

July 1, 2022

The Ohio State University

Compliance Strategic Plan

FY2023-FY2027

Office of University Compliance and Integrity

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Working Together to Advance Ohio State’s Shared Values and Meet Our Compliance Requirements

The Ohio State University is working to become “the absolute model land-grant university for the 21st century.” Achieving this standard requires a strategic focus on excellence in five key areas: academics, research, operations, service, and talent and culture. The Ohio State Compliance Organization assists the university community in implementing a compliance program and fostering our shared values to advance this mission. Our efforts are focused on strengthening existing teams, solving critical problems, and optimizing needed processes to support the university’s vision, mission, and values. Guided by this five-year Strategic Plan, we strive to be a compliance organization that sets the standard for higher education in serving students, faculty, staff, patients, and the wider community.

Our Vision

We seek to be the national model for promoting integrity and ensuring compliance in higher education.

Our Mission

We exist to advance the mission of the university by encouraging ethical conduct and compliance with applicable laws, regulations, and policies.

Our Values

We lead with Integrity and Respect in advancing Ohio State’s Shared Values—and the principles and behaviors they embody. Ohio State’s Shared Values are:

Ohio State Shared Values

VALUES, PRINCIPLES AND BEHAVIORS

VALUES	Excellence and Impact	Diversity and Innovation	Inclusion and Equity	Care and Compassion	Integrity and Respect
<i>Enduring commitments that shape our culture</i>	Demonstrating leadership in pursuit of our vision and mission	Welcoming differences and making connections among people and ideas	Upholding equal rights and advancing institutional fairness	Attending to the well-being of individuals and communities	Acting responsibly and being accountable
PRINCIPLES <i>Established goals that reflect our values</i>	Advancing sustainable and evidence-based solutions through mutually beneficial partnerships	Encouraging open-minded exploration, risk-taking, and freedom of expression	Advocating for access, affordability, opportunity, and empowerment	Putting people at the center of all we do	Building trust through honesty, transparency, and authentic engagement
BEHAVIORS <i>Expectations for our work together</i>	Together, we <ul style="list-style-type: none"> Stimulate creativity, critical thinking and problem solving Proactively collaborate with others and strive for meaningful outcomes Are bold in our endeavors and create environments to foster new approaches Demonstrate persistence and commitment Inspire others to join in and take action Champion everyone’s potential for success 	Together, we <ul style="list-style-type: none"> Are curious and open to different experiences Recognize everyone’s potential to contribute new ideas Actively engage others’ perspectives as opportunities for individual and institutional growth Work toward creative, collaborative solutions Use our successes and failures to learn and improve with humility 	Together, we <ul style="list-style-type: none"> Intentionally foster a sense of belonging where all are valued Strive to understand and appreciate each other’s backgrounds and experiences Listen to multiple voices and engage in civil discourse Acknowledge and address individual and systemic effects of bias and discrimination 	Together, we <ul style="list-style-type: none"> Are compassionate and meet people where they are Support each other’s physical and mental health Nurture a community of kindness and gratitude Foster individual growth and development Empower people to overcome obstacles 	Together, we <ul style="list-style-type: none"> Value our greatest resource, our people, and acknowledge the contributions of every individual Allow people to make and learn from mistakes Work conscientiously and assume positive intent of others Actively listen and engage in open, honest dialogue Are good stewards of our and others’ resources

Overview – Office of University Compliance and Integrity

Higher education is one of the most public and regulated industries in America today, and expectations continue to grow as universities become more complex. Compliance and integrity—the need to abide by laws, regulations, and policies while meeting high ethical standards—are increasing priorities throughout higher education.

In 2012, the Board of Trustees created the Office of University Compliance and Integrity (OUCI) to integrate existing compliance teams across the university into a Compliance Organization, to ensure that Ohio State fosters a culture that promotes ethical conduct and continues to meet our legal and regulatory responsibilities.

