



SUS Compliance Program Status Checklist

Instructions: For the four area tables below, please complete the Description and Progress Indicator columns for each Regulation Component, which align with Board of Governors Regulation 4.003 (effective November 3, 2016). Then complete the Program Status Summary table immediately below.






Return completed checklists to BOGInspectorGeneral@flbog.edu.


For assistance, please contact the Board of Governors Office of Inspector General and Director of Compliance at joseph.maleszewski@flbog.edu or 850-245-9247.

Program Status Summary (January 2017)						
		Completed	In Process			Not Begun
Area	Regulation Components	✓	Good Progress ●	Slow Progress ●	Poor Progress ●	N/B
A - University-wide Compliance Program	5	0	0	0	0	0
B - Program Plan	5	0	0	0	0	0
C - BOT Committee	4	0	0	0	0	0
D - Chief Compliance Officer	5	0	0	0	0	0
TOTAL	19	0	0	0	0	0

Legend:


- ✓ Indicates that the university president and board chair assert that the regulation components making up this area are fully implemented in accordance with Board of Governors Regulation 4.003.
- Indicates that the university president and board chair anticipate regulation components making up this area to be completed by November 3, 2017.
- Indicates that the university president and board chair anticipate regulation components making up this area to be completed by November 3, 2018 (completion of items beyond this date constitute non-compliance with Board of Governors Regulation 4.003).
- Indicates that the university president and board chair anticipate regulation components making up this area to be completed by May 3, 2019 (six months beyond the period established in Board of Governors Regulation 4.003).
- N/B Indicates that the university president and board chair acknowledge that the university has not begun implementing the regulation components making up this area. The "N/B" indicator should be used in conjunction with one of the green/amber/red light indicators to communicate anticipated completion periods for items not yet begun.






Area A - University-wide Compliance Program		
Regulation Component	Description	Progress Indicator
A1 - University-wide Compliance Program implemented consistent with Code of Ethics for Public Officers and Employees (Part III, Chapter 112, F.S.) and the Federal Sentencing Guidelines Manual, Chapter 8, Part B [4.003(1) & (2)(b)]	January 2017: Description in narrative format	 N/B
A2 - CCO reports to the BOT at least annually on Program effectiveness (copy to BOG) [4.003(7)(g) 8.]	January 2017: Description in narrative format	 N/B
A3 - External Program design and effectiveness review every 5-years (copy to BOG) [4.003(7)(c)]	January 2017: Description in narrative format	 N/B
A4 - Process established for detecting and preventing non-compliance, unethical behavior, or criminal conduct [4.003(7)(h)]	January 2017: Description in narrative format	 N/B
A5 - Due diligence steps for not including individuals who have engaged in conduct not consistent with an effective Program [4.003(8)]	January 2017: Description in narrative format	 N/B

Area B - Program Plan		
Regulation Component	Description	Progress Indicator
B1 - Compliance and Ethics Program Plan approved by BOT (copy to BOG) [4.003(7)(a)]	January 2017: Description in narrative format	 N/B

B2 - Plan provides for compliance training for university employees and BOT members [4.003(7)(b)]	January 2017: Description in narrative format	✓ ● ● ● N/B
B3 - Designated compliance officers (e.g., Title IX, Athletics, Research, etc.) as either direct reports or dotted-line reports (specify which) [4.003(7)(d)]	January 2017: Description in narrative format	✓ ● ● ● N/B
B4 - Reporting mechanism (e.g., Hotline) for potential/actual violations and provides protection for reporting individuals from retaliation [4.003(7)(e) & (f)]	January 2017: Description in narrative format	✓ ● ● ● N/B
B5 - Promoting and enforcing the Program through incentives and disciplinary measures [4.003(7)(g)9.]	January 2017: Description in narrative format	✓ ● ● ● N/B

Area C - BOT Committee		
Regulation Component	Description	Progress Indicator
C1 - BOT Committee provides oversight to Compliance and Ethics Program [4.003(3)]	January 2017: Description in narrative format	✓ ● ● ● N/B
C2 - BOT Audit and Compliance Committee Charter [4.003(3)]	January 2017: Description in narrative format	✓ ● ● ● N/B
C3 - Routine CCO meetings with BOT Committee - please describe the nature and frequency of meetings (e.g., semi-annually, quarterly, monthly, etc.) [4.003(7)(a) & 7(g)(3)]	January 2017: Description in narrative format	✓ ● ● ● N/B
C4 - Routine CCO meetings	January 2017:	✓

<p>with President – please describe nature and frequency of meetings (e.g., semi-annually, quarterly, monthly, etc.) or whether the CCO participates in other regularly held direct reports or leadership meetings [4.003(7)(a) & 7(g)(3)]</p>	<p>Description in narrative format</p>	<p>  N/B </p>
---	--	--

Area D – Chief Compliance Officer		
Regulation Component	Description	Progress Indicator
<p>D1 – Appointed Chief Compliance Officer (CCO) [4.003(4)]</p>	<p>January 2017: Description in narrative format</p>	<p>  N/B </p>
<p>D2 – CCO reports functionally to the Board and administratively to the President [4.003(5)]</p>	<p>January 2017: Description in narrative format</p>	<p>  N/B </p>
<p>D3 – Compliance Office Charter [4.003(6)]</p>	<p>January 2017: Description in narrative format</p>	<p>  N/B </p>
<p>D4 – CCO independence, objectivity, and access, (provide details of resolution of barriers [4.003(7)(g)5 & (7)(g)7]</p>	<p>January 2017: Description in narrative format</p>	<p>  N/B </p>
<p>D5- CCO authority and resources (provide details of both staffing and budget) [4.003(7)(g)(2)]</p>	<p>January 2017: Description in narrative format</p>	<p>  N/B </p>

I certify that all information provided is true and correct to the best of my knowledge.

Certification: _____ Date _____
President

I certify that all information provided is true and correct to the best of my knowledge.

Certification: _____ Date _____
Board of Trustees Chair