University Compliance Office

Integrity – Service – Excellence

Compliance Core Values

Who: System Ethics and Compliance Offices

When: Established May 2012 per Chancellor, Texas Education Code and the Federal Sentencing Guidelines

What: Established to prevent, deter, detect and respond to possible deviations and/or violations of established standards, while supporting and promoting ethical conduct and behavior of university students and employees.

How: The Compliance Office conducts informal and formal Compliance Reviews of State, Federal, System and University established standards.

Why: Protect the Integrity of the Institution – Provide Service to the Institution – Support Institutional Excellence

Compliance Core Values Formula: Integrity + Service = Excellence

Compliance & Ethics –The PLUS Acronym


Compliance Facts:

1. The first line of defense in Compliance is to help employees become aware of their responsibilities and to help them prepare for visits from System Internal Audit (SIA). This is accomplished by conducting Compliance Reviews of established standards with identified contact office(s) and/or designated
university official(s).

2. Compliance works collaboratively with the CEO and following System Offices to protect the integrity of the institution. Compliance responsibilities are identified below.

   a. **CEO & System Ethics and Compliance Officer (SECO)**: Identify and elevate concerns regarding life, limb, property damage and/or reputational harm to the CEO and SECO immediately upon notification

   b. **Office of General Counsel**: Consult with legal counsel on matters requiring litigation and governance interpretation

   c. **Internal Audit**: Assist in providing support documentation for follow-up audit findings and request assistance as needed for identifying corrective actions to mitigate future risks

   d. **Risk Management Office**: Consult with SRM team to assess, identify, detect and implement a plan of action to mitigate risks at the institutional level through using the Enterprise Risk Management Matrix

3. Compliance works diligently with University Compliance Committee members to prevent, deter, detect and respond to possible deviations and/or violations of the established standards, while continuously supporting and implementing the Annual Compliance Plan.

---

**Facts behind Compliance Myths:**

1. Compliance **does not** implement management corrective actions and/or management controls.

2. Compliance **does not** enforce established standards **nor is it responsible** for correcting deviations and/or violations of the established standards. Compliance is responsible for providing due diligence.

   a. The identified contact office and/or designated university official **is responsible** for enforcing the established standards and/or correcting deviations and/or violations of the established standards.

3. Compliance **is not** the Subject Matter Expert (SME). The role of Compliance is to act as a Facilitator.

4. Compliance **is not always** the investigators of compliance related concerns (i.e., Ethics Point Hotline and/or employee grievances). Compliance **routes** concerns to designated SME’s unless there is an identified conflict of interest with that designated SME.