Compliance and Integrity Program

UNCG Board of Trustees | Compliance, Audit, Risk and Legal Committee
September 24, 2019

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Overview

I. Compliance Programs in Higher Education
II. UNCG Compliance Program
III. Elements of an Effective Compliance Program
IV. Next Steps
Compliance Programs in Higher Education
Compliance in Higher Education

• Compliance is not new; always managed compliance obligations

• However, external rules, regulations, and policies have increased in recent years
Compliance Programs in Higher Education

• Historically, compliance has been decentralized (silos)

• A compliance program provides assurance to the University governance and management structures that compliance obligations are being managed and monitored

• Assists University leaders in fulfilling their fiduciary responsibilities
UNCG Compliance and Integrity Program
Overarching Goals

- To create a culture in which compliance and ethical decision making are second nature

“Create awareness by people that they need to be in compliance and the expectation is that they will be in compliance.”

http://agb.org/trusteeship/2013/7/welcome-compliance-u-boards-role-regulatory-era
What is the UNCG Compliance and Integrity Program ("CIP")?

The CIP is

• An initiative to promote awareness, provide support, and conduct monitoring of the University's compliance with laws, regulations, and policies

The CIP is NOT

• An enforcement mechanism
• A barrier to strategic initiatives
• Responsible for handling internal investigations or internal audits
What is the CIP? (continued)

A commitment to operating **ethically**, with **integrity**, and in **compliance** with all applicable laws, regulations, and policies in furtherance of our mission for the benefit of the students and community we serve.
Purpose of the CIP

- **Identify compliance risks** that impact the University.
- **Understand** the nature of **compliance risks** and ensure measures are in place to proactively **mitigate** them.
- **Foster a culture of integrity and compliance** that is central to all the institution’s operations and activities.
- **Provide a resource** to those charged with day-to-day compliance activities.
Guidelines

- Federal Guidelines for Building and Evaluating Compliance Programs
  - Evaluation of Corporate Compliance Programs, U.S. Department of Justice, Criminal Division
- International Organization for Standardization, ISO 19600 Compliance Management Systems Guidelines
Elements of an Effective Compliance Program
Elements of an Effective Compliance Program, Summarized

• **Oversight** by high-level personnel
• **Due care** in delegating substantial discretionary authority
• **Effective communication** to all levels of employees
• Reasonable steps to achieve compliance, which include systems for **monitoring**, auditing, and **reporting** suspected wrongdoing without fear of reprisal
• Consistent enforcement of compliance standards including **disciplinary mechanisms**
• Reasonable steps to **respond** to and **prevent** further similar offenses upon detection of a violation
Elements of the CIP

• Culture
• Oversight
• Risk assessment
• Written policies and procedures, including disciplinary guidelines
• Monitoring, reporting, and response
• Prevention through training and education
• Communication
• Continuous improvement
# Tentative Work Plan 2019–20

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<tr>
<th>Months</th>
<th>Activities</th>
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<tr>
<td>September–December 2019</td>
<td>- Define program structure and first-year CIP work plan</td>
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<td>- Identify and meet with Compliance Partners to conduct initial compliance risk inventory</td>
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<td>- Enhance University Policy Manual website</td>
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<td>January–March 2020</td>
<td>- Develop compliance matrix</td>
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<td>- Enhance University Compliance website</td>
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<tr>
<td>April – August 2020</td>
<td>- Prepare compliance risk assessment criteria and process</td>
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<td>- Training sessions with Compliance Partners on compliance risk assessment criteria and process</td>
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<td>Fall 2020</td>
<td>- Review 2019–20 CIP work plan and develop work plan for 2020–21</td>
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<td>- Conduct compliance risk assessment</td>
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Thank you

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