



STATE UNIVERSITY SYSTEM OF FLORIDA BOARD OF GOVERNORS COMPLIANCE PROGRAM

INTRODUCTION

The State University System of Florida (System) Board of Governors (Board) Compliance Program (compliance program) is a structured and organized approach to promote and support a culture of compliance, risk mitigation, and accountability. The Office of Inspector General and Director of Compliance (OIGC) has developed its compliance program with a focus on the Board of Governors Office (Board office).

The United States Sentencing Commission publishes the (Guidelines), which recommends that all organizations, including higher education institutions, have a comprehensive compliance program in place. Chapter 8 of the Guidelines lists and defines the elements required for an effective compliance program, which are incorporated in the “Compliance Program Structure” section of this document. The Guidelines continue to serve as the standards upon which compliance and ethics programs in all sectors are developed.

The benefits of a comprehensive compliance program within the Board office are significant. The compliance program exists to:

- Foster a culture that encourages and supports compliance-based decision-making;
- Enhance decision-making by raising awareness of requirements and expectations;
- Reduce risks of non-compliance while increasing the likelihood of early detection and correction;
- Address concerns through collaboration, cooperation, and communication; and
- Enhance employee engagement to report actual or perceived violations of law or policy.

COMPLIANCE PROGRAM STRUCTURE

1) Executive Oversight

Primary oversight and direction for the Board’s compliance program rests with the Board’s Audit and Compliance Committee (AACC). In addition to the Committee’s duties and responsibilities enumerated in the

, the Committee's responsibilities related to compliance focus directly on the Board office and on the System through Board of Governors Regulation 4.003.

Proactive and engaged leadership by Board members and Board office management is critical to maintaining a strong culture of compliance conduct. The AACC has designated the Board's Inspector General and Director of Compliance (DoC) to implement and administer the Board office's compliance program.

The DoC serves as the central point for coordination, collaboration, and oversight of activities and initiatives to promote and encourage a culture of compliance behavior. The DoC also serves in an advisory capacity to the chancellor and his leadership team in making compliance management decisions. Included in the DoC's responsibility for the compliance program implementation is providing oversight and monitoring along with periodic review. The DoC reports functionally to the Board's AACC Chair and administratively to the chancellor.

The DoC is also governed by the , which describes the office's operations for audits, investigations, and compliance. Additionally, it provides for the DoC to have full access to the chancellor and Board members. As such, the DoC can escalate critical and/or time-sensitive compliance issues as appropriate and necessary.

As an opportunity to learn from and contribute to compliance for the SUS, the DoC is directed to serve as the Board's liaison on the State University Compliance and Ethics Consortium (Consortium). The Consortium is composed of compliance directors and representatives from each System institution. Its mission is to provide an avenue for System institutions to discuss the development and improvement of compliance and ethics programs, new federal and state regulations, best practices, and issues campuses may be facing.

2) Standards of Conduct/Policies and Procedures

The Board office has designated a separate Ethics Officer (EO), who also serves as the Board's general ene prl (egul)6(a)20()Tj0.8 0ampus compall (all 2 Tw (es)4 n)-3 (t4 (e a)

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Chapter 112, Florida Statutes). Additionally, the OIGC is governed by the

3) Education and Training

The DoC will coordinate with the Board, university leadership, and others as appropriate for outreach opportunities to educate them on the protocol for addressing concerns they may wish to voice without fear of retaliation. The objective will be for the DoC and the role of the Board's OIGC to be more widely known both at the Board office as well as on System campuses.

4) Compliance Reviews and Issues Monitoring

OIGC staff will conduct compliance reviews of statutes, Board of Governors regulations, policies, and procedures to evaluate Board office as well as related System compliance. Identifying areas for review will be included in an annual OIGC risk assessment and scaled to available staff resources. The annual work plan will be presented to (eas)4 B(h8.(s)3.C educ)e Bpllh Boaf (i/g Td(S)AAC (af)C-o)Tth.6s, a

For complaints concerning the System, the OIGC strives to promote accountability, efficiency, and effectiveness and to detect fraud and abuse within state universities. Upon receipt of any significant and credible allegations, OIGC staff are governed by the

and Board of Governors Regulation 4.001,

The former describes the process for conducting a preliminary inquiry and making a determination for any possible Board action through the OIGC. The latter describes the process for any OIGC role that may be required in evaluating and/or handling the matter.

Reporting results of reviews or investigations is critical to fostering an environment of integrity, trust, and accountability. Corrective actions as a result of an investigation can aid in the prevention of similar future issues.

8) Program Design and Effectiveness Review

Internal and external assessments of a compliance program's design and effectiveness are a critical management tool for program improvement. The DoC, in coordination with the chancellor and the AACC chair, will oversee the compliance program evaluation process.

The DoC will report annually to the Board through the AACC on the compliance program's effectiveness. This information will be included in the
, which is due by
September 30