Authority

Whereas it is a primary function of the University of Connecticut Board of Trustees and University of Connecticut Health Center Board of Directors (hereinafter referred to collectively as the “Board”) to ensure effective control of the administration and operations of the University of Connecticut and University of Connecticut Health Center (hereinafter referred to collectively as the “University”), the Joint Audit and Compliance Committee (JACC) of the Board of Trustees mandates the establishment of the Office of University Compliance (OUC). It shall report to the Office of the President with a “dotted line” to the Joint Audit and Compliance Committee (JACC) of the Board of Trustees.

The functions of the OUC are prerogatives of the Chief Compliance Officer, which may not be infringed upon nor otherwise compromised. OUC shall be organized at the discretion of the Chief Compliance Officer for optimum effectiveness.

The OUC is authorized to have access to University records, facilities and personnel necessary to fulfill its responsibilities. Senior Administration will ensure units and personnel cooperate with the OUC in carrying out its compliance activities.

Purpose

The purpose of the OUC is to promote and maintain a University-wide culture of compliance and ethics. The OUC assists units in complying with the laws, regulations and policies that govern institutions of higher education and academic medical centers through education, monitoring, assistance with policy and process development and investigations. The OUC promotes coordination of and consistency among individual University compliance programs to prevent, detect and respond appropriately to potential violations of law.

Standards and Independence

The OUC shall function so as to satisfy the requirements of the U.S. Sentencing Commission’s guidelines for an effective compliance and ethics program.

Staff will be members of appropriate professional associations and will participate in continuing education to remain current with best practices and emerging issues in Compliance.

Staff will be independent in fact and appearance by upholding the principles of integrity, objectivity, confidentiality and competency.

Staff will be independent of the activities or operations they review; they will not engage in any activity which would impair their independence of judgment. They shall be independent of any other influence or control of any kind.
Scope and Responsibility

In consultation with the Office of the President and JACC, the Chief Compliance Officer shall plan, implement, report upon, supervise and be responsible for all compliance activities and personnel within the framework of this Charter. The OUC will fulfill its responsibility to the President and the Board by:

- Maintaining awareness of statutory/regulatory requirements and keeping abreast of new statutory/regulatory developments
- Confirming the University implements policies and procedures that are reasonable capable of reducing misconduct and that comply with relevant regulatory requirements
- Promoting awareness of the University’s Code of Conduct, compliance risks and the objectives of compliance activities through communicating with and educating the University community
- Developing and implementing effective training and education programs to ensure that employees are aware of, adhere to and report potential violations of laws, regulations or policies and procedures
- Maintaining a confidential safe harbor to receive and direct compliance issues for investigation and resolution
- Investigating potential violations of laws, regulations and policies
- Developing effective ways to mitigate compliance risk though collaboration with the university community and the implementation of appropriate monitoring plans
- Following up on identified weaknesses, findings and recommendations from previous compliance reviews
- Work with Senior Administration to promote and enforce compliance through appropriate incentives and disciplinary measures

Reporting

Annually, the Chief Compliance Officer or his/her designee will submit information on the annual compliance plan to the President and JACC for their approval. Quarterly, the Chief Compliance Officer and/or his/her designee will provide reports to the President and the JACC detailing departmental accomplishments, and highlights of any significant compliance findings and recommendations. It shall also report regularly to the University’s Compliance Committee.

Adoption of Charter

Approved by Joint Audit and Compliance Committee          Date: March 1, 2018