Overview:

Texas A&M University-Corpus Christi is a growing regional University and is designated as a Hispanic Serving Institution, experiencing a 36% increase in Hispanic enrollment from Fall 2008 to Fall 2013. Many students are first generation college students. A significant portion of students attending the University receives student financial aid.

As part of its strategic plan, Texas A&M University-Corpus Christi has expanded its research capacity and realized a 21% increase in research expenditures from 2007 to FY 2013. This has also enhanced and allowed for growth in the number of master and doctoral programs over the past 15 years. The University has taken on plans to expand its course offerings via distance education models and partnerships, which has created a need for additional technology resources and faculty training.

A number of federal regulations as well as accreditation standards continue to expand and impact our faculty and staff responsibilities requiring more intensive and appropriate training.

Intercollegiate Athletics has helped expand campus recognition and alumni support. Increased participation in athletics has continued to expand growth in the number of sports, travel opportunities, facilities and has positively impacted student engagement activities. Fall of 2013 brings the beginning of women’s soccer and new facilities for this sport as well as the first campus track and field event facility.

Compliance Risks:

1. **Culture of Ethics and Compliance** - The University achieved its goal of designating an Ethics & Compliance Officer, establishing an Ethics & Compliance Committee to advise the administration on matters of compliance risk, and establishing the Compliance Services department to assist the Ethics & Compliance Officer as well as other offices with implementing appropriate compliance programs. The next step is to further establish a compliance program that will provide a strong proactive culture of ethics and compliance.

Goals:
Create and provide quality resources that will optimize compliance activity within the university community.

Metric:
- Develop rule and/or procedure that outline the organization, roles, and structure of the compliance program.
- Promote understanding and awareness of the compliance program through ongoing communications via email, newsletter, compliance website, training, presentations, and staff assistance visits/reviews.
- Review and assist in the development of controls, and monitor controls. Identify compliance risk assessment gaps and assign to appropriate process owners for prompt resolution and accountability.
• Leverage lessons learned from internal reviews and external audits and communicate to departments/ divisions to improve their respective efforts.
• Conduct a compliance program self-assessment by December 2014.
• Conduct program assessment in at least one major area by December 2014.
• Complete matrix on required reporting for campus by March 2014
• Monitor implementation and compliance efforts and provide quarterly reports to Ethics & Compliance Committee.

2. **Clery Act Compliance** - With the addition of more students and more residential students on campus, it is likely that there will be an increase in reportable acts on the Annual Fire, Safety and Crime report. There is a continuing need to review and inform faculty and staff of their roles related to this compliance area and the interpretation of laws, which have expanded the need for additional compliance actions. Campus Security Authorities were informed of their duties and required to complete an online Clery Act training course.

**Goals:**
Meet all reporting requirements for Clery Act and ensure that Campus Security Authorities (CSA) understand their roles and comply with reporting duties.

**Metric:**
- Implement the new VAAW/SaVe Act requirements effective March 1, 2014
- Annual reporting for Clery will be timely and accurate.
- Monitor implementation and compliance efforts and provide quarterly reports to Ethics & Compliance Committee.

3. **Financial Aid** - Financial aid is important to our students with 77% of our student population applying for financial aid. Financial aid applications are increasing, and so is the Cohort Default Rate (CDR). The projected rate is 13.6%, the official rate will be released in March 2014. If the default rate exceeds the threshold of 30% for three consecutive years, the University could lose all Title IV funding for our students and this will adversely affect access to higher education.

**Goals:**
1. Increase FAFSA percentages from 77% to 80% by visiting more high schools and increasing community events in the region. Of the 80% of applicants, the goal is to have 70% of those applicants be freshman. Currently 65% of those preparing the FAFSA are freshman.
2. Decrease the Cohort Default Rate each year with the assistance of American Student Assistance, the University’s new Default Aversion Contractor that began in January 2013. To spread awareness of our new Default Aversion/Financial Literacy Program (SALT) on campus, we will kick off a sign-up campaign in March 2014 to get more students acclimated to using this service. By getting more of our students enrolled in SALT will assist with the Cohort Default Rate. This campaign will consist of current
students and our Alumni.

