



GE2045 - University Compliance Program

Issued: 7/22/2021

Responsible Official: President

Responsible Office: Office for Institutional Equity

Policy Statement

Central to the University's values is a commitment to integrity. All members of the University community are expected to conduct themselves in an ethical and honest manner. Consistent with this expectation is also a commitment to comply with local, state and federal law as well as University policy. This policy reinforces the University's commitment to integrity and provides measures to hold members of the University community accountable when their actions depart from expectations.

This policy is applicable to all University faculty, staff and student employees.

Policy

Chief
Compliance
Officer

The University's compliance program will be implemented under the day-to-day management of the Chief Compliance Officer (CCO). The CCO is responsible for coordinating with University leadership to ensure that the following components of the University's compliance program are in place:

- Written Policies and Procedures
- Compliance Council
- Training and Education
- Internal Compliance Reviews and Assessments
- Reporting Mechanisms
- Well-Publicized Disciplinary/Corrective Measures
- Prompt Responses to Reports/Issues

The CCO is responsible for the overall operation of the University's compliance program. The CCO will carry out the following functions:

- Review, maintain and develop policies and procedures necessary for carrying out the components of the compliance program
- Conduct periodic reviews and assessments of individual division/unit compliance

- Establish a confidential reporting mechanism and coordinate responses to reports of compliance violations
- Coordinate with the Office of Internal Audit and Consulting, the Office of Legal Counsel and the Department of Human Resources to triage reports of compliance violations, including illegal, improper, wasteful or fraudulent activity, and assign investigations to the appropriate division/unit
- Provide periodic updates to the Board of Trustees on the University's compliance program

Compliance Council

The Compliance Council is an advisory body chaired by the CCO and comprised of individuals selected by University division leadership, Faculty Senate and Staff Senate to serve as liaisons for compliance related issues specific to their unit or division. Compliance Council members are responsible for the following:

- Attending meetings of the Compliance Council
- Communicating compliance policies and procedures to their respective divisions
- Providing feedback to the CCO about their respective divisions' compliance needs
- Coordinating compliance related education and training within their divisions
- Serving as the main point of contact for compliance reviews and assessments
- Assisting in the preparation of the annual compliance report

Employee Responsibilities

Training: All faculty (including adjuncts), staff, temporary employees and student employees are required to comply with University policies as well as local, state and federal law. Additionally, all faculty (including adjuncts), staff, temporary employees and student employees are required to complete and remain current with all compliance related training recommended by the leadership in their unit/department/division. Supervisors, managers and department/division level leadership are responsible for ensuring their respective employees have access to and complete all compliance training required by federal, state or local law and University policy.

Reporting: All employees should report violations of federal, state and local law or University policy, and supervisors, managers and department/division level leadership are required to report any such violations as follows:

- Fraud, waste and abuse of University resources: University Office of Internal Audit and Consulting- UoM_Audit@memphis.edu; 901.678.2125; <https://www.memphis.edu/audit/forms/fraudreportform.htm> (anonymous option)
- All other violations of federal, state and local law or University Policy:
 - Office for Institutional Equity - oi.e.compliance@memphis.edu; 901.678.2713;

https://cm.maxient.com/reportingform.php?UnivofMemphis&layout_id=55
(anonymous option)

- Department of Human Resources - hr@memphis.edu; 901-678-3573
- Criminal acts (theft, destruction of property): University Police Services- 901.678.3848; <https://www.memphis.edu/police/incidents/confidential.php> (anonymous option)
- Additionally, fraud, waste and abuse of University/state resources can be reported to the Tennessee Comptroller of the Treasury- 615.741.2775; <https://apps.cot.tn.gov/ANTS/Submission/Submit> (anonymous option)

Compliance
Investigations
and
Assessments

Investigations: Upon receipt of a report of a violation of federal, state, local law or University policy, any member of the Complaint Triage Team (composed of the Chief Audit Executive, Chief Compliance Officer, Chief Human Resources Officer and the University Counsel) may convene a meeting in order to discuss the report and assign it to the appropriate office for investigation, if warranted. An appropriate member of the Complaint Triage Team will monitor the progress of the investigation.

At the conclusion of the investigation, the office responsible for the investigation will draft an investigative report outlining the facts, parties involved and laws or policies violated (if any). The report will be submitted to the Complaint Triage Team who will work with the corresponding leadership of the unit or department involved to determine corrective action, if warranted.

The Complaint Triage Team will determine if federal, state, local law or University policy requires a report or violation to be disclosed or referred to an external agency and ensure that such disclosure or referral is done in a timely manner. The Chief Compliance Officer shall be responsible for maintaining the records associated with each report, investigation and corresponding corrective action.

Assessments: Periodically the CCO, or designee, will conduct compliance assessments of University departments, units or programs in order to identify, assess, manage and monitor risk. The CCO will prepare a Compliance Assessment Calendar at the beginning of each fiscal year outlining the areas of the University scheduled for an assessment. The Compliance Council member for the area undergoing assessment shall serve as the point of contact. Assessments will generally consist of the following steps:

- Opening conference with the department/unit/program leadership and Compliance Council member to outline the scope of the assessment
- Department/Unit/Program completion of an assessment questionnaire
- Document review
- Staff interviews
- Assessment report issued
- Closing conference to review the assessment report, areas of concern, recom-



mended corrective action, if any, and a timeline for completion

Any department/unit/program recommended for corrective action will be placed on a monitoring schedule to ensure compliance with the recommendations made in the assessment report.

Prohibition Against Retaliation	Retaliation against individuals who report or participate in investigations of compliance violations is strictly prohibited. Anyone found responsible for retaliation will be subject to disciplinary action up to and including termination. Supervisors, managers, unit/department/division leadership are responsible for reporting any retaliation they become aware of to the Chief Compliance Officer, the Chief Audit Executive, the Chief Human Resources Officer or the Legal Counsel. All other employees are strongly encouraged to report retaliation to the aforementioned University officials.
---------------------------------------	---

Links

The following are policies central to the University's compliance program. They can be found at <https://memphis.policytech.com>:

[Conflict of Interest GE2021](#)

[Lost or Stolen University Property GE2029](#)

[Reporting Fraud, Waste, or Abuse of University Resources GE2014](#)

[Preventing Fraud, Waste, or Abuse of University Resources GE2015](#)

[Non-Discrimination and Anti-Harassment GE2030](#)

[Sexual Harassment and Sexual/Gender-Misconduct GE2039](#)

[Occupational Health and Safety GE2000](#)

[Nepotism and Personal Relationships HR5055](#)

[Employee Debt to the University HR5065](#)

[Research Misconduct RE7001](#)

[Disclosure of Financial Interests Related to Sponsored Research RE7003](#)

[Human Subjects Protection RE7007](#)

[University Travel BF4001](#)

[Travel Cards BF4035](#)

[Payment Card Industry Compliance BF4023](#)

[Data Access IT6000](#)

[Acceptable Use of Information Technology Resources IT6003](#)

[Security and Protection of Information Technology Resources IT6004](#)

[Data Security IT6005](#)

