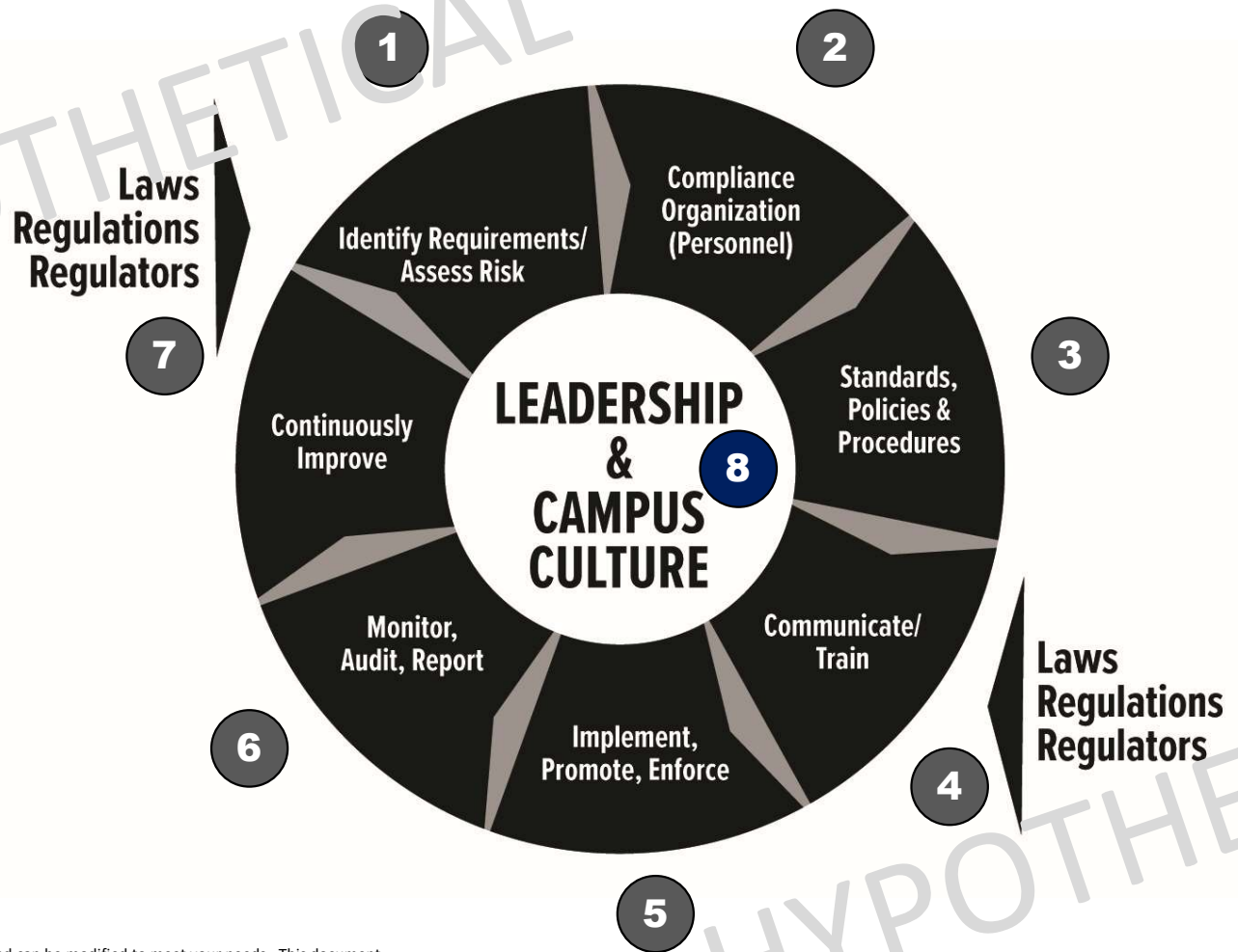


[Org name] Compliance "How": The Model

YOUR LOGO
GOES HERE



Disclaimer: This model is provided as guidance only and can be modified to meet your needs. This document does not guarantee prevention of lawsuits, judgments, or fines and is not a substitute for the advice of an attorney. All information is provided without warranty, express, implied, or otherwise, including as to their legal effect and completeness.

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BEG. DATE – END DATE

YOUR LOGO
GOES HERE

[Org name]
Action Plan
for [time
period]:
Status

1

Identify Requirements/Assess Risk

- Compliance inventory and process to keep it current*
- List of high compliance risks and a process to keep it current
- Projects/programs in place to address these risks
- **Risk Mgt Action Plans**

2

Establish/Modify Organization

- Board/Regent Compliance Committee in place
- Chief Compliance Officer
- **Compliance Leadership Group (mid-level)**
- Network of compliance SMEs
- SME Working Groups, as needed

3

Standards, Policies, and Procedures

- Mission; Value
- Code of Conduct
- **Policies**
- Procedures and SOPs
- SME Compliance Programs
- Processes to create/maintain all of the above

4

Communicate/ Train

- Annual Conference
- **One-on-Ones**
- Online Training
- Websites; Newsletters
- Email blasts
- Processes to create/maintain all of the above

5

Implement, Promote, and Enforce

- **Compliance action plans**
- JDs and annual performance eval include compliance responsibilities
- Visible leadership support
- "Compliance Week"
- Enforcement mechanisms - **Investigations, etc.**

6

Monitor, Audit, and Report

- Hotline Case Management
- Executed Risk Mgt Plans
- Executed Review Plans
- Appropriate reporting to executives and regulators
- **Outside Activity Disclosures**
- Regular compliance program audits/evals

7

Continuous Improvement

- Appropriate changes made when compliance program gaps are identified
- Audit/Review recommendations implemented
- **Staff professional development**

8

Leadership/ Campus Culture

- **Leadership that supports compliance and ethics with necessary resources and decisions**
- A culture that supports compliance and ethics
- Regular Culture Survey

Required Program Activities

Governing Documents:

- System Compliance Charter (pre-existing)
- [Org name] Compliance Charter

Key (bold=on deck to complete):

- Completed
- Partial/In process
- To Do (Gap)

As of [date goes here]