Compliance personnel at Ohio State are integrated into the university’s activities and operations. Compliance officers work within many units, either individually or as part of multi-person teams. OUCI coordinates these compliance efforts, working with leaders throughout the university to identify and fulfill ethical, legal, and policy responsibilities. A central compliance function must be objective and independent. To meet this imperative since its inception, OUCI has worked specifically with compliance teams in units and colleges to create a Compliance Organization through separately organized reporting relationships.¹

The university operates in an increasingly complex regulatory environment, which requires focus on accountability. Outside regulators and funding sources require the university to have a comprehensive program in place to ensure that everyone at Ohio State understands our requirements and works to meet them. A successful compliance program:

- Fosters a culture that advances university values, does not tolerate illegal or unethical behavior, prompts faculty and staff to consider the potentially adverse consequences of unethical conduct, and encourages the raising of concerns regarding such conduct;
- Proactively solves problems by improving collaboration and communication, and facilitates risk-based decision-making in alignment with the university’s mission;
- Reduces the risks of non-compliance, while increasing the likelihood of early detection and correction of issues; and
- Provides a source of best practices and assistance for the entire university community.

A compliance program is only as successful as the colleagues who do its wide-ranging work. We work daily to ensure that we value our people and acknowledge the contributions of each individual on our team. We developed and implemented the Compliance Career Framework

¹ The university’s Compliance Program Statement identifies the units that have formalized reporting relationships with OUCI and, together, comprise Ohio State’s Compliance Organization. These units currently include: the Wexner Medical Center Office of Compliance and Integrity; Athletics Compliance; Digital Security and Trust; Environmental Health and Safety; Office of Institutional Equity; Office of Research Compliance; Office of Secure Research; and Office of Student Academic Success/Student Financial Aid. Additional formalized efforts exist in the Colleges of Medicine and Food, Agriculture, and Environmental Sciences, and in the OSU Comprehensive Cancer Center.

to support and scaffold their career growth, improve organizational effectiveness, and continue to improve our outstanding talent. We leverage limited resources creatively across the Compliance Organization to meet expectations as simply and efficiently as possible.

The strategic plan outlined below builds on progress made since 2012 and details our vision for implementing the Board’s directives to optimize a Compliance Organization at Ohio State that is best in class and a model for higher education. We recognize the university’s unique culture and embrace its commitment to Shared Values in all our work. We are dedicated to ensuring that compliance risks are proactively and effectively addressed. Ensuring values and compliance across the university is essential to Ohio State’s becoming the model land-grant university for the 21st century.

Strategic Scan

The following are the principle expected external and internal factors that will affect the university’s compliance priorities over the coming five years—all of which reflect a day-to-day working environment that is increasingly complex and challenging.

External Environment

Increasing Regulatory Expectations and Enforcement Actions

The coronavirus pandemic and its economic impacts have caused significant regulatory change, affecting all aspects of the university’s mission. In the first three months of the pandemic, for example, we identified 460 significant regulatory changes impacting our work. In addition, regulatory enforcement actions in higher education continue to increase.

This continuing increase in regulatory expectations and enforcement occurs in the context of heightened focus on the ability of universities and other organizations to manage their overall compliance organizations. Specifically, in June 2020 the United States Department of Justice (DOJ) issued revised guidance for compliance programs. This guidance provides a comprehensive overview of the compliance expectations of federal regulators, as other federal agencies extensively rely on DOJ when setting more detailed requirements. The guidance further clarifies an existing expectation that compliance programs should demonstrate: (1) iterative risk management; (2) a data-led program built on autonomy and independence; (3) targeted training with a demonstrated impact; and (4) reporting and investigations processes rooted in transparency and efficacy.

Concerning iterative risk management, the new DOJ guidance stresses a dynamic, rather than static, approach to generating policies and requirements, demonstrating appropriate self-regulation through the continuous evaluation of processes and controls. This emphasizes the importance of proactive, not reactive, management of risk, to include making changes when policy violations occur, when peer universities violate regulations, and when program assessments produce lessons learned.

Second, the DOJ guidance emphasizes the importance of independent access to and analysis of control data. Universities and other organizations must ensure that data demonstrating compliance is appropriately analyzed by personnel capable of providing independent assessments of whether controls are adequately meeting regulatory requirements. If assessments do not produce these results, then the compliance program should be redesigned in a way to support access to resources and ensure sufficient autonomy.

