reputation and social media from incidents
8.	Aging facilities
9.	Emergency preparedness
10.	Political, legislative, and regulatory changes: state and federal

(Source: UNC-SO 2018 Top Risk Survey, December 2018 – Draft Results)

ECU Student Government Association Risk Survey Results

Top Five

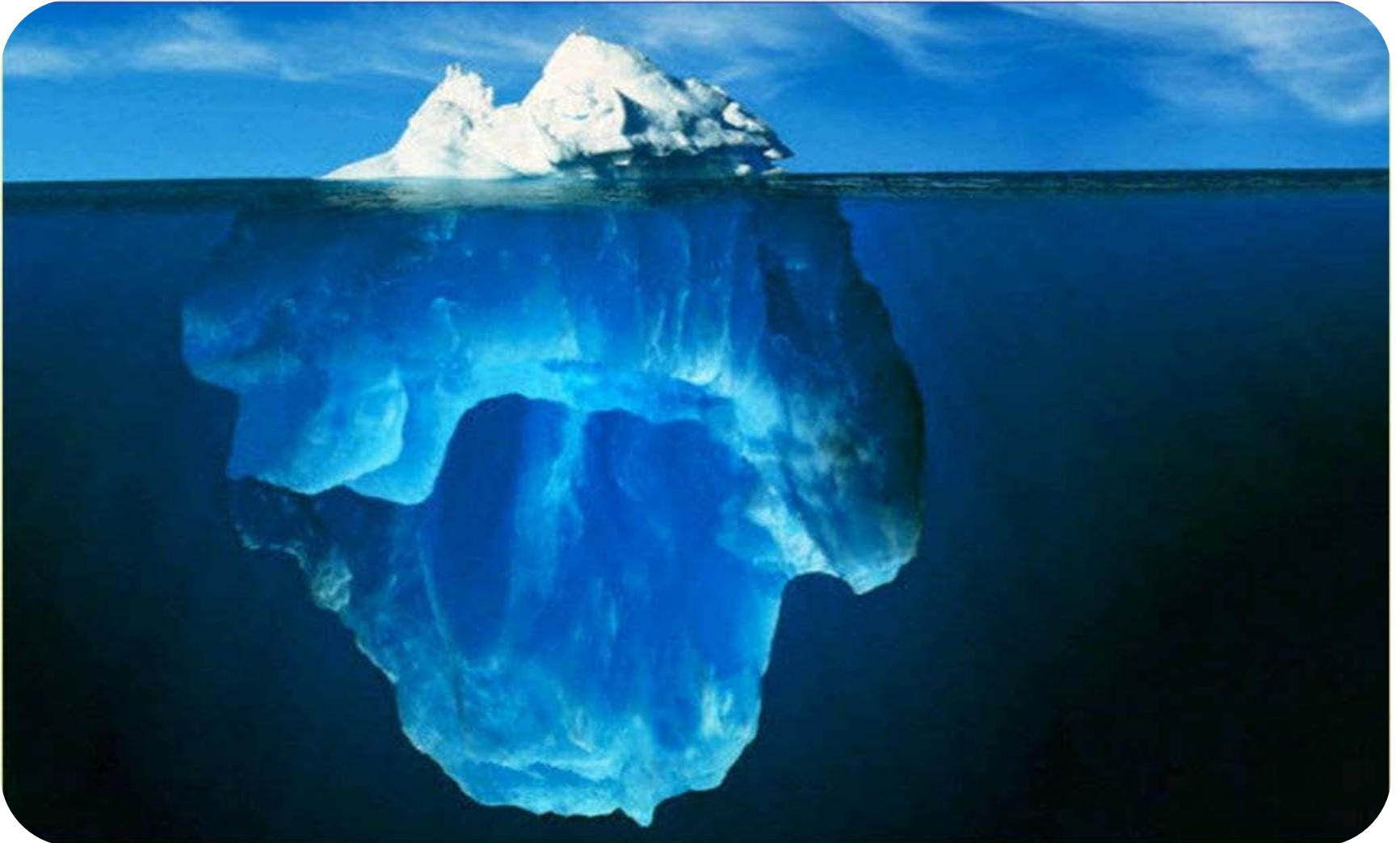
	Risk Description/Title
1.	Safety
2.	Parking zones, fees and rules
3.	Food availability and options
4.	Financial (affording tuition and books)
5.	Reputation (academic excellence, presence among NC universities, lack of competitiveness, and reputation as students)

