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

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

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

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

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

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

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

8. Acting on Reports of Non-Compliance and Criminal Activity
   o General Counsel and Internal Auditor triage and assign investigator
   o 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