Presentation – Overview of UHS policies and procedures for investigating and acting on reports of non-compliance and criminal activity

August 15, 2012

1. Longstanding culture of compliance and reporting
   - Implementation of the institutional compliance program/anonymous reporting mechanism - 2005
   - Implementation of the Fraud policy (1989) and Whistleblower protections (1980’s)
   - Annual Cleary reports to the Board of Regents
   - New regent orientation

2. Tone at the top: Communications from the Chancellor
   - Holding management accountable for compliance
   - November 16, 2011 email
   - March 12, 2012 email
   - July 23 & 24, 2012 tweets

3. Board of Regents Policies
   - Code of Ethics, 57.01
   - Internal Auditing, 41.01
   - Institutional Compliance, 42.01

4. UHS Policies
   - Reporting / Investigating Fraudulent Acts, 01.C.04
   - Ethical Conduct of Employees, 02.A.29
   - Campus Programs for Minors, 05.C.01
   - Guidelines for Sexual Harassment Policies and Procedures, 02.A.03

5. Institutional Policies
   - Policies
   - Faculty handbooks
   - Student handbooks
   - Title IX policies

6. UHS Training
   - Ethics
   - Sexual harassment and EEO
   - Fraudulent Activity
   - Programs for Minors (child abuse)
   - New hire orientation for faculty & staff

7. UHS Institutional Compliance Programs
   - Human Resources (HR & EOS)
   - Research
   - Athletics
   - Health and Safety (UHPD)
   - Student Affairs

8. Acting on Reports of Non-Compliance and Criminal Activity
   - General Counsel and Internal Auditor triage and assign investigator
   - Report log maintained (Anonymous, SAO or Miscellaneous)
Follow-up to determine appropriate action taken
Report log periodically reviewed by Chancellor and Chair Audit and Compliance Committee

9. Enhancing programs for Compliance, Reporting and Training
   • System-wide log through MySafeCampus and Maxient
   • Campus Security Officer program
   • Expand General Counsel report on pending or potential legal matters