(Source: SGA ERM Survey Sept. 2018)

Significant ERM Actions

- | | |
|--|-----------------|
| ✓ '18 -'19 Risk Survey | Completed |
| ✓ SGA Special Survey | Completed |
| ✓ Risk Prioritization Exercise | Completed |
| ✓ Risk Presentation Development | Completed |
| ✓ Evaluation of '16 -'17 ERM Risk Survey Results | Completed |
| ✓ '18 -'19 Top Risks Presentations to EC | Completed |
| ✓ '18-'19 Top Risks Presentations to BOT | April 2019 |
| • Risk Management Plans (Select) Create/Update | Mar-May 2019 |
| • Risk Management Plans Reviewed by EC & BOT | Apr - June 2019 |
| • "Off Year" Review of Risk Trends | Fall 2019 |

Insurable Risks



Enterprise Risk Management

AY 2018-19 Top Risks Review

BOT-ARMCE Presentation

April 11, 2019



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	VII.A. Current year statistics and information
Responsible Person:	LaKesha Forbes
Action Requested:	Information
Notes:	N/A

2018 Equal Opportunity and Title IX Data

Office for Equity and Diversity

April 11, 2019

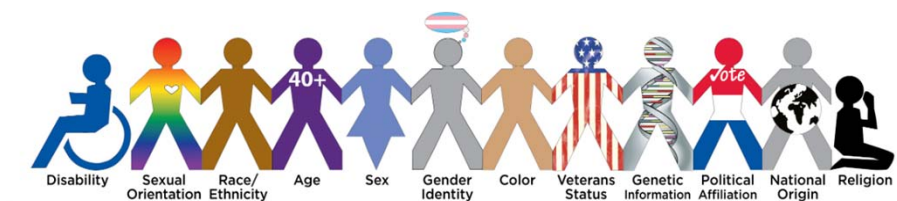


The Office for Equity and Diversity

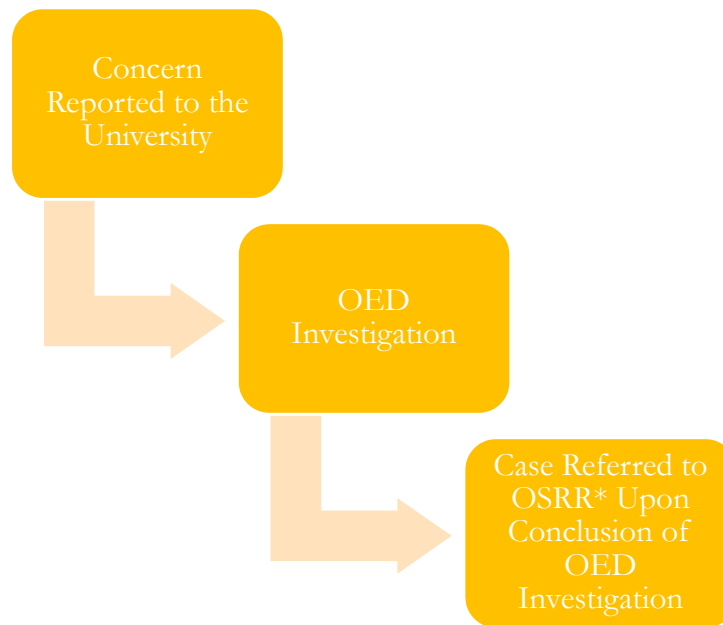
- The Office for Equity and Diversity (OED) provides leadership in the university's efforts to foster a welcoming and inclusive environment for all.
- The scope of the Office for Equity and Diversity encompasses institutional equity and diversity functions involving:
 - education,
 - intervention,
 - compliance,
 - consulting,
 - programming,
 - outreach, and
 - assessment.

