

**INSTITUTIONAL
COMPLIANCE
PLAN**

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I. Scope of the Plan

This is the Standard Operating Procedure Plan for the Office of University Compliance.

II. MISSION STATEMENT

A. *ASU UNIVERSITY COMPLIANCE MISSION STATEMENT*

Alcorn State University's Office of University Compliance is responsible for the creation and maintenance of a compliance and ethics program that supports the University's Mission and strategic goals and promotes the highest ethical standards by members of the University Community in the pursuit of the University's academic, administrative, athletic, engagement and research activities. The role and mission of Alcorn's Office of University Compliance is to support the University's commitment to doing business and educating students with the highest standards of ethics, integrity, lawful conduct, and responsible citizenship. This Office is fully aligned with the University's Mission, Vision, and Strategy. The compliance program shall provide an infrastructure that facilitates on-going assurance that the institution is complying with internal and external Compliance Requirements and Alcorn State University policies and procedures as the University moves forward to become a premier, nationally recognized, rural research university.

III. ASU COMPLIANCE PROGRAM

The Compliance Program provides the means to co-ordinate compliance across the University, manage, and monitor the internal and external risks associated with legal and regulatory compliance. It follows generally accepted standards for establishing and maintaining an effective compliance program, including the following key elements:

- Effective oversight with a designated compliance officer and Board committee;
- Written policies and procedures;
- Training and education;
- Effective lines of communication;
- Standards enforced through well-publicized disciplinary guidelines;
- Internal auditing and monitoring;
- Response to detected offences and corrective action plans; and
- Periodic risk assessments.

The Compliance Program helps maintain Alcorn State University's reputation for integrity and high standards in the educational and business community. It also helps protect the University from regulatory errors, omissions, and failures by improving communication and information

The program describes conduct expected of all members of the ASU community, which includes: senior administrators, faculty, staff, students, student employees, student leaders and university-authorized volunteers acting on its behalf.

EFFECTIVE COMPLIANCE PROGRAM STRUCTURE

- A. **Governance:** The University's governing body will be kept informed about the content and operation of the University's Compliance Program and will exercise reasonable oversight over its implementation and effectiveness.
- B. **Executive Oversight:** Through a University Compliance Steering Committee, chaired by the Chief Compliance Officer, high-level management exercises overall responsibility for the Compliance Program. The Compliance Steering Committee is appointed by the President.
- C. **Day-to-Day Oversight:** Designated responsible compliance liaisons in their respective areas exercise day-to-day responsibility for their parts of the Compliance Program.
- D. **University's Chief Compliance Officer:** The Chief Compliance Officer assists in coordinating the University's compliance activities and reports regularly the results of these activities directly to the President.
- E. **University Community:** The University's faculty, staff, students and others who perform work at the request of the University will understand and follow principles of conduct in the execution of their University obligations; ensure that they and the staff who report to them are aware of and operate in compliance with applicable laws, regulations, and policies; and report incidents of non-compliance or concerns.

Areas for Compliance

Athletics and Gender Equity
Financial Aid
GLBA
Business and Finance
Registrar
Diversity and Inclusion
Title IX
Health and Safety
Human Resources and EEOC
Information Technology Services
Research Integrity

The key focus areas are the day to day activities performed by the Compliance Department:

- | | |
|-----------------------------------|------------------------------------------|
| 1. University Governance | 2. Risk Assessment and mitigation |
| 3. Communication | 4. Oversight and Responsibility |
| 5. Policies and Procedures | 6. Training Compliance Program |
| 7. Monitoring | 8. Response and Prevention |
| 9. Enforcement | 10. Title IX and Clery |

INTERNAL REVIEW AND MONITORING

Monitoring provides on-going routine surveillance of actual performance and should be continuous

and dynamic. The University shall take reasonable steps, including monitoring and auditing, to ensure that the organization's compliance program is followed, by:

- Periodic evaluation of the effectiveness of the organization's compliance program;
- Routine monitoring of actual performance vs. expected performance; and
- Review and periodic investigation of the current situation, including how the internal and external context is changing, the possible emergence of new risks, and whether controls remain effective for existing risks.

PERIODIC RISK ASSESSMENTS

A primary purpose of the University's Compliance Program is to identify and assess significant compliance risks and implement internal controls to reduce these risks. It builds on the existing University structures and improves the coordination, dissemination and communication of compliance information and identifies gaps in compliance.

The Chief Compliance Officer will coordinate the compliance process identifying the most significant compliance issues facing the University, engaging the managers with day-to-day administrative responsibilities to identify the compliance risks and to develop mitigation plans, and building consensus among multiple departments and functions impacted by the potential risks. Newly identified risks will result in the promulgation of new policies and procedures or revisions to old ones as well as action plans, where necessary, to address those risks.

IV. COMPLIANCE EDUCATION & TRAINING

COMPLIANCE EDUCATION & TRAINING

Compliance education and training is a critical element of an effective compliance program. Alcorn State University is committed to providing general and specific compliance education and training so that Alcorn employees understand their obligations and responsibilities in accordance with applicable laws, regulations, and policies.

Employees are expected to complete required compliance education and training within the time frames and frequencies established by the department or committee requiring and/or providing the compliance education. Notification of compliance education requirements will be communicated through various means, including, but not limited to supervisors, written memorandum, internet/intranet and/or e-mail.

General and Specific Compliance Education and Training programs and related information shall be periodically reviewed and updated to address current risk areas and improvement opportunities. A variety of educational methods, materials, and tools, will be utilized to present General and Specific Compliance Education and Training programs.

General Compliance Education & Training Content and Delivery

The Office of University Compliance shall be responsible for developing the content for and delivery of general compliance education and training for Alcorn State University. The content of general compliance education and training will include, but is not limited to, the Alcorn Code of Conduct, University Compliance, Alcorn risk areas, roles & responsibilities and other information necessary to maintain an effective general compliance education and training program. General compliance education and training requirements shall be published on the University Compliance website and advertised through other resources as necessary to communicate the information.

Specific Compliance Education & Training Content and Delivery

It will be the responsibility of the individual, department or committee having regulatory compliance oversight to develop the content and deliver specific compliance education and training related to their area of regulatory oversight responsibility. The content of these educational and training programs shall include those areas mandated by law, regulation and/or policy and may include a review of relevant compliance requirements applicable to that regulatory compliance area, identified or potential risk areas, responsibilities, and methods to improve compliance. The scope of specific compliance education and training includes, but is not limited to the Institutional Review Board (IRB), Institutional Animal Care and Use Committee (IACUC), Institutional Biohazard Committee, Human Resources, Medical Compliance, Privacy, Conflicts of Interest, and other education as may be required by Compliance Requirements and/or Alcorn policy. Specific compliance education and training requirements shall be communicated by the department or committee responsible for the content and delivery of the Specific Compliance Education.

Completion Reporting and Maintenance of Compliance Education and Training Materials

Records of completion of required compliance education and training shall be maintained by the department or committee responsible for delivery of the education and training in accordance with institutional/regulatory guidelines. Summary reports of compliance with mandatory compliance education and training requirements shall be compiled by the department responsible for the education and training at least annually or more often as necessary and be made available for review, upon request, by the Office of University Compliance.

APPENDIX A

ALCORN STATE UNIVERSITY OFFICE OF UNIVERSITY COMPLIANCE ORGANIZATIONAL CHART