Third, the DOJ guidance continues to emphasize targeted, effective training. This emphasis reflects increased regulatory frustration with rote, check-the-box training programs, in favor of just-in-time and specified checklists, operating procedures, and other training tools that more effectively ensure that employees receive the training relevant to their functions within the university, particularly by enabling students, faculty, and staff to ask follow-up questions and make recommendations.

Finally, the DOJ guidance emphasizes that reporting and investigations processes must demonstrate that employees not only know how to report concerns but understand and trust how such concerns are evaluated and resolved. This requires investigations and disciplinary actions to be implemented consistently and transparently throughout the university.

In summary, the DOJ guidance emphasizes three overall questions: is the compliance program well designed; is the program being implemented effectively; and does the program work in practice? The guidance makes clear that federal agencies seek answers to these questions not only at the time of an audit or investigation, but over the entire period of review, placing greater emphasis on adequate resourcing and improvement when mitigating compliance. The additional external environmental factors noted below will challenge the ability of all institutions in higher education to meet these increased expectations.

Public Scrutiny and Politicization of Higher Education

Recent years have brought unprecedented public attention to higher education across diverse areas. Publicity-generating incidents at universities across the country—including Title IX sanctions, governance investigations, and athletics scandals—have heightened public awareness and concern regarding the level of institutional control exercised by university leaders. Many of these issues play out against the backdrop of a country divided by bitter partisanship and are often seen through a political lens.

With change in federal administrations, guidance from policy makers and regulators varies about how universities must address these challenges most effectively. But analysis of the root causes of these events have underscored two significant expectations for universities: (1) the need for an independent function through which faculty, staff, and others can raise concerns without fear of retaliation—anonously if necessary—and that is responsible for objectively investigating and resolving such issues; and (2) a strong integrity culture to ensure that leaders prioritize decisions based on the university's values.

Higher education continues to confront a student loan crisis: student loan debt recently exceeded \$1.75 trillion, and the average debt balance is nearly \$41,000. This crisis increases public scrutiny of universities' decisions regarding tuition, scholarships, grants, and costs.

As a result of these issues, universities—both public and private—receive heightened public interest in their decision-making and priorities, governance, and financial stewardship. This trend is particularly significant at Ohio State, given the State of Ohio’s commitment to transparency and our broad disclosure obligations under the Ohio Public Records and Open Meetings Acts. Most recorded forms of communication and many meetings at the university are subject to public inspection. This creates a significant challenge when assessing compliance risks and ensuring accountability, as both must be done in a manner that either fairly and accurately represents the facts when documented in public records, or appropriately meets exceptions to these Sunshine Laws.

National Security through Compliance

In recent years, the federal government has increasingly pursued national security through compliance initiatives. Multiple funding agencies now regularly partner with the FBI to identify and investigate faculty foreign affiliations. For three years, DOJ’s China Initiative surged resources to prosecutors investigating theft of intellectual property and other economic espionage. While the China Initiative was ended in February 2022, DOJ will likely continue to pursue its goals through criminal prosecutions and a shift towards civil false claims cases. Enforcement of export control regulations has also increased, with heightened risk associated with foreign conflicts and competition. These dynamics require universities to navigate an increasingly fraught landscape with security imperatives and the mission of fundamental research in tension.

Security and Privacy

University community members crave quick access to new technology and innovative uses of personal information. Software supply chain challenges and other institutions’ security incidents and privacy gaffes, add pressure in this space. Bad actors and threats can thwart the university’s mission by disrupting our academic services and programs. Changes in these landscapes continue to bring focus to the security realm and pivots must be made with controls, reporting, and operations to maintain compliance and effectively manage response to issues. In addition, the ever-changing landscape of state, federal, and international security and privacy regulations requires our programs to flex and expand to balance the expectations of our university community and our regulators.

