STATE UNIVERSITY SYSTEM OF FLORIDA
BOARD OF GOVERNORS
Audit and Compliance Committee
January 31, 2019

SUBJECT: SUS Compliance Program Implementation Status

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PROPOSED COMMITTEE ACTION

For information

AUTHORITY FOR BOARD OF GOVERNORS ACTION

Article IX, Section 7, Florida Constitution

BACKGROUND INFORMATION

Inspector General Leftheris will provide Committee members with a status of SUS institutions implementation of Board of Governors Regulation 4.003, *State University System Compliance and Ethics Programs.* The regulation requires each institution to implement a university-wide compliance and ethics program within two years of the regulation's effective date, which was November 3, 2016. The compliance and ethics program serves as a point for coordination of and responsibility for activities that promote ethical conduct and maximize compliance with applicable laws, regulations, rules, policies, and procedures.

This status check is the fourth and last in assessing each university's progress in implementing a university-wide compliance and ethics program. In developing the status checklist, we grouped the 19 required elements into four categories: "University-wide Compliance Program," "Program Plan," "BOT Committee," and "Chief Compliance Officer." Universities were asked to evaluate their implementation status for each element using the legend provided on the checklist: Completed, Good Progress, Slow Progress, Poor Progress, or Not Begun.

The first status check, or "baseline," was presented to the Committee at the March 2017 meeting. The baseline summary table contained mostly Slow Progress (yellow) and Good Progress (green) progress indicators. A small percentage (31%) of the progress indicators were marked as Completed (blue checkmarks).

In November 2018, Ms. Leftheris requested each university president and board of trustees chair to update the checklist. She will provide Committee members with a summary of the results, which show that each university has implemented all required

elements of a university-wide compliance and ethics program in accordance with Board of Governors Regulation 4.003.

Supporting Documentation Included:	SUS Compliance Program Status Checklist Summary, January 2018 – November 2018; and Compilation of Completed University Checklists
Facilitators/Presenters:	Ms. Julie Leftheris