# [Subject Area Goes Here] Basic Compliance Program Template #1

LOGO GOES HERE

[Note: Fulfills the Requirements of “Program Design.” This is a template. Items can be modified, added, and/or deleted as needed.]

## Purpose

[Insert a summary of purpose of this compliance plan.]

## Background

[If there is some background, include that here—a summary.]

## Compliance Program Data

Date compliance program is to be implemented (*or other data as needed*):

## Responsible Personnel

Compliance leader(s) overseeing this program, including titles:

* Vice president/chancellor over this function:
* Compliance leader:
* [leaders in other areas to coordinate with]:
* [others as needed]

## Legal Requirements

Compliance area [HIPAA, OSHA, FERPA, etc.]:

Key compliance obligations (such as policies, procedures, practices, training, reporting, etc. that the regulation requires):

* .
* .
* .

Source of compliance obligations (statute/regulation/other):

* .
* .
* .

Responsible federal/state agency or other body [such as NCAA]:

## Risk(s) to [THE INSTITUTION]

List the potential risks if [THE INSTITUTION] is out of compliance (financial, reputation, assets, political, etc.):

List the other campus offices affected/coordination (i.e. the committee/team):

* .
* .
* .

## Program Review

Date this program will be reviewed for effectiveness (whether mandated by law or institutional practice—the recommendation is annually or bi-annually):

# The Compliance Program

## Prevent, Find, and Fix, Part 1

### Section 1: Leadership/ Ethical Culture

* *Leadership*: Regularly provide written overviews and other documentation of the compliance program to our vice president/chancellor to get feedback, support, and approval.
* *Leadership*: A quarterly report/discussion with our vice president/chancellor improves compliance buy-in and leadership.
* *Ethical Culture*: The bullet items in sections 5-8 below communicate the importance of compliance and ethics and help enhance the compliance culture.
* As necessary, additional changes will be made in steps 3-8 below to improve leadership and culture in this compliance area.
* [include additional actions, as needed]

## Prevent

### Section 2: Identify Requirements/Assess Risk

* Once a year, the compliance leader will attend a professional conference that includes a mandatory track on changes to existing regulations and a briefing on new regulations that impact his/her area.
* The compliance leader will arrange to receive regular emails from a professional organization that will update him/her on changes to existing regulation and briefings on new regulations.
* The compliance leader will use the above information to establish and maintain a list or spreadsheet of, at minimum, a summary of all laws and regulations that impact his/her area.
* Once a year the compliance leader will meet with staff and other advisors to review compliance requirements and determine which requirements might bring added risk to their operations or the institution. If issues are identified, the department will use sections 3-10 below to design and implement plans to address these compliance risks.
* [include additional actions, as needed]

### *Section 3: Establish Compliance Organization*

* *Establish*: If compliance responsibilities have not been assigned, the compliance leader will design an org chart and create a list of roles, job descriptions, and/or committees who will be responsible and accountable for subject-specific compliance responsibilities. This organization will be reviewed annually and changes will be made as necessary.
* *Modify*: If compliance responsibilities and accountabilities have been assigned, as significant changes are made in compliance requirements, the compliance leader will review the compliance organization and make changes as necessary.
* *Modify*: The compliance leader will annually review the organization, including roles and responsibilities, job descriptions, committees, etc. and make changes as necessary
* [include additional actions, as needed]

### *Section 4: Standards, Policies, and Procedures*

* *Establish*: As new compliance requirements are identified, the compliance leader will work with staff, the general counsel, the Office of Compliance and others to design standards, policies, and procedures that address these requirements (usually identified in Section 1 above).
* *Modify*: As changes in compliance requirements are identified (usually via Section 1 above), the compliance leader will work with staff, the general counsel, the Office of Compliance and others to update/modify standards, policies, and procedures that address these changes (usually identified in Section 1 above).
* *Note*: This step includes designing or re-designing one or more of the eight sections of this compliance plan.
* [include additional actions, as needed]

### *Section 5: Communicate, Promote, and Train*

* When a new employee is hired, they will be required to take a compliance training module before they can begin doing their job.
* Refresher training will be required once every year. Training logs will be kept.
* Posters that communicate information and expectations will be displayed in well-trafficked areas around the office and the campus.
* Employees with particularly sensitive compliance requirements will be given “cheat sheets” to use to ensure they follow proper protocols.
* When necessary, at “all hands” meetings, the compliance leader will provide guidance on compliance issues and follow this up with a summary email to all staff.
* *Promote*: When relevant, the compliance leader will go on the road to promote compliance in their area at staff meetings, leadership meetings, and other events.
* *Promote*: During at least 2-3 “all hands” meetings each year, the compliance leader will promote “ethics and compliance” and its importance to department and university operations.
* [include additional actions, as needed]

## Find and Fix

### *Section 6: Monitor, Audit, and Report*

* *Monitor/Report*: For sensitive issues, the compliance leader will receive daily/weekly/monthly reports on \_\_\_\_\_\_\_\_\_\_\_, review them, and make changes in department processes, as needed.
* *Audit/Report*: The compliance leader will oversee a department self-audit on a regular basis (at least annually) and act on gaps to implement changes, as needed.
* *Audit/Report*: If the department is subject to an internal audit every [1-3] years, leaders will be cooperative during these audits and, after the reports are received, implement all reasonable recommended changes.
* *Reporting to Senior Management*: Quarterly the compliance leader will provide a compliance program status report to the vice president over our area.
* *Self -Reporting*: If a compliance failure is discovered, if regulation requires self-reporting, the failure will be properly reported to the appropriate agency.
* *Compliance Program Self-Assessment*: The compliance leader will self-assess this program every three years.
* [include additional actions, as needed]

### *Section 7: Investigate and Report*

* As compliance failures are reported or uncovered, they will be properly investigated with appropriate reporting.
* If violations are identified, actions will be taken to close gaps and enforce policy, as needed.

### *Section 8: Enforce and Remediate*

* When violations of any of the above standards, policies, or procedures are identified or surface, appropriate action will be taken using University policies and procedures for investigation and adjudication.
* If discipline is required, it will be handled per University policy.
* If required, appropriate remediation will occur.
* [include additional actions, as needed]

### *Section 9: Evaluate and Continuously Improve*

* As problems are identified in sections 1 through 8 above and 10 below, either via a post-mortem or a program review, the compliance leader will make changes to this program, including relevant policies, procedures, communication, and training. This will create a “continuous improvement” compliance culture in the department.
* [include additional actions, as needed]

## Prevent, Find, and Fix, Part 2

### *Section 10: Implement*

* A separate implementation plan will be created and completed.
* Each bullet item in this compliance plan will be implemented as designed.
* [include additional actions, as needed]