Evolution of the Research and Innovation Environment

Universities are faced with an evolving landscape regarding research and innovation. Many institutions are under increasing pressure to commercialize valuable intellectual property to help corporate partners and boost local economies. Faculty are increasingly focused on their own potential stake in innovative start-up efforts. And federal funding agencies are more focused in recent years on enforcing complex requirements related to conflicts of interest and research misconduct. This environment—including high-profile scandals at peer institutions—has brought additional public scrutiny to a range of related compliance issues, including export controls and research regulations, state ethics laws, and intellectual property policies.

Athletics Transformation

The landscape of collegiate athletics is undergoing transformation. The NCAA itself is undergoing a substantial strategic reorganization and is increasingly reliant on its conferences like the Big10 Conference, and on institutions themselves, to make decisions. Further, in its unanimous 2021 decision in *NCAA v. Alston*, the Supreme Court struck down NCAA caps on student-athlete academic benefits (i.e., reimbursements and pay for academic-related expenses) on antitrust grounds. Many state legislatures subsequently passed laws preventing the NCAA from restricting student-athletes' name, image, and likeness (NIL) earnings and the NCAA adopted a policy that suspended its amateurism rules related to NIL monetization. As student-athletes pursue sponsorship deals, universities are left to operate in a vacuum of clear NCAA guidance about the parameters of permissible NIL engagements. Consequently, there is increased risk of litigation, enforcement actions, and compliance complications with this unsettled and quickly evolving landscape.

New Economic Challenges

Throughout the COVID pandemic, many university employees have worked remotely or in a hybrid mode with time split between a campus and home office. Employees have increasingly come to expect real flexibility in how they can best work. These dynamics are posing recruiting and retention challenges, which threaten to undermine the expertise and experience needed to meet compliance requirements and optimize integrity culture.

Internal Environment

Strategic Priorities

Recent transitions in university leadership, including a new President, significant changes in senior leader and Board of Trustees members, has brought significant new strategic and operational priorities. These strategic changes seek to transform many aspects of a large, historically decentralized institution with an annual budget comparable in size to the gross revenue of a Fortune 500 company, diverse colleges and administrative units, and a comprehensive Medical Center. Most decisions are made at the college or unit level, often with comparatively little central input or oversight, and local decisions made on issues with university-wide implications can conflict with strategic priorities or create substantial institutional risk. In addition, such decentralized decision-making has often resulted in largely reactive, not proactive, responses to compliance risks. The university's focus on strategic initiatives over the next five years will present challenges of resource allocation and priority-setting, as it changes the historically de-centralized decision-making model. These challenges put increased pressure on the Compliance Organization, in alignment with other assurance functions and operational units, to effectively identify, assess, and ensure the mitigation of top compliance risks, and on university governance structures to appropriately accept identified risks and ensure ownership and accountability.

Innovation and Entrepreneurship

Ohio State is committed to supporting wide-ranging innovation and entrepreneurship efforts involving faculty, students, staff, and community partners. Corporate partners often seek special arrangements in sponsored research agreements. The university is addressing increasingly complex conflicts issues due to expanded federal regulations that focus on research collaborations and commercialization. Many of these efforts also implicate university policy and the Ohio Ethics Law.

The Compliance Organization has focused on supporting innovation and entrepreneurship through policy and control simplification. For example, conflicts of interest management efforts historically have been decentralized and inconsistent and were defined through four separate university policies. Significant efforts have been made to simplify and combine the disclosure process and to combine these four policies into one new Outside Activities and Conflicts policy, to improve this foundational component. The university's focus on research and innovation will require these simplification efforts to continue, even as new regulatory requirements and innovative business arrangements continue to be addressed.

Alignment of the Medical Center and Campus

Ohio State is fortunate to have one of America's leading academic medical centers and is committed to the "One University" model. Historically, the Wexner Medical Center's financial, human resources, information technology, and policy systems have existed alongside those of the rest of campus. Since OUCI's inception, the Wexner Medical Center's Office of Compliance and Integrity has had a reporting line to Ohio State's Chief Compliance Officer. The consistency of values and regulatory expectations across the entire university offers an opportunity to leverage the Wexner Medical Center's strong compliance culture and processes, including its newly implemented governance, risk and compliance (GRC) tool, with other units, as has already occurred in the oversight of health care privacy (HIPAA) requirements. Efforts to align the health sciences colleges with OSU Wexner Medical Center leadership and operations, and to ensure compliance with clinical trial and human subject research requirements, will continue to present challenges.