Policies and Regulations

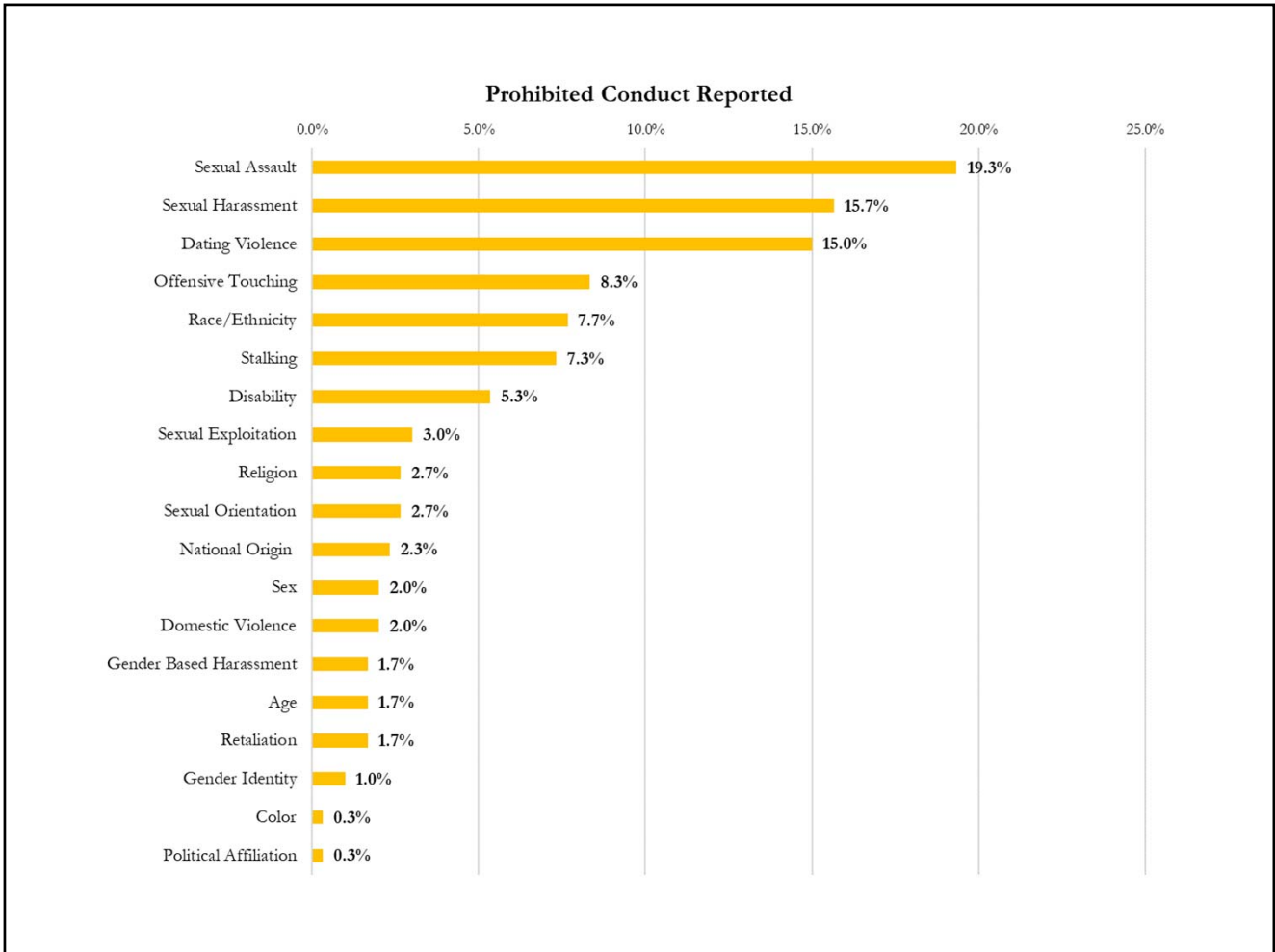
- OED is responsible for the University's *Notice of Nondiscrimination and Affirmative Action Policy* which prohibits discrimination, harassment and related retaliation based on a protected class.
- OED is also responsible for the University's *Regulation on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence* which covers "Prohibited Conduct".
- Prohibited Conduct includes:
 - Sexual Assault
 - Offensive Touching
 - Sexual Exploitation
 - Stalking
 - Dating Violence
 - Domestic Violence
 - Sexual Harassment
 - Gender-Based Harassment
 - Complicity
 - Related Retaliation

