REORGANIZATION OF
THE OFFICE OF AUDIT,
COMPLIANCE & ETHICS (OACE)
ABOUT THE REORGANIZATION

What it was?

OACE

- Reported functionally to Chair of JACC and administratively to the President’s Office
- Audit function oversaw efforts to identify institutional risks, perform audits, and provide independent, objective, assurance and consulting services
- Compliance function oversaw Privacy, Policy Management, Minor Protection, as well as Clinical Compliance & Privacy at UConn Health
- Separate Ethics Liaisons at UConn & UConn Health
- Separate management of Reportline & investigations
The Three Lines of Defense Model in Effective Risk Management and Control

1st Line of Defense
- Management

2nd Line of Defense
- University Compliance
- Privacy
- Healthcare & Regulatory
- Research Compliance

3rd Line of Defense
- Internal Audit

Effective risk management requires the coordination of activities between the various lines of defense.

Adapted from ECIIA/FERMA Guidance on the 8th EU Company Law Directive, article 41
ABOUT THE REORGANIZATION

What’s Changed?

- **Office of University Compliance**
  - Kimberly Fearney
  - Interim Chief Compliance Officer
  - 860-486-6195 (UConn)
  - 860-679-1802 (UConn Health)

- **Office of Healthcare and Regulatory Compliance**
  - Debra Abromaitis
  - Interim Compliance Officer
  - 860-679-7015

- **Office of Privacy Protection & Management**
  - Rachel Rudnick
  - Chief Privacy Officer
  - 860-486-5256 (UConn)
  - 860-679-7334 (UConn Health)

- **Office of Audit & Management Advisory Services**
  - Cheryl Chiaputti
  - Chief Audit Executive
  - 860-486-2749 (UConn)
  - 860-679-4735 (UConn Health)
### About the Reorganization

<table>
<thead>
<tr>
<th>Office of University Compliance</th>
<th>Office of Healthcare and Regulatory Compliance</th>
<th>Office of Privacy Protection &amp; Management</th>
<th>Office of Audit and Management Advisory Services</th>
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</thead>
<tbody>
<tr>
<td>Promotes a University-wide culture of compliance and ethics</td>
<td>Serves as a central resource for healthcare regulatory compliance preparedness reporting and response</td>
<td>Serves as a central resource for privacy matters University-wide</td>
<td>Provides independent objective assurance and consulting services designed to add value and improve operations</td>
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<tr>
<td>Provides educational training &amp; resources, assists decentralized compliance areas with monitoring efforts</td>
<td>Provides enterprise risk management assessments, guidance and monitoring &amp; offers healthcare compliance education &amp; training to the healthcare domain</td>
<td>Advises &amp; assists regarding the proper access, use, management, protection &amp; disclosure of confidential information via education, outreach &amp; guidance</td>
<td>Enhances &amp; protects organizational value by providing risk-based assessments, advice &amp; insight</td>
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<td>Manages confidential Reportline</td>
<td></td>
<td>Monitors compliance and investigates privacy concerns</td>
<td>Helps the University accomplish its objectives by bringing a systematic, disciplined approach to evaluate &amp; improve the effectiveness of governance, risk management &amp; control processes</td>
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<td>Ensures coordination &amp; consistency among individual compliance units</td>
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<td>Manages response to data incidents (e.g. breaches) and identity theft concerns</td>
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**Reorganization of the Office of Audit, Compliance & Ethics (OACE)**
What we do?

- Responsible for institution-wide operation of the compliance and ethics program
- Includes role of Ethics Liaison
- Promotes the University’s Commitment to Compliance & Ethics
- Manages the anonymous REPORTLINE
- Provides updates to the Joint Audit and Compliance Committee
- Manages Compliance Committees
- Responsible for annual compliance training
- Monitors key compliance areas
- Supports University-wide compliance initiatives

https://compliance.uconn.edu/
What we do?

- Investigates healthcare concerns
- Proactively provides enterprise risk management assessments, advice and monitoring
- Provides healthcare and regulatory new employee orientation and annual compliance training
- Guides healthcare operational practices and assists with decision making
- Works with healthcare program design and modifications
- Works with physicians to establish relationships educating and monitoring physician billing requirements
- Collaborates with management on compliance with changing laws, regulations and statutes
- Prepares healthcare areas for regulatory surveys
- Coordinates healthcare regulatory surveys
- Coordinates, implements and monitors action plans after regulatory surveys
- Reports adverse events
- Provides updates to UConn Health Senior Team
- Chairs/member on appropriate committees to support Healthcare and Regulatory Compliance

https://health.uconn.edu/healthcare-regulatory-compliance/
What we do?

- Responsible for integrated, University-wide Privacy program
- Conducts investigations into privacy concerns, identity theft, data compromises and inappropriate access to confidential and protected information
- Collaborates with information technology, clinical and operational areas to promote “Privacy By Design” approach towards management of confidential and protected data
- Promotes the University’s commitment to protect privacy rights of patients, students, employees, research subjects, and other constituents through education, outreach and advice
- Conducts periodic monitoring and reviews of privacy obligations and access to confidential and protected data
- Coordinates management of, and response to, data incidents including breaches
- Chairs/serves as member on appropriate campus-specific and University-wide committees

https://privacy.uconn.edu/
OFFICE OF PRIVACY PROTECTION & MANAGEMENT

President

Associate Vice President & Chief Privacy Officer
Rachel Rudnick

Executive Assistant (Vacant)

Health Privacy Manager (Vacant)

Health Privacy Specialist
Susan Kerr

Health Privacy Specialist
Priscilla Fretz

Health Privacy Analyst (Vacant)

University Privacy Specialist (Vacant)

University Privacy Analyst
Laurie Neal

https://privacy.uconn.edu/
OFFICE OF AUDIT AND MANAGEMENT ADVISORY SERVICES

What we do?

The scope of audit activities encompasses all controls, reports and operations and the evaluation of a broad range of objectives including:

- Efficiencies and effectiveness of operations
- Safeguarding of assets
- Compliance with laws, regulations, policies, procedures and contracts
- Effectiveness of risk management and control framework and processes

How we do it?

- Performs risk based financial, operational, compliance and IT audits – results are formally communicated to the JACC
- Acts as liaison to external auditors including the state auditors
- Performs investigations related to suspected fraud and fiscal irregularities - results may be communicated to the JACC and other external entities
- Performs consulting services including advisory and related activities in order to mitigate risk and improve business operations – results may be communicated to the JACC

https://audit.uconn.edu/