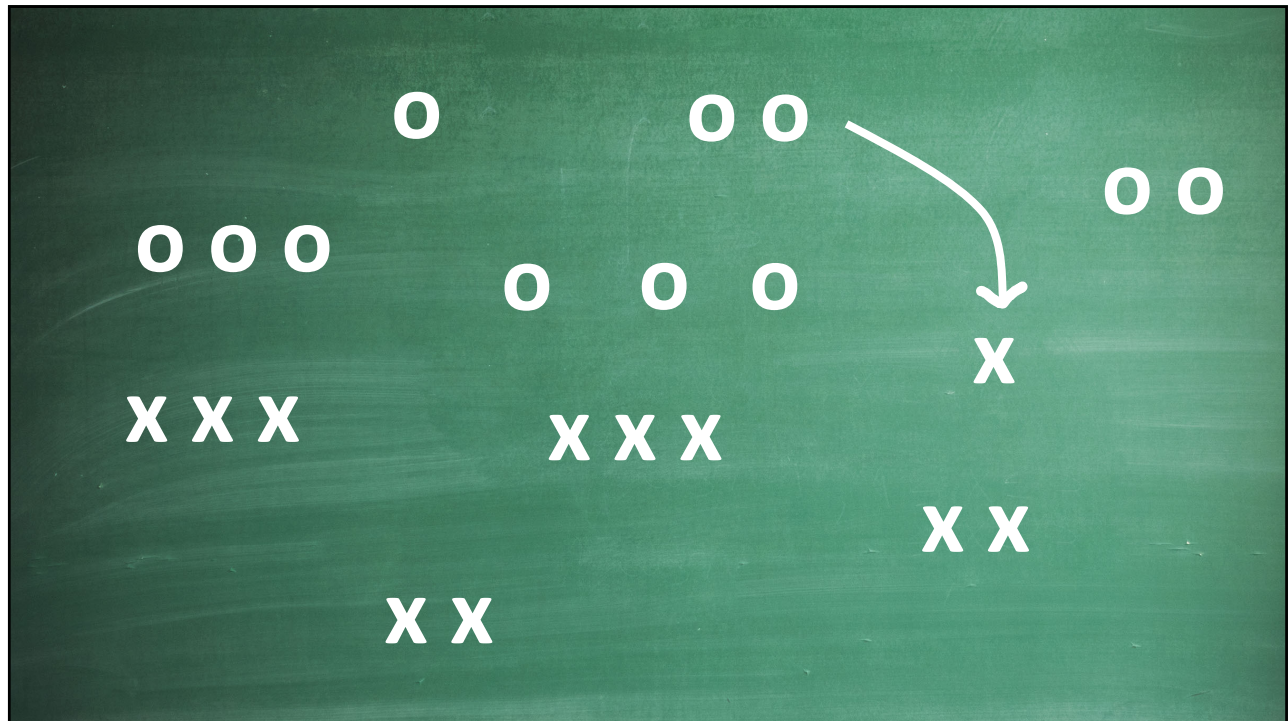


Compliance: What's the Job is it Anyway?

Presented by:
Joshua B. Toas, JD, CCEP, CCEP-I, CHRC, CFE
Chief Compliance Officer & Assistant Secretary