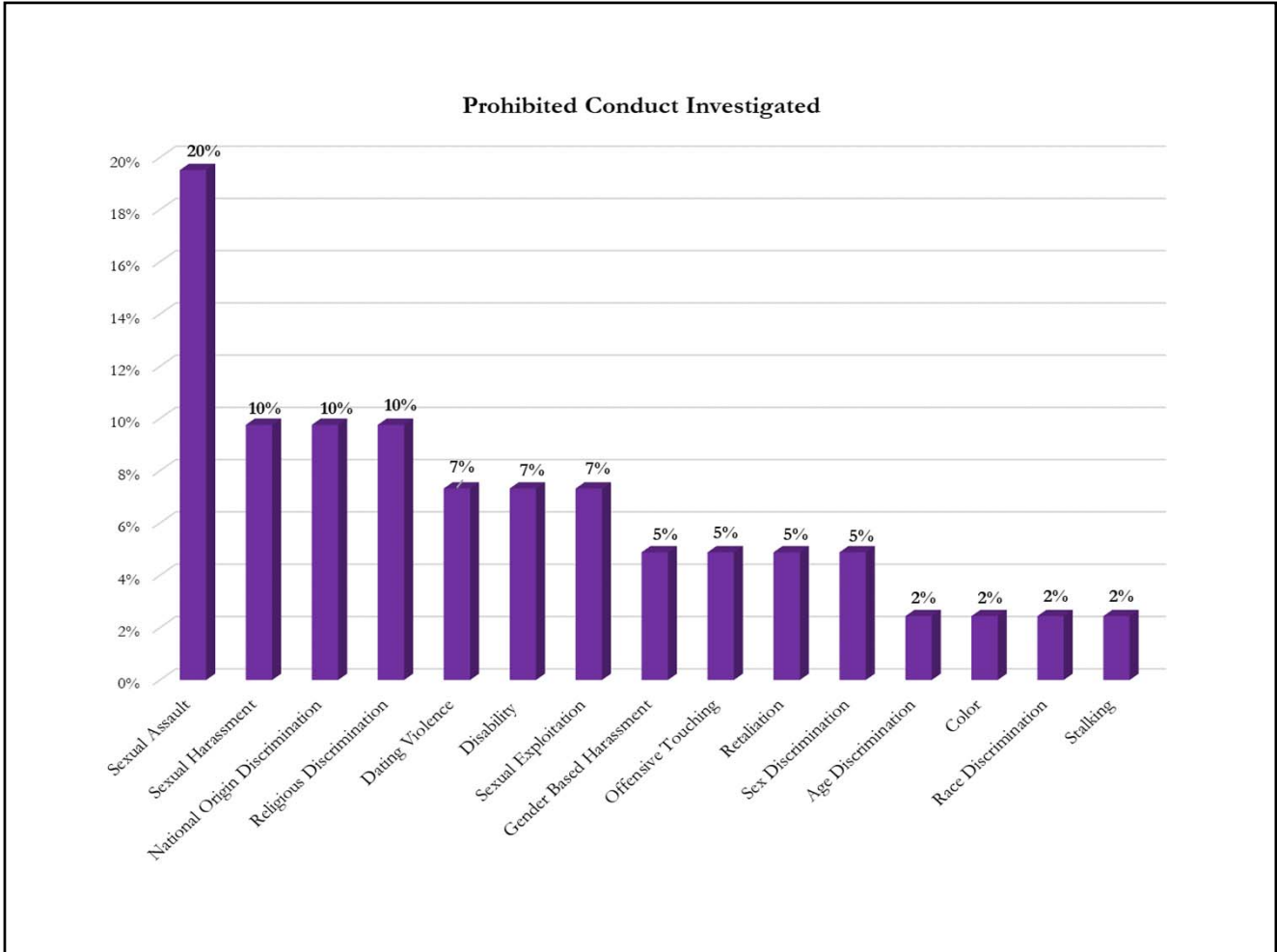


Investigation Process

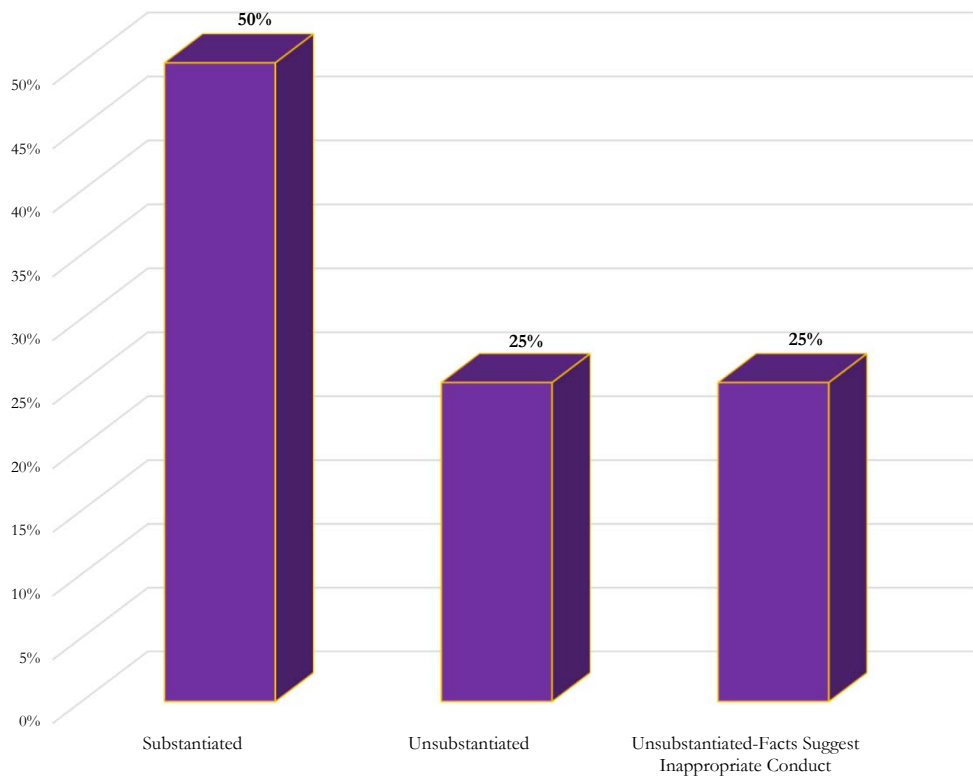


*OSRR refers to the Office for Student Rights and Responsibilities



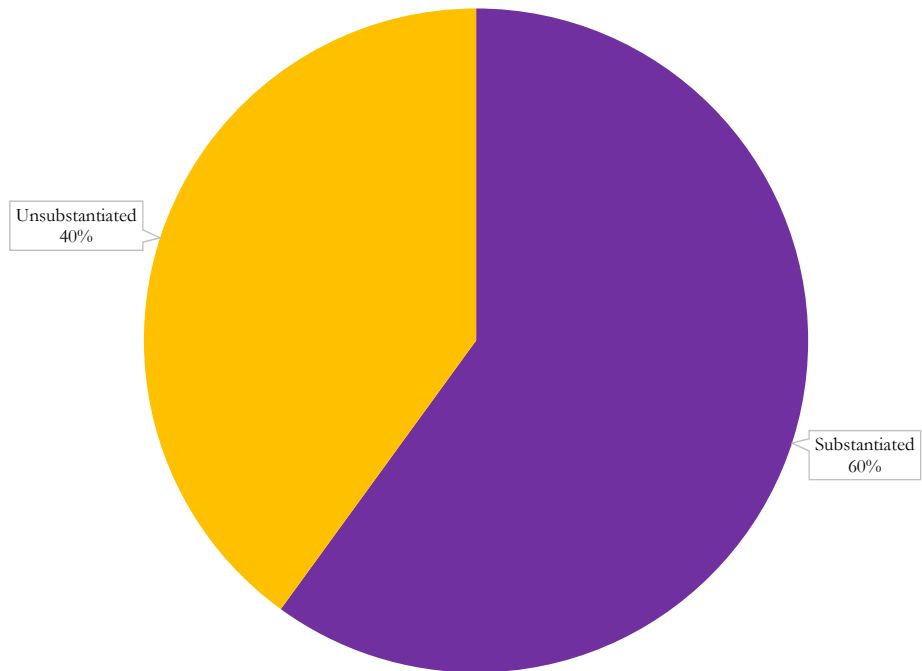


Internal Investigation Findings - Employee Respondents

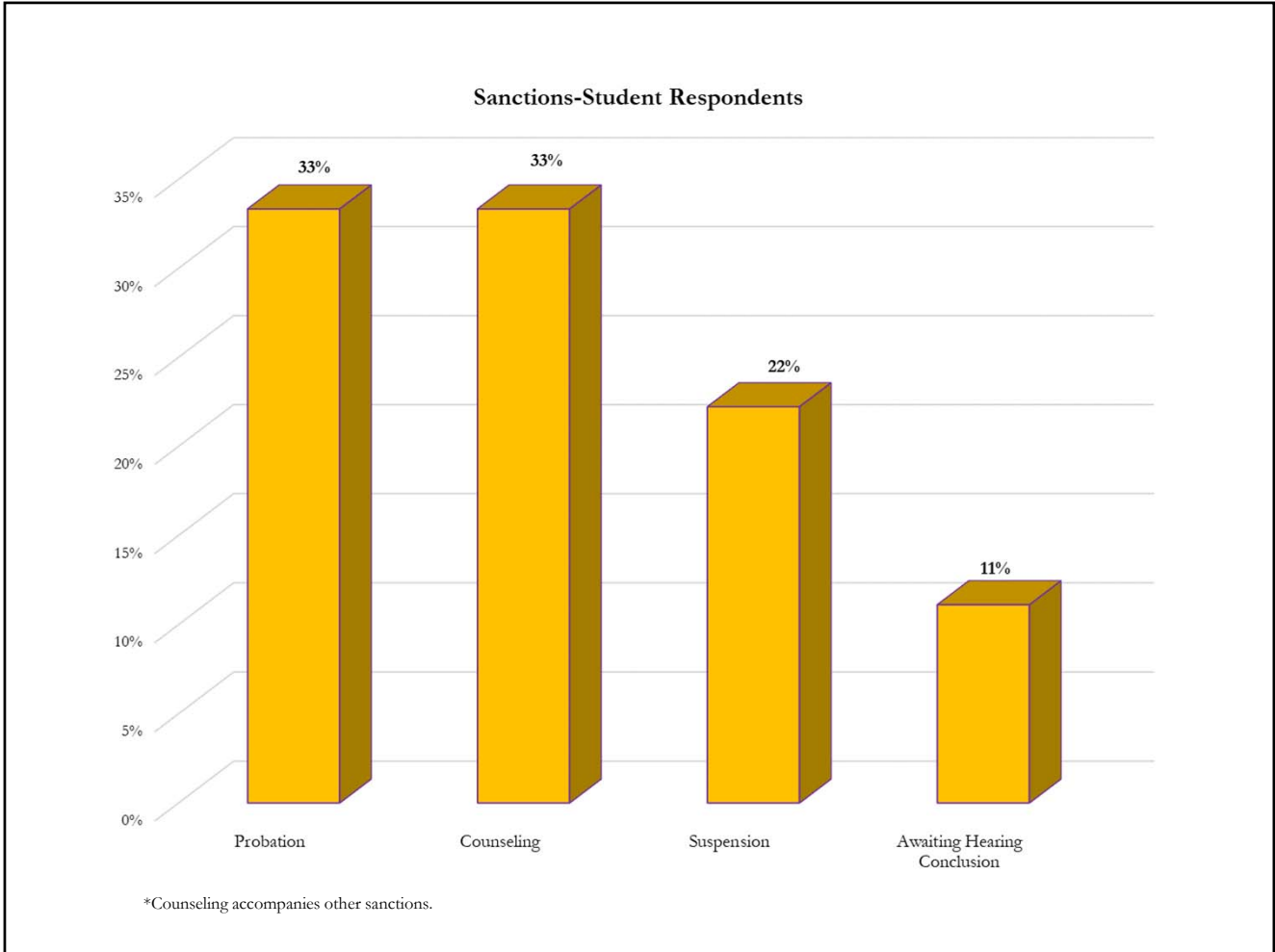


*OED determines whether or not there is enough information to substantiate whether a policy violation may have occurred.

Internal Investigation Findings - Student Respondents



*OED determines whether or not there is enough information to substantiate whether a policy violation may have occurred.



Reports vs. Investigations Trends

- Similar institutions in the UNC System and Nationally have seen large amounts reported incidents and smaller numbers of investigations pursued by complainants.
