

Compliance Oversight Council Make-up and General Responsibility

Compliance Oversight Council (COC) – is appointed and chaired by the Chief Operating Officer/Chief Finance Officer. The Council is made up of the following individuals:

- Chief Operating Officer (COO)/Chief Finance Officer (CFO) (Chair)
- Executive Vice President and University Provost
- Executive Vice President for Health Affairs
- Executive Vice President for Research and Innovation
- Associate Vice President, Audit Services & Institutional Compliance
- University Counsel
- Faculty Member
- Dean
- Faculty Senate Chair (or designee)

Purpose

The objective of the compliance program is to provide an infrastructure that facilitates on-going assurance that the institution is complying with internal and external laws, regulations, policies and procedures. The COC is charged by the Provost and President to oversee the University's compliance activities and programs to ensure they are reasonably designed, implemented, enforced and generally effective in detecting and minimizing violations of policies, regulations or laws. The council oversees actions to promote an organizational culture that encourages a commitment to compliance and ethical conduct. The COC will be a forum for the organized and other compliance areas to raise areas of concern and will be responsible for assuring the concerns are properly addressed.

Responsibilities

The COC serves as an oversight committee for the institutional compliance program. The council has decision-making responsibility and authority to establish, staff, and implement compliance initiatives across the entire University. The COC is responsible for review and adjudication of compliance issues throughout UofL and is responsible for guiding the compliance unit(s) in its development of compliance policies, procedures, training and an annual compliance work plan for ongoing compliance oversight. This council advises the compliance officer on high risk areas needing particular attention reviews the activities of the compliance officer and other compliance areas and recommends changes or additions if needed, allocates resources when necessary to mitigate activities deemed to be high risk, and assists the compliance officer in carrying out its functions. The council will oversee the development of an ethics policy for the university. The council also approves the roles and responsibility matrix and makes sure a clear duty and responsibility balance exists between different compliance areas. The COC will meet at least quarterly and will review annual reports submitted by the compliance areas.

The COC is also responsible for assuring the University's compliance programs have the core elements of a model compliance program. These elements include, but are not limited to:

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1. Adoption of compliance standards
2. Appointment of a compliance officer
3. Implementation of procedures and tools to help ensure employee integrity
4. Implementation of training and communication tools to promote compliance
5. Implementation of systems and procedures to detect and monitor instances of non-compliance
6. Assurance of consistent enforcement of policies for non-compliance
7. Assurance of and documentation that appropriate actions were taken to respond to, deter and correct non-compliance
8. Reviews and provides input into the annual Audit Plan
9. Reviews implementation of Audit Services' recommendations