Design by Andrew Kenyon, CCEP, Ethics & Compliance Manager

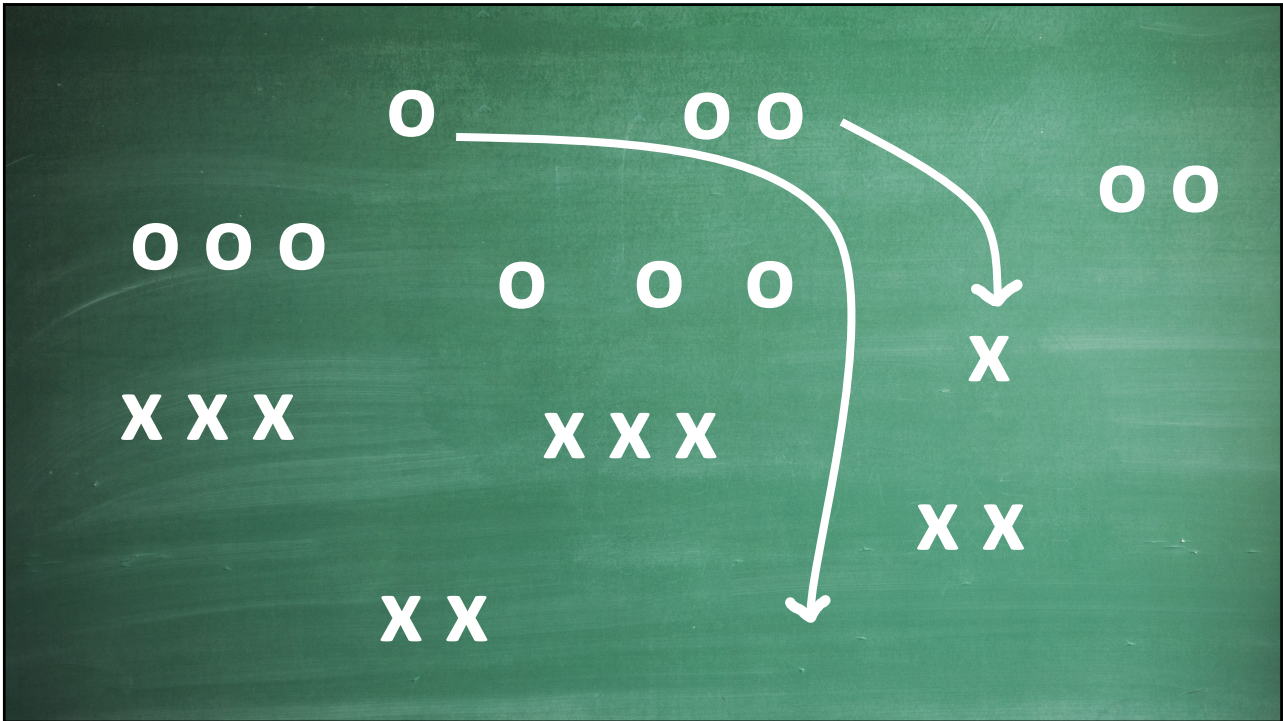
1



2



3



4

The Role of the Compliance Officer

Institutional Needs

Who Does What?

A green chalkboard background with white text and icons. At the top center is the title 'The Role of the Compliance Officer' with a football icon to its left. Below the title, on the left side, is the text 'Institutional Needs' with a football icon to its left. On the right side, below the title, is the text 'Who Does What?' with a football icon to its left.

5

The Role of the Compliance Officer

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The Role of the Compliance Officer

- Federal Sentencing Guidelines

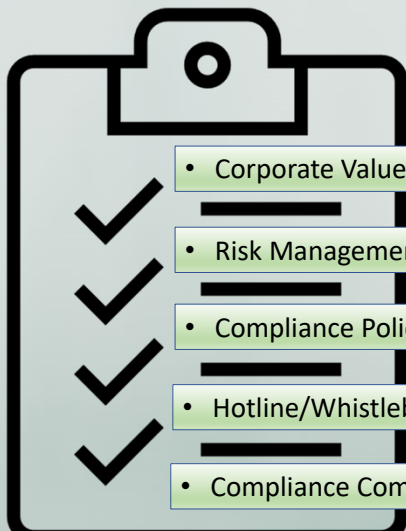
- "High Level personnel . . . Shall ensure that the organization has an effective compliance and ethics program. Specific individual(s) within high-level personnel shall be assigned overall responsibility for the compliance and ethics program."