Concern Reporting Increase

OUCI administers the EthicsPoint anonymous hotline system that Ohio State has had since 2006. This platform serves all students, faculty, staff, and external parties who wish to raise any concern and is used by more than 15 units that conduct various investigations. This set of tools has been critical in advancing a culture of integrity and compliance and demonstrating to regulators that Ohio State has a robust and effective concern reporting environment. Since OUCI began overseeing this hotline, reports have steadily increased from 128 in 2013 to 722 in 2021—nearly six times as many concerns raised annually. This trend is felt by many units on campus, most especially by the Office of Institutional Equity, which addresses sexual misconduct and discrimination complaints. Many of the concerns raised are also increasingly complex and implicate multiple areas of compliance and other issues. In addition, the university continues to rely on two separate systems (NAVEX and Maxient)

for reporting employee and student concerns, respectively, which adds complexity. While robust concern reporting reflects a strong integrity culture, the volume of reports poses a continued resourcing challenge to the university's Compliance Organization.

Workday and Career Roadmap Optimization

The university invested substantial resources in recent years to transition financial and human resources systems and data to Workday, and to align employee staff employee roles through the Career Roadmap project. The Workday system provides an opportunity to streamline and improve compliance controls and reporting, and Career Roadmap assists the university in meeting its Affirmative Action/Equal Employment Opportunity (AA/EEO) requirements. While these projects will eventually produce greater role equity, improved capabilities, stability, and future efficiencies, challenges remain to optimize these tools and processes, with implications for the university's ability to meet its compliance obligations. In particular, Career Roadmap implementation continues to challenge employee engagement and retention, while the decision not to use Workday for student systems and data presents significant challenges in updating existing systems. These challenges will continue throughout this period.

Operational Simplification and Efficiency

Advancing the university's strategic priorities will depend on maintaining and improving operational effectiveness. This dependency will be challenged by increased costs, ongoing operational demands, and employment and retention trends in key units and functions. Shared services units will need to help eliminate silos between different departments and adopt agile operating models to realign staff more efficiently toward the highest value-creating and value-protecting opportunities throughout the university.

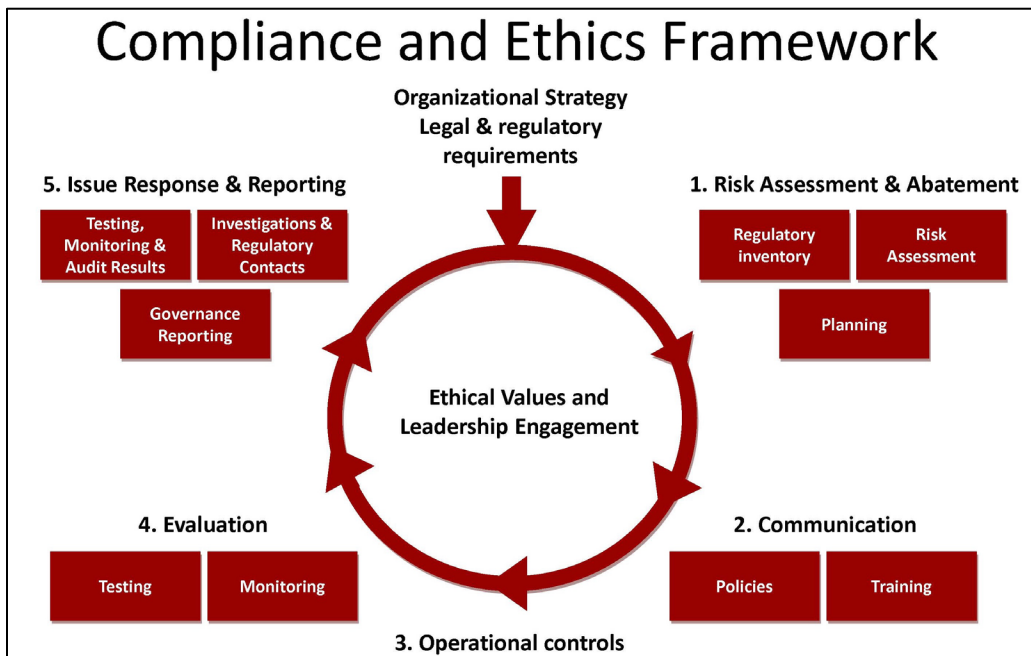
University units, systems, and processes responded differently to the COVID pandemic. Those that could be flexible responded more effectively, while previously efficient processes either proved brittle and could not adapt quickly. Overall, the university adapted in extraordinary ways to the pandemic, through innovation and disruption of traditional pathways, and individually through increased sacrifice and commitment of individual faculty, student, and staff. This effort to adapt created long-term stress, however, and employee turnover and retention, departure of key personnel, lack of clarity and consistency over remote work continue to present challenges. These challenges require ongoing and increased focus on retaining individual compliance staff members and ensuring ownership and accountability over key compliance controls.