**Metric:**
- Increase in FAFSA applicants is expected by March 2014.
- Increase in number of students currently utilizing the SALT programs, which includes financial literacy along with various other services.
- Increase in number of students signed-up for the Default Aversion/Financial Literacy Program (SALT).
- Monitor implementation and compliance efforts and provide quarterly reports to Ethics & Compliance Committee.

4. **Research Compliance** - Research has expanded and matured at the University, and programs have been developed or are in development to meet the compliance requirements associated with the progression. Infrastructure and resources are needed to help develop more comprehensive and proactive programs. The Export Control Committee has been established and various university departments are working on export control manual sections as well as internal policies and procedures. The University Export Control Rule is under review by the Texas A&M University System Office of General Counsel.

**Goals:**
- Develop a proactive approach to research compliance by establishing necessary programs and expanding training programs to create a culture of compliance.
- Develop tools necessary to monitor compliance programs in a proactive manner.

**Metric:**
- Continue export control program development and monitoring
- Continue ongoing research compliance program updates and monitoring
- Monitor implementation and compliance efforts and provide quarterly reports to the TAMUCC Ethics and Compliance Committee

5. **Distance Education** - As the University moves to offering more courses and programs via distance education, there are a number of federal regulations and SACS standards that need to be met. These require the University to demonstrate it has processes in place to verify student identity and ensure that the student who enrolls in coursework and receives a grade is the same student who completes the assignments required for the class. The University must also demonstrate that it has processes in place that protect student privacy, including the privacy of student records as covered by FERPA. Students must be notified at the time of registration and enrollment of any additional student costs associated with identity verification. The University is required to demonstrate that it provides the same quality in courses and programs offered at a distance as in those offered face-to-face and that the same level of services and support to students in online courses/programs are provided as are provided to on-campus students.

**Goals:**
- The university monitors procedures related to student identity verification and protection of student records and ensure that they are followed.
- Review of distance course/program quality is incorporated into the annual assessment process as well as in the comprehensive program review process where relevant.
- High quality support services available to those in distance education are reviewed regularly and available services are coordinated and advertised to distance students and faculty.
- Faculty who provide instruction through online delivery models receive high quality training in online pedagogy and online course design.

**Metric:**
- Annual review of procedures related to student identity verification, protection of student privacy and identification of costs associated with identity verification will be completed by May 2014, where warranted, changes will be reviewed and approved by September 2014.
- Review of course/program quality will be completed according to the university’s annual assessment and academic program review schedules.
- Student support service availability and accessibility will be monitored, assessment of quality and availability will be assessed annually according to the university’s assessment schedule, and weaknesses identified will be addressed as part of the assessment cycle.
- Regular review of training records and workshop feedback will document faculty completion and identify any weaknesses in available training. Annual review of records will be completed by August 2014. Identified strengths and weaknesses will be documented in annual assessment reports.
- Monitor implementation and compliance efforts and provide quarterly reports to Ethics & Compliance Committee.

6. **Student Safety–Laboratory, Studio, Clinic** - A number of courses offered by the University involve hazards that require students receive course specific safety training. A compliance risk exists when students are not provided with applicable safety training.

**Goals for Lab Safety:**
- All students enrolled in courses that requires them to participate in a scientific laboratory, medical clinic, theatre, or art studio will receive College specific safety training
- Expand safety training/awareness and compliance to other areas including employment.

**Metric for Lab Safety:**
- 100% of students will complete and pass the Lab/Studio/Clinic Safety Course prior to working in a Laboratory, Studio, and/or Clinic.
- Monitor implementation of compliance efforts and provide quarterly reports to Ethics & Compliance Committee.

**Student Safety-Travel Issue:** Approximately 250 student-athletes compete each year as part of Islanders Athletics. Travel associated with competition comprises approximately 30% of any given week when a student-athlete’s sport is “in-season.” Approximately 15-20% of student-
athlete travel, occurring outside a 25-mile radius of Corpus Christi, utilizes mini vans, 12 or 15-passenger vans, or large SUVs rather than charter buses or air transportation.