- Specific individual(s) within the organization shall be delegated day-to-day operational responsibility for the compliance and ethics program. Individual(s) with operational responsibility shall report periodically to high-level personnel



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Corporate wide or entity level compliance officers own:



- Corporate Values and Ethics

- Risk Management and Internal Controls

- Compliance Policies

- Hotline/Whistleblower Management

- Compliance Communication, Learning and Development



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The Role of the Compliance Officer

- What about Policy Administration?

“Policy on Policies”



9

The Role of the Compliance Officer

- Strategic
 - Develop , Implement , Monitor , Modify , and Manage the Compliance Program

- Ensure the elements of an effective compliance program are in place and operationalized
- Provide guidance on strategies and programs needed to ensure the organization is complying with the laws, rules, regulations, policies, and contractual obligations that govern your business



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The Role of the Compliance Officer

- Strategic

- Enterprise Risk Management
 - Risk Assessment
- Internal Control Monitoring
- Audit Remediation



11

The Role of the Compliance Officer

- Leader
 - Ethical
 - Thought Leader
 - Strategic
- Evaluator
- Partner
- Independent Monitor



12

The Role of the Compliance Officer

Institutional Needs

Who Does What?

This slide features a green chalkboard background. At the top center, the title "The Role of the Compliance Officer" is written in white. To the left of the title is a white outline of a football. Below the title, on the left side, is the text "Institutional Needs" with a football icon to its left. On the right side, the text "Who Does What?" is written with a football icon to its left.

13

The Role of the Compliance Officer

Institutional Needs

Who Does What?

This slide is identical to slide 13, featuring a green chalkboard background with the title "The Role of the Compliance Officer" at the top center, and two sub-sections: "Institutional Needs" on the left and "Who Does What?" on the right, each accompanied by a white outline of a football icon.

14

Departmental and Functional Leaders

- Human Resources;
- Employee Relations;
- Labor Relations;
- Diversity, Equity, and Inclusion

- Communications;
- Government Relations;
- Press Office;
- Legislative Affairs

- Counsel
- Audit

- Finance
- IT/CIO

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Mission Oriented Functions

Functional areas related to the specific business or mission of the organization

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Higher Education related functions

- Academic - degree granting
- Human Resources; Employee Relations; Labor Relations; Diversity, Equity, and Inclusion
- Student Health
- Advancement; Endowments; Philanthropy
- University Run Medical Centers/Hospitals
- Research
 - Soft Sciences
 - Hard Sciences
 - Human Subjects
 - Animal Care
 - Biosafety
 - Misconduct

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Higher Education related functions

(Continued)

- Student Health Services
- Student Life (Clubs, Greek, Club Sports, Activities, etc.)
- Student Living
- Athletics/NCAA
- Financial Aid
- Facilities
- Child Care – Children and Youth
- Public Safety, Emergency Management
- Fundraising/Philanthropy
- Auxiliary Services

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Mission Driven Functional Compliance Areas

- Financial Compliance
- HR, ER, LR Compliance
- Athletic Compliance
- Research Compliance
 - IRB
 - IACUC
 - FCOI
 - Foreign Travel and Export Controls
 - Disclosure of Foreign Interests
 - HAZMAT, IBC, lab safety, radiation safety, EHS
 - Privacy/HIPAA

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The Role of the Compliance Officer

 Institutional Needs

 Who Does What?

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CCO Role in Unowned Functions

Similar to the role of a fiduciary

- Are there appropriate **policies** in place to manage expectation, ensure compliance, mitigate the risk of fraud, waste, or abuse?
- Are there **controls** in place to mitigate risk?
- Is management clearly **communicating** the policies/controls?
- Does management require/offer **learning and development** to ensure compliance?

