# [Subject Area Goes Here] Compliance Program Template #2

LOGO GOES HERE

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

## Compliance Leader and Responsible VP: [insert data here]

## Compliance Area: [insert data here]

## Compliance Program Name: [insert data here]

## Date: [insert data here]

## Next Audit Date: [insert data here]

## High-level Overview of this Compliance Area/Program:\*

General compliance obligations of this particular program:

[insert data here]

Primary legal sources of these obligations:

Federal: [insert data here]

State: [insert data here]

Agencies that oversee these obligations:

Federal: [insert data here]

State: [insert data here]

What are the risks [the college/university] is exposed to in this compliance area?

[insert data here]

Other campus areas that have similar compliance responsibilities:

[insert data here]

\*Note: The overall purpose of this compliance program is to meet the following requirement as it relates to this particular function at [the college/university], i.e. that this, "compliance and ethics program [is] reasonably designed...so that the program is generally effective in preventing and detecting criminal conduct" (USSG §8B2.1.a.2).

# The Compliance Program

## Purpose

[Insert a summary of purpose here]

## Background, Terms, Roles

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

## Prevent, Find, and Fix, Part 1

### Section 1: Leadership/Ethical Culture

#### Leadership:

[Insert a summary of the actions that will be taken to ensure adequate executive leadership support for this program.]

#### Ethical Culture:

[Insert a summary of the actions that will be taken ensure the compliance and ethical culture required to support this program is in place and being improved as needed.]

## Prevent

### Section 2: Identify Requirements/Assess Risk

#### Identify Compliance Requirements:

[Insert a summary of how you and/or your team stay up-to-date on federal, state, local, and other requirements.]

#### Assess Risk:

[Ty Insert pe a summary of how you and/or your team evaluate the risk these requirements bring to [the system/college/university] faculty, staff, students, and guests.]

### Section 3: Establish Compliance Organization

[Insert a summary of who owns and is responsible to address these risks and requirements—who will lead, who will be on the committee, who will provide oversight, etc.]

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

[Insert a summary of how you and/or your team evaluate the adequacy of policies and procedures related to this area and ensure policies/procedures are created/updated/retired.]

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

#### Communication and Promotion Plan:

[Insert a summary of the communications required to support this program, including frequency. Include ways to periodically and specifically promote compliance in this area as necessary to all relevant personnel.]

#### Training Plan:

[Insert a summary of the training required to support this program, including frequency.]

## Find and Fix

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

#### Monitor and Report

[Insert a summary of the actions that will be taken to monitor to ensure this program is being used as outlined and to regularly monitor the subject activity for deviations/violations.]

#### Audit and Report

[Insert a summary of the actions that will be taken to occasionally audit the subject activity of this program for deviations/violations.]

#### Regulatory Reporting

[Insert a summary of the actions that will be taken to self-report violations or make regular required reports to external regulators, if and or when it is needed.]

#### Executive/Board/External Reporting

[Insert a summary of the actions that will be taken to report results, etc. to management, executive leadership, and the System, as needed.]

#### Evaluating This Compliance Program

[Insert a summary of the actions that will be taken to evaluate this compliance program effectiveness every few years.]

### Section 7: Investigate and Report

[Insert a summary of the investigative actions that will be taken when an alleged violation is reported, including how the investigation results will be reported and to whom.]

### Section 8: Enforce and Remediate

#### Enforcement:

[Insert a summary of the actions that will be taken to enforce policy when violations are substantiated in Section 7, including applying appropriate disciple per University policy.]

#### Remediation:

[Insert a summary of the actions that will be taken to remediate a violation, as needed, when a violation is substantiated in Section 7.]

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

[Insert a summary of the actions that will be taken to improve this program when gaps are identified, either via a post-mortem or a program review, in sections 1 through 8 above and 10 below.]

## Prevent, Find, and Fix, Part 2

### Section 10 – Implement

#### Implementation Strategy:

[Insert a summary of the actions that will be taken to implement this program, including frequency.]

#### Implementation Documentation:

[Insert a summary of the plans, documents, projects that were used to implement this program.]