**Goal for Athletic Travel:**
Enhance the safety of student-athlete travel by reducing unnecessary risks.

**Metric for Athletic Travel Safety:**
- Provide ongoing training to coaches and staff on the risks of various modes of transportation and how to reduce risks when utilizing vans and SUVs.
- Monitor implementation of compliance efforts and provide quarterly reports to Ethics & Compliance Committee.

7. **Civil Rights** - The department of Education, Office for Civil Rights’ (OCR) and the Department of Labor’s Equal Employment Opportunity Commission (EEOC), and Office of Federal Contract Compliance (OFCCP) have intensified their efforts to ensure institutions of higher education and employers comply fully with legal obligations in a number of areas including: Preventing & responding to Sexual Assault, The Violence Against Women Reauthorization Act (VAWA) SaVe Act, Affirmative Action and nondiscrimination obligations of Contractors and Subcontractors regarding individuals with disabilities (Section 503) and Vietnam Era Veterans’ Readjustment Assistance Act, as amended (VEVRAA)

**Goals:** Ensure the University is complying fully with federal laws and guidelines.

**Metric:**
- Develop and implement an affirmative action plan for persons with disabilities in accordance with new Section 503, Disabilities guidelines.
- Develop and implement an affirmative action plan for veterans in accordance with new VEVRAA guidelines.
- Conduct Title IX STEM self-assessment.
- Develop procedures for student complaints regarding faculty and staff conduct not associated with academics and/or civil rights.
- Develop procedure/compendium of various campus internal complaint forums.
- Develop a procedure for addressing the Academic Success of Students & Pregnancy under Title IX.
- Develop procedures to implement VAWA/SaVe requirements by March 1, 2014
- Monitor implementation of compliance efforts and provide quarterly reports to Ethics & Compliance Committee

8. **Information Technology** - *Payment Card Industry (PCI) Compliance.* Multiple University entities take credit card payments and as such must comply with various Payment Card Industry (PCI) standards. The University must ensure that it is aware of all PCI systems operating within the University and that all those systems are PCI compliant.
**Logical Security Monitoring Program.** TAC 202 requires the University to have a logical security monitoring program, i.e., a program for monitoring the effectiveness of the University's “logical” security controls, e.g., passwords, software updates, firewall settings, etc.

**Risk Management.** TAC 202 requires the Information Security Officer to perform an annual risk assessment of all of the University’s information resources and present the results of those assessments to upper management.

**Goals:**
- Ensure University awareness of all PCI systems operating within the University and that all those systems are PCI compliant.
- Ensure compliance with TAC 202

**Metric:**
- Conduct (PCI) review and provide report to President’s Cabinet by September 1, 2014
- Revise and update the University’s current logical security monitoring program and provide recommendation of tools by October 1, 2014
- Conduct an annual risk assessment of campus information resources by January of each year
- Monitor implementation of compliance efforts and provide quarterly reports to Ethics & Compliance Committee

**Summary:**

Texas A&M University-Corpus Christi created and assigned duties for the position of Ethics and Compliance Officer as well as an Ethics and Compliance Committee. Additional compliance services support resource was added within the Division of Finance and Administration to provide further support to the Ethics and Compliance Officer as well as the newly formed Compliance Committee. Last year’s efforts focused on developing and implementing the Compliance and Enterprise Risk Management Plans. The Compliance Program is still evolving, but already many steps have been undertaken to implement stronger monitoring and supporting framework for compliance to foster a culture of compliance. This year our compliance efforts will focus on strengthening our structures and begin advising and assisting departments/divisions in supporting of their respective compliance needs.

Keys to establishing our compliance efforts are leadership, support, and communication from the President and Vice Presidents. This past year, President Killebrew has reinforced the importance of our compliance efforts through various communications to the campus community including: The annual President’s Reaffirmation of Commitment to Equal Opportunity and Diversity, the Academic Success for Students and Pregnancies in support of Title IX, and the External Employment Compliance. An additional letter is planned for this spring concerning FERPA and HIPAA compliance.