- The University offers a variety of interim measures, accommodations, and support resources to individuals reporting concerns of Prohibited Conduct. These include but are not limited to:
 - Safety measures such as No Contact Directives, Housing Relocations, Assistance in reporting to Law Enforcement, etc;
 - Support resources including the Center for Counseling and Student Development, the Victim Advocate, and Student Health;
 - Accommodations such as University Excused Absences, Academic and Class accommodations, Workplace assistance.



New Proposed Title IX Guidance

- The New Proposed guidance, by the U.S. Department of Education, was released on November 16, 2018 and was open for the sixty day notice and comment period which concluded on January 30, 2019.
 - The comment portal was open to the public including institutions and individuals such as student, parents, faculty, staff, etc.
 - ECU hosted an Open Forum on January 15, 2019 to inform the campus community about the proposed changes and how to submit comments to the Federal Register.
- The UNC System Office collected feedback on behalf of constituent institutions and submitted the aggregated comments through the portal in the Federal Register.
 - ECU submitted comments to the System Office per this request.



New Proposed Title IX Guidance

- Other university systems, individual institutions, and advocacy organizations are preparing comments to submit.
- Over 104,000 comments were received on the new proposed regulations.
- Once the guidance is finalized and published, the University will update current policies and procedures in compliance with the new regulations and any subsequent guidance from the UNC System Office.



Top 4 Concerns Related to the New Guidance

1. Location
2. Definition of Sexual Harassment
3. Standard of Evidence
4. Potential Administrative Burden





**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	VII.B. Potential changes from the US Department of Education
Responsible Person:	LaKesha Forbes
Action Requested:	Information
Notes:	N/A



**Board of Trustees
Audit, Risk Management, Compliance, and Ethics Committee April 11,
2019**

Agenda Item:	VIII. Other Business
Responsible Person:	Kel Normann, Chair
Action Requested:	
Notes:	N/A