

# Universities of Wisconsin Administration Office of Compliance & Risk Management: Building an Effective Compliance Program in an Ever-Changing Landscape

## Understanding the Role of a Compliance Officer

- ☐ It is up to each institution to determine who will oversee, track, and enforce compliance. Although the Compliance Officer acts as the main compliance liaison for the institution, it is every employee's responsibility to ensure and promote a culture of compliance, ethics, and integrity.
- ☐ OCI convenes the Universities of Wisconsin Compliance Officers Working Group. This is a supportive group where collaboration and networking are fostered.
- ☐ Due to various factors, each UW institution organizes compliance roles and responsibilities in different configurations. It is not uncommon for Compliance Officers to also serve as the Ethics Officer, Risk Officer, etc.

## Navigating Policies and Procedures

- ☐ Primary policies and procedures for the entire Universities of Wisconsin (Wisconsin Administrative Code, Board of Regents Policies, UWSA Policies and Procedures) are available here: <https://www.wisconsin.edu/uw-policies/>.
- ☐ Institutional policies, procedures, and handbooks for each UW Institution are available here: <https://www.wisconsin.edu/uw-policies/uw-institutional-policy-library/>.

## Ensuring Compliance and Monitoring Obligations using a Compliance Matrix

- ☐ Universities of Wisconsin Administration created a Compliance Matrix tool to assist UW institutions in monitoring and complying with hundreds of obligations from federal and state law, as well as Board of Regents and UW System policies. The Matrix contains summaries of each obligation and guidance on how to comply. For obligations requiring regular reporting, the matrix auto-generates reminders to the designated responsible employee including information to be reported, due dates, frequency of reporting, and to whom the report is submitted. Reminders are sent 90, 60, and 30 days in advance of a report due date.

## Prioritizing Institutional Risks, Compliance, and Audits

- ☐ Universities of Wisconsin Administration created the RCA (Risk, Compliance, and Audit) Program to enhance the existing ERM (Enterprise Risk Management) initiative, allowing more collaboration and consistent structures and processes for institutions and UW System to fulfill risk assessments, compliance monitoring, and audit review functions.

## Defining Your Institution's Compliance Program

- ☐ Senior leadership should empower the Compliance Officer and others who have the day-to-day responsibility to mitigate risk and focus on compliance and integrity, as well as the compliance program with a tone that is visible, strong, and explicit. As stated in the Guiding Elements of the Universities of Wisconsin Compliance Framework, the compliance program will receive adequate stature, funding, and resources from the institution. The tone that is set directly impacts the foundation of the compliance program.
- ☐ Compliance programs should be based on an ethical culture that reflects the values and standards of the institution's community.
- ☐ Compliance and ethics programs will thrive with a commitment to do the right thing. Having effective steps will help employees know what to do and create a workplace culture where the institution is serious about acting legally and ethically.

## Setting Expectations Across the Institution and Ensuring Timely Communication

- ☐ Employees must understand institutional compliance expectations and standards, so that they can comply with them.
- ☐ Employees should understand the importance of communicating in a timely manner to ensure questions, situations, issues, and concerns tied to compliance and ethics are addressed.
- ☐ Employees should be able to anonymously report compliance issues and concerns without fear of retaliation. The Universities of Wisconsin is committed to an environment where open, honest communications are the expectation, not the exception. The Universities of Wisconsin takes all concerns seriously, will follow through, and has zero tolerance for retaliation.

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## Understanding the Role of a Compliance Officer

Questions to consider:

- After understanding the various aspects of your position description, have you created strategic priorities and goals?
- As the Compliance Officer, have you made connections with fellow UW Compliance Officers? Colleagues that fulfill the same configuration of compliance roles as you?

## Navigating Policies and Procedures

Questions to consider:

- Are your institutional policies and procedures well organized and accessible?
- Does your institution's website link to the UWSA policy webpage?

## Ensuring Compliance and Monitoring Obligations using a Compliance Matrix

Questions to consider:

- Who is your institution's Matrix Administrator?
- Are the appropriate individuals regularly monitoring and updating the Matrix?
- Do the individuals listed as Primary Manager and or Institutional Lead need to be updated?

## Prioritizing Institutional Risks, Compliance, and Audits

Questions to consider:

- Does your institution currently have an internal strategic approach toward managing risks, addressing gaps, and verifying effectiveness of processes?

## Defining Your Institution's Compliance Program

Questions to consider:

- What is your compliance program's mission? Core values?
- What is the ethical culture and foundational tone of your compliance program?
- Who is serving in each of the compliance roles? Who provides oversight to the compliance program and roles? Is this clearly communicated?
- What compliance resources are made available?

## Setting Expectations Across the Institution and Ensuring Timely Communication

Questions to consider:

- Does your institution have standards of conduct?
- What expectations are being set and how are they being communicated?
- Does your institution's website include information to report compliance concerns?
- Does your institution's website provide compliance and risk management information? Is it readily available and easily searchable?
- What is your Compliance Program creating, providing, and communicating out to the institution for training, education, and additional resources?