21

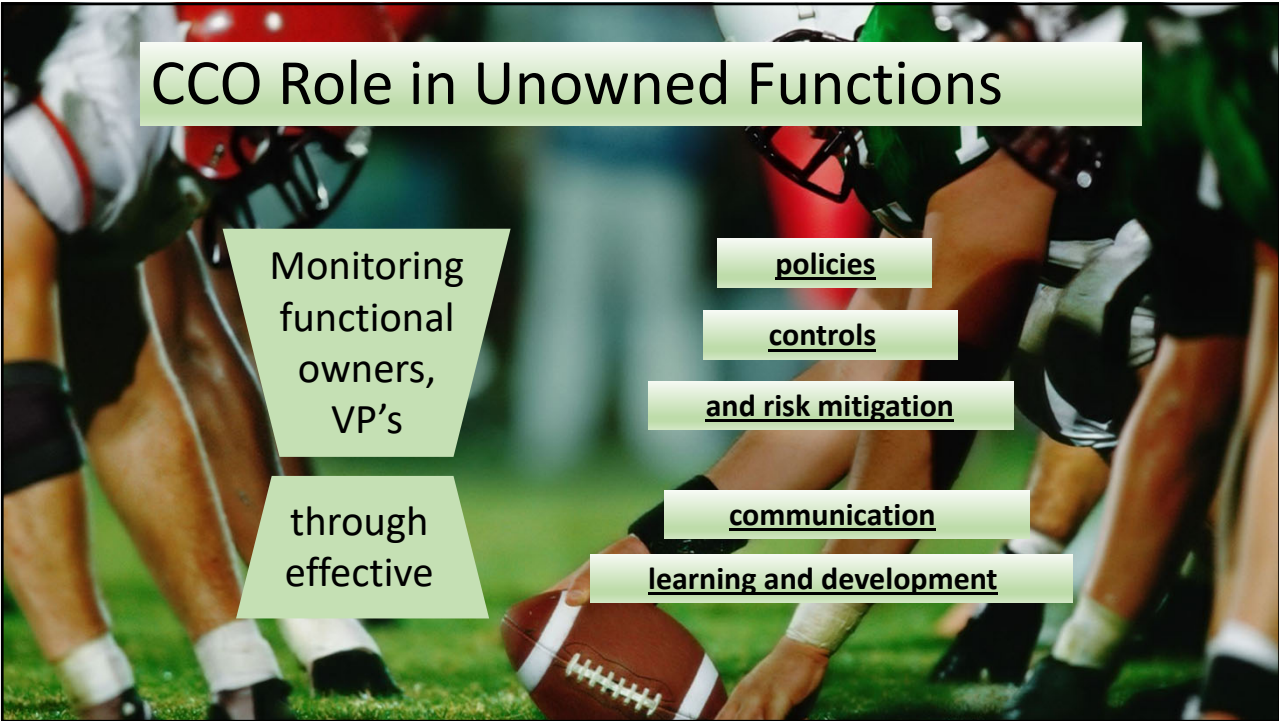
CCO Role in Unowned Functions

Similar to the role of a fiduciary

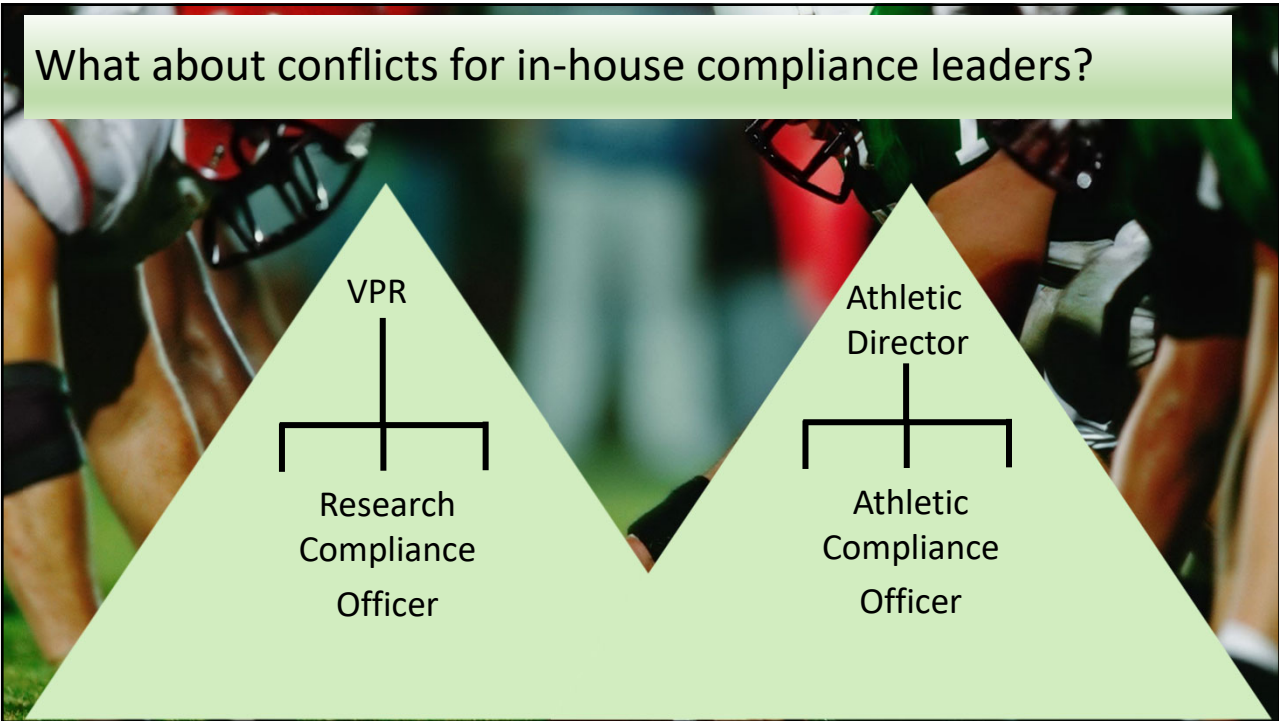
Is management implementing its policies & controls?

CCO cannot do it all

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24

What is a Conflict of Interest?

Research Compliance Official?

Athletic Compliance Official?

Financial Compliance Official?

Title IX and DEI Compliance?

What is the role of and who do they report to?

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CCO Role in Unowned Functions