Meeting our Functional Responsibility: Continuing to Improve Ohio State's Compliance Program

Effective compliance programs ensure that institutions foster a culture that promotes ethical conduct and meet their legal and regulatory responsibilities. The strength of Ohio State's Compliance Program must serve to advance the university's mission, vision, and values, and

support its values-driven and engaged leaders. Our strategic efforts must ensure the continued evolution of this foundation.

Ohio State’s Compliance Program rests on a consistent and simple framework which meets the seven elements for an effective compliance and ethics program in any organization as defined by the [U.S. Sentencing Guidelines](#).



Our efforts over the next five years will focus on continuing improvements in each element of Ohio State’s Compliance Program. Our efforts will drive continued integration of the Compliance Organization, in which units collaborate to meet our common goals.

Ethical Values and Leadership Engagement

Our Compliance Organization seeks to facilitate strong, ethical leadership. We will continue to assist university leaders advance the Shared Values Initiative. One key outcome of the initiative has been developing a new set of Ohio State core values to complement our university vision and mission. These Shared Values reflect our commitments as a university community and are accompanied by principles and behaviors that illustrate how we can live our values every day at Ohio State.

Ohio State's Compliance Organization will help operationalize the Shared Values into our daily work that touches students, faculty, and staff. Using the Leader Guide, we will focus on the four domains of action – explore, communicate, reinforce, and measure & share. At the same time, we will help provide operational counsel, process expertise, and a focus on governance to streamline and accelerate decision making with university leadership. We also will continue to support colleges and units as they work to embed values in ongoing operations and planning.

Risk Assessment and Abatement

The Compliance Organization will continue to facilitate the University Integrity and Compliance Council (UICC), which oversees Ohio State's compliance program by providing permanent, global, and proactive oversight of risk and compliance issues. In addition, we will continue to support compliance governance committees and processes in key units. The UICC and these governance committees and processes oversee the university's integrity culture and ensure elevation, mitigation, and accountability of key compliance issues; support alignment of compliance approaches across the university; and facilitate reporting to appropriate Committees of the Board of Trustees.

The capabilities of the Compliance Organization have grown to the extent that it is now capable of developing data driven risk assessment processes, leveraging existing business operations data, and seeking out pre-emptive opportunities for regulator engagement. This will require refinement of compliance testing scoping, in alignment with unit and internal audit monitoring, as well as external audits, and increased focus on capitalizing process efficiencies, such as use of the GRC tool, to increase cross-organizational collaborations and training. OUCI will continue to support unit-level governance and will provide the UICC with regular reports on compliance risks and issues from members of the university's Compliance Organization. We will also continue to integrate the UICC's focus on compliance risks with the university's Risk Management Committee and continue collaborations with Risk Management and Internal Audit to ensure alignment of assurance functions.

Policies and Training

OUCI will continue to optimize the university's policy process, while ensuring robust feedback and participation from stakeholders. The Compliance Organization will continue to consolidate overlapping policy expectations to help drive greater efficiencies for faculty and staff. We will continue to work with partners to reduce any barriers presented by

specific policies that might unnecessarily impede progress towards the university's strategic objectives or service to its patients, students, faculty, and staff.

