Purpose

The University Ethics and Compliance Committee (UECC) is established by the President with members selected by each Vice President to represent their respective key compliance areas. The UECC will facilitate the objectives of the University Compliance Program ("Program") and make recommendations in response to regulatory oversight, regulatory changes, and assessed risks that will be communicated to Executive Leadership and the Board of Trustees.

The Program, while being an enterprise program, works individually with the Provost and Vice Presidents, their college and department level leadership, and compliance owners and partners.

Committee Member Responsibilities

Members will be knowledgeable about the goals and objectives of the Program and advise the Committee Chair and Compliance Manager in the design and implementation of the Program including strategies to:

1. Continuously promote a culture of compliance, internal controls and ethical behavior,

2. Enhance accountability, enforcement and remediation processes,

3. Evaluate the need for and assist in securing resources necessary to meet the requirements of the Program,

4. Develop systems to prevent and detect potential violations and a process to solicit, evaluate, and respond to employee complaints,

5. Develop an efficient process to review and implement new or revised legislation,

6. Conduct compliance and internal control risk assessments,

7. Effectively address complaints, audits, and investigative findings that involve compliance or ethic violations and internal control issues,
8. Respond to lessons learned and advise on necessary adjustments to the program for continuous improvement, and

9. Develop tools and data sources to evaluate and report on program effectiveness.

In addition to activities to establish and maintain the Program, the UCC will support the various University delegated compliance owners by:

1. Providing a forum for individual compliance owners to seek assistance or advice from the UCC on addressing compliance issues and strategies to mitigate risks,

2. Advising on internal control activities including policy development and training programs, and

3. Advising on strategies and resources that can be streamlined and shared by compliance owners in meeting their individual compliance responsibilities to improve University operational and financial efficiencies.

**Annual Plan and Reporting**

The Committee will:

1. Maintain an annual plan focused on addressing the maturity status of the Program and identified and prioritized high-risk compliance areas,

2. Adhere to the University's policy on *Escalating Compliance and Ethical Matters* (underdevelopment), and

3. Assist in the preparation of reports for the Board of Trustees (BOT) on compliance and internal control issues and Program development.

The Associate Vice President for Business and Financial Affairs and the University Compliance Manager will provide program update reports to the Board of Trustees, President, Provost, and vice presidents.