# Compliance Program Action Plan Worksheet

*(# in parentheses below correspond to compliance program element/activity numbers in the table below)*

|  |
| --- |
| **Law/Regulation (Title and/or Citation) (2):** |
| **What law/reg/rule do we need to comply with? (2)** | **Action Plan (3-5)** | **Responsible Person(s)(3)** | **Due Date** | **Notes** |
|  | Design: Implement: |  |  |  |
|  | Design: Implement: |  |  |  |
|  | Design: Implement: |  |  |  |
| Etc etc etc |  |  |  |  |

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**Plan to monitor this implementation (6):**

**Plan to audit compliance with this regulation (6):**

**Plan to investigate alleged non-compliance with policies related to this regulation (7):**

**Plan to enforce non-compliance with policies related to this regulation (8):**

**Plan to improve this compliance program, as needed (9; either via a post-mortem or a program review):**

**Table 1: Summary of the Nine Compliance Program Activities/Elements**[[1]](#footnote-2)

|  |  |
| --- | --- |
| **Activity/Element** | **Summary** |
| **Prevent, Find, and Fix** |
|  | **Leadership and Ethical Culture****(Element)** | The U.S. Sentencing Guidelines (FSG) state, “The organization’s governing authority shall be knowledgeable about the content and operation of the compliance and ethics program” and “an organization shall…promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law.” Federal Energy Regulatory Commission (FERC) guidelines on compliance state, “Developing a strong and continuing culture of compliance is a critical task…the responsibility for a culture of compliance rests squarely on the shoulders of senior management.” The Board, System, institutional, and other campus leaders should promote a culture of compliance where obeying policies, laws, and regulations is expected as part of the job. Leadership oversight not only sets the tone from the top but also establishes a culture where compliance and ethics are indisputable.  |
| **Prevent (Activities)** |
|  | **Identify Requirements/ Assess Risk** | A documented process shall be established and utilized to identify all compliance requirements applicable to the organization and to evaluate the risk these compliance requirements pose to the organization’s success. |
|  | **Establish Compliance Organization** | Once compliance risks are identified, compliance responsibility shall be assigned to appropriate individuals, committees, functions, coordinators, etc. Designing and implementing an effective organizational structure is essential for an effective program. It is important to identify compliance leads for each regulatory area as these personnel will execute the day-to-day compliance operations of that compliance program. These executives and managers should also have the authority, budget, and resources necessary to achieve compliance in their respective areas.  |
|  | **Document Standards, Policies, and Procedures** | Fundamental to all effective compliance and ethics programs are documented standards, policies, and procedures written and designed by those with compliance responsibilities (Activity 3) and based on risks and requirements (Activity 2). This documentation should be accurate, relevant, current, and accessible to all organization employees and agents. |
|  | **Communicate**, **Promote, and Train** | Compliance communication (which includes training) is a significant component of all effective compliance and ethics programs. All employees and agents of an organization, from members down to third- party contractors, must know what is required of them via policy and procedure and if necessary, be trained on the specific elements of compliance that affect them. Together, communicate, promote, and train not only works to shape a cohesive organizational culture but also propels growth by ensuring that messages are heard, compliance initiatives are recognized, and skills are consistently developed. Communication, promotion, and training fortifies the foundation needed for success. |
| **Find and Fix (Activities)** |
|  | **Monitor, Audit, and Report** | An important component of effective compliance and ethics programs is monitoring. This entails the regular assessment of the compliance readiness of an organization. In addition, an audit function (internal or external) should conduct audits of overall compliance and ethics program effectiveness and audits of specific regulatory areas. In all cases, results should be reported to appropriate leaders. |
|  | **Investigate and Report** | When significant compliance incidents occur, they must be investigated. Thorough investigations can identify root causes of issues, assess risks, and assist in the formulation of solutions. It is important that the reporting of investigations is transparent and comprehensive. Clear and accurate investigative reports aid in the understanding of issues and provide insights for informed decision making.  |
|  | **Enforce and Remediate** | Enforcement is the backbone of an effective compliance and ethics program, providing the necessary teeth to policies and regulations. Enforcement ensures accountability and adherence to established standards, policies, and procedures. By consistently applying consequences for non-compliance, and remediating when required and/or necessary, the program reinforces the importance of compliant and ethical behavior.  |
|  | **Evaluate and Continuously Improve** | Compliance and ethics programs should be designed to provide tools and resources to managers and employees so they can make their operations incrementally better at ensuring achievement of the core values and standards represented by laws and regulations. Regular evaluations allow organizations to assess the effectiveness of their compliance measures, identify emerging risks, and gauge the efficiency of existing processes. This step fosters a resilient and adaptable compliance program that can improve and navigate the complexities of an ever-changing regulatory environment.  |

1. Adapted from Deena King, *Compliance in One Page, Second Edition*, (Garland, TX: Author, 2020), 7. All Rights Reserved. Used with permission. [↑](#footnote-ref-2)