



## Institutional Compliance Program Charter

### Purpose

The purpose of the Sam Houston State University (“University”) Institutional Compliance Program (“ICP”) is to minimize significant and potential compliance failures within our organization, and to promote a working environment that reflects the University’s commitment to maintaining the highest level of compliance in the conduct of all operations.

### Goals and Objectives

The ICP:

1. Will include programs and practices designed to build compliance consciousness into the daily activities of University faculty and staff.
2. Shall be implemented as a risk based process that reasonably satisfies the requirements of the *U.S. Sentencing Commission’s Guidelines for Organizations* for an effective compliance program, and complies with all applicable laws, regulations and policies of the University and the Texas State University System.
3. Shall accomplish these goals through compliance standards and efforts; providing oversight, support and partnering with University administration, staff and faculty to ultimately achieve the following objectives:
  - a. Promote an organizational culture that encourages all employees to conduct University business with a commitment to compliance with the law.
  - b. Assure executive level personnel of the University are informed of ICP operations and effectiveness.
  - c. Establishment of clear compliance standards for all employees and consistent enforcement of these standards.
  - d. Effective communication of compliance and initiatives to all levels of employees and to relevant vendors and/or third parties.
  - e. Maintenance and development of compliance training programs related to employee job functions and compliance responsibilities.
  - f. Development and maintenance of a compliance risk assessment and management processes.
    - i. Identifies the compliance risk areas of the University.
    - ii. Inventories and evaluates compliance risks.
    - iii. Providing information to leadership for those institutional risks considered to be most critical;



- g.** Establishment of a process to hold individuals accountable for the implementation of an appropriate action plan to achieve compliance in the respective deficient area(s) identified.
- h.** Continuous oversight and monitoring of the compliance environment across the University.
- i.** Continued review, assessment and improvement of the ICP and; prevention and mitigation of non-compliance.