The Compliance Organization will improve and expand proactive education and prevention efforts to help mitigate legal, regulatory, and reputational risks. Through the Enterprise Training Governance Committee, Compliance will engage with partners to advance improved governance for assignment of training. We will advocate for all units to have the support and resources needed to ensure digital accessibility. We will develop a sustainable process to ensure compliance with Title VI Limited English Proficiency (LEP) requirements and to review and provide for requests for translation services.

Operational Controls

OUCI will focus on improving operational efficiencies to save colleagues' time and maximize limited resources. We will build and expand process efficiency to optimize every aspect of our compliance work. We will combine control requirements where feasible to achieve regulatory compliance and operational simplicity. We will seek to leverage the Governance, Risk, and Compliance (GRC) toolset implemented by the Wexner Medical Center Office of Compliance and Integrity across the wider Compliance Organization.

Testing and Monitoring

OUCI will work with the Office of Risk Management and Internal Audit to optimize the university's strategy to test and monitor risk mitigation efforts. We will focus on assessing whether limited resources are deployed to advance strategic priorities through risk mitigation. We will assess the effectiveness of remediation efforts committed to following significant regulatory actions.

Issue Response and Reporting

The Compliance Organization will improve the university's concern reporting environment by advancing our investigations capacities and combatting retaliation. We will identify and seek appropriate staffing levels for key risk areas across the Compliance Organization, including sustainable caseloads for investigators and intake coordinators. We will create cross-functional teams to best manage large regulatory actions efficiently. We will provide actionable analytics to assist in effective decision-making. We will expand tailored reporting and annual compliance reports to assist leadership in guiding the breadth of the university's compliance programs.

Operational Simplification and Efficiency

The Compliance Organization will maintain its lean staffing approach while continuing to focus on risk assessment and prioritization. In addition, we will continue our focus on building and deploying operational excellence and project management expertise across the Compliance Organization, and ensure risks are appropriately assessed, prioritized, and mitigated. We will adopt agile operating models to break down silos with different

departments, simplify processes for faculty, students, and staff, and devote limited resources to highest-value creating and value-protecting opportunities. We will continue to assess staffing needs across the Compliance Organization and make needed budget requests to ensure that Ohio State continues to meet fundamental compliance responsibilities. We will also develop annual Simplification and Efficiency plans to identify opportunities and capture progress.

Organizational Strength and Resiliency

We are only as good as our team. The Compliance Organization’s ability to support the university’s continuing operations and future aspirations depends on individuals who deliver compliance expertise and solve problems every day. To support each team member, we will continue to advance the Compliance Career Framework to help the career progression of individuals working in all areas of compliance, and to support compliance teams by providing a common structure to identify shared and complementary strengths. We will leverage the Career Framework to help all members of the Compliance Organization reinforce and extend the compliance program and advance the university’s mission. We will explore ways to create “compliance pods” to help cross-train colleagues across wide-ranging subject matter in the Compliance Organization. We will ensure our existing strong focus on diversity and innovation, and on inclusion and equity, continues to improve. Finally, we will continue to develop collaborative opportunities that reinforce our commitment to making the Compliance Organization a fun and supportive place to work.

Advancing the University’s Strategic Initiatives

The purpose of our annual Compliance Report, Assess, and Planning (RAP) process is to ensure alignment of the efforts of the Compliance Organization with the strategic initiatives and priorities of the university. The RAP process enables us to consider how annual plans for individuals, units, and the wider university connect with this Strategic Plan and adjust these priorities as needed. While continuing to support Shared Values and ensure compliance through our Compliance Program, the Compliance Organization also will provide additional support for the university’s strategic plan as outlined in **Appendix A**.

Tracking Our Performance

We will leverage two main tools to track our performance in meeting this Strategic Plan’s goals and objectives.

First, we will continue our annual Report, Assess, and Plan process for the Compliance Organization, which will now integrate efficiency measures.

Second, we will implement biannual program assessment reviews to assess the maturity of key components of our compliance framework and program. We will share the program assessment methodology with partners to extend the reach of these reviews beyond the program’s core elements.

