



Prairie View A&M University

- Second oldest public institution of higher education in Texas – established in 1876
- An HBCU
- Part of the Texas A&M University System
- Over 9,000 students
- Over 1,200 employees



Course Objectives

- Why “building a culture of compliance” was the approach taken to change and improve the university’s overall compliance environment.
- Factors that assisted in successes towards changing the compliance culture and factors that distracted from the university making progress.
- Lessons learned by the Office of University Compliance during the first two years of our “building a culture of compliance” journey.

History of Compliance Program at PVAMU

- Started in early 2000's to address many audit issues
- Was the CFO's eyes and ears
- Investigated hotline reports
- Conducted compliance reviews and made recommendations
- Provided trainings to campus community
- Facilitated the university's policy development process

Compliance Program Required by Policy

In 2012, the A&M System Board of Regents passed an Ethics and Compliance policy that required:

- Each member of the A&M System to establish and maintain an effective compliance program, appoint a compliance officer, implement a compliance plan, and establish a member compliance committee.
- The compliance committee shall meet quarterly to address mitigation of risk, to provide appropriate resources for compliance and to ensure appropriate action for noncompliance issues.

"Building a Culture of Compliance" - Why is that Important?

"Because CULTURE determines what we actually do"

PVAMU has plenty of policies, directives, guidelines, procedures, audits, etc. that tells its employees and students "what to do." The PVAMU culture determines what we "actually do."

When We Started This Journey



What Did We See and Hear About Compliance

- “Because the auditor said so”
- Backlog of outdated rules and university procedures
- Lack of accountability
- Leadership and operational management – not in sync on what is really happening
- Limited communication between divisions
- Avoid change
- Check a box mentality
- Avoid conflict

First Steps in the Journey

- Get university rules and procedures updated and current
- Get outstanding audit recommendations implemented
- Continue to provide training
- Define mission and goals of the office
- Change perception as a secondary audit shop
- Build relationships

Compliance Champion Contest

- Compliance Champion Trophy
- Submit application to Compliance Office
- Application review
- Champion selected and announced to campus community



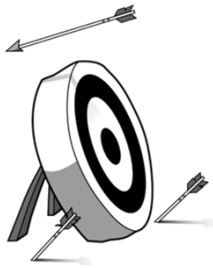
Tone at the Top Shift

- Leadership changes at president and provost positions
- Emphasis on ethics and integrity
- President Executive Committee is the University Compliance Committee
- Emphasis on students and faculty

Policy, Audit and Communication Changes

- University rules and procedures up-to-date and less restrictive
- Follow-up audits resulted in no “repeat findings”
- Subject matter expert list published and communicated to the campus community
- Multiple venues for communicating compliance information – PV Place, faculty folders

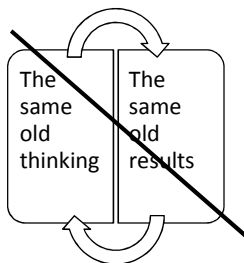
Misteps Along the Way



Where We Still Have Challenges

- Communication issues
- Holding meetings and making decisions without ALL parties present
- Disconnect between upper and middle management
- Lack of ownership/accountability
- Misuse of anonymous hotline reporting system and investigative processes

Where Are We Today



What Are We Doing

- Building relationships and helping to solve problems
- Are consultants instead of auditors
- Keeping compliance issues in the forefront
- Improving the effectiveness of the university compliance committee
- Training employees on why a “culture of compliance” is important

What Are We Doing

- Asking for peer commitment – peers support one another in doing the right thing
- Asking for employees to embed ethical values into their daily activities
- Expect violations to be reported and hold violators accountable
- Recognize and reward those that do the right thing

Where Do We Want to be in the Future



Where Do We Want to be in the Future

- More consistent and defined investigation program
- Better management monitoring processes
- More effective training programs for all compliance areas
- More effective lines of communication
- Stronger accountability with enforcement, discipline and incentives

What Are We Doing To Get There

- Involving the President
- Working on relationships and building trust
- Creating better tools and processes for the campus community
- Developing knowledge and expertise
- Recommending software/technology solutions
- Being more transparent in communications and sharing of information

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