Monitor,
Monitor,
Monitor

Review audit findings

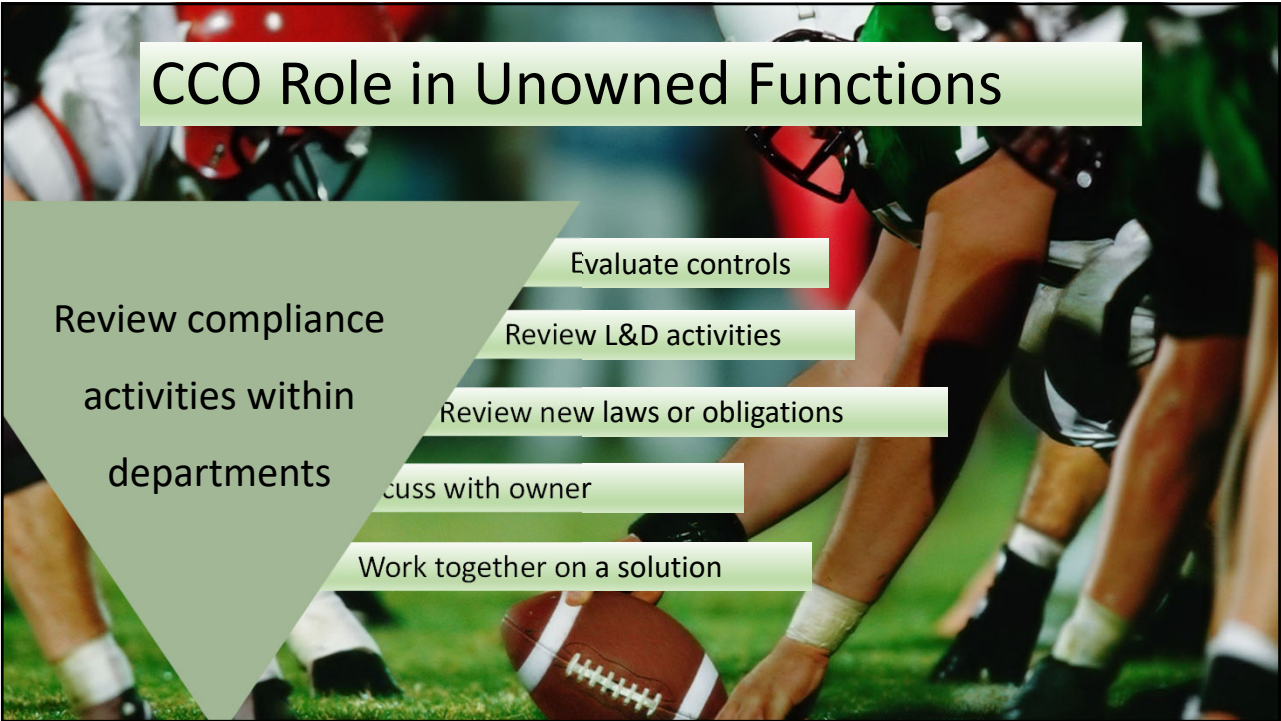
Conduct monitoring activities

Talk to people in the field

Talk to people in the field

Listen – Always be listening

26



CCO Role in Unowned Functions

Review compliance activities within departments