We will report progress regularly to the University Integrity and Compliance Council and to the Board of Trustees Legal, Risk, and Compliance Committee.

Appendix A

Advancing the University's Strategic Initiatives

While continuing to support shared values and ensure compliance through our Compliance Program, the Compliance Organization also will provide additional support for the university's strategic plan. Identified below are key compliance initiatives, organized under the Outcomes, Core Objectives, and Institutional Capacity of Ohio State's current strategy map (see attached).

Outcomes

Academic Excellence

01. Educate and graduate students well equipped to compete in an open, diverse, and global society.

- Educate students about values, compliance, and ethics within higher education to facilitate career opportunities in any industry.

Research Excellence

02. Achieve transformative impact of OSU research and innovation to better society and serve our community.

- Facilitate the transformative impact of research and innovation by proactively identifying and mitigating potential compliance challenges.

Operational Excellence

03. Achieve excellence in our resource management revenue generation and advancement for fueling our vision and mission.

- Enable partners and stakeholders to better leverage resources to achieve our vision and mission while meeting regulatory requirements.

Service Excellence

04. Ensure OSU is accessible, innovative and serves the Ohio community.

- Continue to innovate our compliance program, make it more accessible to the university community, and seek ways to serve other institutions across Ohio.

Talent and Culture Excellence

05. Maximize individual potential and cultivate an inclusive culture.

- Hire and retain top talent, while building inclusive and supportive teams.

Core Objectives

Academic Excellence

A1. Create and implement a strategy for inclusive faculty retention and hiring.

- Facilitate inclusive faculty retention and hiring by advancing the Shared Values and optimizing the Office of Institutional Equity's proactive education and training efforts.

A2. Achieve inclusive transformational learning experiences.

- Optimize our Compliance Externship opportunities, which engage 30-50 students annually with hands-on learning experiences across the university.

A3. Enhance student life success.

- Help provide a safe environment for students to thrive by advancing the Shared Values and a healthy concern reporting environment.

Research, Entrepreneurship and Partnership Excellence

R1. Grow large scale, interdisciplinary research centers.

- Provide compliance support necessary to grow interdisciplinary research centers.

R2. Grow research expenditures.

- Help maximize funding opportunities for researchers by preventing and addressing compliance concerns from funding agencies.

R3. Expand research infrastructure.

- Provide compliance support necessary to expand research infrastructure and seek increased administration resources to complement the expansion in research.

R4. Expand strategic corporate partnerships and entrepreneurship.

- Provide compliance support necessary to expand strategic corporate partnerships and entrepreneurship.

Service Excellence

S1. Provide quality health care in our hospitals and clinics.

- Continue to optimize our Medical Center compliance work to advance the delivery of quality health care in our hospitals and clinics.

S2. Make education accessible and affordable.

- Continue to optimize Student Financial Aid compliance to advance accessibility and affordability in support of the Scarlet & Gray Advantage and other initiatives.

S3. Expand extension services.

- Help expand extension services by facilitating the implementation of the Shared Values.

Institutional Capacity

People

IC2. Achieve Employer of Choice status.

- Continue to build an integrity culture by operationalizing the Shared Values, expanding the Compliance Career Framework, and bolstering a healthy concern reporting environment through effective investigations.

IC3. Align Staff Support Ratios.

- Continue to address growing regulatory demands with lean resources and creative staffing.

Resources

IC4. Align budget to strategy.

- Leverage our annual compliance risk assessment process to target limited resources to areas of strategic focus.

IC5. Implement strategy management process.

- Optimize our compliance program to enable effective leadership engagement on areas of strategic focus.

Infrastructure

IC6. Build a vibrant innovation district.

- Provide compliance support for the Innovation District regarding regulatory requirements, confidentiality, and conflicts of interest.

IC7. Optimize and assess IT infrastructure.

- Continue to optimize our Information Security and Privacy work to bolster IT infrastructure, support research demands, and unleash the potential of data across the university.

IC8. Strengthen Physical Infrastructure.

- Provide appropriate safety support to physical infrastructure.