- Evaluate controls
- Review L&D activities
- Review new laws or obligations
- Discuss with owner
- Work together on a solution

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But . . . That's not my job!

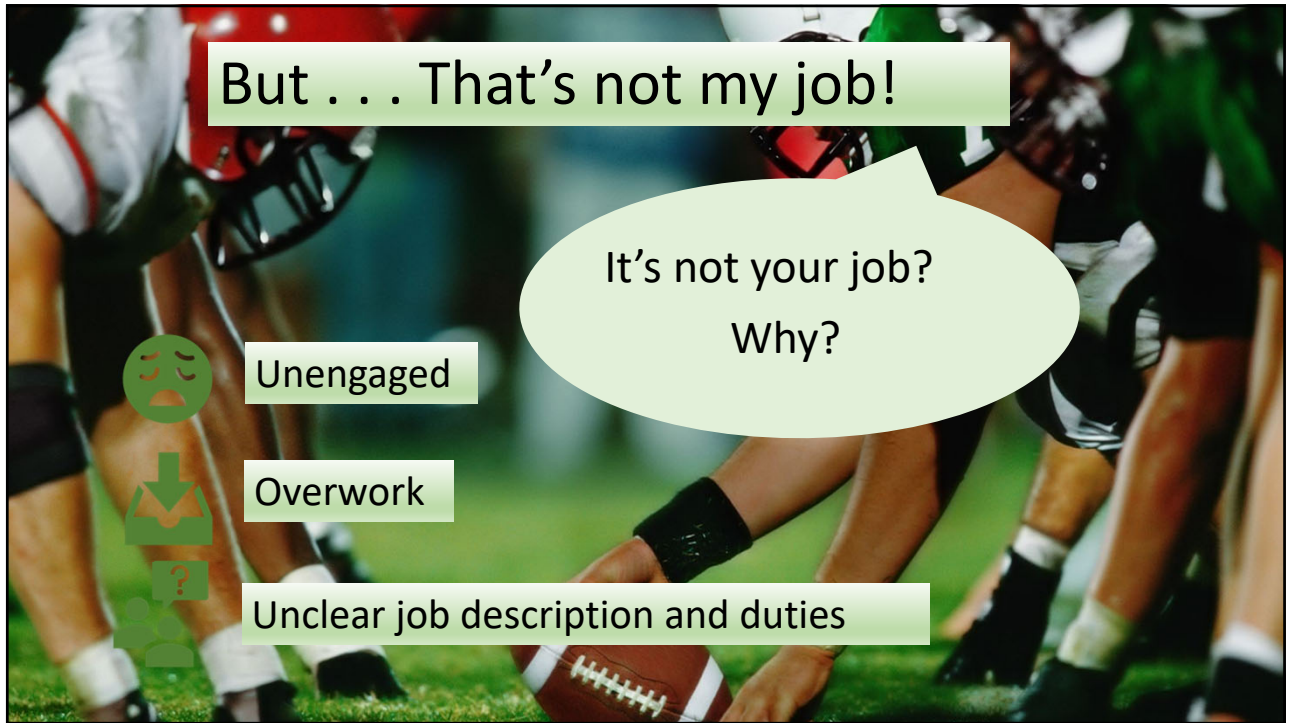
If you see something broken inform the appropriate team

Fix it

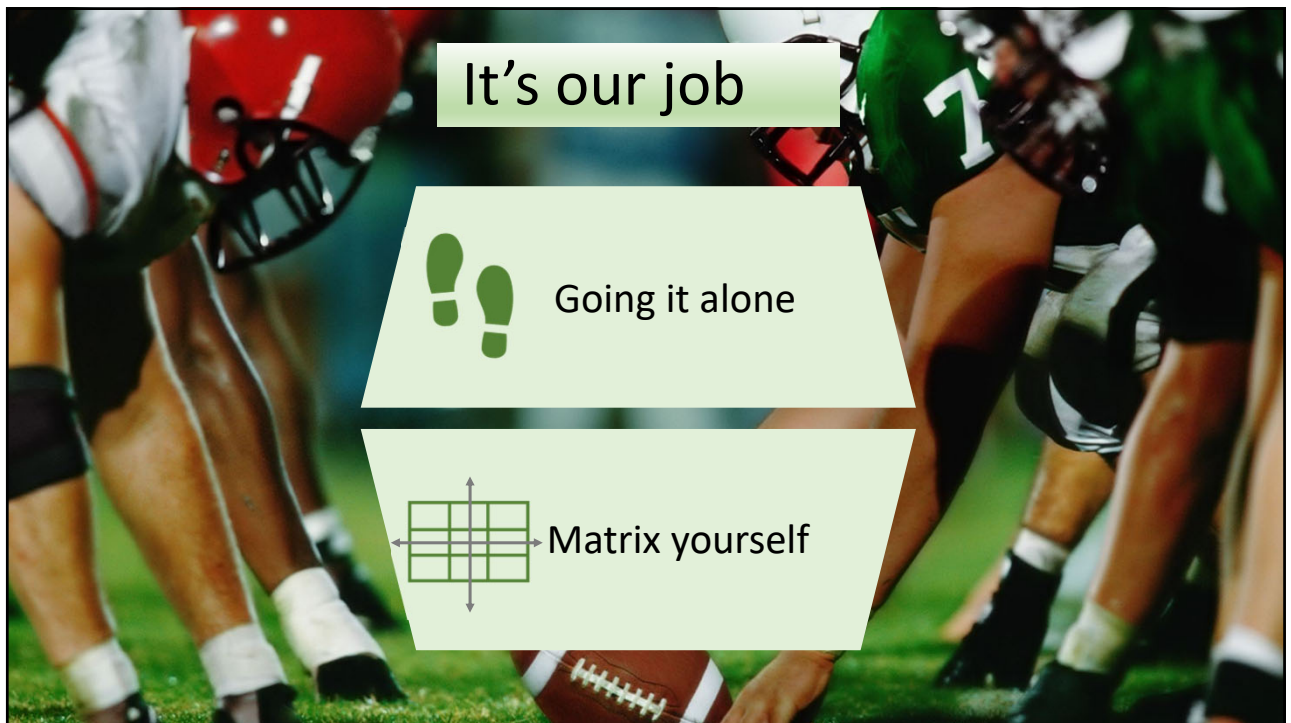
Don't do nothing

Don't assume that someone else will address the problem

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29



30

Board Oversight

Why is it important for a compliance officer to report to a Board periodically?

Do you ever have private time with the Audit Committee?